

# **Sharing Diversity Data- Explore Phase**

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# **Executive Summary**

Diversity, equity and inclusion (DEI) have become increasingly important topics for UK financial services firms, and initiatives have been rolled out to try and improve workforce diversity and employee experience. In order to evaluate how resources should be allocated towards such activities, identifying areas for improvement and understanding the demographic profile of the employee population are essential. This is so interventions can be appropriately designed and targeted, and so that their success can be measured. However, many firms struggle with securing high data sharing rates by their employees – meaning that their data may not be sufficient to draw firm conclusions from.

As part of our 2022 thematic focus on creating Diversity and Inclusion initiatives that work, FSCB Insights launched an industry-wide Sharing Diversity Data (SDD) programme of work to help develop best practices for collecting accurate data about the demographic characteristics of employees in Financial Service firms.

This briefing reports on FSCB's SDD programme of work; the "Explore Phase".

The Explore Phase deployed multiple research methodologies to investigate good practice, barriers and challenges firms face when collecting employee diversity data:

- Conducting an evidence review to understand the drivers behind non-disclosure of diversity data as they relate to different demographic characteristics
- Analysis through a behavioural lens of initiatives used in industry case studies to increase diversity data sharing
- Qualitative interviews with experts in Human Resources (HR) and DEI from participating firms
- Benchmarking of information provided by participating firms
- Analysis on diversity data sharing rates and interventions tried across the industry

As this phase of the programme concludes, we summarise our findings and make suggestions for next steps in this area.

In summary, our work has revealed a lack of quantifiable and robust evidence on what works in increasing diversity data sharing rates.



## Introduction

UK firms in the financial services (FS) sector have been increasingly taking more concrete steps to advance diversity and inclusion. In addition, a clear message to the industry was sent in a discussion paper issued jointly by the Prudential Regulation Authority, the Financial Conduct Authority and the Bank of England in 2021. The paper emphasised the relevance of creating, promoting and sustaining more inclusive and diverse organisational cultures and the positive correlation of this with better outcomes in "risk management, good conduct, healthy working cultures, and innovation". They found that, "these outcomes directly contribute to the stability, fairness and effectiveness of firms, markets and infrastructure that together make up the financial sector" (Bank of England et al., 2021).

To this end, many initiatives have been implemented by firms, and the industry is maturing in its approach to improving diversity and inclusion.

At the centre of this work is the need to gather accurate and timely information. Identifying issues related to diversity requires accurate data about the demographic characteristics of employees. Likewise, effective initiatives to promote greater inclusion requires that firms develop their capacity to triangulate demographic data with employee experience data.

'Intersectionality' is an analytical framework based on the idea that a person's social identities or characteristics (e.g. race, gender, sexual orientation) intersect, or converge, to lead to experiences of both advantage and disadvantage, which vary by context (Crenshaw, 1989)

Firms are increasingly working towards understanding the intersectionality of their employees. A barrier to evaluating employee experience data using an intersectional approach is what is known as 'the small n problem' – this refers to the fact that when you subdivide populations you end up with smaller and smaller groups, which can make drawing reliable conclusions more challenging and protection of individual anonymity less achievable.

Challengingly, there are many reasons that staff do not wish to share sensitive demographic information to their employers, even in an anonymous setting.

Additionally, we do not know and cannot assume the distribution of characteristics of those who choose not to share their demographic data and the data that is collected may not be representative. It is possible that of the group who do not share their demographic data, there is a higher proportion of those with a more often discriminated against characteristic. This compounds the problem of low sharing rates, as the remaining data could be more heavily weighted towards majority groups. On the other hand, those not



sharing their data might not do so because they feel they represent the majority and are not from a 'diverse' background. Some people may not feel the question applies to them and may believe that sharing their data is not much benefit to them personally or to the firm. For example, one of our interviewees noted:

I was surprised [...] some colleagues were saying: "I'm not in a [...] minority, so I don't need to complete it."

For these reasons it is important to achieve high levels of sharing across the whole employee population otherwise we cannot be sure that the data we have is representative.

