Broken Ladders:

The myth of meritocracy for women of colour in the workplace

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Fawcett Equality. It's about time.

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About Us

The Fawcett Society

The Fawcett Society is the UK's leading membership charity campaigning for gender equality and women's rights at work, at home and in public life. Our vision is a society in which women and girls in all their diversity are equal and truly free to fulfil their potential creating a stronger, happier, better future for us all. We publish compelling research to educate, inform and lead the debate. We bring together politicians, academics, grassroots activists, and wider civil society to develop innovative, practical solutions and we campaign with women and men to make change happen.

The Runnymede Trust

Proudly independent, the Runnymede Trust speak truth to power on race and racism without fear or favour. We are authentic, led by an ethnically diverse team, we draw from our lived experience and that of our wide and inclusive community and partnership networks. From broadening the curriculum to exposing the Windrush scandal, our work is rooted in challenging structural racism and its impact on our communities. Our authoritative research-based interventions equip decision makers, practitioners and citizens with the knowledge and tools to deliver genuine progress towards racial equality in Britain.

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A note on language

In the UK, there are a number of terms used to describe a person's race and ethnicity. The most common terms used to describe all those who are non-white British are 'BME' and 'BAME'. Both terms are widely used in the UK by government, public bodies and the media, when referring to ethnic minority groups. BME stands for Black and Minority Ethnic and BAME stands for Black, Asian and Minority Ethnic.

For this report, we have chosen not to use the term 'BAME' or 'BME' as it has its limitations in implying that ethnic minority groups are homogenous. This doesn't allow for further insights into the varied experiences of women in different ethnic minority groups as this report seeks to do. We have chosen to use the phrase 'women of colour' or 'people of colour' when discussing all ethnic minorities. We have chosen to identify the specific heritage of all the women, we feel it is important to provide disaggregated data to be able to better understand how women from different ethnic minority groups experience progression at work. We have interviewed women of Black African heritage, Indian heritage, Bangladeshi or Pakistani heritage, East Asian heritage and Black Caribbean heritage to show the specificities of their experiences. This report does not cover all women from all ethnic minority backgrounds however we have sought to represent the views and experiences of the broadest range of minoritised women possible. For further insight into the language we have chosen to use, please refer to our Pay and Progression Women of Colour Literature Review.[1]

1 Dey, M. White, C and Kaur, S (2021) *Pay and Progression of Women of Colour: A literature review* Pay and Progression of Women of Colour (fawcettsociety.org.uk)

Definitions

Individual racism, institutional racism and systemic racism:

Individual racism: holding racist values (example: 'I would be upset if my child married someone who was Muslim'), racist beliefs (example: 'Black people don't work as hard as white people') or racist behaviours (example: using derogatory language to describe someone's ethnic minority background).

Institutional racism: "the collective failure of an organisation to provide an appropriate and professional service to people because of their colour, culture or ethnic origin. It can be seen or detected in processes, attitudes and behaviour which amount to discrimination through unwitting prejudice, ignorance, thoughtlessness and racial stereotyping."[2]

Systemic/structural racism: People of colour are alienated from positions of power and resources by legislation and face day to day discrimination by institutions. Structural racism (also known as systemic racism) is the condition where these "laws, institutional practices, customs and guiding ideas combine to harm racially minoritised populations in ways not experienced by white counterparts".[3] In the workplace, this registers as modes of discrimination, that can determine who gets hired, trained, promoted, retained, demoted and fired. Thus, racism contributes to the maintenance of an economic system which creates and reproduces racial and ethnic inequality.[4]

Micro-aggressions

Indirect or everyday exchanges which serve to undermine and denigrate a marginalised group. This can include a statement, action or other incident. In the workplace, this might manifest itself as a 'joke' about someone's ethnic minority background.

Code-switching

Code-switching involves "adjusting one's style of speech, appearance, behaviour, and expression in ways that will optimize the comfort of others in exchange for fair treatment, quality service, and employment opportunities."[5] A person of colour might switch the way in which they speak, express themselves in meetings and interact with colleagues in order to appear more palatable in the workplace.

