

The Inaugural Justice, Equity,
Diversity and Inclusion (JEDI)
Review
Final Report



by Triple C Advisory

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List of Acronyms

AA- Affirmative Action
BLM- Black Lives Matter
CEO- Chief Executive Officer
CLA- Collective Labour Agreement
DEI- Diversity Equity and Inclusion
EEO- Equal Employment Opportunity
FGD- Focus Group Discussion
HR- Human Resource
ILO- International Labour Organisation
JEDI- Justice, Equity, Diversity and Inclusion
LNOB- Leave No One Behind
NGO- Non-Governmental Organisation
SWOT- Strengths Weaknesses Opportunities Threats
UN- United Nations
USD- United States Dollars
WASH- Water Sanitation and Hygiene
WFP- Water for People

Preamble

Following the Black Lives Matter (BLM) protests in the United States of America, a global BLM movement evolved in the summer of 2020. The aid sector was forced to confront the reality that its work is steeped in structural racism, something which has been barely discussed or acknowledged until very recently. The world had finally acknowledged how acting without listening or thinking cost George Floyd and many more people of colour their lives and dignity.

Decolonising development, humanitarian aid and peacebuilding – is a movement to address and dismantle racist and discriminatory structures and norms hidden in plain sight in the aid system. It is emerging as an urgent, vital and long overdue ongoing discussion and range of advocacy strategies that add greater weight to the existing calls to transform the aid system¹.

In June 2020, IRC put its stake in the ground on anti-racism in a [BLM statement](#) by its CEO, Patrick Moriarty. He committed the organisation to the global struggle against racism, acknowledging that most of those served were people of colour, and anti-racism was an organisational value and development imperative. IRC expressed its determination to listen, reflect and act towards anti-racism in that statement. This inaugural organisational JEDI performance review was commissioned as a catalyst to the “listening to – think – and then act” intention. This report presents the review’s findings and recommendations.

¹[Direct, P., & Paige, S. \(2021\). Time to Decolonise Aid: Insights and Lessons from a Global Consultation. Full Report.](#)

Executive Summary

This report presents the findings and recommendations of an inaugural Justice, Equity, Diversity, and Inclusion (JEDI) performance review of IRC. The review employed a triangulated mixed-methods approach to the collection, synthesis and analysis of data, which was used to compare IRC policy and practice to JEDI best practices gleaned from literature and comparative international NGOs (INGOs), including Water for People.

The key review finding was that IRC had an inclusive culture and diverse team as well as some good practices. The JEDI performance review concluded that the IRC staff had maintained an inclusive culture across the organisation despite the absence of systems and safeguards and fostered robust political will for JEDI to thrive. JEDI was, however, yet to be prioritized, and efforts to uphold JEDI principles in policy did not consistently translate into practice. The room for improvement was mainly linked to systemic issues like colour blindness. IRC was found to have a solid track record in policy formulation and a systems approach to strengthening national water systems. Both strengths bode well for the recommended JEDI improvements. JEDI emerged from this performance review as a key business opportunity for IRC's growth and leadership position ambitions.

The JEDI performance review offers these three main recommendations:

1. **Establish a JEDI system:** This refers to the organisational hardware and software improvements required to translate JEDI policy into practice.
2. **Mainstream and safeguard JEDI across the organisation:** This refers to the reinforcement and standardization of policies to embed JEDI and the enactment of minimum operating procedures that ensure consistent implementation.
3. **Establish JEDI governance and accountability:** This refers to Board and leadership JEDI role modelling and the establishment of JEDI performance metrics, tracking and rewards.

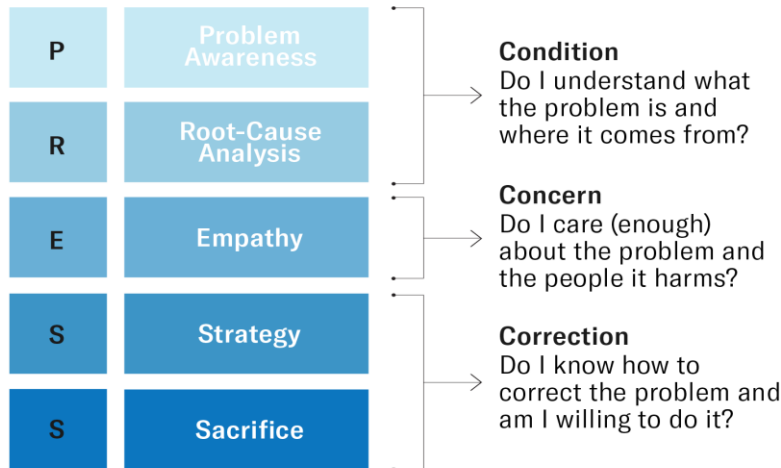
The Six-part Roadmap

A six-part road map to guide the implementation of those adopted.

According to the Harvard Business Review,² organisations concerned with achieving racial equity apply the 3Cs: Condition, Concern and Correction. Organisations move through these stages sequentially: first, establishing an understanding of the underlying condition, secondly, developing genuine concern, and finally, focusing on correcting the issues.

² [Livingston, R. \(2020\). How to Promote Racial Equity in the Workplace. Harvard Business Review, 64-73.](#)

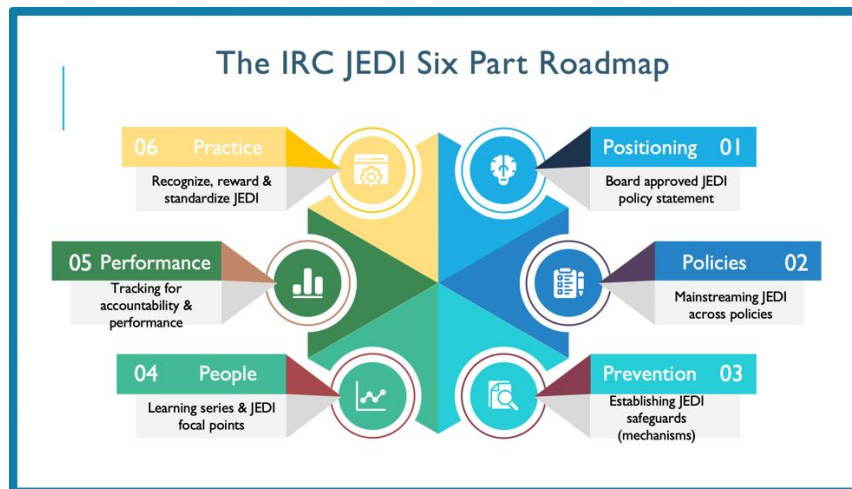
Figure 1: Roadmap for Racial Equity



As outlined below and discussed in this report, the six-part roadmap is designed to guide IRC through the 3C process to facilitate the implementation of the three recommendations. The JEDI performance review assesses the condition and spotlights concerns. The road map then offers guidance for action planning related to course correction.

1. **Positioning:** JEDI has a priority and value, starting with a Board approved statement.
2. **Policies:** Mainstreaming and embedding JEDI across policies.
3. **Prevention:** Safeguarding JEDI-compliant practice.
4. **People:** Strengthening JEDI knowledge, skills, and attitudes.
5. **Performance:** Developing metrics and tracking performance.
6. **Practice:** Recognition, reward, and standardization of JEDI best practices.

Figure 2: The JEDI Roadmap



1.0 Background

The purpose of this IRC of a Justice, Equity, Diversity, and Inclusion (JEDI) performance review report is to present both findings and recommendations for improvement. It was conducted over three months, from October to December 2021.

JEDI is considered of organisational value to IRC because the sector with which it works is intricately linked to social justice and inclusion. Access to safe water, improved hygiene, and sanitation (WASH) is not only a need; it is a human right. These essential services underpin human development and transform lives, enabling people to overcome poverty. Poverty, marginalisation, and social exclusion are inextricably linked.

There is increasing evidence of the business case for JEDI. According to a [McKinsey report](#), companies in the top-quartile for gender diversity on their executive teams were 21% more likely to have above-average profitability than companies in the fourth quartile. For ethnic/cultural diversity, top-quartile companies were 33% more likely to outperform in profitability.

IRC is a diverse, multicultural organisation that hosts 89 staff, more than 40 nationalities, and ten offices around the world. The JEDI review identified decentralisation as a JEDI driving force in IRC, founded in 1968 with a focus on knowledge management. IRC transformed itself into an international “think and act” tank using “the listening to rights” holders as the key success factor of its systems approach to its development work. IRC works with governments, NGOs, businesses, and people worldwide to find long-term solutions to the global crisis in water, sanitation and hygiene services (WASH), which necessitated presence nearest to where the change was needed. This physical and organisational movement towards the countries and people served is referred to as decentralisation. IRC seeks to expand its reach and impact much further through a strategic partnership with the US-based Water for People. The USA is where the Black Lives Matter movement took shape and force.

This review comes on the heels of that awakening—informed and grounded by findings of sector-wide reviews like [Decolonising the Aid Sector](#), which found that racism in aid is often unconscious in nature and systemic. Most people do not think about it or recognize its presence in the organisational system because it hides within norms. IRC is no exception. Several IRC staff described IRC as ‘colour blind’, citing this as a metaphor for inclusion, indicating blindness to the perils of colour blindness when fighting racism. A reference to colour blindness in critical race theory indicates denial of racism as a system that exists and needs to be dismantled.

The IRC JEDI performance review surfaced several examples of the system of racism at work in IRC based on the following definition of racism.

*Racism is the marginalization and/or oppression of people of colour based on a socially constructed racial hierarchy that privileges white people. Structural (or systemic) racism refers to the normalisation and legitimatisation of an array of dynamics – historical, cultural, institutional and interpersonal – that routinely advantage whites, while producing cumulative and chronic adverse outcomes for people of colour.*³

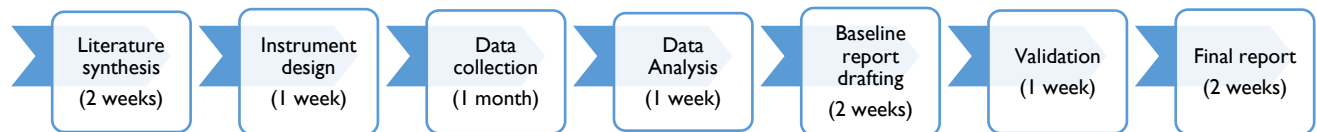
According to the [Aspen Institute](#)'s Glossary for Understanding the Dismantling Structural Racism/Promoting Racial Equity Analysis, the terms “systemic racism” and “structural racism” are generally used synonymously. However, structural racism analysis tends to pay more attention to the historical, cultural and social-psychological aspects.

This performance review established systemic JEDI issues despite noble intentions. For instance, decentralization was found to be both a driver of JEDI progress and regression in the absence of system-based anti-racism intentionality.

2.0 Methodology

This section of the report explains the method by which the JEDI performance review was conducted over three months. Figure 3 outlines the timeline.

Figure 3: Methodology



A five-dimension framework was developed from literature to benchmark IRC's JEDI performance against best practice globally. The data collection instruments for a survey, interviews and focus group discussions were designed in collaboration with the IRC project team, including one country director. Several sources of data and insights were collected, analysed, collated, and triangulated to arrive at the key findings.

Instrument design (see Annex A for details) was informed by the most frequently used JEDI instruments available in the public domain, including: [Equileap Gender scorecard](#), [DEI Meyer Spectrum 2018](#) and [Anti-Racism Rubric](#) (see Annex B for detail on sources). Instrument design ensured the coverage of this set of research questions derived from JEDI review best practice. The method used to arrive at the five JEDI review dimensions used is detailed in Annex C. The whole multi-method process used to arrive at findings is illustrated in [these slides](#).

³ Lawrence, K., & Keleher, T. (2004). Structural Racism. *Chronic Disparity: Strong and Pervasive Evidence of Racial Inequalities*. Intergroupresources.com. Retrieved 29 December 2021, from <https://www.intergroupresources.com/rc/Definitions%20of%20Racism.pdf>.

Figure 4 presents a matrix of the research questions used to formulate the combined quantitative and qualitative line of questioning. This is further elaborated in the data analysis plan in Annex D.

Figure 4: The Data Analysis Map

	Opportunity	Diversity Management	Diversity Climate	Inclusion	Workplace Discrimination
1. What does JEDI, intercultural competence and other relevant terminologies mean?					
2. Does IRC organizational values and governance structure adequately reflect JEDI within IRC?			✓	✓	✓
3. Are the internal policies, practices and culture in relation to JEDI appropriate? What can be improved?	✓	✓			✓
4. What are the JEDI perceptions among IRC staff overall, and according to demographic characteristics?	✓	✓	✓	✓	✓
5. Which areas do managers (senior staff, the company in general) need to improve on to enhance JEDI within IRC?		✓	✓		
6. What are the JEDI growth areas for IRC?	✓	✓	✓		✓
7. What accountability measures do we recommend for IRC?			✓		

The five dimensions used for the JEDI review were: opportunity, diversity management, diversity climate, inclusion and workplace discrimination.

1. **Opportunity** is concerned with occupational opportunity for minority and/or marginalized groups and focused on achieving equal opportunity. A right to equal opportunities and equal treatment in employment and occupation provide all persons with a chance to work and care for their families, regardless of their race, skin colour, nationality, social or ethnic origin, language, religion or belief, sex, gender identity, sexual orientation, health, disability, age, material background, marital or family background, group affiliation or other personal characteristics.
2. **Diversity management** refers to organisational actions that aim to promote the greater inclusion of employees from different backgrounds into an organisation's structure through specific policies and programs.
3. **Diversity Climate** is characterized by openness towards and appreciation of individual differences.
4. **Inclusion** is seen as a universal human right. Inclusion aims to embrace all people irrespective of race, gender, disability, medical or other need. It is about giving equal access and opportunities and abolishing discrimination and intolerance (removing

barriers). Inclusion is not the same as belonging. It is a behaviour. Belonging is the positive emotional outcome of effective inclusion—feeling like one belongs.