Reviewing the evidence and talking with HR and DEI professionals, there is plenty of advice on increasing diversity data sharing. There are also several case studies of organisations increasing their diversity data sharing rates for different demographics. However, there is little empirical evidence to meaningfully quantify the effect of interventions. Despite many initiatives having been tried, a common occurrence is trying many things at once in the hope that one works. This means organisations cannot easily replicate what has been done successfully elsewhere – or recommend which initiatives should be given priority.

When running campaigns to collect demographic data, many companies have turned to making statements about anonymity and security of data, or about how their employees' data will be used to help increase inclusion in the future. This is something that is frequently seen as part of case studies in this area. But are these statements included because they are effective, or because they are quick and simple to do? When multiple changes in messaging are introduced at once, we can't say for sure which part is driving the effect we want to see. Again, this means that a company with limited resources may not choose the most effective message to increase data sharing. It is important to know what works, and why. We seek to provide this as an outcome of the SDD programme of work.

Narrowly looking at the behaviour we want to change – that of demographic data sharing – we may be able to design behavioural nudges or interventions which happen at the moment of sharing which do make a difference to sharing rates. However, there remains the greater question of culture change – are there fundamental reasons that people do not feel comfortable sharing their demographic data with their organisation? Bearing this in mind, we might then consider longer term intervention types that seek to support growth towards a more inclusive and equitable organisation. Indeed, this is the ultimate goal of DEI initiatives which diversity data allows us to begin to measure. It is important though to think of the time span we are looking at – there is likely room for a mixture of both quick fix solutions, and more fundamental culture change work.

In this briefing we first report on our aggregated findings from our qualitative and quantitative research with firms in the Explore Phase interviews and diversity data sharing rates. Secondly, we present the summary of our evidence review, followed by a review of some of the case studies found in the literature through a behavioural lens. We finish with the recommendations from the FSCB and next steps for the SDD programme.

We would like to thank all those that have been involved in the project so far, the insights shared have been invaluable in shaping our research.



# **FSCB Primary Research**

### Qualitative Research: Expert Interviews

We interviewed 13 industry professionals from 11 FS firms, who were responsible for diversity data collection. We discussed the DEI journey of each firm including: the structure of the DEI team in the organisation, demographics collected and initiatives tried - and planned for the future. We found that there was broad agreement in the importance of DEI and measurement, but considerable variation in the maturity of firms' DEI journeys in the following aspects:

- which characteristics are collected
- when and how demographic information is collected
- internal structures used for DEI
- messaging around DEI

Firms are interested to know where others have successfully obtained diversity data, how they encourage people to share their diversity data, and what the most successful communication strategies are.

...I think that would be one of the key questions for me is how do you encourage people to be willing to share. So, that's the journey we're going on, so, if there was people who were a bit more further advanced, what-, like, how, from a communication perspective, how can you get it to land better?

...what do you do when your data campaigns stop working? What do you do then, when you're like us, where you've run every campaign going, and people are a bit bored?

Related to this, some firms also want to know how others process and display the diversity data in both user-friendly and secure ways to protect the anonymity of individuals. These topics are covered in this member briefing and were discussed further at the participating firms' roundtable held by the FSCB in November 2022.

We heard from firms about the importance for the improvement of DEI across the whole sector, rather than only at a firm specific level. Beyond collecting and reporting on figures, many firms expressed a desire to find out more about what others in the industry are doing with their diversity data to improve DEI as a result.

I personally would like to know what they do with the data, like, genuinely what do you do with it, other than, 'Oh, look, x percentage of people are x'?

There was broad consensus in the potential role of the regulator in this arena. While it was noted that the regulator has a role in setting baseline standards and expectations for firms to meet, there were also areas identified where firms thought that the regulator could improve - for example providing guidance on how to collect socio-economic background or gender diversity data.

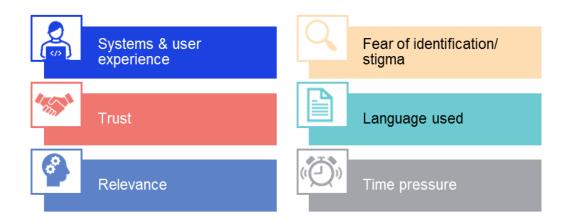


It was also important to firms that the regulator maintained an awareness of the varied capabilities of firms, and that requirements should be set so that they are achievable across all financial services firms.