2 Sir William Macpherson (1999), *The Stephen Lawrence Inquiry*
3 Dr Lingayah, S, (2021) *It takes a system: The systemic nature of racism and pathways to systems change* It takes a system FINAL - January 2021.pdf (rota.org.uk)
4 Dr Ashe, D. S, Dr Borkowska M & Professor Nazroo J (2019), *Racism Ruins Lives* http://hummedia.manchester.ac.uk/institutes/code/research/projects/racism-at-work/tuc-full-report.pdf (p32)
5 McCluney C, Robotham K, Lee S, Smith R, Durkee M (2019), *The Costs of Code-Switching* https://hbr.org/2019/11/the-costs-of-codeswitching

Heritage

Throughout this report, we have referred to women of colour of x "heritage". We have been careful not to reduce a woman's ethnic minority background to be the sole definer of their identity, recognising the different factors contribute to someone's sense of identity.

Ethnicity pay gap

The ethnicity pay gap is the difference in the average hourly pay rates for people of colour in comparison to their white colleagues. The Office for National Statistics (ONS) reports on the ethnicity pay gap every year. In doing so, it calculates the "difference between the median hourly earnings of white or white British employees (the reference group) and of other ethnic minority groups, as a proportion of average hourly earnings of the reference group."[6]

6 House of Lords Library (2021), *Mandatory Ethnicity Pay Gap Reporting* https://lordslibrary.parliament.uk/mandatory-ethnicity-pay-gap-reporting/#:~:text=The%20Office%20for%20National%20Statistics,earnings%20of%20the%20reference%20group

Executive summary

"I don't think the system is set up for us to survive in it"

Maya, a woman of Black African heritage (senior leader)

Where there are institutions, there are challenges

Broken Ladders is the first report of its kind to focus explicitly on the experiences and perspectives of women of colour in the workplace – their voices on the challenges they face are now being heard.

Right now, in workplaces across the UK, women of colour are missing in positions of power. In top roles, such as Supreme Court Justices, Metro Mayors and FTSE 100 CEOs and in boardrooms and leadership teams across the UK, there is an unacceptable lack of women of colour[7]. But it's not just a lack of representation, there are significant pay and progression gaps for women of colour, who continue to earn less than white employees.

This must change.

Broken Ladders provides an in-depth exploration of the challenges facing women of colour from entry to employment to senior leadership. It shows that the cumulative negative impact on women of colour at work is common across all sectors and in all types of organisations. The challenges of structural racism, including micro-aggressions, embedded bias and lack of representation exist in all institutions – it does not happen because of a few aberrant individuals; it is rooted in organisational cultures and structures.

For women of colour, the workplace is a site of constant negotiation between their identities and their ability to progress.

Our key findings show:

- **75% of women of colour reported having experienced one or more forms of racism at work** – from "banter" about ethnicity or culture, surprise at their ability to speak English, micro-aggressions such as repeated mispronunciation of their name or outright racial slurs.

- **61% of women of colour (compared to 44% of white women) had performed the 'mental gymnastics' of changing something about themselves** – they had changed their language, topics of conversation, hairstyle, their name or what they eat at work a great deal' or 'quite a

7 Marren C, Bazeley A (2022), Sex and Power Women's representation in positions of power (fawcettsociety.org.uk)

bit' – to 'fit in' within the workplace.

- **Women of colour are more likely than white women to report a manager having blocked their progression at work (28% compared with 19%)** – as well as experiencing 'sticky floors' and 'concrete ceilings'. And self-employed women of colour are often expected to lower their fees or work for free.

Our Broken Ladders report shows that businesses are losing out too. Direct losses such as absence related to mental health have become well understood, but more subtly, organisations are losing intangible commitment that helps employees contribute and businesses to go the extra mile, and the ability to promote the best talent:

- **45%** women of colour experiencing racism at work said it had affected their ability or desire to stay in their role 'a great deal' or 'quite a bit'.