5. **Workplace Discrimination** is to be eliminated in policy and in practice. Equality and non-discrimination are basic labour rights protected by law in all countries in which IRC operates. According to best practice, furthering equality and reducing workplace discrimination in an organisation requires policies that address the following:

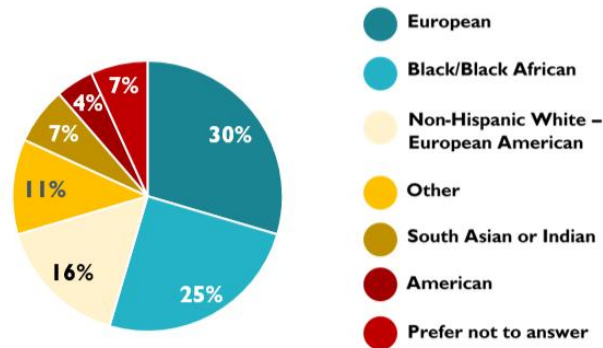
- Fair recruitment practices.
- Fair treatment during employment.

Quantitative Data Analysis

Quantitative data collected through the staff survey was cleaned and analysed using Stata, a general-purpose statistical software package developed by StataCorp for data manipulation, visualization and analysis. Demographic statistics on the characteristics of survey participants are provided here and illustrated in Figures 5-8. There were 47 respondents; the majority (55%) self-identified as either being European or Black/Black African, female (56%) and aged between 30 – 54 (78%).

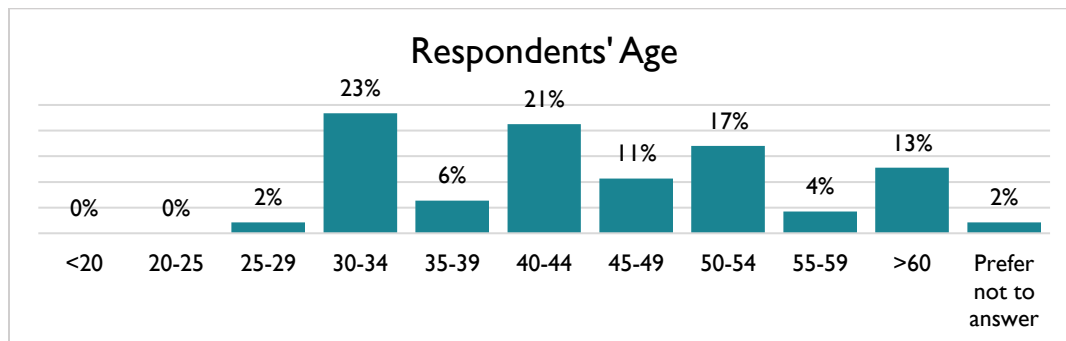
a) Race

Figure 5: Race



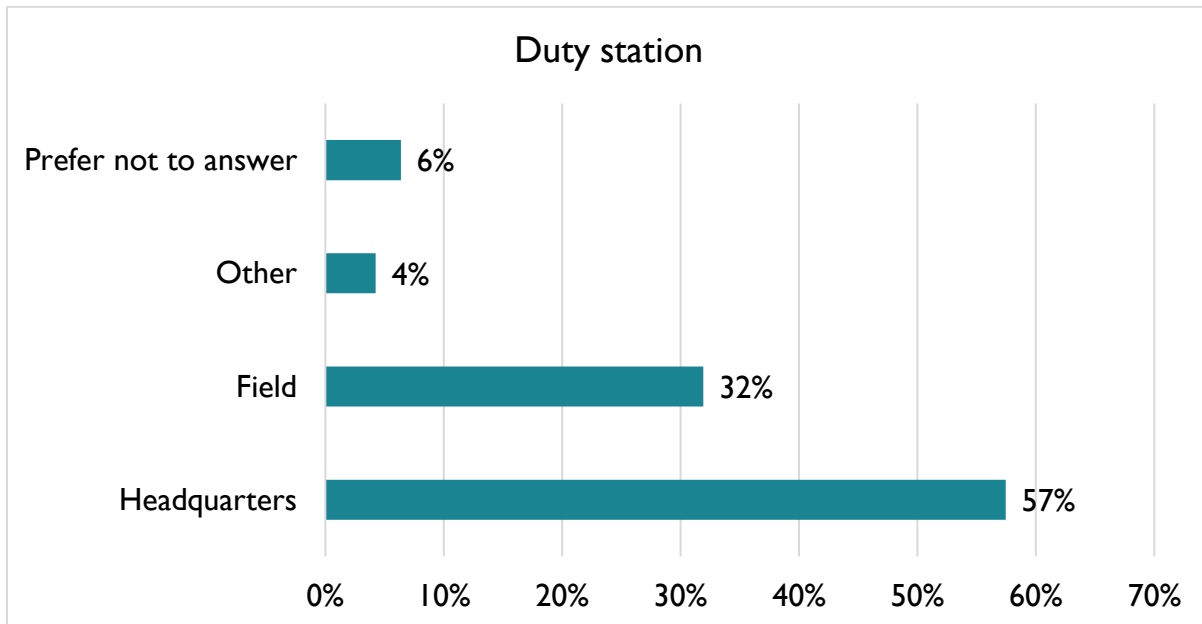
b) Age

Figure 6: Age



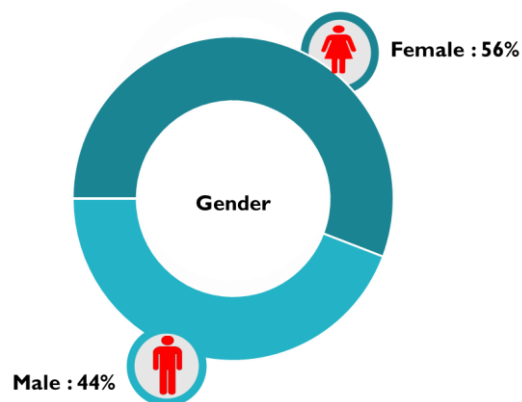
c) Duty Station

Figure 7: Duty Station



d) Gender

Figure 8: Gender



The location of respondents was captured under broad categories of field or headquarters to protect anonymity at the request of initial respondents. It was noted that none of the respondents self-identified as non-binary; therefore, it was assumed that none of the respondents self-identified as LGBTIAQ. However, it is acknowledged that these terms are not synonymous.⁴

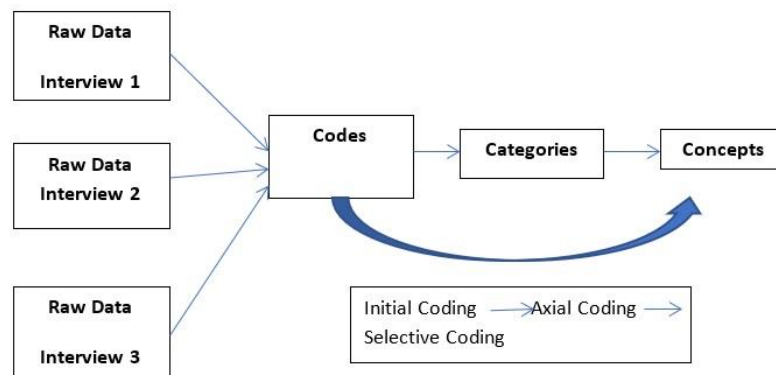
⁴ **Non-Binary (NB or enby)**:. Intersex, genderqueer, and bisexuality are all examples of non-binary identities. LGBTQIA (lesbian, gay, bisexual, transgender, queer/questioning, intersex, asexual/ally) acknowledges the non-binary nature of gender and in addition gender's fluidity.

Qualitative Data Analysis

Qualitative data was obtained through key informant interviews and focus group discussions. The data was analysed under the same five dimensions (opportunity, diversity management, diversity climate, inclusion, and workplace discrimination) using the grounded theory method. Grounded theory analysis was conducted in three steps: open, axial and selective coding⁵. See Figure 9.

1. **Open coding:** Categorises the data into emerging themes. The themes are then compared and contrasted with each other.
2. **Axial coding:** Compares the themes by identifying the indicators that relate closely with each other.
3. **Selective coding:** Uses the indicators to develop units of meaning.

Figure 9: Grounded Theory Method



Limitations

There are limitations associated with the methodology used. The first is that no standard way of conducting JEDI reviews was found in literature, which limits the replicability of the method and generalisability of the review's findings. JEDI is an emerging body of knowledge and practice. The second was that the Netherlands-dominated project team that supervised the review limited the inclusion of regional perspectives, as was evidenced by some of the comments received during both the data collection and findings validation stages. A third limitation relates to the embedded and hidden nature of racism and race-based injustice in aid. In general, racism has become even more covert and sophisticated in the aid system due to the upsurge against it. This requires sophisticated detection and counteraction methods that this performance review did not always succeed in establishing or using, given the deficiency of JEDI review standards, limited time, and budget of the review.

3.0 Key Findings

This section presents the JEDI review performance findings in the five dimensions used to collect and analyse data in these three parts:

⁵ Corbin, J. M., & Strauss, A. (1990). Grounded theory research: Procedures, canons, and evaluative criteria. *Qualitative Sociology*, 13(1), 3-21. Accessed from <https://sites.duke.edu/niou/files/2014/07/W10-Corbin-and-Strauss-grounded-theory.pdf>

- 3.1 Policy Analysis
- 3.2 Analysis of Primary Data
- 3.3 SWOT Analysis

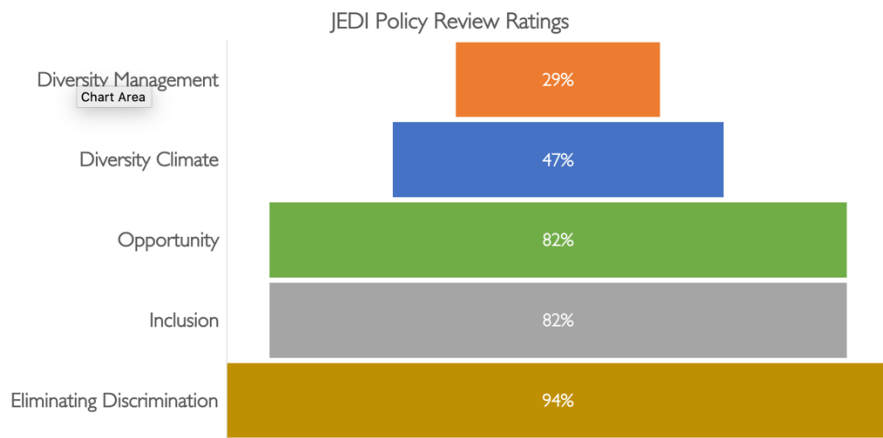
3.1 Policy Analysis

IRC policies were reviewed against best JEDI practices which helped remove the white gaze that distracted from assessing racial impact. The Decolonising Aid publication recommends JEDI evaluations that remove the white gaze, also sometimes known as ‘the imperial gaze’. This gaze views people and societies through the lens of white ethnocentrism, which assumes that whiteness is the only referent of progress. This ‘gaze’ can mean that institutions and people may engage with non-white people, practices and institutions on the basis of their perceived inferiority to white institutions and norms.

Organisational reviews can provide the opportunity to look at a system and its culture from a JEDI perspective (JEDI lens). This is important as many current policies and practices in the aid system are derived from the colonial era—a fact that most organisations are reluctant to acknowledge. Removing white gaze involves assessing whether and how “whiteness” impacts decisions on who, what, where and how policy gets developed, and how the process and policy product impacts the organisation. This starting point of white gaze removal aligns with the England-focused Association of Chief Executives of Voluntary Organisation's (AVECO) 8 anti-racism principles, which encourage acknowledging that there is a problem with racial diversity and that racism is systemic, as best practice. The Netherlands-based equivalent, Partos, which has a [code of conduct](#), was found not to have anything similar.

Seventeen (17) IRC policies were reviewed under the conditions described and compared to JEDI best practices using the five dimensions gleaned from literature. The policy review showed that IRC has invested effort in eliminating workplace discrimination from a policy but not as much has been done to assure implementation. Mechanisms for translating policy into practice are lacking, as evidenced by the 29% rating on diversity climate and management policy integration (See Figure 10 for the summary of the JEDI lens policy review and Annex E for analysis matrix).

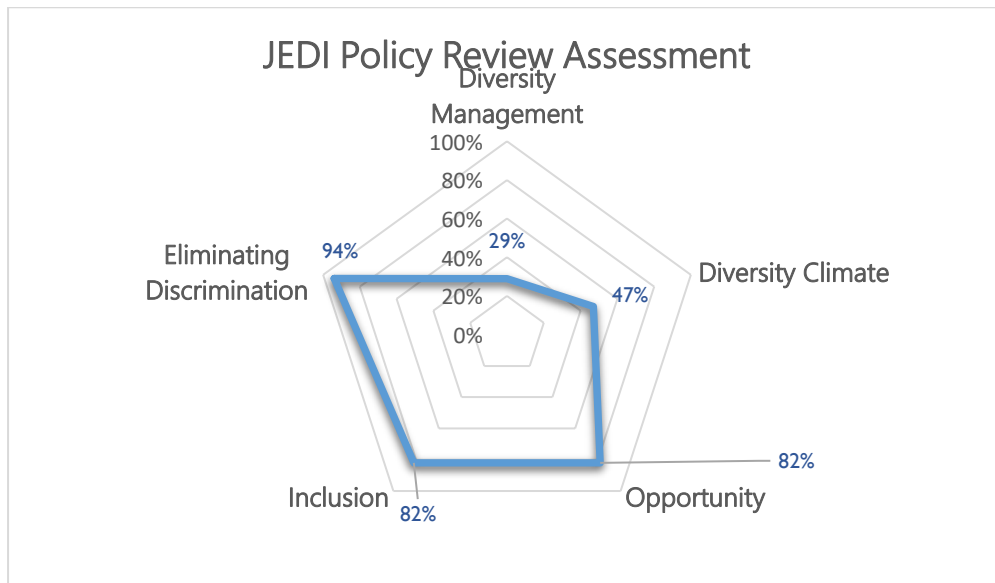
Figure 10: JEDI Lens Policy Review Ratings



The policy review indicated that IRC JEDI infrastructure in the forms of systems, structures, processes, practices, training, and resources was found to be inadequate from a policy perspective. Whilst there was great effort to prevent workplace discrimination across all policies in ways that fostered inclusion and opportunity, the gaps in diversity management and climate could hold IRC back from attaining best practice in JEDI policy.

