Racial Equity Scorecard

For UK public market investments

RES | Racial Equity Scorecard

A research project under

PATHWAY FUND

The research is **led and conducted by**

tsic the social investment consultancy

EIRIS FOUNDATION

Funded by

collective wellbeing Carnegie UK

Connect Fund

Contents

01 The Racial Equity Scorecard

A) Governance and Strategy

01 Commitment to Racial Equity
A public commitment backed by a plan, internalised through policies, budget and staff.

02 Race-sensitive Human Rights Due Diligence (HRDD) and Grievance Mechanism
Race-sensitive HRDD inclusive of refugees, migrants and indigenous people with grievance mechanisms and remediation.

03 Board-level Accountability
An identified board member or regular review of the board's contribution with independent audits or progress reports.

04 Collaboration and Partnership
Takes an active part in racial equity alliances and partnerships.

05 Red Flag: Failure to have at least one ethnic minority board member by 2024 or to set 2027 senior management targets

B) Workplace Culture and Agency

01 Diversity Across Different Employment Bands
A commitment to reflect the racial/ethnic composition of the community in the board, leadership and workforce with annual data.

02 Pay Gap and Job Security
Intersectional data on both pay and tenure is disclosed yearly with action plans to close any pay gaps.

03 Education in Diversity and Racial Equity
Trainings or mentorship schemes are introduced at every level, focussing on an effective inclusive ethos and outcomes.

04 Freedom of Association
Supports collaboration with unions or provision of internal support groups for racial equity.

05 Wellbeing and Psychological Safety
Annual surveys and runs supportive schemes and programmes.

06 Flexible Work Patterns and Adjustments
Flexible working and adjustments that cater for the needs of Black and Ethnically Minoritised communities.

07 Red Flag: Failure to address discrimination and harassment on racial grounds as part of equal opportunities policies.

C) Business Model

01 Inclusive Products and Services
Products and services are periodically analysed for racial equity and development opportunities.

02 Supply Chain and Value Chain
High-risk supply chains assessed for racial equity and minority-led businesses included in the value chain.

03 Red Flag: Failure to address workers' rights or apply HRDD in supply chains with a high risk of poor human rights or labour standards.

D) Wider Community

01 Reparations for Historical Injustices
Reparative actions, donations and advocacy for racial equity.

02 Investment in Key Social Determinants
Investment in local economic development and education/training/employment/housing to advance racial equity.

03 Red Flag: Failure to address historical injustices.

E) Contraversies

01 Records of racial equity controversies and how the company has responded.

F) For Portfolios

01 Racial Equity Impact Strategy
Disclosure of tangible measures on strategy and investment philosophy with context specific goals.

02 Allocated Part of the Portfolio to Businesses that Advance Racial Equity
A specified part of the portfolio advances equity through share investors' ownership, leadership and other impacts.

G) For Asset Managers

01 Stewardship Activities Advancing Racial Equity
Consideration is given to investees' racial equity performance in voting and engagement.

02 Tools and Networks to Analyse Racial Equity
Tools and networks to advance analysis and understanding of racial equity in the investments/firms analysed.

02 About the Scorecard

The Racial Equity Scorecard (scorecard) aims to enable investors to consider racial equity more intentionally in public market investments.

It provides a practical tool to help assess companies, asset managers and portfolios based on their strategies and actions taken to advance racial equity. Designed primarily as a tool for investors, both asset owners and asset managers, the scorecard can also be used by companies and other stakeholders.

The scorecard contains 19 metrics for companies and can be used as a standalone tool, or as a tool to complement other environmental, social and governance (ESG) and diversity, equity and inclusion (DEI) metrics and benchmarks. There are four additional metrics specifically for asset owners with investment portfolios and asset managers in financial services. The scorecard is designed to be used in any sector or industry, with just one theme, Business Model, which is sector-specific.

This is the first iteration of the scorecard, and is the product of a research project supported by funding from Barrow Cadbury Trust's Connect Fund and Carnegie. This funding covered the time spent by the core research team of four members from The Social Investment Consultancy (TSIC) and EIRIS Foundation from March to October 2023.

The scorecard is an initiative by the Pathway Fund, a new social investment wholesaler in the UK focused on catalysing investments for Black and Ethnically Minoritised communities.

02 About the Scorecard

Some important notions used in this scorecard

01 **Race** is a concept used to categorise people based on their physical characteristics such as skin colour, hair texture and facial features. It has been used to justify slavery, segregation and other forms of discrimination experienced by different racial and ethnic groups. It is important to note that the concept is a social construct[1] which refers to an idea created and maintained by society, rather than being an inherent or natural aspect of the person concerned.[2]

02 **Racial equity** is a proactive commitment to ensuring all individuals, regardless of their race and ethnicity, have equal access to opportunities, resources and outcomes. It is the intentional and ongoing practice of changing policies, actions, attitudes and cultural messages, alongside actively dismantling systemic barriers and rectifying historical injustices that have led to disparities.

03 **A racially equitable organisation** actively applies the principles of racial equity in its strategies, policies, employment opportunities, service provision, sustainability, community service and social impact in order to eliminate racial disparities and promote fairness and inclusivity for individuals of all racial and ethnic backgrounds.

04 **Black and Ethnically Minoritised communities** experience systemic disadvantages and discrimination based on their race or ethnicity. They may experience prejudice, stereotyping and unequal treatment in various aspects of life, including employment, education and social integration. They encompass a diverse range of racial and ethnic backgrounds. However, it is important to recognise their heterogeneity and avoid generalisations.

05 **Intersectionality** is a concept highlighting the interconnected nature of social categorisation and identities such as gender, race, class, sexuality and disability, and how these overlap and shape one's experience, including one's experience of discrimination and inequality. Where data disclosure is sought in the scorecard, we expect data disaggregated at least by race, gender and any other characteristic that the business believes is relevant to a full understanding of its context with respect to racial equity.

06 **Data granularity** is a measure of the level of detail at which data is collected, recorded and structured. High granularity gives the greatest precision and allows accurate and detailed analyses, while also allowing aggregation of different data sets to analyse and forecast different outcomes.

03 The Scorecard in Context

3.1 The case for a Racial Equity Scorecard in the UK

This scorecard is the first practical tool to capture corporate strategies and actions on racial equity in the context of UK public market investments. Its design is informed by primary data collection activities and various existing global and UK-specific DEI benchmarks and scorecards (including those focusing on gender equality and LGBTQIA+ inclusion), as well as by racial equity benchmarks and scorecards in the United States context. Below is a list of relevant benchmarks and scorecards researched by the team to inform the design of the present Racial Equity Scorecard.