- **64%** women of colour feel it is important to be promoted – but, they are significantly more likely than white women to report being passed over for promotion, despite frequent good feedback (42% versus 27%).

- **43%** women of colour said being refused promotion led to loss of motivation.

This report makes recommendations to institutions on what needs to change to make workplaces work for women of colour. Most of the recommendations have come from the women we engaged with, based on our survey of over 3,000 women we engaged with through our survey, events, focus groups and depth interviews.

The recommendations outlined in this report will not yield immediate reductions in pay and progression gaps for women of colour but will create sustainable culture change that addresses the root causes of systemic issues. Due to the embedded nature of structural racism, long-term culture change is needed across society and in sectors such as healthcare, education, criminal justice and housing. For the purpose of this report, we have focused on changes within the employment sector. We hope that employers and sector leaders will implement our recommendations with the aim of closing pay and progression gaps for women of colour. Not only will this contribute to a more even playing field, but it will benefit employers and workplaces as they improve their ability to retain skilled staff.

Getting a foot in the door:

Many women of colour find themselves being asked to lower their ambitions starting from school. They also do not have access to financial and social resources, such as the right kind of careers advice, to start their working lives. This is compounded by making different career choices due to limited financial support. They want more and better quality informal career advice, and support on how to look for jobs.

The process of 'mental gymnastics' starts early in their working lives – women of colour describe it as a 'constant guessing game' involving code switching and changing aspects of themselves to 'fit in' with wider expectations about class, background and ethnicity.

- **Risking a harmful environment:** Women of colour were significantly more likely than white women to search for information about the organisation's ethnic diversity (18% vs 7%), gender balance (14% vs 10%), ethnicity pay gap data (11% vs 6%), policies (22% vs 11%), and to have read employee reviews online (38% vs 26%).

- **Pay transparency:** 70% of the women and 75% of women of colour we surveyed, advocated for all organisations to include salaries on job adverts to improve pay transparency. The results of the survey showed that this was the recommendation women of colour were most supportive of.

Once women of colour are successful in securing an interview, they face more 'mental gymnastics' to weave their way through a hiring process where they are indirectly and directly discriminated against. Every step of the way, they are assessing how they are going to feel working there and asking themselves if they are risking entering a harmful, racist environment.

Hard road to progression:

Throughout their career, women of colour face challenges and barriers that lock them out of progression. From barrier bosses to a lack of access to training that is rationed by employers to an over reliance on informal networks for progression - the potential of women of colour is being stifled.

Women in our survey wanted clear and unbiased promotion processes and career paths - so that everyone is aware of what they need to do to progress.

- **Locked out of progression:** Women of colour were significantly more likely than white women to report being passed over for promotion, despite frequent good feedback (42% versus 27%).

- **Progression matters:** Women of colour were more likely to agree that it is important to them that they are promoted over time (64% versus 49% for white women). Yet the lack of transparent and fair recruitment processes into senior roles is notable.

- **Barrier bosses:** Women of colour are more likely than white women to report a manager having blocked their progression at work (28%, compared with 19%). This was most common for women of Pakistani, Bangladeshi and Indian heritage.

The other invisible workload

For most women of colour, the workplace is a site of constant negotiation between their identities and their ability to progress. The message most women of colour receive throughout is one of exclusion and othering – the idea that they do not belong in these spaces. This is reinforced through overt means such as direct racism and discrimination, and through subtle cues that force women of colour to change who they are to assimilate.

- **Prevalence of racism:** 75% of women of colour reported having experienced one or more forms of racism at work.

- **Everyday mental gymnastics:** 61% of women of colour, compared to 44% of white women, change something about themselves 'a great deal' or 'quite a bit' to 'fit in' in the workplace - their language, topics of conversation, hairstyle, their name or what they eat at work.

- **'The right kind of minority':** Women of colour are being told how calm, professional or well-spoken they are in comparison to others within their ethnicity.

These everyday adaptations that women of colour make directly challenge the notion of 'bring your whole self to work' that many employers claim they want.

I'm in leadership and my face still doesn't fit!