Each of the JEDI policy review ratings (see Figure 11) of five dimensions, under which policies were reviewed, is discussed in turn in this sub-section.

Figure 11: JEDI Policy Review Assessment



3.1.1 Opportunity (scored 82%)

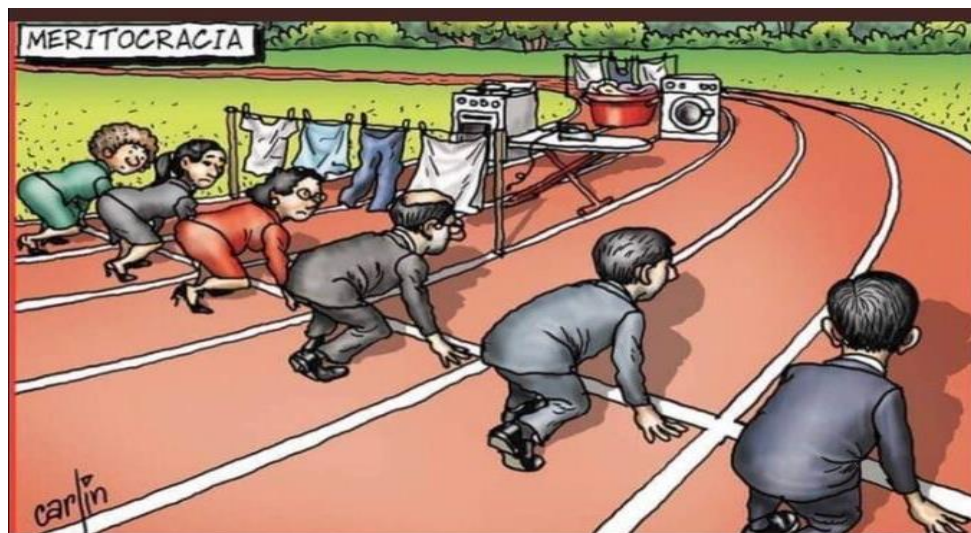
The large majority (82%) of the 17 reviewed IRC policies were found to enable occupational opportunity for all. This element of JEDI is concerned with the occupational opportunity for minority and/or marginalized groups and is focused on achieving equal opportunity.

Two examples of best practice are the IRC [Global HR plan 2021-2022](#), which seeks to build strong, confident, world-class staff, supported by flexible and attractive (country-specific) human resources policies rooted in principles of JEDI sustainable and collective employment policy conditions.

Sustainable employment is the IRC policy ambition that drives a need to contribute to the development of the local employment market, economy, education system, and equal opportunities within the IRC HR plan. The IRC employment target is a 25/75 global north: global south employment ratio. The second example is collective employment conditions that seek equitable employment benefits across the organisation, including pre-natal and post-natal maternity leave, birth and supplementary birth leave for partners, and parental leave. Parental leave is a best practice as it promotes a shared burden of care across genders.

Overall, the IRC policies aligned with best practices on occupational opportunity but fell short of the equity requirement. Equity considerations can clear the roadblocks inherited by some from a historical source or marginalisation and make sure that everyone has the same opportunity in practice and not just in policy. Equity considerations were not observed across IRC policies with respect to leveling the playing field for those who have been disadvantaged in the past. See Figure 12, which illustrates the concept of equity.

Figure 12: Illustration of Equity Considerations



Equity considerations can involve positive discrimination like career development programs that target only people of colour or quotas that seek to achieve higher representation of marginalized groups.

One example that is useful to illustrate this point is that of Maria Klawe, the president of Harvey Mudd College. She concluded that the only way to increase the representation of women in computer science was to treat men and women differently. Men and women tended to have different levels of computing experience prior to entering college—different levels of *experience*, not intelligence or potential.

Society treats boys and girls differently throughout secondary school—encouraging STEM subjects for boys but liberal arts subjects for girls, thus creating gaps in experience. To compensate for this gap created by bias in society, the college designed two introductory computer-science tracks—one for students with no computing experience and one for students with some computing experience in high school. The no-experience course tended to be 50% women whereas the some-experience course was predominantly men. By the end of the semester, the students in both courses were on par with one another. Through this and other equity-based interventions, Klawe and her team dramatically increased the representation of women and minority computer-science majors and graduates.

3.1.2 Diversity Climate (Scored 47%)

The diversity climate at IRC was found to be relatively weak. Diversity climate is an organisational climate characterized by openness towards and appreciation of individual differences⁶. Forty-seven (47) % of IRC policies were found to contain diversity climate considerations but mostly from a compliance and not an organisational culture or development perspective.

A diversity climate supports feeling valued enough to speak up on points of difference and/or discomfort. People speak up and/or report discomfort related to policy non-compliance in a strong diversity climate but silence themselves in fear of repercussions in a weak one. This type of climate has been shown to positively affect outcomes on the individual, group, and organisational levels⁷. The qualitative data analysis discussed later in this document show silence as a possible indicator of an issue with diversity climate. Some of the interviews done alongside a survey alluded to a culture of silence when it came to racism in the fear that it may affect the happy and inclusive work climate.

IRC policies tend to focus on diversity at entry and not on organisational culture or development. The [New talent policy](#) focuses on gathering a wide range of new talent that allows people regardless of gender, religious affiliation, age, ethnicity, or disability. The [Human Resource Policy and Procedure Manual for Uganda](#) policy states that IRC Uganda is an equal opportunity employer, which does not discriminate based on gender, religious affiliation, age, ethnicity, or disability throughout its hiring, training, compensation, and termination. Governance is exempt from diversity requirements. The [IRC Statutes 2006, 2009](#) do not outline the composition of the supervisory board in terms of gender and/or race.

3.1.3 Diversity Management (scored 29%)

Diversity management is a significant area of weakness for IRC Diversity management. Both because of the low score of 29% and because this dimension could strengthen all other

⁶ [Hofhuis, J., Van Der Rijt, P. G., & Vlug, M. \(2016\). Diversity Climate Enhances Work Outcomes Through Trust and Openness in Workgroup Communication. *SpringerPlus*, 5\(1\), 1-14.](#)

⁷ [Buttner, E. H., Lowe, K. B., & Billings-Harris, L. \(2012\). An Empirical Test of Diversity Climate Dimensionality and Relative Effects on Employee of Color Outcomes. *Journal of Business Ethics*, 110\(3\), 247-258.](#); [Hofhuis, J., van Der Zee, K. I., & Otten, S. \(2012\). Social Identity Patterns in Culturally Diverse Organisations: The Role of Diversity Climate I. *Journal of Applied Social Psychology*, 42\(4\), 964-989.](#)

dimensions as it is the one that is most focused on JEDI infrastructure, which was identified as a key JEDI improvement area for IRC.

The 29% diversity management rating works against the way IRC does business. Diversity management could be addressed using the systems approach with which IRC does its programming. Basic issues like the use of JEDI insensitive language like “chairman” and referring only to the masculine gender were found when reviewing policy under the diversity management dimension. For example, the [Board of Directors By-Laws](#) (2007) refers to “he/a man” as the director of the management team, ignoring the possibility that other genders could occupy that role.

According to best practice, some of the ways that IRC could strengthen diversity management would include:

- Commitment from top management in the form of incentives, metrics and targets for diversity recruitment and management. For example, The [Human Resource Policy and Procedure Manual for Uganda](#) states that IRC Uganda is an equal opportunity employer, which does not discriminate based on gender, religious affiliation, age, ethnicity, or disability throughout its hiring, training, compensation, and termination. The IRC Uganda leadership could be recognised, and their best practice applied across IRC.
- A talent focus achieved by purposefully hiring individuals with diverse skills and knowledge can help companies deliver better quality services to a diverse client base. For example, IRC’s [New talent policy](#) gathers a wide range of new talent that allows people, regardless of gender, religious affiliation, age, ethnicity, or disability.
- Creating an environment where organisations create resource groups where employees from similar backgrounds can connect and communicate their concerns safely and create avenues for mentorship, networking, and socialising helps increase minority and/or marginalized employee engagement and performance levels.

More examples are provided in the section of this report that discusses recommendations.

3.1.4 Inclusion (scored 82%)

IRC staff expressed high levels of inclusion (82%) in the JEDI survey, which is consistent with past more general staff surveys.

An inclusive working environment refers to a workplace where all employees are treated with dignity, discrimination is not tolerated, and special needs are considered. Unfortunately, organisations tend to overlook the need to question, identify, understand, and dismantle the racist/colonial mindset and behaviors within their normative space that resulted in the elimination and mistreatment of minorities in the first place. This lack of interrogation of the ‘norm’ can negate inclusion efforts.

One of the most prevalent criticisms of inclusion efforts is an excessive focus on fixing ‘the problem’ of a few ethnic minority employees as ‘them’ instead of creating an ‘all of us’ environment. This phenomenon is also known as “othering”.

Some othering was found when it came to the inclusion policy at IRC. The language used in the [Collective Labour Agreement](#) is gender inclusive. However, it is only applicable to employees at the HQ and those subject to Dutch labor law, meaning it does not apply to country directors and other employees. The [IRC Statutes 2006](#) and [IRC Statues 2009](#) provide that every member of the Board of Directors has the right to cast one vote. The Board of Directors consults with the Works Council and allows the Works Council to be included in the Supervisory Board. The guidelines provide that every member of the Supervisory Board has the right to cast one vote. Yet the membership of the Board is predominately white male, which works against the policy's inclusion intent. Both the organisation and the Supervisory Board are led by middle-aged white males (MAWM).

The [Whistleblowing policy](#) document was found to be more consistently inclusive. It details the ability to report suspicions directly to a Trust Person. A Trust Person is an individual elected by IRC employees in every office. The policy applies to IRC employees, IRC Associates, IRC Supervisory Board members, IRC consultants, volunteers, and beneficiaries of IRC, thus ensuring that all staff members feel included in that their grievances will be addressed. The policy principles outlined in this document apply to IRC employees, IRC Associates, members of IRC Supervisory Board, IRC Consultants, volunteers, and IRC beneficiaries. This document aims at ensuring that all individuals to whom this law applies have the ability to report wrongdoings or suspected wrongdoings without fear:

- An individual is not afraid of disciplinary action or unfair treatment.
- A culture of openness, accountability, and integrity is developed within IRC.

3.1.5 Eliminating Workplace Discrimination (scored 94%)

Several best practices were found across IRC policies seeking to prevent workplace discrimination. Best practices relate to fair recruitment processes and fair treatment during employment and are well documented across IRC policies. Equality and non-discrimination at work are basic labor rights and crucially important in all countries that IRC operates in. According to best practice, furthering equality and reducing workplace discrimination in an organisation requires policies that address the following:

- Fair recruitment practices.
- Fair treatment during employment.

All but the IRC New Talent policy were found to directly address workplace discrimination at IRC – to either prevent it, address it, or support its elimination. The focus across the two categories seemed to be even. On the recruitment side, accountability measures like targets and management performance metrics were found missing. Several IRC policies were found to protect the rights of all to take up issues of workplace discrimination seeking redress from whistleblowing to grievance handling and disciplinary action.

The [Whistleblowing policy](#) eradicates discrimination by ensuring that whistleblowing is done to the Trust Person or, alternatively, the Trust Person of another IRC office or HR at the HQ. The Trust Person will then contact HR and the CEO, or if the disclosure concerns HR or the CEO, the Trust Person will contact the Supervisory Board through the Board's Trust Person.

The [Grievance procedure](#) allows IRC staff to make formal complaints to the management regarding sexual intimidation, harassment, prejudice, aggression, violence, or bullying in the workplace. The IRC [Disciplinary Procedure](#) for handling misconduct requires that staff members appeal through the line manager, and this may act as a deterrent if the grievance is against the same. However, a grievance appeal must pass through the line manager first before going to HR and the CEO, which may limit its use.

The [IRC Code of Conduct](#) policy provides that all staff receive fair representation regarding their capacities and vulnerabilities but does not specify the mechanisms for this. Another possible workplace discrimination risk area is the Career Development Policy which does not outline how discrimination can be addressed, particularly when staff apply for promotion.

Efforts were identified that encouraged the following during the JEDI policy review:

- Increased ability to attract a talented and qualified workforce.
- Increased employee retention.
- Greater satisfaction and motivation of employees.
- Increased innovation and creativity.
- Increased productivity and operational efficiency.
- Decrease (or eliminate) risks from conflicts in the workplace.
- Increased customer satisfaction and better access to new markets.
- Better reputation and public image.
- Reduction of risk from judicial procedures.

A more in-depth JEDI policy review and analysis would pinpoint these aspects and recommend how to replicate them. It was not possible during the limited time and allocated budget to conduct one.

3.1.6 Other Policy Considerations

Diversity data related to organisational JEDI accountability and performance is a major issue that was not covered by the five dimensions used to review policy, but it is deemed important. This issue was found to be exacerbated by Dutch law, so it would need to be dealt with at a policy level to find a legally compliant way to address the issue. IRC does not collect diversity data. This makes setting diversity targets, tracking progress, and holding the organisation accountable for JEDI through reporting and transparency impossible. Diversity data is essential in monitoring diversion and inclusion, and Dutch law provides for its collection under specific conditions outlined in this sub-section.