#### Barriers to diversity data sharing

We also asked about enablers and barriers to employees sharing their demographic information and found several themes common to all firms. There were some barriers which were demographic specific and others which were universal.

The most commonly cited barriers to data sharing across firms were:



**Systems/User Experience**: A clear difficulty in progressing diversity measurement which came up in many interviews was around the capabilities of legacy HR **systems** which for some firms restricted how questions could be asked, answered and used, and often was difficult for employees to navigate. Several firms were in the process of renewing these clunky systems, which was likely to make demographic collection easier. In a conversation with the FSCB earlier this year (2022), demographic data analytics firm FLAIR explained that **user experience** in this domain is very important and can make a large difference to sharing rates. Many firms we interviewed felt their HR **systems** could be more user-friendly and that the process for updating demographic details was longer than it could be:

Now this is where our HR system is not as good as it could be. So it will click them through to their own self-service page. They then have to click on something else to get to the right drop down message, click, 'About'. Click on there that I'm going to update my self-identity. Click on the bit

So, we're hoping, by the end of the year, we will have that functionality for it to be a self-service tool, so people can just update it and we're hoping that that will change the amount of data we get, because it is difficult. Also, I think, even without, sort of, that natural suspicion which people might have, it's just effort, isn't it? Filling in a form, sending it back, either printing it or scanning it...

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Several firms believed that a reason for low data sharing rates is that their recruitment and HR **systems** do not share diversity data – meaning that data provided at job application stage is not subsequently sent to the HR system.

"

Mostly people have assumed that they've already shared their data when they shared when they joined and that it's not been uploaded is a different issue."

"

**Trust**: A frequently cited barrier and enabler to data sharing was **trust** in the organisation. This often was referred to in conjunction with firms giving assurances of anonymity and confidentiality to their employees, and links strongly with a fear of potential repercussions from identification and associated stigma.

**Time pressure** was cited as a reason for low sharing rates in general, particularly in departments with higher turnover rates, operational staff and time-poor executives. This was often mentioned in association with difficult to navigate HR **systems**.

**Relevance**: In addition, not understanding the **relevance** or feeling that diversity data sharing isn't applicable to them as they are not from a 'diverse' background also appeared to have inhibited some responses. Also there were several instances shared of employees questioning the **relevance** of sharing their sexual orientation with employers, as it does not affect their job performance. We consider that this may reflect a lack of understanding of why these data are being collected and what the aims are for DEI in the firm. However, one firm shared the positive difference it made to one of their long standing employees who was pleased to have been asked and been able to share that aspect of themselves at work.

**Stigma**: For the disability and sexual orientation demographics, reasons for non-disclosure tended to focus around **stigma** and uncertainty about who the information would be shared with.

**Language:** A key barrier also highlighted was the **language** used to ask about disabilities – both the question and answers given. Many firms have had success in engaging with their employee resource groups (ERGs) and other forums to improve on their wording and engagement in this area. The language of talking about demographic disclosure specifically was also questioned by some firms – with the word disclosure sometimes being interpreted as having something to hide with negative connotations. In communication with employees it may therefore be better to use language such as "sharing".

There were no demographic specific barriers identified by interviewees for the other collected demographics such as religion or caring responsibilities – this is likely due to the reduced number of firms collecting these demographics, and reveals that there is further research needed to understand potential reluctance to share specific demographic information. It is also likely that the above barriers act together to discourage sharing more generally.

In summary, there are many reasons why employees may not share their diversity data with their employers – some of these more demographic specific than others. In



designing an approach to improve data sharing, it is important to assess which of these reasons might be more relevant for different circumstances and target a response accordingly.