The illusion of meritocracy in the workplace and the narrative of 'merit' obscures the power and influence of invisible and informal networks at work, of which women of colour are often excluded.

- **A less acceptable leader:** Being a woman of colour was significantly associated with being seen as a less acceptable leader; with women of Pakistani and Bangladeshi heritage most likely to report being told they do not have the right leadership qualities (36%).

- **A mistaken leader:** Women of colour in senior roles reported attending conferences and being mistaken as hospitality service staff or taking part in meetings and being addressed as the secretary.

- **Restricted expertise:** An additional problem is the issue of 'leadership fit' where women of colours' expertise and skills are restricted to what is seen as in line with their racialised and gendered identity, rather than a broader recognition of their leadership qualities.

The ability to earn more and progress further had vastly improved for those now self-employed, but they still face bias in accessing funding and receiving quality business support.

The cumulative impact on mental health

Most women of colour talked about the significant impact of their experiences of racism and discrimination at work on their mental health and well-being. Women of colour suffered from an erosion of confidence due to a lack of recognition at work causing self doubt and poor mental health.

- **Impact of racism:** On average, over three quarters of women of colour (76%) in our survey reported that experiences of racism in the workplace have an impact on their mental health, wellbeing, confidence at work, and feelings about work job satisfaction, progression opportunities, and ability or desire to stay in a role.

- **Loss of talent:** 45% of women of colour said it affected their ability to do their job or desire to stay in their role.

- **Well-being implications:** 39% of women of colour reported that a lack

of progression had affected their well-being, compared to 28% of white women; whilst being refused promotion led to loss of motivation for 43% of women of colour.

For many the move to self-employment was to protect mental health and well-being; gain flexibility needed to balance work and family life; and to escape 'career blocking' or continuous workplace bias and discrimination. Self-employed women of colour shared regular occurrences of being asked to lower their fees and/or being expected to work for free. Ultimately, many women of colour end up leaving their sector or jobs altogether, resulting in loss of talent from their industries and organisations.

Our Recommendations: The challenge to employers and institutions

The women of colour who took part in our research come from various sectors and have worked in UK organisations of all shapes and sizes. We spoke to women working in big businesses, small charities, and in the public sector such as the civil service, local authorities, the NHS, and in education. Women of colour spoke to us about their experiences with other institutions too, some of which exist to support them – universities and schools, trade unions, funders, and business incubators. The findings are common across all these sectors and the challenges of racism, micro-aggressions, embedded bias and lack of representation, exist in all institutions.

Businesses and public bodies are losing out too. They are losing talent and damaging their sustainability through sickness and absence and weakening their ability to manage people well and in turn, failing to create diverse, effective succession. We support the Race at Work Charter created by Business in the Community, who note that action by employers could boost the UK economy and lead to increased productivity and returns in the workplace.[8]

Through hearing the experiences of women of colour in workplaces and self-employment, we have been able to craft recommendations that highlight the root causes of the barriers that exist. Our recommendations speak to government, employers, third-sector bodies, financial institutions and funders in terms of specific actions they can and should take to respond to the issues we have uncovered. It is essential that all institutions reflect on how racism manifests for them both as employers, service providers and as corporate citizens. The recommendations for employers in this report are not just for profit-making businesses but for all organisations, including those that exist to tackle inequalities and serve the public. Charities, trade unions and funding bodies are some of those institutions that came up in our research as organisations who are falling short of the values they speak to and must do more to gain the trust of women of colour and aid in their career progression.

8 Business in the Community (2021), *Race* https://www.bitc.org.uk/race/

Employers

To address the cumulative negative impact on women of colour and structural nature of the barriers that hold them back, organisations need an effective, evidence based Anti-Racism Action Plan. While we acknowledge that this will be a journey, the research we have conducted identifies the following set of strong starting points for your Action Plan.

Minimise bias in recruitment

1. **Make job advertisements more inclusive:**

    - Include salaries on all job advertisements and don't ask salary history questions at any point in the recruitment or negotiation process.
    - Include reasonable flexible working options in all job advertisements and support staff to adopt flexible working practices – including options for part time work, flexible hours, working from home, compressed hours and job sharing.
    - Provide transparent job descriptions with less rigid requirements which explicitly recognise the value of transferable experience and skills through alternative workplace settings.