The bodies that deal with data privacy under the relevant laws are the Constitution and the General Data Protection Regulation ([GDPR](#)). The Diversity Quota and Targets Act makes recommendations about the exceptions of the data privacy law. The [GDPR](#) allows the processing of personal data on the grounds of the legitimate interests of the controller or third parties. In general, employers should only process the data that is strictly necessary for a predefined purpose. Personal data must be processed to ensure there is appropriate security. This is done by carrying out a risk analysis. The data should not be kept longer than is necessary to achieve the purposes for which it is collected.

GDPR provides that a Data Privacy Impact Assessments (DPIA) is required if the processing is likely to result in a high risk to the rights and freedoms of natural persons.⁸ Assurances must be made that personal data will be processed in a way that ensures appropriate security.⁹ On 27 November 2019, the Data Protection Authority (DPA) published an overview of types of processing activities that require a (DPIA). It included the processing of employee monitoring and profiling.

How Dutch privacy laws restrict the processing of personal data is detailed in Annex F and summarised in this section. In terms of process, a DPIA should first be conducted to establish the need for collecting the information. If the DPIA indicates high risk, either of two actions may be taken. First, mitigating measures must be taken. Second, a consultation is done with the Dutch DPA.¹⁰

In essence, the following provisions could be used to justify legitimate interest as permitted by Dutch law:

- (i) Affirmative Action.
- (ii) Diversity Quota and Targets Acts.

(i) Affirmative Action

Collecting specific information from employees in the context of an affirmative action policy is considered a legitimate interest in the Netherlands. This is derived from a study done by PwC on behalf of the Ministry of Social Affairs and Employment. Absolute care must be taken to limit the use and storage of the data. Once a group has stopped being disadvantaged, changes to the policy would be necessary.

(ii) Diversity Quota and Targets Act (New legislation)

If IRC was a large company (>250 employees) as provided in the Dutch Civil Code, it would allow for reporting on matters of gender. The GDPR allows Member States to make laws limiting certain provisions. The need for these quotas would allow for reporting on gender as a legitimate interest.

However, this could only happen under two conditions: consent or the cultural barometer. The first – if IRC meets the definition of a large company. The second – after the law has come into force.

Consent

⁸ [Boelhouwer, J., & Elshof, M. \(2021\). Dutch Works Councils and Employees' Privacy: Personal Data and Employee Tracking Systems.](#)

⁹ [Boelhouwer, J., & Elshof, M. \(2021\). Dutch Works Councils and Employees' Privacy: Personal Data and Employee Tracking Systems.](#)

¹⁰ [Jongen, H., Bernard, N., & Yildirim, E. \(2021\). The Privacy, Data Protection and Cybersecurity Law Review: Netherlands.](#)

The company could collect personal information after securing consent. Such consent should be freely given, specific, informed, unambiguous and properly separable from an agreement to any other issue. An employee should also be informed of their right to withdraw their consent. According to the European Union, the process must also be transparent. Individuals must be provided with clear information about who is processing the personal data and why. The following should be included as a minimum:¹¹

- (i) Who you are.
- (ii) Why you are processing the personal data.
- (iii) What the legal basis is.
- (iv) Who will receive the data (if applicable).

Consent must be based on affirmative action, so pre-ticked boxes are not acceptable. Consent might not be valid if:¹²

- (i) there is any detriment to the *data subject* for refusing;
- (ii) there is an imbalance of power;
- (iii) consent for multiple purposes is bundled together; or
- (iv) consent is a condition of entering into a contract.

Finally, consent can be withdrawn at any time.

Disclosure of such information to a third party must be on legal grounds in line with the compliance of a legal obligation, such as the [European Directive on The Disclosure of Non-Financial and Diversity Information](#), which allows for reporting non-financial information for large companies.¹³

The Cultural Diversity Barometer.

This tool allows large Dutch companies with more than 250 employees to ascertain the level of their cultural diversity. It provides anonymous and compiled information about the cultural diversity and migration background of employees.¹⁴ Participation is offered at a price. It is done by sending an email to barometer.culturele.diversiteit@cbs.nl. A practical example is the Utrecht University in the Netherlands, which submitted information to the CBS Barometer. They had to do a risk analysis to ensure that information could be shared securely.¹⁵

3.1.7 Considerations for Updating the IRC's Code of Conduct

The IRC Code of Conduct was reviewed from a JEDI policy perspective as part of the review assignment requirements. The IRC Code of Conduct applies to all staff. "Staff" refers to all people employed by IRC, including supervisory board members, associates, consultants, interns, young professionals, and volunteers. Violations of the code of conduct can be subject to disciplinary

¹¹ [Union, E. \(2021\). Data protection under GDPR.](#)

¹² [Linklaters. \(2020\). Data Protected - Netherlands.](#)

¹³ [Social and Economic Council of the Netherlands. \(2019\). Diversity in the Boardroom: Time to Accelerate](#)

¹⁴ [Business.gov.nl. \(n.d\). Know your company's cultural diversity.](#)

¹⁵ [Agterberg, R. \(2021\). Questions Arise about UU's Participation in the Cultural Diversity Barometer](#)

measures. The fact that the Code of Conduct is enforced could support diversity management and climate.

These two extracts from the Code of Conduct (see Annex G) address the principles of diversity and protection from workplace discrimination. Inclusion is also somewhat addressed in the Code of Conduct:

- *Consider the sensitivities of people's customs, habits and religious beliefs and avoid any behavior that is not appropriate in a particular cultural context.*
- *Ensure that individuals and their circumstances are fairly represented in terms of their capacities and vulnerabilities. Every effort should be made to explain how data, including photos and stories, will be used. To obtain permission from the individuals for the use of the material does not produce process, distribute, or use illegal, discriminatory, pornographic, or racist material in IRC offices or on IRC equipment, including reading or surfing illegal, discriminatory pornographic, or racist websites or message boards or sending illegal, discriminatory, pornographic, or racist emails.*

Based on the five-dimensional policy review, one would have hoped that diversity climate and management (rated 47% and 29%, respectively); could be addressed in the Code of Conduct. This was found to be an impractical approach as JEDI infrastructure could be better addressed under organisational development and performance management using JEDI metrics and targets. There are a few opportunities to strengthen the Code of Conduct from a JEDI perspective related to the other three dimensions elaborated as part of the implementation roadmap.

In conclusion, the IRC JEDI policy review shows that while some effort has been made on embedding JEDI particularly related to eliminating workplace discrimination, inclusion, and equal opportunity; there was still room for improvement with respect to diversity management and climate, which could be best achieved by building JEDI infrastructure and systems. Although some policy documents were customized to different countries, biases influenced by compliance with Dutch laws and perspectives remained. A more in-depth policy review could help address this.

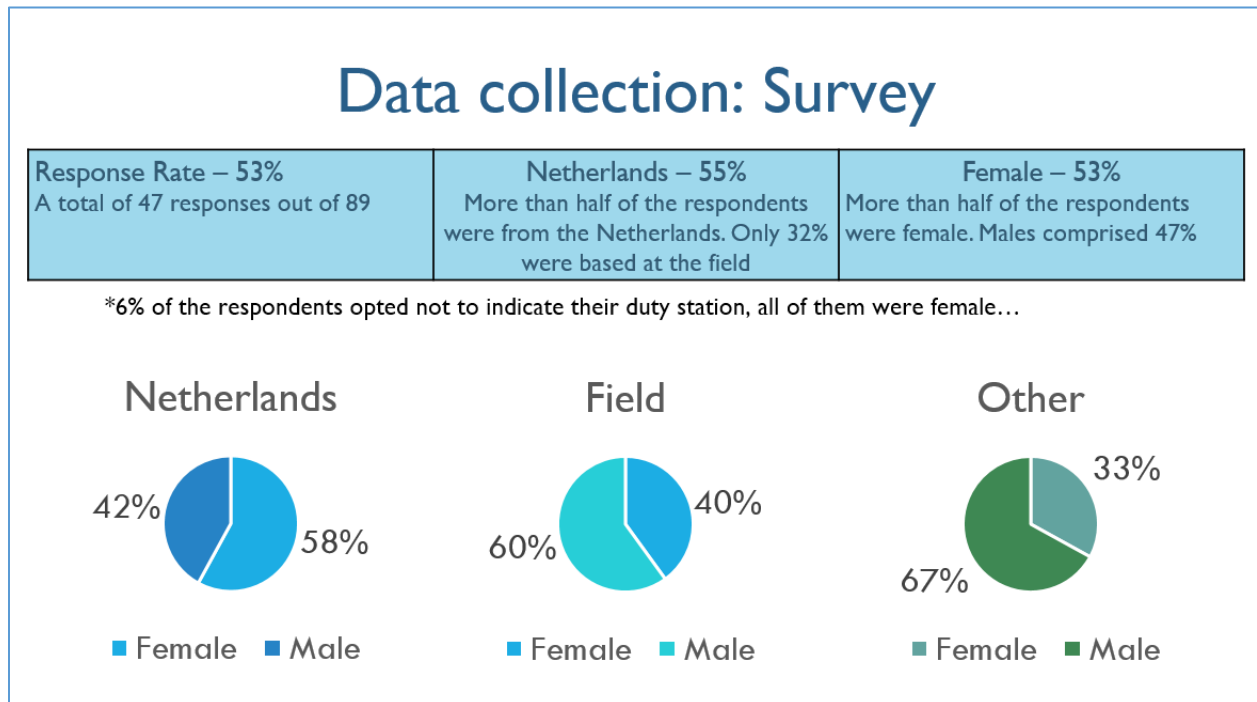
3.2 Analysis of Primary Data

This section discusses quantitative and qualitative survey findings from the primary data collected.

3.2.1 Quantitative Findings

An all-staff survey was conducted that secured a high response rate of 53%. Most respondents were based in the global north and many of them were female. See figure 13.

Figure 13: Survey Data collection



The all-staff survey had 33 statements across five JEDI review dimensions (opportunity, diversity management, diversity climate, inclusion, and workplace discrimination) in the proportions listed below for respondents to indicate levels of agreement against. A few statements were reversed, asking for levels of disagreement with worst practices to elicit a surprise factor to guard against autopilot-type responses.

- Opportunity 8/33 (24%)
- Diversity Management 8/33 (24%)
- Diversity Climate 6/33 (18%)
- Inclusion 5/33 (15%)
- Workplace Discrimination 6/33 (18%)

The responses were analysed, and the results were clustered into three categories, summarised in this section. A synopsis of survey results provides more detail in Annex H:

- Areas of strength (levels of agreement above 75%)
- Areas of potential (levels of agreement between 50-74%)
- Areas of relative weakness (levels below 50%).

Box I shows a diverse, inclusive, highly motivating workplace with weak JEDI infrastructure.

Box 1: Areas of strengths/weaknesses

Top five responses

- At IRC, I do not experience feelings of social isolation because of my racial group – **94%**
- JEDI is relevant to IRC work – **94%**
- IRC inspires me to do my best work every day – **93%**
- At IRC, people of different racial groups get along well with each other – **91%**
- There is an understanding and acceptance of cultural differences among employees of different racial groups within my organization – **86%**

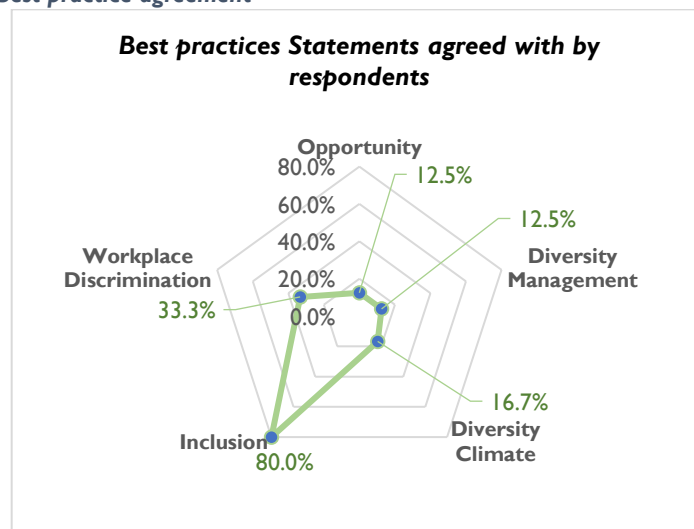
Bottom Five Responses

- IRC has formal procedures for obtaining feedback on diversity management practices – **24%**
- IRC employees are normally trained on issues relevant to JEDI – **17%**
- IRC has an accountability mechanism that ensures that its projects, management, staff and board have JEDI metrics in its performance evaluations – **14%**
- IRC regularly conducts staff evaluations with equity, diversity and inclusion (EDI) lens – **11%**
- IRC normally evaluates the effectiveness of JEDI training provided to employees – **7%**

With respect to the detailed primary data quantitative findings, inclusion emerged as the only area of strength as it had the highest proportion of statements agreed with (80%). Eliminating workplace discrimination 33%; diversity climate (16.7%) and diversity management (12.5%) were categorized as areas of relative weakness by staff (see figure 14).

This was somewhat in contrast with the policy review, which showed eliminating discrimination as an additional strength to inclusion, indicating a gap in the translation of policy into practice.

Figure 14: Levels of JEDI best practice agreement



Strengths, potential areas of improvement and weaknesses are now discussed and charted by the three categories/areas introduced; strengths, potential and weaknesses.

Category 1: Strengths (levels of agreement with statements on average above 75%)

This category of statements indicated that IRC staff were highly motivated and appreciated IRC's cultural diversity and inclusive management style. Inclusion statements dominated (44%) this category and emerged as a key JEDI strength.