#### Initiatives to increase data sharing

We discussed with interviewees from firms the initiatives they had tried to improve their diversity data sharing rates. Many initiatives have been tried with varying degrees of success. By far the most often cited as having had a positive impact is feeding back to employees what their data is being used for – including sharing the purpose of data collection and progress made so far. We consider that this may work by lending authenticity to the appeal for information and engages colleagues by feeding back their aggregated information. Around three quarters of firms we interviewed were using this strategy to increase data sharing rates.

Below we list the most common types of data sharing initiatives from our qualitative research.

Table 1: Initiatives tried across firms

| Initiative type  |
|--|
| Anonymity/confidentiality assurances   |
| Role models or relevant messenger to encourage sharing                       |
| Language in questions and responses made user-friendly and use best practice |
| Direct links to data collection forms (making it easy)                       |
| Relevant timing of campaigns (e.g., celebration and awareness days)          |
| Making it social (use of social norms or social comparison)                  |
| Purpose and value of the data demonstrated                                   |
| Making time for employees to share their data                                |

#### Cross referencing initiatives and barriers to diversity data sharing

When we cross-reference these initiatives above against the barriers to data sharing cited, we can see how the initiatives are aimed towards overcoming one or more of these barriers. Based on the research conducted for the first phase of this project, we hypothesise how the initiatives could affect different barriers below.



'Trust' as a barrier and enabler to sharing is multifaceted – it encompasses both trust in the data protection process of a firm as well as trust in the culture of inclusion in a firm; trust that difference is not stigmatised. Trust may therefore be bolstered by assurances of anonymity, in that employees can be confident that they will not be identified. We know that concerns about identification are important barriers to sharing for several demographic characteristics, and that sharing rates appear to be higher in anonymous external surveys than internal HR surveys overall. However, most firms already use this strategy in their communications and many firms still see relatively low sharing rates. Ideally, firms would be able to hold confidential rather than anonymous information about their employees – as this can help in analysis by pay and seniority, for example.

The use of **role models** and showing the purpose and value of the data may also increase **trust** – it can demonstrate that difference is celebrated in the organisation. There were many different methods of doing this shared in the interviews. Some firms had low sharing rates in certain geographical areas and found that engaging local managers to encourage data sharing within their teams via email was more effective than when the CEO issued the email. Others used a video campaign of a popular manager who shared their personal reasons for sharing. These examples demonstrate the importance of the **messenger** in such communications.

**Timing campaigns** to coincide with relevant awareness days might also increase **trust** in the organisation, supporting colleagues to believe that **stigma** is less likely to be an issue. The majority of firms were using these awareness days as extra touchpoints to encourage sharing, with some using the opportunity to highlight certain demographics in their own employee pool and/or highlight efforts to increase inclusion in those areas.

Another barrier we have discussed is employees sometimes feeling that diversity data sharing is **irrelevant** to their role, or that it is not 'for them'. This barrier could be overcome by sharing the purpose and value of the data – to show the benefits of diversity data sharing. Showing employees that the information they have given previously is being used and acted upon could be a way to build trust and reduce potential feelings of futility. It could also show that the organisation is really 'walking the walk' instead of just 'talking the talk'. This can show that an organisation really does value diversity and inclusion, and therefore reduce concerns about sharing their information. This could become a virtuous cycle.

The use of relevant **role models** could also help counter uncertainty about the relevance of data sharing – for example someone without a disability explaining why they chose to share their demographics. Changing the **language** used in the survey to more user-friendly wording or alternative terminology - such as for gender identity or disability and impairment questions— could also help overcome uncertainty and difficulty around filling in the survey. Some firms we spoke to told us that when done in collaboration with employee resource groups (ERGs), changing the language used appeared to increase engagement with and accountability to these groups – a positive element when moving towards an inclusive organisation.

**Finding time** for employees to share the data helps with the time pressure barrier to sharing. However, few firms mentioned explicitly in the interviews to doing this. It is more often done as part of the on-boarding process, when employees might already have set aside time to fill in multiple forms including disclosure of demographic information.

There is work to be done in assessing which of these are worthwhile and the most impactful. The most used initiatives may not be used because they are effective – it is



likely they are potentially perceived as quick wins which are simple to implement. There is little reliable evidence which shows if each of these interventions does indeed have the intended effect on sharing.