Racial equity or justice scorecards:

- Corporate Racial Equity Tracker[3] (in the US, by JUST Capital, since 2021, yearly edition, latest edition 2022)
- Racial Justice Scorecard[4] (in the US, by As You Sow, began reporting in 2020, with quarterly reporting on racial justice since July 2021)
- Toolkit for Centering Racial Equity Throughout Data Integration[5] (in the US, by Actionable Intelligence for Social Policy, since 2020)
- Racial and Gender Pay Scorecard[6] (in the US, by Arjuna Capital & Proxy Impact, yearly edition since 2018)

Gender equity scorecards:

- Equileap Gender Equality Scorecard[7] (in the Netherlands, with international research, by Equileap, yearly since 2020 with editions covering different geographic regions)
- Gender Benchmark[8] (international, by World Benchmarking Alliance, since 2020, latest edition in 2023)

Other DEI scorecards and benchmarks:

- What is the Workplace Equality Index, and how is it scored?[9]
(in the UK, by Stonewall, focusing on LGBTQIA+ inclusion, since 2020, yearly edition)
- Workplace DEI[10] (in the US, by *As You Sow*, since 2020, and with quarterly reporting on DEI since 2021)
- Corporate Human Rights Benchmark[11] (international, by World Benchmark Alliance, yearly edition since 2017)

03 The Scorecard in Context

The researched scorecards and benchmarks typically cover 5 - 7 themes, revolving around main topics such as:

- Governance and Strategy;
- Representation;
- Compensation and Benefits, with some specific themes addressing the Pay Gap;
- Recruitment and Hiring;
- Career Advancement and Turnover;
- Supply Chain;
- Wider Community; and
- External Actions.

There are generally between 20 and 30 indicators across the themes; for example, *As You Sow's Race Justice Scorecard* has 27, the *Equileap Gender Equality Scorecard* has 19, and the *Corporate Racial Equity Tracker* has 23 indicators in total.

It is important to note, however, that the present scorecard is the result of triangulating multiple research methods to fully understand the many complex and interlocking issues involved. This 'deep dive' approach included: studying the ethnic minority and racial data publicly available on FTSE100 companies; holding scoping conversations with creators of other scorecards and benchmarks; and organising focus group conversations, which were overseen by peer reviewers. As a mixed research approach, this method is similar to the one used by *As You Sow*[12] in the US, where the research team worked with an advisory committee and pulled data from different sources as part of its interdisciplinary approach.

Racial equity is contextual. The existing tools have a primarily US context, so the present scorecard aims to pinpoint focus areas for the UK public markets, responding to their different historical, societal, legal and financial contexts. This has resulted in a number of different metrics when selecting the 'five plus two' themes and a total of '19 plus four' indicators. As a comparison, the Racial Justice Scorecard devised by *As You Sow* developed 27 key performance indicators to cover racial and environmental justice topics prominent in the US. By contrast, in this scorecard, the Governance and Strategy theme offers a special focus on racial equity issues as well as the rights of refugees, migrants and indigenous peoples under its HRDD process requirements.

This UK-specific scorecard strives to offer a holistic view of the performance of a given company in advancing racial equity. It places a special emphasis on its Workplace Culture and Agency theme, which has the highest number of indicators out of all themes, in recognition of the fact that this is a recurrent theme in many other scorecards. Business Model, as a theme, emphasises advancing racial equity in both a company's products and the accountability of its supply and value chains. There is a separate theme for the Wider Community to give space to historical reparations and outreach represented by investment in key social determinants. Special themes are dedicated to Portfolios and Asset Managers, accentuating the growing focus on racial equity investing as an investment lens. These two themes also underline the importance of spurring the financial services industry to act on racial equity and enhance representation – since 98% of global finance is currently controlled by white males, despite this group accounting for only a small percentage of the world's population.[13] (See more about themes and indicators in section 5.)

This scorecard also considers broader DEI issues intersecting with racial equity. For example, it looks into the family responsibilities of, and flexible working support provided to, Black and Ethnically Minoritised communities, as well as companies' contribution to key social determinants of racial equity in the wider community. It also collects intersectional data to capture DEI outcomes and progress more precisely.

The concept of racial equity is universal, and this scorecard envisions further research, practice and the formation of a collaborative network with the other above-mentioned scorecards, benchmarks and trackers to progress towards international use-cases featuring a mix of universal and country-, region- and sector-specific indicators, beyond the UK.

3.2 Need for more action on racial equity in the UK

The scorecard has been created in response to the need for more corporate actions on racial equity (especially in the UK) and better corporate data and transparency.

Corporate action on racial equity, as part of wider movements on ESG and DEI, is increasing. In the US, by May 2021, racial equity commitments of corporations had reached $200 billion.[14] JUST Capital[15] found that out of the 100 largest US employers, 98% had anti-discrimination policies, 43% disclosed pay equity, 98% provided racial/ethnic diversity data, 91% committed to education and training programmes, and 51% supported community investments. In Europe, while racial equity has gained some traction since the Black Lives Matter movement came to prominence, it is still a relatively new area of focus for businesses. Nonetheless, since the adoption of the Corporate Sustainability Reporting Directive in January 2023 by the European Union,[16] more companies are expected to act on corporate sustainability, including DEI and racial equity.

Within the UK, racial disparities affect every aspect of society: from education to employment, from healthcare to mortality, and from legislation to wealth accumulation. Within the UK's financial services industry, 68% of ethnic minority workers had experienced bias at work in 2020, and eight out of ten or 82% encountered unwelcome comments based on their background.[17] However, it is worth recognising that ethnic minorities within the UK are diverse, and Black inclusion requires a special focus. In London, less than 1% of asset managers are Black, despite this ethnic group making up 13% of London's population[18] and most asset managers in the UK being based in London. Looking further back in history, after the UK abolished the slave trade in 1807, the British government paid the slave traders £20 million in compensation – 40% of the Treasury's budget at the time.[19] The government took out a loan to pay it, which was only finally paid off, with British taxpayer money, in 2015. Moreover, a UCL research study has estimated that 10-20% of Britain's wealth can be identified as having had significant links to slavery.[20] Some organisations and companies are beginning to reckon with their history in the slave trade, such as Lloyd's of London and Church of England.[21]

Racial equity can drive economic growth. The McGregor-Smith Review of 2017 estimated that if both corporate employers and entrepreneurship focused on racial equity in career progression and trajectories, this would potentially add £24 billion to UK GDP.[22]

Furthermore, a growing number of investors and businesses have incorporated a 'just transition' lens in their operations,[23] by acknowledging the need to address the negative impacts of the transition towards a low-carbon economy on workers, communities and vulnerable populations. It is essential to address racial disparities to achieve a just transition, as racial and ethnic minorities and indigenous people often bear the brunt of environmental degradation and economic inequities.[24] Historically, industries that have caused significant environmental harm or exploited labour have disproportionately affected these communities. Achieving both a just transition and racial equity requires addressing the underlying structures and systems that perpetuate injustices and inequalities.