Table 1: JEDI Strengths

Dimension	Statement	Agreement level
Opportunity	IRC inspires me to do my best work every day.	93%
Diversity Management	IRC managers give feedback and evaluate employees fairly, regardless of employees' race, gender, sexual orientation, religion, or age.	77%
Diversity Climate	At IRC, people of different racial groups get along well with each other.	91%
Inclusion	At IRC, I do not experience feelings of social isolation because of my racial group.	94%
	There is an understanding and acceptance of cultural differences among employees of different racial groups within my organisation.	86%
	I feel that I have not been treated less favorably here because of my race, gender, sexual orientation, religion, or age.	79%
	At IRC, I have never heard of the usage of a language that reinforces racism and discrimination.	78%
Workplace Discrimination	JEDI is relevant to IRC work.	94%
	At IRC, national and international staff are treated with the same level of respect.	77%

Category 2: Potential (levels of agreement with statements, on average, ranged between 50-75%)

Diversity management and inclusion featured amongst the statement level of agreements that represented potential. Diversity in recruitment, career development and management, and JEDI safeguards and proactive engagement emerged as some of the aspects that IRC could improve.

Table 2: Potential areas for JEDI

Dimension	Statement	Agreement level
Opportunity	IRC motivates me to go above and beyond what is normally required of my role when necessary.	75%
Diversity Management	Managers promote cooperation between people of colour (non-white) and other racial groups.	73%

Dimension	Statement	Agreement level
	I consider IRC diversity management to be mere tokenism that only creates the impression of social inclusion and diversity.	71% (Reverse scored)
	Only white people have decision-making power at IRC.	66% (Reverse scored)
	IRC managers have a track record of hiring and promoting employees objectively, regardless of their race, gender, sexual orientation, religion, or age.	60%
	The management of IRC puts sufficient emphasis on having a diverse workforce.	51%
Diversity Climate	The IRC environment is safe and proactive in addressing violence, abuse and sexual harassment complaints.	64%
	At IRC, it is unlikely that some staff will receive better treatment because of their racial group.	52%
Inclusion	People of colour (non-white) have sufficient say in decisions that affect the functioning of IRC.	57%
Workplace Discrimination	At work, minority employees receive equal opportunities with others.	62%
	At IRC, promotions and rewards are not influenced by racial group membership.	61%
	IRC is proactive in the creation and implementation of safeguarding policies.	60%

Weaknesses (levels of agreement with statements on average were below 50%)

The statements in this category indicated that IRC was under-invested in JEDI with respect to capacity building, systems, accountability, and implementation mechanisms. Best practice JEDI statements from the opportunity dimension attracted a low level of agreement – 50% of statements in this category.

Table 3: JEDI Weaknesses

Dimension	Statement	Agreement level
Opportunity	IRC has a parental leave policy that allows parents, regardless of their gender, to decide how to share roles at home.	45%
	At IRC, role models from minority racial backgrounds are sufficiently nurtured and coached to progress their careers.	40%
	IRC spends sufficient money and time on JEDI awareness and related training.	38%
	IRC communicates equity, diversity and inclusion training objectives to employees.	33%

Dimension	Statement	Agreement level
	IRC employees are normally trained on issues relevant to JEDI.	17%
	IRC regularly conducts staff evaluations with an equity, diversity, and inclusion (EDI) lens.	11%
Diversity Management	Gender diversity is normally included when undertaking equity, diversity and inclusion evaluations within IRC.	37%
	IRC has formal procedures for obtaining feedback on diversity management practices.	24%
Diversity Climate	IRC's most senior management has a sufficiently diverse representation of races.	38%
	IRC has an accountability mechanism that ensures that its projects, management, staff and board have JEDI metrics in its performance evaluations.	14%
	IRC normally evaluates the effectiveness of JEDI training provided to employees.	7%
Workplace Discrimination	It's just as hard for whites to get ahead at IRC as it is for people of colour (non-white).	30%

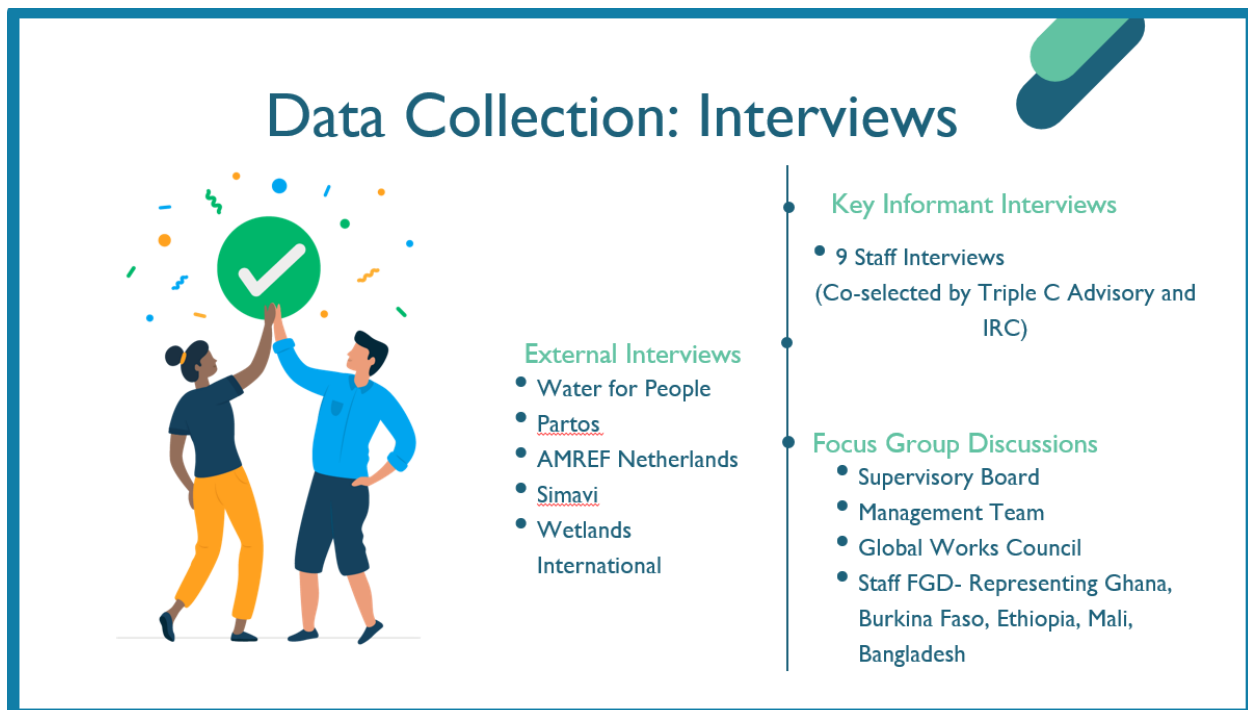
IRC staff who responded to the survey seemed to indicate that the organisation had a diverse and inclusive culture but an inadequate system to harness, grow, safeguard and sustain it. The quantitative primary data findings reinforced the systemic normalized nature of racism. Racial discrimination was attributed to aspects outside organisational control.

3.2.2 Qualitative Findings

Qualitative primary data was solicited through interviews and focus group discussions. An effort was made to cover all IRC offices when targeting respondents. Additionally, five interviews with peer organizations were conducted for learning and comparison. Progressive efforts by Water for People stood out in terms of best practice (see Figure 15). Water for People had a JEDI policy and was taking visible measures to safeguard it and enable implementation.

Nine staff interviews were conducted at IRC across all levels of the organisation, and they were augmented by four focus groups. The interviewees were selected in collaboration with the project team.

Figure 15: Qualitative Data Collection

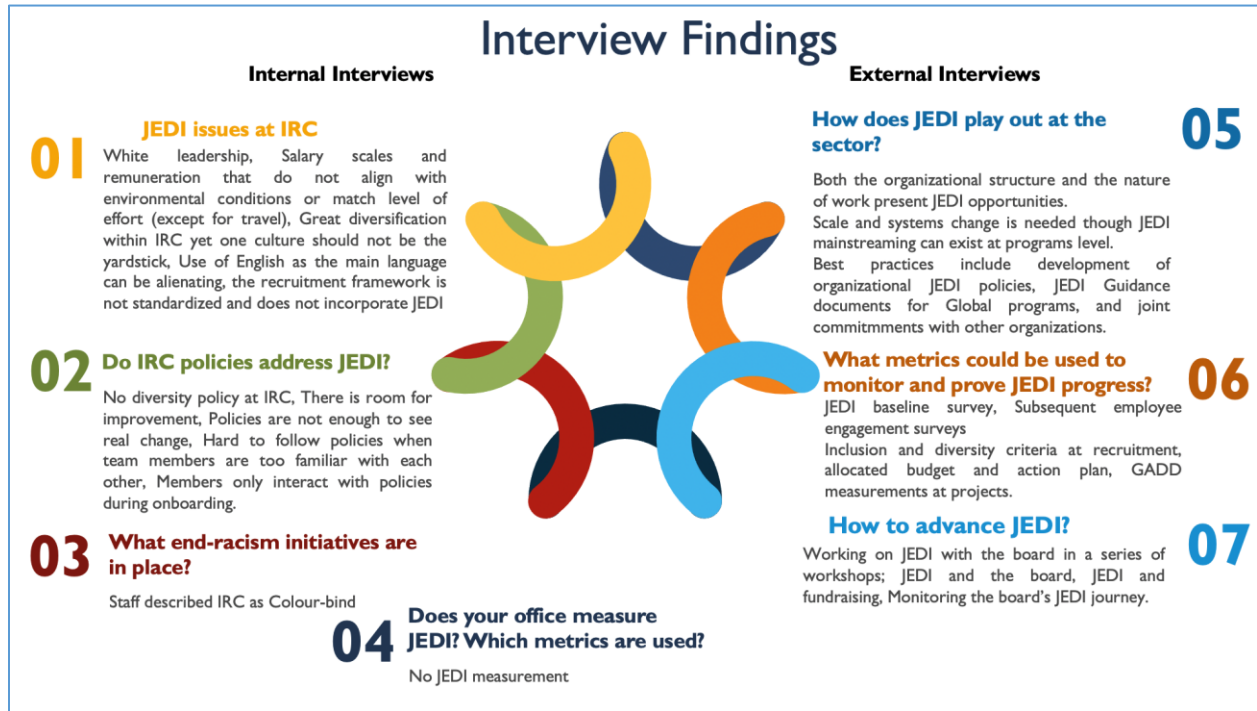


Analysis of the key informant interviews was conducted using the Grounded Theory Method. The coding process showed up several JEDI issues cut across different aspects of the organisation, including:

- Limited representation of non-white people in leadership and decision-making.
- A shortfall in policies, particularly recruitment policies, in ways that inadvertently introduce bias in compensation and recruitment practices.
- JEDI knowledge gaps among the staff.
- The existence of loopholes in information-sharing across the organisation that had JEDI impact.

The qualitative findings from the interviews highlighted key JEDI issues at IRC, some of which had surfaced during the staff survey. The interviews and focus group discussions reinforced the organic nature in which the JEDI agenda has advanced within the organisation. They also surfaced the JEDI impact of the well-intended changes that the organisation has made over time; for instance, the additional responsibility carried by Country Directors required adequate remuneration that created a local compensation gap between management and staff. Another example is that people of the same colour would experience discrimination based on ethnicity or caste, which was ill addressed by policy. Figure 16 provides an overview of some of the interview findings.

Figure 16: Interview Findings



The coded qualitative findings are presented by category in the tables that follow. The grounded theory analysis method was pursued in three steps.

- **Open coding** – the data is read, revealing all the themes (categories) that emerge. The themes are then compared and contrasted with each other.
- **Axial coding** – the themes are compared by identifying the indicators that relate closely.
- **Selective coding** - all the themes are combined to obtain units of meaning.

Step I: Open Coding

I. Justice, Equity, Diversity and Inclusion issues within IRC

Table 4: JEDI Issues within IRC

Open Code	Properties	Examples of participant words
Leadership representation	White leadership; The Chief of staff has always been a woman.	White CEO, CFO and Chair of the Board. White men are in leadership.
Salary disparities	Salary inequality; Salary scales; Remuneration.	Country staff have local salaries; however, country directors are on secretariat payroll.

Open Code	Properties	Examples of participant words
		<p>Level of effort does not match pay.</p> <p>The Hague and Burkina Faso have implemented the salary scale, even though not equal.</p> <p>How to make the packages more equitable.</p>
New talent policy	Intern policy	<p>Graduate interns only get a stipend even though they do regular work. Best practice is the UNDP Intern Policy which only accepts interns up to a year after graduation.</p>
Decision making	Racial decision making; White dominance in decision making	<p>Africa and Asia – people are often left out of the designing of policies, systems thinking;</p> <p>Informal institutions that exist favour native English speakers and contribute to decision-making.</p>
Internal transparency	Information sharing	<p>There used to be sharing of minutes which has stopped completely.</p> <p>There's a level of favouritism to people who won't push back. Sometimes you don't get information on international conferences.</p> <p>Staff selection for duties or committees should be based on ability to deliver and skillset, not favouritism.</p>
Ethnic representation	Ethnic representation at the secretariat	<p>The population of IRC Secretariat has been predominantly white.</p> <p>Trouble comes when one culture is offered a yardstick.</p>

Open Code	Properties	Examples of participant words
Teamwork	Team spirit	Employees appreciate each other's role and input in the organization.
Diversity awareness	Experience with diversity	People in support have little experience with diversity.
Capacity development	Learning requests	Often higher learning requests get stuck at country office because of bureaucracy.
Recruitment policies	Recruitment Recruitment framework	Is there such a thing as positive discrimination? Encourage women to apply. There is no known recruitment framework.
Language disparities	Language usage	What are good writing standards for which audiences. i.e., Ghanaian English vs British English. The Global North audience should not be the default audience. English is predominant, other languages (French) are not appropriately accommodated. Occasionally, one would receive emails that are quite condescending.
Policy implementation	Use of policies	Is it executive behaviour to use policies or not? Hard to follow policies when people are too familiar with each other.
Departmental gaps	Gap between departments	The gap between management level and support level is too wide.
Diversity within IRC	Existence of Diversity	There is regional and ethnic representation within countries.
Fundraising	Need to enhance focus on fundraising	Lack of trust of people of colour with respect to speaking to donors directly.
Limited representation of developing countries	Representation of developing countries	There is an issue of poor representation of

Open Code	Properties	Examples of participant words
		developing countries in the leadership team and on the board.