# **FSCB Primary Research**

# Quantitative Research: Aggregated firm-level data sharing

The second part of our primary research in this area was to gather data from firms on their diversity data sharing rates. We collected data from 11 firms who shared with us:

- demographics they collected
- phrasing of their questions
- answer responses available
- response rates received.

### **High level findings**

- In HR systems, levels of data sharing varied widely
- Some firms included mandatory fields which led to 100% sharing (this would not be appropriate for all demographics)
- Not all questions had a 'prefer not to say' option
- Question wording varied widely between firms
- Some internal staff surveys were carried out solely to collect demographic data, and others were broader employee experience surveys with demographic data questions included within them.

The graph below illustrates the rates of sharing for the FSCB Survey 2022 in comparison to HR systems as shared by participating firms for five demographic characteristics: sexual orientation; disability; ethnicity; gender and socioeconomic background. It is notable that, with the exception of gender, sharing rates are significantly lower for most characteristics in the HR systems. Gender has a 100% median value as this is frequently a mandatory field in HR systems. In addition to some of the barriers to sharing demographic data set out in the qualitative research chapter, the lower level of sharing in firm's own HR systems on most demographics may in part be attributable to the lower levels of perceived confidentiality and anonymity HR systems provide in comparison to an external survey.



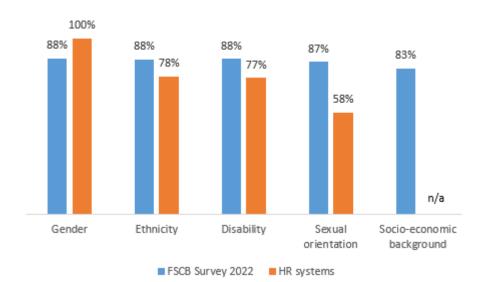


Figure 1: Average (median) disclosure rates sharing their demographic data<sup>1</sup>

Levels of sharing also vary by demographic characteristic collected. The FSCB Survey is anonymous, but there is still a level of non-disclosure, that is not uniform across demographics. This could imply that there are demographic specific reasons for non-disclosure. We note that the level of sharing tends to correlate with the potential visibility of the characteristic, which could indicate that where this information is not already known to others in their workplace, people are less likely to disclose it in a survey.

Our consultation of **14** firms, using information from the interviews in addition to quantitative data shared, revealed that across the industry there are around 14 characteristics collected in total through HR systems and surveys (some of these overlap with one another such as LGBTQ+ with sexual orientation and gender identity). The below table displays the collected characteristics in order of frequency. This information is based on both the data sharing exercise and the interviews, and relates to information collected outside of the FSCB survey.

<sup>&</sup>lt;sup>1</sup> Average sharing rates by demographic from the FSCB Survey have been calculated based on all 23 participating firms in the FSCB 2022 Survey exercise across member firms. Average sharing rates by demographic from HR systems are based on 5 to 7 firms who provided this information as part of this study. Average sharing rates across HR surveys for socio-economic background could not be provided due to insufficient firms collecting this information.



Table 2: Employee demographic data collected by firms

| Demographic             | % of firms<br>collecting<br>demographic |
|-------------------------|---|
| Disability              | 100%                                    |
| Ethnicity               | 100%                                    |
| Gender/Gender identity  | 100%                                    |
| Sexual orientation      | 92%                                     |
| Religion                | 77%                                     |
| Caring Responsibilities | 57%                                     |
| Age                     | 50%                                     |
| Socioeconomic           | 46%                                     |
| Parent                  | 38%                                     |
| Gender Reassignment     | 31%                                     |
| LGBTQ+                  | 21%                                     |
| Military                | 15%                                     |
| Nationality             | 15%                                     |
| Language                | 8%                                      |



# **Secondary Research**

# Evidence review of factors affecting sharing

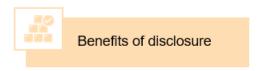
We conducted an evidence review to find out what the main barriers and enablers to sharing were and what has been tested in the field. We found several themes that resonated with our qualitative and quantitative findings, which we discuss in turn. First, we discuss trust – both in the safety of personal information and trust not to be discriminated against. Secondly, we discuss the benefits of individual data sharing – the reasons why individuals might choose to share their demographic characteristics despite the perceived risk of doing so. Thirdly we look at asking the right questions – using the language appropriate to ask about highly sensitive personal subjects. Finally we look at characteristic specific concerns – although there are many aspects of sharing which are common to all demographics, some have certain sensitivities and dependencies it is good to be aware of when designing interventions.