3.3 The Role of scorecards in creating corporate behavioural change

Scorecards and metrics help track and incentivise corporate progress on social and environmental issues and ensure accountability. Despite being relatively new tools to leverage change, scorecards have already proven their use-case and impact worldwide.

In the US, there have been a few examples of racial equity scorecards successfully driving corporate behavioural change. For the Russell 1000 companies surveyed, the majority agreed that "JUST Capital's rankings and data review process helped inform and/or prompt implementation of new policies, practices, or new public disclosures on the issues we cover".[25] Furthermore, disclosures on pay equity increased from 25% of companies in 2019 to 40% in 2022.[26]

Additionally, 38 companies including Nike, Procter & Gamble, Uber and Charles Schwab took explicit steps after being analysed by *As You Sow* in 2022 to improve their racial equity policies and practices, such as disclosures of recruitment, retention and promotion data by gender and by race or ethnicity.[27] Uber Technologies agreed to conduct an independent civil rights audit after consulting with *As You Sow*.[28]

According to gender data provider Equileap, finance was the second-best performing sector in 2023 regarding transparency and disclosures. Yet its average score rose only from 35% in 2021 to 44% in 2023. In the UK, the Parker Review[29] found a 7% increase in FTSE100 companies with at least one ethnic minority director on their boards, with 96% of companies meeting this target. However, data was not detailed enough to capture the change in supporting historically underrepresented communities. ShareAction's ethnicity pay gap reporting campaign in the FTSE100 has also led to more companies disclosing their ethnicity pay gap, though there are still limitations (see next section).[30]

3.4 Status of UK companies' disclosures on race-related data

Primary research of publicly available data conducted for this scorecard shows that, as of April 2023, only 62% of FTSE100 companies disclosed any kind of measurable data on race or ethnicity.

The detailed split is shown in the table below.

Industries	Number of companies that disclosed data on race or ethnicity	Total number of companies	%
Financial services	14	23	61%
Basic materials	3	8	38%
Industrial	8	18	44%
Healthcare	3	5	60%
Technology	2	2	100%
Consumer discretionary goods	12	20	60%
Real estate	4	4	100%
Energy	2	2	100%
Consumer staples	8	10	80%
Telecommunications	2	3	67%
Utilities	4	5	80%
Total	62	100	62%

Since the UK government mandated gender pay gap reporting in 2019,[31] it has also conducted official consultations on ethnicity pay gap disclosure. However, ethnicity pay gap disclosure is not mandatory, though the government recognises that "it can be a valuable tool to assist employers".[32]

The UK government document *Ethnicity Pay Gap Reporting: An investor briefing and toolkit,* [33] published in July 2023 with reference to 2022 data, points out that only one in five FTSE100 companies discloses data on the ethnicity pay gap.

04 Research Methodology and Activities

4.1 Research question

What are the key indicators of the strategies and actions of companies, portfolios and asset managers in the UK to ascertain if they are taking significant and transformative steps to reach racial equity?

4.2 Methodology

The research adopted mixed methods,[34] using the principles of action research,[35] which enables researchers to collect and reflect on data from different sources.

The main advantages of this research method include:

- **Based on collaboration:** focus groups, scoping conversations, peer reviews
- **Has a circular structure:** by documenting every research step, researchers are enabled to reflect and repeat research cycles flexibly, depending on needs
- **Enquiry-based:** a large amount of research time was spent on semi structured research conversations to obtain value-driven data,[36] as well as literary research
- **Practice-led:** the research is based on use-case scenarios, and it focuses on the usability of this scorecard for investors, both asset owners and asset managers, as well as potentially, companies themselves. It strives to offer simple, holistic and realistic solutions for collecting data that will provide a snapshot of where the company is and the progress made in racial equity

4.3 Research activities

01 **Research on publicly available data and disclosures of FTSE100 companies** as of April 2023 to document the measurable racial equity indicators in publicly available sources of these companies (see the summary in the table in section 3.4):

- racial equity indicators of the companies, in 11 industry sectors
- differentiation between racial equity and other DEI metrics
- assessment of the quality of the metrics used by the companies and the communication of data.

Note: A similar research technique was used in developing the Corporate Human Rights Benchmark although that process also included engagement with companies.

02 **Literature review, including:**

- sociological research papers and reviews on racial divide and bias in the UK
- research and reports on racial and ethnic minority inclusion data and strategies in UK workplace culture
- research in the US and with an international outlook into racial and ethnic minority inclusion data and strategies
- case studies that have affected UK society (e.g. the Stephen Lawrence case) and workplace culture
- literature on methodology, especially focusing on collaborative research strategies such as action research and standpoint theory
- shorter analyses and reports on the most recent racial equity an inequality issues in the UK. (See selected bibliography at the end of this document.)

03 **Reviewing and referencing the design of existing scorecards, benchmarks and trackers** that capture race equity and broader DEI standards in the UK, US and internationally. (see the list in section 3.1).

04 Semi-structured scoping conversations with creators of scorecards and benchmarks in the UK, US and internationally, between 25 April and 11 May 2023. The main questions discussed included: research methods and limitations; data collection for themes and indicators; and use-case scenarios of the scorecard and dissemination.

The interviewees included:

- *Danielle Burt,* Independent Consultant and former Lead of Gender
- Benchmark (World Benchmarking Alliance, The Netherlands)
- *Andy Behar,* CEO, and *Kaylea Noce,* Research Associate, at the Racial Justice Scorecard *(As You Sow, US)*
- *Jonathan Hutchins-Levy*, Fund Lead, Emerging Futures, at Joseph Rowntree Foundation
- *Kohinoor Choudhury,* Senior Campaigns Officer, ShareAction (UK), author of the publication *Briefing and Toolkit on Ethnicity Pay Gap Reporting.*

05 Four semi-structured focus group meetings, between 16 and 22 May 2023, bringing together participants with lived experience and asset managers to fully understand the standpoint[37] of each group and to discuss possible themes and indicators.