2. Do you think IRC policies adequately address JEDI?

Table 5: IRC Policies and JEDI

Open Code	Properties	Examples of participant words
Existence of local policies	Existence of local policies Initiatives to develop policies at local context.	There are global policies, which have annexes that respond to local context. HR dept wants to make the policies less directive from secretariat to countries, but encounter issues with not receiving feedback from colleagues.
Clarity on Policies	Need for clarity on policies	Presentation of policies should be made clearer.
More work needed on policies	Need for improvements	Documents should be improved, especially to support the decentralization move. There is a clear intention to improve but often no clear plan in place.

3. Initiatives in place to end racism

Table 6: End Racism Initiatives

Open Code	Properties	Examples of participant words
None	None	None
Improved information management	Increased information flow	Adoption of Microsoft share point platform in 2018 has improved information management.
Increased attention towards JEDI	Focus on JEDI initiatives	The current JEDI study and the global webinar on decolonization.

Open Code	Properties	Examples of participant words
Having equal compensation	Provision of equal compensations	Have equal packages and DSAs for all staff.
No racism	No racism	There is no racism in IRC, as far as I know.

4. Does your office measure JEDI? If yes, which metric does your office use in measuring this?

Table 7: JEDI Metrics

Open Code	Properties	Examples of participant words
No diversity policy	Existence of policy on diversity	No Diversity policy at IRC.
Representation on gender, ethnicity and race	Gender, ethnicity and racial representation need to be included.	Measuring and reporting staff representation on gender, ethnicity, race.
JEDI training	Need to include training on JEDI	Budget and organize JEDI trainings and refreshers.
JEDI Focal Person	Include a JEDI focal person	Have a focal person to keep an eye on JEDI issues-representation, inclusion.
No measurement for JEDI	Existence of JEDI measurement	No, we don't measure JEDI and we don't have any metrics as far as I know.

5. What else would you like to say about JEDI

Table 8: Further information on JEDI

Open Code	Properties	Examples of participant words
Need for skill development	Skill development	Skills Development is needed, training budget is not spent up.
Introduction of exchange programmes	Need for exchange programmes	Secretariat staff have found opportunities to work in the countries, but fewer country staff have the opportunity to work in The Hague. Exchange programs are a great way of appreciating each other's culture.

Open Code	Properties	Examples of participant words
More fundraising	Need to do more fundraising	There is limited autonomy in fundraising. Fundraising function remains predominantly at Secretariat level because there are more donors in the North currently.
Inclusion of Skilled People in Committees	Need for more skilled people in the committee	Inclusion of Skilled People in Committees.
Limited personnel	Few staff	Some country offices have encountered a challenge in setting up due to fewer staff.
Equal treatment	Fair treatment	IRC has a culture that promotes equal treatment. For one to get ahead in things like promotions, he/she needs to be proactive. For one to be included in certain programs or information, they've got to belong to a certain group.
Great awareness on staff representation	Staff representation	There is greater awareness of the importance of staff representation within IRC.
Segregation of the management team members from the works council	Management team as the works council	Management team members should not be a part of Works council, but should be given a chance to report to the Works Council.
Amendment to the governance structure	Need for changes in the governance structure; Empowerment of representatives	To fully translate the commitment of the leadership to JEDI, the governance structure needs to be reformed.
More Awareness on JEDI	Need to raise more awareness on JEDI	There is a need to raise more awareness on JEDI within IRC for staff to be able to recognize unconscious bias on JEDI. Behavioral promotion of JEDI among IRC staff. JEDI Discussion at IRC is at its infancy.

Open Code	Properties	Examples of participant words
Need to embrace diversity	Gender diversity;	There is a need to embrace more gender diversity within IRC than racial diversity – particularly at management level.
Equality in pay	Equal payment	There needs to be equal pay for equal work of the same level.

Step II and III: Axial and Selective Coding

Table 9: Axial and Selective coding

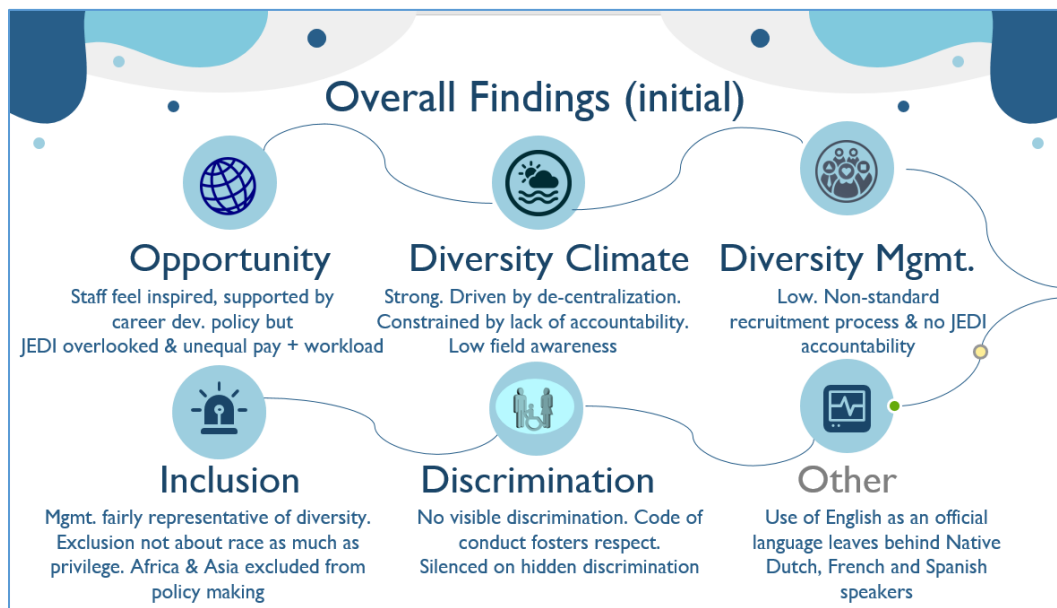
Open Codes	Axial Codes	Selective Code
Leadership representation; Decision making; Departmental gaps; Limited representation of developing countries; JEDI Focal Person; Inclusion of Skilled People in Committees; Segregation of the management team members from the works council;	Leadership and decision making	<p>JEDI issues cut across a number of aspects within the organization. These include:</p> <ul style="list-style-type: none"> a) Perceived bias towards white culture and race in decision making, mainly at the secretariat. b) A shortfall in policies, particularly recruitment policies, which introduce bias in compensation and recruitment practices. c) JEDI knowledge gaps among the staff. d) Existence of loopholes in information sharing. e) Staff compensation is perceived as unfair for locals and interns. f) Lack of trust in non-white races perceived.
New talent policy; Recruitment policies; Policy implementation; Existence of local policies; Clarity on Policies; More work needed on policies; No diversity policy; Amendment to the governance structure	Policies	
Teamwork; Diversity awareness; Capacity development; JEDI trainings; Need for skill development; Introduction of exchange programmes; Limited personnel; Need for more awareness on JEDI	Capacity development	
Internal transparency; Increased attention towards JEDI; Improved information management; No measurement for JEDI	Accountability for JEDI	
Salary disparities; Having equal compensation;	Salaries and remuneration	
Language disparities	Language	
Ethnic representation; Diversity within IRC; No initiatives to end racism; No racism; Representation on gender, ethnicity and race; Equal treatment; Great awareness on staff representation; Need to embrace diversity	Diversity within IRC	
Fundraising; More fundraising;	Resource Mobilisation	

The external interviews conducted were instrumental in gleaning INGO best practices, and the findings are discussed as part of recommendations.

3.3 SWOT Analysis

The overall finding from the analysis of primary data collected through a survey, informant interviews, and focus group discussions, was that even though IRC has an inclusive culture and diverse team, JEDI has not been prioritized, and equity is not given attention. See infographic in Figure 17.

Figure 17: Overall Findings



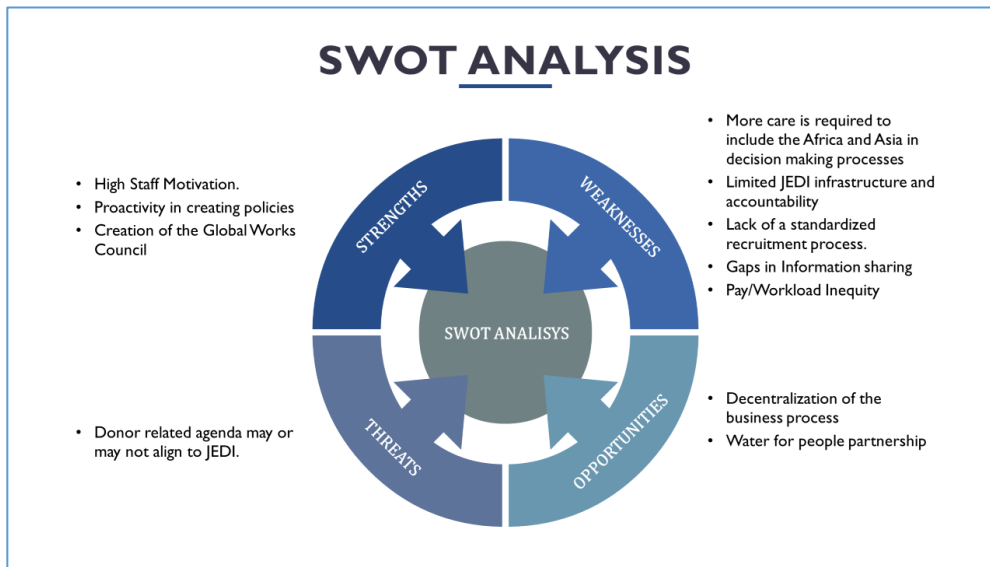
A Strengths, Weaknesses, Opportunities, and Threats (SWOT) analysis was also done that pulled together the findings from all the analyses. See Figure 18.

The SWOT analysis reinforced the key finding that IRC has enormous potential to strengthen JEDI if colour blinders are removed and racism is acknowledged.

Strengths

IRC’s key strengths lie in systems approaches, the value of people, and the ability to develop policies. In addition to creating a culture of inclusivity, the organisation has succeeded in increasing the representation of diversity in decision-making. The organisation’s senior leadership is quite diverse, both at Supervisory Board level and Management team level, bearing a representation of both males and females; as well as whites and people of colour. Further diversity has been introduced through the Global Works Council, which has very recently come to force.

Figure 18: SWOT Analysis



Opportunities

Decentralization is seen as having been the key JEDI driver so far; it can also serve as the biggest threat if the JEDI blind approach continues. IRC attained greater racial and gender diversity within the senior leadership with the introduction of IRC offices and a decision to include all Country Management in the Management Team (MT). IRC is pursuing a global network of independent country and regional entities under a single brand and customised governance structure supported by effective and efficient support functions under its [Destination 2030](#), offering more JEDI implementation opportunities.

Additionally, IRC is implementing a strategic partnership with Water for People (WFP) to expand the geographic scope of impact to reach an even more significant scale. Based on IRC's track record of inclusion of diverse voices at management level in the past, it is expected that this would be a welcome move. Both of these are exciting prospects for IRC's JEDI journey.

Weaknesses

Whereas the organisation has a fair representation of diversity, a section of the population self-identified as marginalized, highlighting a need for focus on inclusion. Staff from Africa and Asia also need to be more engaged in key decision-making processes. Other critical areas of improvement across the five dimensions presented already include the need for staff training on JEDI and the enforcement of a JEDI accountability mechanism.

Threats

Fundraising has been identified as a threat for two reasons. Firstly, some of the recommendations for JEDI have costs attached to them directly tying their implementation to the availability of resources. Secondly, many non-profits receive funding from well-resourced foundations based in the Global North. At IRC, this factor has determined the main language

of use. It follows then that the sustainability of JEDI at the organisation has to be very intricately linked to the corporate missions.

4.0 Conclusion

This performance review established systemic JEDI issues despite noble intentions. For instance, decentralization was found to be both a driver of JEDI progress and regression in the absence of system-based anti-racism intentionality.

Establishing country offices emerged as a key driver of JEDI across IRC by bringing more diversity to management and diversifying the organisational profile. This drive should be promoted under Destination 2030, the Strategic partnership with Water for People aimed at expanding the geographic scope and impact of IRC. The decentralisation of the business model by 2023 is also a potential JEDI driver wherein IRC will have a network organisation, with a Netherlands global secretariat serving more independent and autonomous offices. The different ways country offices applied policy were both a lost opportunity and a deterrent to consistent JEDI practice.

Although the multi-method methodology ([see link to slides](#)) used had the limitations already discussed, developing a five-dimension review process will make future reviews possible for assessing progress and benchmarking performance against comparator organisations.

The IRC JEDI review findings were consistent across policy and practice as gleaned from primary data findings. With respect to policy, the review indicated that IRC JEDI infrastructure in the forms of systems, structures, processes, practices, training, and resources was inadequate. The IRC JEDI policy review shows that while some effort has been made to embed JEDI, particularly related to eliminating workplace discrimination, inclusion, and equal opportunity, there was still room for improvement with respect to diversity management and climate, which could be best achieved by building JEDI infrastructure and systems. Although some of the policy documents were customized to different countries, biases influenced by compliance to Dutch laws and perspectives remained, which a more in-depth policy review could help address.

A major issue that was not covered by the five dimensions used to review policy but deemed important related to organisational JEDI accountability and performance. This issue was found to be exacerbated by Dutch law; it would need to be dealt with at a policy level to find a legally compliant way to address it. IRC does not collect diversity data; this makes setting diversity targets, tracking progress, and holding the organisation accountable for JEDI through reporting and transparency impossible.

IRC's JEDI practice was derived from primary data findings, both quantitative and qualitative. The quantitative primary data findings reinforced the systemic normalized nature of racism. Racial discrimination was mostly attributed to aspects outside organisational control.