Based on our quantitative research, it does appear that sharing rates differ based on the perceived anonymity of the data collection method. HR systems have lower sharing rates than an external survey for example. However even in anonymous surveys, such as the FSCB Survey, there is not complete sharing. This suggests there are additional factors at play.

A common practice in surveys is to include an assurance of confidentiality or anonymity. The efficacy of such assurances will depend highly on the degree of *trust* that the employee has that the organisation will honour this, as well as their degree of comfort sharing such information regardless of their trust.

Around 9 in 10 of firms interviewed firms highlight the anonymity or confidentiality of their surveys. However, it is possible that this could have unintended consequences. Research suggests that highlighting privacy concerns, even in a positive privacy protection manner, can lead to people being less likely to share identifiable information than a neutral message (Marreiros et al., 2017). This highlights the need to carefully disentangle the effects of different interventions on sharing rates.



Another possible factor at play relates to the attention and support that each characteristic receives externally from regulators and society at large. For example, preventing gender discrimination has attracted much governmental, media and regulatory attention in the past years, including the requirement for large firms to publish their measures on gender pay gaps (Bank of England et al., 2021). However, we consider that sharing demographic characteristics that have historically received less public

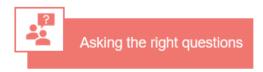


attention could potentially be connected to producing a sense of futility in employees, that there is nothing to gain from sharing their information.

This can be put into the context of a 'risky choice' (Arrow, 1951) – why would the individual choose to share their information, where there is a (subjective) risk that they could be identified and face discrimination, if there are no negative consequences to non-disclosure? Unless the potential benefits of sharing are important to the individual they may not choose to share.

There is not always a purely 'economically' rational benefit for individuals filling in their demographic details, particularly if there is an element of risk. There is no financial motive to fill it out. Despite this, it should be noted that we do see high levels of sharing for some demographics, and especially in anonymous surveys. This suggests that some individuals have other intrinsic or extrinsic motivations (Deci and Ryan, 1985).

A key reason used to appeal to employees to share their diversity information is that it will lead to the firm being able to measure, evaluate and improve DEI in the workplace. This is advice suggested by multiple sources in the literature, for example in the Social Mobility Commission (2021-b) toolkit. Some individuals will therefore share their data due to altruistic motives, possibly motivated by fairness (Fehr & Schmidt, 1999). Another appeal speaks to the benefits inherent in having a diverse workforce (Bank of England et al., 2021).



It is important to follow best practice guidelines for the questions themselves which exist for each of the demographics. This includes both how the question is posed, and the response options available. This makes the questions more user friendly and can make it easier for people to fill in – moving them from system 2 (deliberative and slow) to system 1 (automatic and reflexive) thinking (Kahneman, 2011).

Some questions could benefit from further information, explanation or interpretation guidance. Uncertainty in choosing a response can act as a friction to response. For example:

- ethnicity may not be simple to answer for those from multicultural backgrounds
- in relation to sexual orientation individuals may not identify with any of the options (Heterosexual/Straight, Gay, Lesbian, Bi, for example)
- Some individuals may not consider themselves as disabled based on the Equality Act's definition that one is disabled by their condition, but may have health conditions or neurodiversity that the firm would want to measure (Scope, 2019).





#### - Disability

Some surveys may not be accessible to people with different disabilities. When trying to increase diversity data sharing rates from those with disabilities, it is important to make sure that information about the survey is shared through several and various channels. This could include videos as well as text, or discussion. This is to make information, for example about the anonymity of the survey, accessible to people with varying abilities. For this group, not doing so could risk uncertainty about how the information will be used. Information should also be given about how the data provided will be used – will there be a follow up? Will this be used to start an adjustment making process? Providing signposting to employee resource groups on disability could also be a positive action (Wilkes, 2017). Some individuals could use the interview stage to disclose disability status, to get a feeling for the response of the firm and whether they would want to work there. However, sometimes the advice given to people with disabilities is to not disclose at this stage to avoid discrimination (Wilkes, 2017).