The main questions discussed included:

- definition of the main notions used by the scorecard: race, racial bias, racial equity
- the need for, and the viability of the idea of, a racial equity scorecard in the UK public markets
- steps that companies, asset managers and portfolio managers should take towards racial equity
- both professional and lived experience on racial bias and measures – good and bad examples – that participants had experienced in efforts to improve racial equity
- the most frequently recurring themes and metrics identified by the literature review, the review of other scorecards and scoping conversations with their producers

06 Three peer-review feedback sessions throughout the research process by four internationally acclaimed and highly experienced professionals who agreed to overview the research process, advise, and share experience and knowledge:

- *Joanne Bauer,* Adjunct Professor of International Affairs at Columbia University and Co-Founder of Rights Colab, New York
- *Lisa Hayles,* Director of International Shareholder Advocacy at Trillium Asset Management, Boston
- *Shuangyu Li,* PhD, SFHEA, Reader in Clinical Communication & Cultural Competency and Director of the Cultural Competency Unit, King's College London
- *Lindsey Stewart,* CFA, Director of Investment Stewardship Research at Morningstar, London

Prepared questions, questionnaires, and all conversations were recorded and documented.

4.4 Research limitations

This research process was ambitious, both in encompassing a complex issue that requires a holistic approach, and also in being the first attempt to introduce the Racial Equity Scorecard into the UK public markets.

The project encountered two limitations as it progressed.

4.4.1 Limitations related to mixed research methods

Small size of focus groups: The project brought together six participants in four in-depth semi-structured interviews. Small sample size results cannot be readily generalised because the subjects are few and sometimes possess unique characteristics compared to typical respondents

Research bias: the interpretation of data can be biased because it is influenced by the researcher's perspective

Both limitations were adjusted for by extensive research on relevant literature, existing scorecards and benchmarks, and the FTSE100 companies. Further adjustment was provided by three scoping conversations with five researchers representing four organisations involved in similar projects internationally.

4.4.2 Limitation related to the composition of the project team

Overall, approximately 50% of researchers and participants in the project had lived experience of racial bias and discrimination. As some participants decided not to disclose their racial/ethnic identity, the composition of the researchers, collaborators and participants cannot be stated with more precision. A larger proportion of participants from diverse backgrounds and a longer timeframe will ensure a more detailed and nuanced next iteration of the scorecard.

This limitation was adjusted for by extensive research on relevant literature, scorecards and benchmarks, as well as by in-depth qualitative research with participants from the most diverse backgrounds

Beyond these two limitations, it should also be noted that this version of the scorecard is the first iteration, and each subsequent edition will incorporate improvements based on evolving best practice and feedback from users.

05 Detailed Scorecard

5.1 Overview of Themes and Indicators

This Racial Equity Scorecard is intended to be primarily used by investors, both asset owners and asset managers, but companies may also apply it to capture data and track progress on racial equity.

It proposes a holistic view and measurable metrics to capture an organisation's approach and progress towards racial equity. Initially, themes and indicators are conceived to complement ESG, DEI and HRDD disclosures. However, the scorecard also intends to offer a general picture of racial equity in organisations that do not disclose other ESG, DEI or HRDD data.

5.1.1 Themes

Four major themes have been identified as relevant to racial equity: Governance and Strategy, Workplace Culture and Agency, Business Model and Wider Community. These themes will be researched within the organisations using publicly available data disclosed by the organisations. For some indicators (e.g. B.3, B.5, B.6), it is desirable for the company or a third party to conduct surveys and focus groups at specified intervals (annually or bi-annually) to capture qualitative data – employee wellbeing would be a good example.

Controversies is a fifth theme, and will be researched from sources outside the organisation.

The Portfolios and Asset Managers specific themes also require reviewing publicly available data disclosed by the respective organisations to understand the actions taken to advance racial equity.

The following paragraphs explain the themes in more detail:

Governance and Strategy is part of all ESG metrics, and in this case it checks whether racial equity initiatives are included in the strategy of the organisation. The initiatives should be assessed at the board level to ensure regular follow-up and records of changes (A.1). Leadership is accountable for change towards racial equity, and a specific indicator assigns this task at board level and requires a board member to be accountable for progress towards achieving racial equity (A.3). This indicator is closely linked to the adequacy of the training (B.3). This theme also contains an indicator that is habitually included in most ESG disclosures: the HRDD process, including grievance mechanisms and tracking of remediation (A.2), which in this case is especially focused on racial inequities, to reinforce the human rights of marginalised communities. A further indicator asks whether the organisation is actively supporting other organisations, NGOs, and charities that advance racial equity (A.4).

Workplace Culture and Agency. Workplace Culture is also a recurrent indicator in many scorecards. During the scoping conversations and focus group meetings held, this was the topic that gained the most attention and was most emphasised by participants. On this topic, the scorecard incorporates metrics which are usually considered human resources-related indicators (B.1 to B.4), and which aim to create an inherently anti-racist organisation.

The concept of Agency emphasises the importance of the involvement of underrepresented communities in decision-making. It contains two indicators that are quantifiable (B.1 and B.2). However, they require data disclosure based on racial and intersectional components (see below for further explanation). Another indicator deals with trainings, mentorship, reverse mentorship and professional and leadership programmes (B.3). Mentorship and professional and leadership programmes should ensure that underrepresented communities are actively included in the workplace culture and offered opportunities for career development Another indicator looks at association and influence on decisions with regard to achieving racial equity (B.4). Similarly, taking account of elements of class, family responsibilities (single parents, carers, etc.) and cultural differences, it is important that employees are offered flexible work patterns which consider the specific needs of Black and Ethnically Minoritised communities (B.6). Whilst regular surveys on wellbeing (B.5) could be regarded as a general DEI indicator, historically marginalised communities need special attention when it comes to wellbeing, due to social and economic exclusion persisting for generations.

Business Model is a theme that aggregates the products and services that address minority needs or disadvantages generally (e.g. Sharia-compliant products for Muslim investors) and includes most of the value chain (workplace, marketplace, supply chain and affected community). This is the only theme in the scorecard designed to be sector-specific.

Wider Community as a theme captures the responsibility for restorative and reparative actions. An organisation might or might not have been involved in historical injustice; in the first case this needs to be disclosed and properly remediated, and in the second case the organisation should contribute to the remediation of the continuing impact of historical damage by others (D.1). A second indicator ensures that companies invest in key social determinants that tackle racial inequities (D.2).