From the primary quantitative data collected, IRC staff seemed highly motivated and appreciative of IRC's cultural diversity and inclusive management style. Eliminating workplace discrimination (33%), diversity climate (16.7%), and diversity management (12.5%) were categorized as areas of relative weakness.

Diversity in recruitment, career development, management, JEDI safeguards, and proactive engagement emerged as some of the aspects that IRC could improve upon. IRC was seen as weakest in JEDI capacity building, systems, accountability, and implementation mechanisms by staff compared to the other JEDI aspects reviewed. IRC staff who responded to the survey seemed to indicate that the organisation had a diverse and inclusive culture but an inadequate system to harness, grow, safeguard and/or sustain it.

The qualitative findings from the interviews highlighted key JEDI issues at IRC, some of which had surfaced during the staff survey. The interviews and focus group discussions reinforced the organic nature in which the JEDI agenda has advanced within the organisation. They also surfaced the JEDI impact of the well-intended changes that the organisation has made over time; for instance, the additional responsibility carried by Country Directors required adequate remuneration that created a local compensation gap between management and staff. Another example is that people of the same colour would experience discrimination based on ethnicity or caste, which was ill addressed by policy.

The SWOT analysis reinforced the key finding that IRC has enormous potential to strengthen JEDI if colour blinders are removed and the existence of racism is acknowledged. Though this performance review focused on race as the discordant as per the scope of work, it is recommended that, as a follow-up, a deeper intersectional approach be pursued that considers sources of inequality or exclusion other than race; like age, language, gender, ethnicity and/or caste. It is both urgent and important that IRC invest in building the JEDI infrastructure that will embed an intersectional approach to JEDI in organisational policies, processes, people relations, and growth plans in ways that manage risks and optimize performance.

5.0 Recommendations

This review report recommends three key organisational actions based on the IRC JEDI performance review presented in section 3:

1. **Establish a JEDI system:** This refers to the organisational hardware and software improvements required to translate JEDI policy into practice.
2. **Mainstream and safeguard JEDI across the organisation:** This refers to the reinforcement and standardisation of policies to embed JEDI and the enactment of minimum operating procedures across the organisation that ensure consistent implementation.
3. **Establish JEDI governance and accountability:** This refers to Board and leadership JEDI role modelling and the establishment of JEDI performance metrics, tracking, and rewards.

See figure below.

Recommendations

- 01 **Establish a JEDI System:** This refers to the hardware and software working together as parts of an interconnecting network including a JEDI policy statement, creation of JEDI policies, implementation mechanisms, capacity building, appointing JEDI focal points.
- 02 **Safeguard JEDI across the organisation:** This includes the reinforcement and standardization of policies and enactment of minimum operating procedures for JEDI across the organisation to remove unconscious bias.
- 03 **Establish JEDI Governance & Accountability:** This could incorporate measures to enable the organization collect data, sanctions targeting JEDI compliance, regular JEDI reviews, JEDI metrics etc.

A six-point road map (see Figure 19) is offered in this section to guide the implementation of any of the recommendations that get adopted. The six-point road map covers all functions of the organisation – from purpose to people to practice – and considers IRC’s strategic priorities and resource constraints.

Figure 19: The JEDI Roadmap



The six-part road map may be implemented sequentially or pursued in parallel depending on resourcing and readiness. Implementing each of the six steps is discussed in turn: Positioning, Policies, Prevention, People, Performance and Practice. It is expected that IRC will use the six steps to develop annual JEDI action plans.

5.1. Positioning

The board could establish a JEDI positioning statement to set a JEDI-focused policy climate. The JEDI policy statement can be used to reference policy formulation and review. It can become the JEDI north star of an organisation with regard to policy, practice, and accountability. Much like a mission and values statement, the JEDI statement is, ideally, more than just a marketing exercise. It should guide hiring, employee benefits, customer and community service, and workplace culture. See the example of a JEDI policy statement from ASCE in the box below.

Box 2 – ASCE JEDI Policy Statement¹⁶

The American Society of Civil Engineers (ASCE) fosters a fully inclusive culture that celebrates individual uniqueness, engenders a sense of belonging, and promotes equitable opportunity for all people to participate as members and stakeholders of the civil engineering community regardless of identity. ASCE and its members are committed to inclusive engineering problem solving that recognizes, values, and addresses the unique needs of diverse demographic, social, economic cultural groups when considering, balancing, and mitigating societal, environmental, and economic impacts of our work. This includes a commitment to:

- Promoting accountability and the use of best practices for justice, equity, diversity, and inclusion (JEDI) in leadership, engagement, communications, and partnerships.
- Eradicating discrimination and harassment in all its forms.
- Building mutually beneficial partnerships with engineering and non-engineering organisations to bolster the collective impact of our efforts.
- Advancing a research agenda centered on equitable and inclusive engineering education, research, and practice.
- Fulfilling our roles as leaders, major contributors, or supporters toward the attainment of each of the UN Sustainable Development Goals.

JEDI positioning statement should, at a minimum, include:

- The company's mission.
- A commitment to diversity.
- Mention of specific underrepresented groups.
- Positive and inclusive language.
- Unique information or benefits for diverse groups.

The JEDI positioning statement could underpin the JEDI definitions recommended under the 'People' step. An additional recommended positioning action is a public commitment to anti-racism as part of a peer group. This provides both visibility and peer pressure. The example of AVECO was already mentioned in the report. Another example is leaders representing U.S.-based organizations working in international development and humanitarian assistance who have [pledged to build racial and ethnic equity \(REE\)](#). The pledge commits to addressing REE

¹⁶ [American Society of Civil Engineers. \(2021\). Policy Statement 417 - Justice, Equity, Diversity, and Inclusion.](#)

comprehensively within the organizations' policies, systems, and culture; and instil REE in international development. IRC could work with Partos to develop something similar or join the Water for People (strategic partner), which has committed to the pledge.

5.2 Policies

Best practice involves embedding justice, equity, diversity, and inclusion (JEDI) principles and practices into the fabric of an organisation through policies and related procedures that help change a colonial mindset, culture, and operations, which embed racism.

Senior managers (including board members) formulate IRC's policies and best practice in JEDI policy, starting with engaging leadership.¹⁷ A well-formulated policy can serve as both a launchpad and risk management tool that mitigates or even prevents the future occurrence of racism or other forms of discrimination.

Best practice organisations offer policies that help minority employees continue their careers without experiencing career interruptions caused by racial exclusion and the burden of racial discrimination, which is couched in daily microaggressions. An example of this burden is found in masking.

Research shows that people of colour are well-aware of discriminatory tendencies in organisational settings and report efforts to counteract them by masking versus expressing feelings of exclusion or experiencing it. A study in the USA in 2016 by Sonia Kang and colleagues found that 31% of the Black professionals and 40% of the Asian professionals they interviewed admitted to "Whitening" their résumés by adopting a less "ethnic" name or omitting extracurricular experiences (for instance, a particular college club membership) that might reveal their racial identities.¹⁸ This is just one example of daily efforts to minimize the negative racial impact on careers and the sense of belonging that falls on individuals of colour.

The burden of discrimination holds true for other sources of marginalization like gender. For example, when compared to their male counterparts, female employees tend to experience more challenges balancing work and family lives, partly due to social norms about their family duties. Flexible work policies help manage and shift that burden of care, so it is shared.

Policy provisions on maternity leave, flexible schedules, occasional telecommuting, regular telecommuting, part-time work, compressed workweeks, and job shares can indirectly support inclusion.

In best practices organisations, LGBT+ inclusive policies are adopted, increasing inclusivity and reducing discrimination at work. Examples of LGBT+-inclusive policies are those that would provide for:

- Sexual orientation, gender identity, and/or gender expression of any kind.
- Company-provided domestic partner (not just spouse) health insurance.

¹⁷ [J.E.D.I Collaborative. \(2020\). The How of J.E.D.I.](#)

¹⁸ [Livingston, R. \(2020\). How to Promote Racial Equity in the Workplace. *Harvard Business Review*, 64-73.](#)

- Company supported LGBT+ employee resource groups or a firm-wide diversity council that addresses LGBT+ issues.

Several opportunities were identified during the IRC JEDI performance review for IRC to strengthen its policies in recruitment, talent management, and organisational culture.

- **JEDI Policy.** A policy that defines JEDI, states the business cases, and clarifies respective responsibilities, is considered best practice. Water for People has a coherent JEDI policy and is developing guidelines to support implementation. Water for People has also established an organisational transformation committee to support efforts. IRC could partner with Water for People as part of the Destination 2030 strategy.
- **Recruitment Policies:** IRC can implement measures to ensure there is diversity in the pool of candidates and preferential hiring for groups that are under-represented by building a clear recruitment framework that factors in JEDI best practices. The [Human Resource Management Guidelines for Ethiopia](#), [IRC Associate Policy](#) and [Associate Programme Policy](#) do not outline how to ensure JEDI when recruiting the associates and staff members. To address gaps in the recruitment process regarding JEDI, the organisation can adopt targeted recruitment practices where the Human Resource department can ensure representation of all races, gender, sexual orientation, and abilities.
- **Decentralizing inclusive policies:** Some of the policies like the [Collective Labour Agreement](#) are only applicable to employees at the HQ and those subject to Dutch labour law. The policies can be rolled out to other IRC offices as long as they do not contradict national law.
- The [New talent policy](#) could encourage IRC to acquire talent from diverse backgrounds and introduce the concept of equity to promote equality of opportunity during the interview and onboarding phases.
- **Inclusive language:** IRC policy documents like [IRC Statutes 2006](#) and [IRC Statues 2009](#) can be strengthened and made more inclusive by using language that is gender inclusive and recognising more international languages like French and Spanish. Using gender-inclusive language means speaking and writing in a way that does not discriminate against a particular sex, social gender, or gender identity and does not perpetuate gender stereotypes. There is consistent gender bias in the language used in the policy document. For instance, consistent referral to chairman rather than chairperson and a male member of the Board of Directors in the [Board of Directors By-Laws](#) (2007) and [Supervisory Board By-Laws](#) (2007). Budgeting to translate key policy documents is also recommended.
- **JEDI proof policy.** For example, consulting employees on whether the Code of Conduct should apply to off-duty conduct, and if so, then how. A Code of conduct that attempts to govern what employees do outside of work can be seen as patriarchal. Consulting employees on the formulation or update of the code of conduct and other policies would go a long way to foster dignity, autonomy, and partnership with people of colour on surfacing racism and injustice that is embedded in norms.

- **Make seeking justice safe.** The process of whistleblowing and reporting grievances should guard against reinforcing power in ways that subvert voice and rights. For example, the requirement that reporting be exclusively channeled through line management could be intimidating.

5.3 Prevention

Prevention or safeguarding is important to prevent organisational cultures, values and behaviours that allow perpetrators to hide undetected or get away with racism. Some considerations in this regard include:

The Prevention of Tokenism and Assimilation. Tokenism and Assimilation can get in the way of practicing JEDI-focused recruitment. Recruitment refers to the overall process of sourcing, attracting, screening, shortlisting, and selecting candidates for employment opportunities (permanent or temporary) within an organisation.

Tokenism refers to the act of making only a symbolic effort to do a particular thing, mostly by recruiting a small number of people from under-represented groups to give the appearance of equality within a workforce. Assimilation is the process by which groups and individuals of differing ancestry acquire the basic attitudes, habits, and mode of life of the dominant culture. People of colour are often expected to assimilate western ideals to be accepted/acceptable. Employers pursuing best JEDI practice commit themselves to self-examination, interrogation and discovery, and to dismantling these types of systemic features that result in discriminatory and non-inclusive practices.

Managing the Risk of Racism. Job analysis can be utilized to determine the knowledge, skills, and abilities (KSAs) required for effective performance in a role. Job descriptions should not relay requirements that unfairly restrict against people of colour or locals with less prestigiously (Harvard, Yale, Oxford) obtained academic qualifications when competing with applicants from the global north.

Recruiting managers should conduct a JEDI check on job requirements to ensure that they do not unintentionally introduce barriers. For example, reference to ‘excellent communication skills’ can be mistaken for American or British-style accents by candidates and interviewers alike. Studies show that structured interviews depict significantly less socio-demographic prejudice than unstructured interviews.

Line manager performance needs to be reviewed through a JEDI lens. For instance, it is widely perceived that ethnic minority or black employees have a higher tendency to be “disciplined” or even fired by their employers compared to their white colleagues for similar mistakes. Previous studies have also illustrated that Black and ethnic minority employees have little possibility of getting positive reviews and managerial support with work. Minority employees are more likely to receive meager job performance evaluations, reflecting prejudicial behavior, than evaluations for the dominant group. An overreliance on reference checks can have a halo effect that disadvantages candidates from marginalized communities. Patterns like this will only surface when JEDI-focused reviews are conducted.

Fair Remuneration and Performance Review Policy. Calculations of pay and bonuses should be based on objective criteria to avoid discrimination of any kind. The principle of “equal pay for work of equal value” was established in the ILO Equal Remuneration Convention, 1950 (No. 100). This principle is incorporated into a best practice policy. The criteria used to compare the value of different jobs include Skill¹⁹, Effort²⁰, Responsibility,²¹ and Conditions of work²².

An effective performance management system uses measurable criteria. The application of a JEDI lens to remuneration and performance-related pay increases helps surface disturbing race-based patterns. Additionally, fair treatment of employees during employment should be reflected in practice. Employees' career development in terms of promotions or salary increases should be solely based on their merits or personal abilities rather than colour, caste or creed. An organisation's guidelines regarding performance-related termination of employment should follow the labor laws of the country in which it operates and not discriminate based on gender, race, or sexual orientation, among other grounds.

Pursing JEDI as a Value. JEDI is not a human resource administrative task. It is a way of being. Many organisations make the mistake of relegating JEDI to the human resource department and treating JEDI as an administrative function of counting colours and types of people. JEDI should be a line management responsibility and organisational accountability held by those most senior in the organisation.