2. **Reduce bias and be more transparent in hiring processes:**

    - Remove names from CVs during shortlisting so that hiring managers cannot use them to assume the ethnicity of candidates.
    - Ensure that interview panels represent the organisation's actual diversity, and do not give a false appearance of being inclusive which does not reflect the workplace experience.
    - Hiring managers (or sector bodies, to support smaller organisations) should produce guidance or information sessions to accompany recruitment processes to explain what is required from applicants, especially when using methods such as assessment centres and more complex recruitment practices.

3. **Recruitment organisations should improve transparency** by creating safe online spaces on their websites for women of colour to capture and share their experience of organisations, as done by Glassdoor.

Minimise bias in progression

4. **Set structures that ensure line managers deliver equitable and fair progression and promotion outcomes for employees.** This should include:

    - Support and training for managers in how to conduct appraisals so that they are supportive and developmental.
    - Broaden appraisal systems to have 360-degree input and feedback so that evaluation outcomes are not reliant on one individual.
    - Link line managers' performance targets to organisational performance

targets on diversity and inclusion including for retention, fair allocation of development opportunities, and progression of women of colour.

5. **Provide ongoing support to leaders to improve their own ability to talk about race,** and to actively listen to feedback from women of colour as part of their personal development metrics. Recognise and implement this as not a one-time action, but an ongoing commitment.

Support women of colour to progress: mentoring, training and development

6. **Conduct an annual learning and development audit by gender and ethnicity to track:**

    - How training budgets are spent
    - Who is being given access to prestige level training or development
    - Progression journey for employees after accessing training or development opportunities.

7. **Make progression routes explicit and well-known,** not based on word of mouth and informal networks.

8. **Ensure that women of colour have equitable access to both mentorship and sponsorship opportunities to enable them to progress into leadership roles:**

    - Provide opportunities for women of colour to receive peer to peer mentorship and sponsorship from other women of colour from external bodies such as unions, sector bodies, membership organisations etc.

9. **Provide a reciprocal mentorship programme built into senior leaders' annual KPIs**:

    - Provide training for senior leaders on how to do this effectively.
    - Compensate women of colour for this additional work e.g., additional annual leave, additional compensation, recognition towards professional development etc.

10. **Undertake regular 'stay interviews'** (an alternative to 'exit interviews'), giving women of colour safe spaces and opportunities to feedback on their career experiences. These can also be an opportunity for leaders to improve their own ability to talk about race and listen to feedback from women of colour (as above).

Address racism in your organisation's culture and monitor it

11. **Produce an ethnicity and gender pay gap report, and use it to develop your Anti-Racism Action Plan for improvement, based in the specific challenges you face as an organisation:**

    - Where you have enough data not to identify individuals, break your data down to ethnicity groups (e.g., Black African, Chinese and East

Asian etc. – be more specific if you can), to gain a clear picture of actions needed for different women of colour in your organisation.
- Publish progression data broken down by ethnicity for staff at all levels making it readily accessible for job applicants as well as employees.

12. **Use data about your organisation to develop your Anti-Racism Action Plan with SMART (Specific, Measurable, Achievable, Realistic, and Timely) targets and accountability built in. As well as monitoring your ethnicity pay gaps, this should include:**

    - Setting SMART targets to improve the proportion of women of colour in the organisation at all levels from entry to senior leadership.
    - Carrying out an equal pay audit based on gender and ethnicity every three years to rectify any unlawful pay practices that are affecting women of colour.
    - A record of the number of complaints of racial harassment and bullying including outcomes of the complaints.
    - Gathering and analysing data on disciplinary procedures to identify any differences by ethnicity, e.g., do women of colour rarely have their grievances upheld, but more often have grievances upheld against them.
    - Larger organisations should track progression routes:
        - Track promotion outcomes of mentorship and sponsorship initiatives by gender and race to better understand where the gaps are and develop plans to minimise those gaps.
        - For those who are not women of colour and have been promoted recently, determine the actual routes leading to progression, e.g., was it more often by informal routes such as recommendation or being given a high-profile project than by formal hiring processes?
        - Track by gender and race how work that leads to promotions is allocated.
        - Track the learning and success for line managers and employees taking part in reciprocal mentorship.
        - Report these at senior leadership/management meetings as part of the regular analysis and updating of your action plan.