Two further themes are designed:

Portfolios (i.e. what has been invested in investment portfolios) is a theme that looks for how a portfolio (a collection of companies) may advance racial equity in ways that are not just the sum of the individual achievements of the individual companies (as measured by the rest of the scorecard), such that the portfolio can also effect change through investment. This theme includes two indicators, the first addressing the inclusion of racial equity in investment strategy and the second a special focus on the allocation of capital to businesses led by members of Black and Ethnically Minoritized communities.

The ***Asset Managers*** theme (i.e. how they invest and use their powers) looks for ways in which the functions of an asset manager (asset allocation and valuation, stewardship practices, may promote racial equity in ways that are specific to asset management and not captured in the earlier themes. It captures activities such as the analysis of the racial equity of entities used in portfolio construction, as well as engagement and voting policies that drive greater racial equity.

5.1.2 Indicators

Indicators ensure that plans, actions and follow-up are implemented within the organisation, and bring forth tangible change at every level of a company.

Main requirements for an indicator:

- **Practical:** it can be easily accessed and assessed through disclosed documents and data of the organisation; and its assessment is tied to metrics and processes that can be evaluated objectively.

- **Able to be validated:** an indicator needs to be both valid (measures what needs to be measured) and reliable (changes in a consistent manner according to known variables); and to capture the right features of the company, i.e. those that show real achievement.

Three indicators (B.1, B.3, B.5) require intersectional data, which needs to be in disaggregated form. Intersectionality[38] looks at the individuals at the intersection of different communities; in relation to the present scorecard this means collating intersectional data relating to race, gender and any other characteristic such as LGBTQIA+ status or age that the business believes is relevant to understanding their racial equity context.

The scorecard strives to define transformative indicators that capture data, processes and metrics which show or encourage systemic, holistic change in an organisation and progress towards racial equity.

The following are two examples of transformative indicators:

- ***Qualitative (B. 3) Education in Diversity and Racial Equity:*** Many trainings have been implemented in organisations to achieve racial equity, the most prevalent being unconscious bias trainings.[39] However, despite being implemented for years in many diverse settings, they have often not resulted in the expected change in practice. Research shows that confrontational trainings might easily become 'tick box' exercises, and even trigger offensive or defensive behaviours, rather than inclusion. On the other hand, research-based inclusion trainings, mostly based on enhancing cultural competencies, with accurate follow-ups,[40] can result in a change in behaviours and workplace cultures and contribute to systemic change. Implementation of a more effective model of such trainings is a transformative indicator, in that a description of a model[41] (e.g. teaching what implicit bias is, how it's measured and how it harms underrepresented demographic groups) helps with assessment. This is not a quantitative measure, nor a prescriptive qualitative measure of the indicator: rather, the indicator looks at new, multi-dimensional trainings that include accurate follow-ups to track change.

- ***Quantitative (B. 2) Pay Gap and Job Security:*** disclosure of this kind brings clarity and insight into pay and wealth disparities, and can foster change if there are regular follow-ups to track progress. Furthermore, this indicator asks for *Intersectional data on pay gap and job with yearly disclosure*, which could capture the pay gap for individuals who are at the intersection of multiple underrepresented and disadvantaged communities, e.g. Black women, Black LGBTQIA+ people etc. This indicator is also considered transformative for advancing disclosure of this pay gap, since such disclosure is not legally mandated in the UK.[42] Additionally, this indicator looks at job security: this is important, as racial disparities appear to be accentuated in the gig economy and precarious jobs worldwide.[43]

5.2 Scoring

Most of the indicators, as listed in the table in section 5.4, can be assessed based on publicly available data from companies; some (especially relating to bad practices by companies) may require data from third parties, and others will require the companies or third parties to engage with stakeholders to assess their experience. The indicators are associated with scores, from 0 to 1 or 0 to 3, where higher scores denote good policies, practices and progress towards racial equity. The first four themes contain 'red flag' indicators to assess any negative, harmful action – or lack of action. Any red flags applied are signalling serious breaches of the racial equity standards which are required to be addressed and amended. The fifth theme is a 'red flag' (or 'yellow flag') indicator, but in a different way. It focuses attention on any current or former racial equity controversies associated with a company, which must be investigated before a final scorecard rating can be assigned.

- The maximum attainable score for companies is **26.**
- The maximum attainable score for portfolios is **3.**
- Maximum attainable score for asset managers is **2.**

In thinking about the scoring system, the scorecard authors have had the following framework in mind:

- We expect companies with a strong and ongoing commitment to racial equity and to transparency to score 75% or more after a number of iterations of the benchmark
- Those scoring less than 35% have a series of key issues to address (or which require fuller disclosure) to build stakeholder confidence in their commitment to racial equity
- Those with red flags have specific issues that require urgent and significant attention, as these may undermine other positive work.

5.3 Data Collection

In the United States, racial data collection has been a standardised institutional practice, and the same is true in the UK. In this scorecard, companies are expected to collect data based on ethnicity or race. Collecting racial data on individuals is compliant with GDPR, if individuals' identities are not exposed through the process, and the data can be used to inform companies' actions. However, beyond the UK, it is understood that ethnicity and racial data collection is not a common practice in Europe. Of the 38 Organisation for Economic Co-operation and Development (OECD) countries, as many as 20 do not collect racial or ethnic data.[44]

The scorecard specifically refers to indicators that will require companies to collect data from their employees and wider stakeholders about their identities, including ethnic and racial identities, and other characteristics. Companies operating in countries which may not have standardised practices for collecting ethnicity and racial data may collect proxy information, such as migration status and linguistic grouping. It is anticipated that ethnicity and racial data collection in Europe may become more systematic and institutionalised soon. According to ENAR, a pan-European anti-racism network, over 65% of ethnic minorities are in favour of providing, on an anonymous basis, personal information about their ethnic origin if it could help combat discrimination.[45] The European Union's Anti-Racism Action Plan (2020-2025) recognised that disaggregating data by ethnic or racial origin was required to inform policy choices and decisions to advance anti-racism, and there will be more coordinated actions on an EU level to improve data collection on this front. In this context, we anticipate that where the scorecard seeks to assess the publication of data, it may be necessary to accept data relating only to the UK in the first instance.