#### - Sexual Orientation

There are several concerns which impact on whether someone would share their sexual orientation. A trial in this area by the Behavioural Insights Team found used different messages in a recruitment application portal addressing the below concerns (Nicks et al., 2021)

- A lack of trust in the organisation: in the trial, this was addressed by highlighting applicants' legal rights to the proper storage and handling of their data, and that their personal information would not be identifiable.
- Fear of discrimination: some might believe that sharing this information could harm their application: this was addressed by highlighting that the content from the form is processed separately to applicants' applications and that the hiring team do not view individual responses.
- Not understanding the reason for collecting the information: this was addressed by highlighting the personal relevance of applicants.

However, the study found that these messages did not have a significant effect on data disclosure rates (Nicks et al., 2021)

#### - Gender Identity/Gender reassignment

Being trans or non-binary can be a visible or hidden characteristic. Work from Global Butterflies and Lloyd's states that 'some individuals in every organisation will choose to remain non-visible until they receive signs of inclusion that will allow them to let you know they are there' (Global Butterflies & Lloyd's, 2019).

#### - Socio-economic background

There are several questions which could be used to try to approximate socio-economic status. The Social Mobility Commission (2021-a) found that the question which received



the highest response rate, and was the most reliable at approximating socio-economic status, was a question on the occupation of the main household earner when the respondent was around the age of 14.

A reflection here is that it is possible that not all adults know or remember what the occupation of the main earner was when they were about 14 years old. For some, talking about family is a sensitive issue for many reasons – a difficult relationship, estrangement or bereavement might make this a particularly sensitive topic. Socioeconomic status also relates to social class and other social hierarchies such as caste, making this topic highly complex.



# **Analysis of Case Studies through a Behavioural Lens**

As noted earlier, there is a dearth of publicly available research on which interventions are effective for increasing demographic data sharing, and why. In this section, we identify three industry case studies that have addressed this topic, and provide some of our own analysis, through a high level behavioural lens, to suggest why aspects of the interventions described could have potentially been effective. It is important to note that the case studies were only published in summary form, so the analysis provided is based on that information which was publicly available.

#### 1. Transport for London – demographic data

A behavioural consultancy conducted research with Transport for London (TfL) on demographic data sharing rates (Elfer, 2019). They ran an experiment with 2,000 TfL employees to understand whether different 'motive' messages, included in email communications to employees requesting they update their personal details, had an impact on data sharing. Each of the 'motive' messages was tested against a control group with a neutral message. The four types of message used in the research are listed below, with our description of relevant behavioural mechanisms.

- Organisational commitment message

This put forward TfL's commitment to reflecting the wider population. We consider that this could help overcome the barrier to sharing of futility, or not knowing why the data is collected.

- A prosocial message

Humans have been shown to have naturally cooperative tendencies and to care about others and not just themselves. A message which emphasises the benefit to others and the community may outperform a message focussed on the benefit to the individual (Jordan et al., 2021).

- Social norms frame

People can respond strongly to a descriptive social norm: that is describing the behaviour of others in their group (Goldstein & Cialdini, 2009).

- Loss aversion frame.

This involved negatively framing the message in terms of what won't be able to happen unless demographic data is shared. This could make use of people's tendency to be affected more by a loss than by a similarly sized gain (Kahneman & Tversky, 2013).

The researchers were surprised to find that the prosocial message was overall the poorest performing message. They reported that this message appeared to align with what people feel is important but did not encourage action. The effectiveness of the messages also varied further by demographic background when using the following groups: women, men, white British and minority ethnic. The results of this work confirm that different messages resonate with different people. However, the results do not account for intersectionality – if men and women behave differently in aggregate, how does this interact with their ethnic background?