13. **Sign up to the Business in the Community** (BITC) Race at Work Charter

14. **Appoint an executive sponsor for race:**

    - Leaders should connect to employees and convene significant conversations in the workplace for active listening – BITC's Race at Work: Black Voices recommendations show how.

15. **Leaders should value the skills women of colour bring to leadership,** and foster a culture whereby they can bring their differences, expanding the definition of leadership rather than making women of colour conform to stereotypical ideas:

    - Experts on leadership emphasise the need to connect with employees or stakeholders, to learn from difference; and adapt creatively to manage adversity. The women in our report demonstrate these skills as they respond to challenges in the workplace - organisations who welcome and embrace their talents will benefit.

16. **Have clear and transparent processes for reporting racism, with multiple reporting routes,** including options outside of line management structures; and make sure employees are aware of them:

    - This could include a phone line, a webform or app, an independent third-party, an internal champion or HR specialist.
    - Treat employees who make a report with respect and empathy.
    - Encourage employees to report any experiences of racism.
    - Take action as a result of reports and communicate this to make clear your new stance.

17. **Introduce meaningful and intersectional anti-racism training** (see below in 18 on complex individual experiences), supported by systems and structures to minimise bias; with outcomes linked to organisational performance targets on diversity and inclusion and monitor its impact:

    - Ensure that all interviewers and hiring managers have anti-racist training to minimise bias in their decision-making processes.
    - Noting the limitations of unconscious bias and other forms of anti-oppression training on their own, ensure that any training is part of the wider organisational action plan, and accompanied by clear actions and accountability for those participating.

18. **Recognise the major role that line management plays in shaping the experiences of women of colour as individuals.** The specific negative impacts vary and need to be actioned at the local level:

    - Consider the data in our report for the different groups of women (Black African, Black Caribbean, Chinese and East Asian, Indian, Mixed or other Ethnicities, Pakistani or Bangladeshi), and further, how somebody's multiple characteristics and identities - such as their gender, race, sexual orientation, religion and disability - interact to create a unique and complex experience of disadvantage or inequality.
    - Ensure training and support enables all supervisors and managers to understand and use this perspective.
    - Business in the Community's Practical Guide for Managers outlines ways to build authentic relationships, support mental health and enable everyone to perform at their best.

19. **Recognise and reward women of colour and other minoritised groups if they are asked to engage in work to support anti-racism.** This could take the form of a reduction in other work, additional days of leave, additional payment or recognising this as part of their personal development goals.

20. **Have a plan for reducing the cumulative impact of micro-aggressions and working in unwelcoming spaces, to support the mental health and well-being of women of colour.** Mental Health First Aid England has provided guidance for employers on how best to support people of colour in the workplace to reduce disproportionate incidences of poor workplace mental health experiences.

21. **Sector bodies e.g., Federation of Small Businesses and British Chambers of Commerce should support and provide guidance on tackling racism for smaller organisations.**

Government

1. **Mandatory ethnicity pay gap reporting for employers with 50+ employees, with requirement for employers to publish action plans to tackle those pay gaps:**

    - Including intersectional pay gaps by gender and ethnicity.
    - Include mandatory publishing of data on progression within the workplace by gender as well as ethnicity, and disparities in pay and diversity of senior leadership.
    - Publish the pay gap between women of colour overall and white British men; as well as the pay gaps for specific groups of women by ethnic minority (where the policy on disclosure permits) using a suitable threshold per organisation in order not to disclose individuals' personal data.
    - Publish both mean and median data.
    - Government should set out guidance on how to produce an evidence-led, consultative, time-bound and resourced action plan.