5.4 Full Scorecard

Themes	No.	Indicators	Scoring range
A) Governance and Strategy	01	Commitment to racial equity: • Commitment to racial equity: a public commitment with a strategy/plan to deliver on that commitment. • Internalisation of commitment: supported by policies, budget, staff.	0 to 2
	02	Race-sensitive HRDD: • The company conducts HRDD which considers and engages with communities experiencing racism including refugees, migrants and indigenous people. • The company has a grievance mechanism for employees to report any racial-related wrongdoing. • The company has proper tracking of remediation OR, if no cases yet, a proper system for implementing remediation.	0 to 3
	03	Board-level accountability for racial equity: • A board member is accountable for achieving racial equity progress (going beyond representation) OR the contribution of the board to racial equity is part of the regular review of board performance. • Commissioning of an independent racial equity audit annually which reports directly to the board OR the board publishes an annual assessment of progress and next steps.	0 to 2
	04	Has a collaborative strategy towards taking part in initiatives, alliances and local community groups to advance racial equity.	0 to 1
	05	Failure to have at least one ethnic minority board member by 2024 OR to set a target for percentage of senior management self-identifying as being from an ethnic minority by 2027 (in line with the Parker Review).	Red Flag
B) Workplace Culture and Agency	01	Diversity across different employment bands: The employees of the company fairly reflect the communities in which they operate on all levels and the company discloses intersectional data yearly on recruitment, retention and career progression • A commitment to reflect local and national communities fairly across operating sites, and the identification of currently under-represented groups. • Publication of yearly data distinguishing leadership (directors and senior management) from the workforce and breaking the workforce down by broad occupational functions.	0 to 2
	02	Addressing the pay gap: • Disclosure of race or ethnicity pay gap data. • Disclosure of intersectional data (at least by race and gender) on pay gap and job turnover on a yearly basis. • Disclosure of plan and action on closing the pay gap, with mechanisms for tracking improvement.	0 to 3
	03	Education in diversity and racial equity: • Trainings in racial equity, DEI, cultural competency, relational and restorative conversations etc. for all workforce OR reverse mentorship and mentorship for racial equity. • Professional and leadership skills programmes for racial equity.	0 to 2

05 Detailed Scorecard

	04	Freedom of association: • Working with unions on racial equity programmes and agency OR promoting internal support groups for agency in racial equity.	**0 to 1**
	05	Employee wellbeing and health support which considers the needs of all employees, including those from Black and Ethnically Minoritised communities: • Annual surveys, which ensure confidentiality and anonymity where appropriate, on employee wellbeing and psychological safety, with intersectional data analysis. • Access to health support services, such as counselling, mental health days, access to gym, bike to work scheme, etc.	**0 to 2**
	06	Flexible work patterns and adjustments which consider the needs of Black and Ethically Minoritised communities: • A strategy including flexible working and adjustments reviewed every 1-2 years to check it caters for the needs of Black and Ethnically Minoritised communities.	**0 to 1**
	07	Failure to address discrimination and harassment on racial grounds as part of equal opportunities policies.	**Red flag**
C) Business Model	01	Inclusive products and services: • Identifying the racial breakdown of product/service users and identifying any gaps. • Product development to meet the needs of Black and Ethnically Minoritised communities.	**0 to 2**
	02	Supply chain and value chain: • Strategic commitment for HRDD to be applied where there are risks of poor labour standards in supply chains, e.g. in labour-intensive or extractive activities. • Inclusion of minority-led businesses in the value chain (suppliers or distributors).	**0 to 2**
	03	Failure to address workers' rights OR to apply HRDD in supply chains with a high risk of poor human rights or labour standards.	**Red flag**
D) Wider Community	01	Reparations for historical injustices: • Where the company was historically involved: both reparative actions and donations OR Where the company was not historically involved: advocacy and investment to promote restorative/reparative justice and address the continuing impact of historical injustices.	**0 to 1**
	02	Investment (including corporate social responsibility activities, products or services and direct investment) in key social determinants of racial equity: • Education, employment, financial resilience, housing, overcoming criminalisation. • Local economic development in disadvantaged areas that avoids extractive models.	**0 to 2**
	03	Failure to address historical injustices if the company has been involved in creating racial traumas (e.g. slave trade, evicting indigenous people).	**Red flag**
E) Contraversies	01	Recording of racial equity controversies (as collected by monitoring news sources and researching companies for information on racial-discrimination-related lawsuits) and categorisation of the company depending on the number and gravity of cases. A yellow flag, rather than a red flag, may be applied if most cases (including all the most serious) are well managed in the sense that they have been addressed publicly, affected	**Red flag** **Yellow flag**

			stakeholders (or their representatives) have been engaged, disputes have been resolved, an agreed remedy has been provided where appropriate, and lessons have been learnt (and made public) from the allegations made.	
F)	**Portfolios**	**01**	Inclusion of racial equity in investment strategy for portfolio or products: • Has a documented impact strategy including an investment theory of change focused on real-world racial equity outcomes. • Discloses tangible racial equity goals that are measured and vary by context.	**0 to 2**
		02	Allocates a specified part of the portfolio to businesses that advance racial equity through their ownership, leadership or other positive impact.	**0 to 1**
G)	**Asset Managers**	**01**	Stewardship activities (e.g. voting strategy) includes consideration of investees' racial equity performance.	**0 to 1**
		02	Has in place tools and networks to advance analysis and understanding of racial equity in the investments/firms analysed.	**0 to 1**

06 Acknowledgements

We would like to express our sincere gratitude to all the individuals and organisations who have contributed to the development of this scorecard. Their valuable insights, expertise and dedication have been instrumental in shaping this important tool for promoting racial equity in public market investments.

This research is a collaboration between:

Funders
- Connect Fund at the Barrow Cadbury Trust, in partnership with Access the Foundation for Social Investment
- Carnegie

Pathway and Communication Team
- *Dilys Winterkorn,* Project Director at the Pathway Fund
- *Juanita Rosenior,* Managing Director of TGRG
- *Lizzie Gosland,* Marketing Consultant at TGRG

Research Team
- *Bonnie Chiu,* Co-founder of Pathway Fund and Managing Director of The Social Investment Consultancy (TSIC)
- *Peter Webster,* CEO of EIRIS Foundation
- *Rita Sebestyen,* PhD, Next Steps Project Manager at EIRIS Foundation
- *Timothy Cheng,* Consultant at The Social Investment Consultancy (TSIC)
- *Nicola Sakkas,* Research and Project Officer at EIRIS Foundation