#### 2. PwC - Socioeconomic background

This case study demonstrates the approach many firms take in increasing their sharing rates (Social Mobility Commission, n.d.-b). In highlighting PwC as a success story, the Social Mobility Commission described how the firm drew on their senior leaders and a new ERG – utilising the messenger effect by which people respond differently to a message depending on who it came from (Dolan et al., 2010). They also contextualised the 'ask' – giving their employees more information on how the data was used and the purpose behind it. We believe this could reduce feelings of futility, and increase trust in the organisation. Finally, PwC also included some demographic questions in their annual compliance training – an example of helping employees find time to complete the task. Studies on habit formation show that stacking tasks together in this way can also make people more consistent in completing them (Fiorella, 2020). Together, these interventions reportedly increased data sharing rates on some socio-economic demographic questions by 50 percentage points over two years. However, it is impossible to know which of these might have been the driving force behind the increase, or their relative importance.

#### 3. HMRC - Socioeconomic background

The Social Mobility Commission reported that HMRC sought to collect new data to tell them more about the socio-economic background of employees (Social Mobility Commission, n.d.-a). To encourage completion of the survey they simultaneously utilised a range of different approaches. These approaches are set out below, accompanied by our identification of the behavioural mechanisms (where relevant) which may have motivated their use.

- Messenger effect (Dolan et al., 2010) business leads, unions and senior leader and managers were engaged to gain their support, and the invite was sent from a senior sponsor to complete the survey
- Purpose they explained why the survey was important and what the results would be used for, which may have increased motivation for sharing and reduced the perceived risk of sharing (Arrow, 1951)
- Reminder effect a news article was posted on the intranet to increase recall of the survey and completion
- Assurance of anonymity (Ong & Weiss, 2000) staff were explicitly assured their data would be anonymous, which could have reduced perceptions of the risk of sharing

Through this combination of initiatives, HMRC achieved a response rate of 42% in a three week period. However, we are again unable to say which aspects of these interventions were important for increasing sharing rates.

#### Conclusion

Although many initiatives have been deployed, few have had their effectiveness reliably evaluated. Some organisations use multiple interventions at once and do see a step change in their sharing rates. However, getting high sharing rates is not a one-time event - it is a cumulative process supported by demonstrated trustworthiness and dedication by an organisation. Given the ongoing and variable nature of sharing rates, it is important to understand what does work in this area and why, so that appropriate initiatives can be used which have a proven and measurable record of working. We discuss recommendations for firms on this basis.



# **FSCB recommendations**

We understand that there will not be one simple action that alone will increase and maintain high sharing rates. However there are some factors which could be considered 'hygiene' factors and others which could be considered more as motivators – as described by Herzberg et al. (1959).

Hygiene factors are the basic expectations which unless met can cause dissatisfaction. However, once met these factors alone will not be motivating. We believe these factors to be:

#### 1. Using appropriate language

FSCB recommends updating the questions and responses available in HR systems and surveys to reflect best practice and employee-led change in this area. Not doing so could cause offence to some, as many of these demographics are sensitive topics. As the social environment changes, these should be reviewed and updated.

#### 2. Making it easy

Changes in the HR system which make it easy to complete the forms or enabling recruitment and HR systems to share information are recommended. Without a relatively simple user journey to filling out demographic information, high frictions (many steps to sign-in, reach the demographics page and many pages to navigate) will likely lead to low levels of sharing even with the best campaigns.

#### 3. Making time

If employees are too busy or do not remember to complete their survey, there will be lower sharing rates – even if they would otherwise be willing to share their data. Firms with high turnover could see an increase in sharing if they include the data capture as part of onboarding, whereas firms with lower turnover rates might consider other strategies such as including it within annual training.

Other barriers and initiatives focus more on the motivational side of behaviour. Based on the information gathered so far, the FSCB believes that there is opportunity to motivate employees through innovations in sharing the purpose of the data collection, the use of appropriate role models in messaging and making the data sharing experience more social. However, it is yet to be seen which of these motivational aspects might be most effective. We know that initiatives do not always have the expected effect, so we would encourage firms to explore these one change at a time and build up evidence of what works for your firm's circumstances.





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