2. **Legislate to improve pay transparency and reduce bias:**

    - Introduce an enforceable legal right for women to know what their male colleagues earn if they suspect that they may be experiencing pay discrimination.
    - Review current voluntary pilot pay transparency scheme with a view to making it mandatory. Legislate to ban salary history questions and require employers to include salary bands within job advertisements.
    - Legislate to require employers to include any viable flexible work options in job advertisements, and to assess whether a flexible work request can be reasonably accommodated before rejecting it.

3. **Set up a government-backed, business-led initiative to focus employer efforts to tackle the ethnicity and gender pay gap and drive forward progress:**

    - Similarly, to the Women's Business Council, this should be led by women of colour (although not necessarily exclusively staffed by them).
    - Taking note of the structural challenges and bias that women of colour face and the extra burden of taking on this work, participants should be offered reimbursement for their time (as described for Employers).

4. **Investigate how experiences of institutional, structural and interpersonal racism impact on both the mental health and career outcomes of women of colour**.

5. **Fund local helplines to provide emotional support to people experiencing racial harassment at work** (as Racial Equality Councils used to do more widely – and a supplement to the legal advice line of Equality Advisory Support Service EASS).

6. **Equality Advisory Support Service (EASS) legal advice helpline should have funding increased to allow for specialist support to be offered on**

race discrimination, and to make their service in this area much more well-known:

- Make clearer on their website and in other communications that micro-aggressions and the cumulative impact of bias in the workplace do constitute grounds for a claim of workplace discrimination, which they will support and guide people through raising.

7. **Increase funding for the Equalities and Human Rights Commission to prioritise using investigation powers against employers with high incidences of discrimination of women of colour tribunal decisions against them.**

8. **Embed a firm commitment to furthering equality in the workplace in the new Public Procurement Regulations:**

   - Publicly support organisations that implement inclusive procurement strategies.
   - Prioritise suppliers that demonstrate a commitment to workplace equality.

9. **Create an information and enforcement campaign to end unpaid internships as these are illegal (as identified by the Taylor Review).**

Unions

1. **Building on the work of the TUC anti-racism task force and recommendations of the 2019 TUC report Racism Ruins Lives, unions should develop and implement Anti-Racism Action Plans for themselves, covering all areas of their work including organising, collective bargaining, public policy and their activities as employers.**

2. **Unions to be more active in this space and provide support to members of colour:**

   - Negotiate with employers to introduce our recommendations, including:
     - Bargain with employers to provide opportunities for women of colour to receive peer support or mentoring from other women of colour.
     - Negotiate with employers to provide a programme of support and mental health support for victims of racial harassment and bullying in the workplace.
   - Train union reps to better identify and challenge individual and institutional racism in the workplace:
     - Ensure workplace reps understand the organisational and intersecting structural barriers that impact women of colour that impact women of colour and prevent them from reaching their full potential - particularly those linked to gender, ethnicity and class.
     - Support workplace reps through training, campaigning and organising to challenge these organisational and structural barriers through collective bargaining and action in workplaces.

Universities

1. **Universities should create and implement Anti-Racism Action Plans:**

    - Utilise the Universities UK's report: Tackling racial harassment in higher education.

2. **Universities should review their careers service approach, to reduce the gap in career support experienced by women of colour:**

    - Ensure support is available on writing CVs and how to unpick a job description and spot the key points.

Recommendations to support self-employed women of colour

1. **Financial institutions, charitable grant funders and investors should implement Anti-Racism Action Plans for themselves which should prioritise:**

    - gathering data broken down by ethnicity of funding portfolio
    - active engagement with women of colour
    - targeted funding for women of colour
    - reviewing their business start-up funding processes so that people of colour do not have to excessively retell their hardships in order to qualify.

2. **Business start-up services e.g., Business Growth Hub, Smallbusiness.co.uk to provide more mentors that are people of colour at different stages in their entrepreneurial journey. This will allow self-employed women of colour to gain practical advice that caters to their specific business needs.**