Peer Reviewers
- *Joanne Bauer,* Adjunct Professor of International Affairs at Columbia University and Co-Founder of Rights Colab, New York
- *Lisa Hayles,* Director of International Shareholder Advocacy at Trillium Asset Management, Boston
- *Shuangyu Li,* PhD, SFH EA, Reader in Clinical Communication and Cultural Competency and Director of Cultural Competency Unit at King's College London
- *Lindsey Stewart,* CFA, Director of Investment Stewardship Research at Morningstar, London

Scoping Conversation Contributors
- *Danielle Burt,* Independent Consultant and former Lead of Gender Benchmark (World Benchmarking Alliance, The Netherlands)
- *Andy Behar,* CEO, and Kaylea Noce, Research Associate at the Racial Justice Scorecard (As You Sow, US)
- *Jonathan Hutchins-Levy,* Fund Lead, Emerging Futures at Joseph Rowntree Foundation
- *Kohinoor Choudhury,* Senior Campaigns Manager, ShareAction (UK), author of the publication) Briefing and Toolkit on Ethnicity Pay Gap Reporting

Focus Group Discussion Participants
- *Danielle Walker Palmour,* Director of Friends Provident Foundation
- *Erel Onojobi,* Director of Colourful Impact
- *Mark O'Kelly,* Director of Finance of Barrow Cadbury Trust
- *Stephen Muers,* CEO of Big Society Capital
- *Sarah Santhosham,* Head of Engagement for The Scott Trust Endowment
- *Sergio Ung,* Guy's & St Thomas' Foundation

We would also like to thank Nhelete Dos Santos for designing the logo and visual elements for the Racial Equity Scorecard.

07 References

[1] Machery, E. and Faucher, L. (2005). Social Construction and the Concept of Race. Philosophy of Science, [online] 72(5), pp. 1208–1219. doi:https://doi.org/10.1086/508966.

[2] news.un.org. (2021). *General Assembly creates new Permanent Forum of People of African Descent | UN News.* [online] Available at: https://news.un.org/en/story/2021/08/1096932 [Accessed 6 Oct. 2023].

[3] JUST Capital. (2022). *The 2022 Corporate Racial Equity Tracker.* [online] Available at: https://justcapital.com/reports/2022-corporate-racial-equity-tracker/#the-corporate-racial-equity-tracker.

[4] Racial Justice Scorecard LARGE CAP 1000. (2023). Available at: https://static1.squarespace.com/static/59a706d4f5e2319b70240ef9/t/64c4117cbb107706962bfb64/1690571137114/AsYouSow2023_RacialJusticeScorecard_fin_20230726.pdf [Accessed 6 Oct. 2023].

[5] Actionable Intelligence for Social Policy. (2020). A Toolkit for Centering Racial Equity Within Data Integration. [online] The Annie E. Casey Foundation. Available at: https://www.aecf.org/resources/a-toolkit-for-centering-racial-equity-within-data-integration#key-takeaway [Accessed 6 Oct. 2023].

[6] Racial and Gender Pay Scorecard. (2023). Available at: https://static1.squarespace.com/static/5bc65db67d0c9102cca54b74/t/641c728fa23db127cdca48fd/1679585936428/Racial+and+Gender+Pay+Scorecard+2023.pdf [Accessed 6 Oct. 2023].

[7] Equileap Gender Equality Scorecard. (2020). Available at: https://equileap.com/wp-content/uploads/2023/03/EquileapGenderScorecard-2020.pdf

[8] Gender Benchmark (2020). Methodology report. Available at: https://assets.worldbenchmarkingalliance.org/app/uploads/2020/09/Gender-Benchmark_Methodology-report.pdf [Accessed 6 Oct. 2023].

[9] Stonewall (2020). What is the Workplace Equality Index, and how is it scored? [online] Available at: https://www.stonewall.org.uk/top-100-employers/what-workplace-equality-index-and-how-it-scored
[Accessed 6 Oct. 2023].

[10] As You Sow (n.d.). Workplace Equity. [online] Available at: https://www.asyousow.org/our-work/social-justice/workplace-equity.

[11] World Benchmark Alliance (2021). Corporate Human Rights Benchmark Methodology: Apparel sector. Available at: https://assets.worldbenchmarkingalliance.org/app/uploads/2021/12/CHRB-Methodology_291121_Apparel_FINAL.pdf [Accessed 6 Oct. 2023].

[12] Racial Justice Scorecard LARGE CAP 1000. (2023). Available at: https://static1.squarespace.com/static/59a706d4f5e2319b70240ef9/t/64c4117cbb107706962bfb64/1690571137114/AsYouSow2023_RacialJusticeScorecard_fin_20230726.pdf

[13] Knight Foundation (n.d.). *Using Our Investment Tools to Diversify the Investment Industry.* [online] Available at: https://knightfoundation.org/articles/using-our-investment-tools-to-diversify-the-investment-industry/.

[14] McKinsey. (n.d.). *It's time for a new approach to racial equity | McKinsey.* [online]
Available at: https://www.mckinsey.com/bem/our-insights/its-time-for-a-new-approach-to-racial-equity.

[15] JUST Capital. (2022). *The 2022 Corporate Racial Equity Tracker.* [online] Available at: https://justcapital.com/reports/2022-corporate-racial-equity-tracker/#the-corporate-racial-equity-tracker.

[16] Triggs, M., Mishkin, S. and Meynier, T. (2023). *EU Finalizes ESG Reporting Rules with International Impacts.* [online] The Harvard Law School Forum on Corporate Governance. Available at: https://corpgov.law.harvard.edu/2023/01/30/eu-finalizes-esg-reporting-rules-with-international-impacts/.

[17] Coleman Parkes Research on behalf of Reboot. (2021). *Race to Equality: UK Financial Services Report addressing underrepresentation of ethnic minorities in the financial services sector.* (2021). Available at: https://fticommunications.com/wp-content/uploads/2021/10/Reboot-Race-to-Equality-UK-Financial-Services-Report-2021.pdf.

[18] Bloomberg Professional Services (2021). 'Diversity in the U.K. asset management industry' | *Insights.* [online] 12 Apr. Available at: https://www.bloomberg.com/professional/blog/diversity-in-the-u-k-asset-management-industry/.

[19] Fowler, N. (2020). *Britain's Slave Owner Compensation Loan, reparations and tax havenry.* [online]
Tax Justice Network. Available at: https://taxjustice.net/2020/06/09/slavery-compensation-uk-questions/.

[20] Jolly, J. (2020). 'Barclays, HSBC and Lloyds among UK banks that had links to slavery.' [online] *The Guardian.* Available at: https://www.theguardian.com/business/2020/jun/18/barclays-hsbc-and-lloyds-among-uk-banks-that-had-links-to-slavery.

[21] The Church of England. (n.d.). *Church Commissioners' Links to Historic Transatlantic Slavery.* [online] Available at: https://www.churchofengland.org/about/leadership-and-governance/church-commissioners-england/who-we-are/church-commissioners-links.

[22] The McGregor-Smith Review (2017). Race in the workplace: Issues faced by businesses in developing Black and Minority Ethnic (BME) talent in the workplace. [online] gov.uk. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/594336/race-in-workplace-mcgregor-smith-review.pdf.

[23] Robins, N., Brunsting, V., and Wood, D. (2018). *Climate Change and the Just Transition: A Guide for Investor Action.* [online] Available at: https://sustainabledevelopment.un.org/content/documents/22101ijtguidanceforinvestors23november1118_541095.pdf.

[24] Tranquada, J. (2020). 'Racial justice essential to just transition to a low-carbon future, report says.' [online] Available at: https://www.oxy.edu/news/racial-justice-essential-just-transition-low-carbon-future-report-says

[25] JUST Capital. (n.d.). *Mission & Impact.* [online] Available at: https://justcapital.com/mission-impact/#:~:text=A%20majority%20of%20Russell%201000%20companies%20surveyed%20in

[26] JUST Capital. (n.d.). *Mission & Impact.* [online] Available at: https://justcapital.com/mission-impact/#:~:text=A%20majority%20of%20Russell%201000%20companies%20surveyed%20in

[27] Truist, Stanley M., Chase, J., Bofa, Citibank and Goldman (n.d.). *Annual Wrap-Up 2022: 2022 A REMARKABLE YEAR FOR SHAREHOLDER VOICES - HIGHLIGHTS FROM OUR CORPORATE ENGAGEMENTS.* [online] Available at: https://static1.squarespace.com/static/59a706d4f5e2319b70240ef9/t/6435dcb80ebbed59b217a2a2/1681251513561/As+You+Sow+2022_Report_Final_Reduced.pdf

[28] *As You Sow. (n.d.). 2022 Shareholder Impact Review.* [online] Available at: https://www.asyousow.org/2022-shareholder-impact-review.

[29] Department for Business, Energy & Industrial Strategy (2016). *Ethnic diversity of UK boards: the Parker review.* [online] GOV.UK. Available at: https://www.gov.uk/government/publications/ethnic-diversity-of-uk-boards-the-parker-review.

07 References

[30] ShareAction. (2022). 'ShareAction targets financial sector to fully disclose Ethnicity Pay.' [online] Available at: https://shareaction.org/news/shareaction-targets-financial-sector-to-fully-disclose-ethnicity-pay-gap-data.

[31] Equality and Human Rights Commission. (2021). *'Gender pay gap regulation enforcement to start in October'.* [online] Available at: https://www.equalityhumanrights.com/media-centre/news/gender-pay-gap-regulation-enforcement-start-october

[32] Department of Business and Trade. (n.d.). *Ethnicity Pay Reporting.* Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1165466/ethnicity_pay_reporting_consultation_response.pdfhttps://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1165466/ethnicity_pay_reporting_consultation_response.pdf [Accessed 7 Sep. 2023]

[33] ShareAction. (2023). Ethnicity Pay Gap Reporting. [online] Available at: https://cdn2.assets-servd.host/shareaction-api/production/resources/reports/Ethnicity-pay-gap-toolkit_2023-07-19-131921_pmyy.pdf.

[34] Tashakkori, A. and Teddlie, C. (2010). *SAGE Handbook of Mixed Methods in Social & Behavioral Research*. 2nd ed. Thousand Oaks, Calif.: Sage Publications.

[35] Koshy (2010). *What is action research?* [online] Available at: https://www.sagepub.com/sites/default/files/upm-binaries/36584_01_Koshy_et_al_Ch_01.pdf.

[36] Beach, A. & Segars, A. (2022). *'How a Values-Based Approach Advances DEI: A new model for developing diversity, equity, and inclusion in the organization can increase employee satisfaction.' MIT Sloan Management Review,* Summer 2022. 63.

[37] Rolin, K. (2009). 'Standpoint Theory as a Methodology for the Study of Power Relations.' *Hypatia,* Cambridge University Press, 24(4), pp. 218–226. doi: 10.1111/j.1527-2001.2009.01070.x.

[38] Crenshaw, K. (2015). On Intersectionality: Essential Writings of Kimberlé Crenshaw. The New Press.

[39] Morris, C. (n.d.). 'Don't Jump Into Unconscious Bias Training Until You Read This.' *Forbes.* [online] Available at: https://www.forbes.com/sites/carmenmorris/2020/07/21/dont-jump-into-unconscious-bias-training-until-you-read-this/?sh=362c13063f41 [Accessed 6 Oct. 2023].

[40] Forscher, P.S., Mitamura, C., Dix, E.L., Cox, W.T.L. and Devine, P.G. (2017). 'Breaking the prejudice habit: Mechanisms, timecourse, and longevity.' *Journal of Experimental Social Psychology*, 72, pp.133–146. doi: https://doi.org/10.1016/j.jesp.2017.04.009.#

[41] Gino, F. and Coffman, K. (2021). 'Unconscious Bias Training That Works.' [online] *Harvard Business Review.* Available at: https://hbr.org/2021/09/unconscious-bias-training-that-works.

[42] Mahon, L. (2023). 'Government branded "embarrassing" over ethnicity pay gap rejection.' [online] *Voice Online.* Available at: https://www.voice-online.co.uk/news/uk-news/2023/07/17/government-branded-embarrassing-over-ethnicity-pay-gap-rejection/ [Accessed 6 Oct. 2023].

[43] Premji, S., Shakya, Y., Spasevski, M., Merolli, J. and Athar, S. (1969). 'Precarious Work Experiences of Racialized Immigrant Woman in Toronto: A Community-Based Study.' *Just Labour.* doi:https://do i.org/10.25071/1705-1436.8.

[44] World Economic Forum. (2023). *Prioritizing Racial and Ethnic Equity in Business: Towards a Common Framework.* [Online]. Available at: https://www3.weforum.org/docs/WEF_Prioritizing_Racial_and_Ethnic_Equity_in_Business_2023.pdf.

[45] European Network Against Racism. (n.d.). *Equality Data.* [online] Available at: https://www.enar-eu.org/about/equality-data/

RES Racial Equity Scorecard