HR often experiences a conflict of interest. In JEDI terms, in a situation where an Employee of Colour files a racial discrimination complaint against a superior, Human Resources is likely to make the situation worse or not do anything at all. Harrington et al. (2010) states that Human Resources often experience challenges with promoting social justice as it pertains to upholding policies such as bullying, harassment, and whistleblowing due to organisational pressure to protect managers and the relative powerlessness of Human Resource Management and Human Resource Practitioners (HRPs) relative to line managers in organisations.

Similar findings on the JEDI compromised positions of HR are reported in literature on sexual harassment (e.g., Collinson & Collinson, 1996; Vance, Ensher, Hendricks & Harris, 2004), incivility and mistreatment (Cortina & Magley, 2003; Olsen-Buchanan & Boswell, 2008) and whistleblowing (Rehg, Miceli, Near, & Van Scotter, 2008). Harlos (2001) describes HR responses as the ‘deaf-ear syndrome’, suggesting that it exacerbates the detrimental impact of experiencing discriminatory behaviour at work.

¹⁹ Knowledge and ability accumulated through education and practical experience

²⁰ Physical or mental effort, or physical, mental, or nervous strain connected with the performance of the job

²¹ Responsibility required to perform the work, including the nature, scope and complexity of the duties, the extent to which the employer relies on the employee to perform the work, and accountability of employee to the employer for resources and for the work of other employees

²² Conditions under which the work is to be performed, including factors such as noise, heat, cold, isolation, physical danger, health hazards, and any other conditions produced by the work environment.

5.4 People

The JEDI review found low JEDI awareness, knowledge and skills despite high interest amongst staff and management.

The following actions are recommended:

- (i) An organisation-wide JEDI training that builds awareness and supports the adoption of JEDI enhancing behaviours.
- (ii) **A Senior Management workshop** that defines JEDI in partnership with people of colour in the organisation. This should be done with deep introspection that ‘interrogates norms’.
- (iii) **Injustice sensitisation session** for staff and senior management to build awareness of sophisticated markers of covert and systemic racism and how to confront them. One of the problems with only surveying staff on JEDI is that many Employees of Colour cannot identify and articulate sophisticated ways they are being instrumentalised.
- (iv) **Training on Neo-Kohlbergian Justice-Oriented Principled Thinking.** The neo-Kohlbergian approach describes moral judgment development according to three types of reasoning or schemas: Personal Interest, Maintaining Norms, and Postconventional.

A common complaint in social justice-related training programmes is that learnings are often forgotten. One can achieve lasting anti-racism learning and behaviour change by elevating the cognitive processes among training participants using a programme underpinned by Lawrence Kohlberg’s Theory of Moral Development. The neo-Kohlbergian model revises and extends Lawrence Kohlberg’s model of moral reasoning development to better reflect advances in research and theory.

The combined approach gets at the underlying mental models participants use for decision-making in ways that allow them to flexibly adapt and respond adequately to racism. The lasting change of this type of training can be compared to teaching someone to ride a bicycle so that it is never forgotten.

- (v) **Strengthening the Code of Conduct**

The Code of Conduct could be more specific on what constitutes discrimination. Here are a few clauses that IRC could select from:

- Harassment, intimidation, or discrimination in any form is unacceptable. Harassment includes speech or behaviour that is not welcome or is personally offensive.
- Behaviour that is acceptable to one person may not be acceptable to another, so use discretion to be sure respect is communicated.
- Verbal harassment includes comments, epithets, slurs, threats, and negative stereotyping that are offensive, hostile, disrespectful, or unwelcome.

To foster more inclusion, the Code of Conduct could include aspects like:

- Foster teamwork and employee participation, encouraging the representation of different employee perspectives.
- Seek out insights from employees with different experiences, perspectives, and backgrounds.
- Avoid slang or idioms that might not translate across cultures.
- Support flexible work arrangements for co-workers with different needs, abilities and/or obligations.
- Confront the decisions or behaviours of others that are based on conscious or unconscious biases.
- Be open-minded and listen when given constructive feedback regarding others' perceptions of your conduct²³.

To foster equal opportunity, the Code of Conduct might include mention of:

- Abide by the Equal Opportunity Policy, which aims to ensure equality and diversity for all present and potential employees and not discriminate on the grounds of disability, colour, ethnic origin, gender, sexual orientation, age, religion, political or other opinions.
- Encourage employees to develop skills and progress in their careers and engage in equity-focused initiatives in response to needs analysis.

5.5 Performance

A sound accountability system establishes policies and practices that the organisation is measured against and role models from the top (Supervisory Board and Senior Management). A JEDI accountability system linked to organisational performance, with targets and indicators tracked as part of performance reviews and staff surveys, is highly recommended.

An accountability system for JEDI at IRC could incorporate:

- Measures to enable the organisation to collect diversity data. Though Dutch privacy laws restrict the processing of personal data, this report discusses options by which IRC could prove legitimate interest and be allowed to collect and report on the diversity and inclusion data.
- JEDI Metrics. Metrics could take various forms. Some examples are provided in Table 10.

Table 10: JEDI Metrics

Metric	Definition	Strengths
Representation	Percentage of employees from monitored groups compared with company, labour market, or industry benchmarks.	Identifies underrepresented groups in the organisation, usually as a result of conscious or unconscious prejudices.
Retention	Comparing average tenure for employees from monitored groups to average tenure across the	Identifies groups that may be less satisfied with their

²³ Society for Human Resource Management. (n.d.). Retrieved November 12, 2021, from <https://www.shrm.org/resourcesandtools/tools-and-samples/policies/pages/inclusion-code-of-conduct.aspx>

Metric	Definition	Strengths
	workforce or average tenure of members of the dominant group.	workplace and less committed to the organisation.
Recruitment	Comparing the number of applicants for open positions from monitored groups against the potential pool of applicants from monitored groups or labour market representation.	Identifies barriers to entry for different groups, pipeline issues, and narrow or biased recruitment efforts.
Selection	Tracking appointments of individuals from monitored groups compared with appointments of applicants who are not members of a monitored group.	Identifies bias in assessment and selection.
Promotion	Tracking promotions of individuals from monitored groups compared with promotions of applicants who are not members of a monitored group.	Identifies bias in promotion.
Development	Tracking lateral moves, appointments to acting roles, training and other learning and development participation, and other stretch assignment opportunities by identity group.	Identifying bias in development.
Pay and Benefits	Compare financial and non-financial rewards earned by individuals from monitored groups.	Identifying bias in compensation and reward schemes.
Employee engagement	Compare employee engagement scores for individuals from monitored group versus non-monitored group.	Identifies whether certain groups of employees are experiencing lower levels of satisfaction and engagement than others.

Additional measures that would assist in tracking performance would include:

- Regular JEDI reviews. These could take the different forms of regular staff surveys, employee engagement surveys, employee focus groups, etc. A rerun of the JEDI survey next year with a particular focus on markers of covert and systemic discrimination against ethnic minority employees identified in the injustice sensitisation session is recommended.
- JEDI targets, including the diversity of the Supervisory Board.
- Introduction of Diversity Awards and Champions across the organisation. IRC Ghana already has Equity and Inclusion champions. This can be replicated across all offices.
- An audit of implemented activities related to JEDI and follow-through of policies.
- Annual Returns on Investments assessments on key JEDI activities. This is often achieved by linking an organisation’s diversity and inclusion to performance measures.
- Introduction of sanctions for JEDI non-compliance.

5.6 Practice

Some of the practical implementation mechanisms that would support JEDI uptake and practice could include:

- Guidelines, tool kits, or infographics that guide employee engagement, supplier diversity, etc.
- Regular JEDI reviews to promote evidence-based action as part of staff surveys.

- Expanding the systems-based approach used on programming to JEDI-related organisational change.
- Appointing JEDI focal points across IRC offices to advise managers and support and train colleagues.
- Pursue peer-to-peer learning on JEDI across WASH organisations, perhaps through umbrella organisations like Partos.

The recommendations highlight that it is both urgent and important that IRC invest in building the JEDI infrastructure that will embed an intersectional approach to JEDI in organisational policies, processes, people relations and growth plans in ways that manage risks and optimize organisational performance. JEDI emerged from this performance review as a key business opportunity for IRC's growth and leadership position ambitions.

Annex A I: Staff Survey Instrument

Opportunity

Does IRC:

- Have an approach in ensuring that all races are included?
- Have an approach on how to include people from diverse backgrounds?
- Have a gender balance in the organisation?
- Have an age limit approach during the recruitment process?
- Have an approach/criteria of allocation of duties to different people?
- Have an approach to role allocation in the company?
- Have an approach to ensure equal opportunities for all and promotion processes open to all?

Diversity management

- Does IRC spend sufficient funds and time on training on EDI?
- Does IRC inspire to bring out the best in me at work?
- Does IRC motivate you to go out of your way at times, in order to deliver?
- Does the representation of minority group's leaders show that they are sufficiently nurtured and coached in their respective careers?
- Do IRC employees get trained on issues related to Equity, Diversity and Inclusion?
- Does IRC communicate equity, diversity and inclusion training objectives to its employees?
- Does IRC conduct EDI lens evaluation with the staff?
- Does IRC have a gender balance across the rest of the company?
- Does IRC offer and support parental leave to its employees?
- Does IRC do investments on indigenous knowledge and local researchers?
Is there more reason for IRC to invest on indigenous knowledge and local research?
- Does decision-making power lie with white people at IRC?
- Do managers at IRC give fair feedback and evaluation on employees despite their race, gender, sexual orientation, religion or age?
- Does IRC a formal procedural pattern in order to get feedback on diversity management practices?
- Do IRC managers have a pattern that can be trailed down in history of hiring and employing of race, gender, sexual orientation, religion or age?
- Does IRC management put sufficient emphasis on having a diverse workforce?
- Do managers emphasize on cooperation people of color and other racial group?
- Do I consider diversification of management at IRC to be an act of tokenism meant to create an impression of social inclusivity and diversity?
- Does IRC during evaluation on equity, diversity and inclusion include gender diversity?
- Do you feel your immediate manager is open to equity, diversity and inclusion strategies?

Diversity climate

- Does IRC senior management have sufficient diverse representation of races?
- Do some staff at IRC get better treatment because of their racial group?
- Has IRC made it a norm that they have to evaluate the effectiveness of equity, diversity and inclusion training provided to employees?
- Does IRC have an accountability mechanism that have EDI metrics in its performance evaluation that ensures projects, management, staff and board have access to?
- Do people of different races get along well at IRC?
- Is IRC environment a safe space of addressing violence, abuse and sexual harassment complaints?

Inclusion

- Do people of color have enough say during decision –making processes?
- Does IRCs manifesto act as a guide for the programs and operations being done?
- Do employees at IRC accept and embrace each other’s cultural differences being that they belong to different races?
- Have I experienced isolation at IRC because of my racial group?
- Have I been treated less favorably at IRC because of my race, gender, sexual orientation, religion or age?
- Have I heard the use of a language that reinforces racism and discrimination at IRC?

Workplace Discrimination

- Does IRC work require equity, diversity and inclusion?
- Does IRC implement and create policies that are safeguarding?
- Do minority employees at IRC receive equal opportunities with others?
- Do promotions and rewards get influenced by racial group membership at IRC?
- Do the hurdles to get ahead at IRC same for white people and people of color?
- Does the respect at IRC cut across national and international staff?
- Do you have something to say about IRCs equity, diversity and inclusion?

Tool	Link
Staff Survey (English)	https://drive.google.com/file/d/1inJG6fPIREV03z5aeKoCESrSUv29hd4R/view?usp=sharing
Staff Survey (French)	https://drive.google.com/file/d/1f62HPTVaxp0la8Pta7e9M_X_dRWvADRr/view?usp=sharing

Annex A2: Interview Guides

a) Key Informants of Aspects Survey Results Indicate Require Probing

Introduction

IRC is in the process of carrying out an organisational review of its Equity, Diversity, and Inclusion performance. To achieve this, the organisation had contracted the services of Dr. Khetsiwe Dlamini to assist in the review process. We request that you contribute through a 15-minute interview that probes the aspects surveyed.

Questions

1. What are the justice, equity, diversity and inclusion (JEDI) issues within your Office?
2. Do you think that IRC policies adequately address justice, equity, diversity and inclusion? What changes would you recommend be incorporated in policies?
3. Which initiatives have been put in place in your office to end racism?
4. Does your office measure equity, diversity and inclusion? If yes, which metric does your office use in measuring this?
5. What else would you like to say about equity, diversity and inclusion at IRC?

b) Peer Organisations (Water for People, UNICEF etc.)

Introduction

Same as above.

1. How does justice, equity, diversity, and inclusion (JEDI) play out in the WASH or International Development Sector? What JEDI best practices have you seen in the WASH sector and what methods were used? What are the greatest obstacles?
2. What JEDI metrics could be used to monitor and prove JEDI progress?
3. What else would you like to share on advancing JEDI?

Annex B: Sources of Data Collection Tools

ORGANISATIONAL COMMITMENT QUESTIONNAIRE (MCKAY ET AL, 2007)

1. The company inspires me to do my best work every day.
2. The company motivates me to contribute more than is normally required to complete my work.
3. I would recommend the company as a place to work.
4. I rate the company highly as a place to work.

Scale: Scored on a five-point Likert scale (1 = strongly disagree to 5 = strongly agree). High scores indicate that managers are highly committed to the firm.

PERCEIVED OCCUPATIONAL OPPORTUNITY SCALE (CHUNG & HARMON, 1999)

1. Blacks are discriminated against through hiring practices.*
2. The leaders of this country are trying sincerely to end racial discrimination in the work place.
3. Employers go out of their way to make Black employees feel welcome.
4. Black employees are given respect from White co-workers and supervisors.
5. It's just as hard for Whites to get ahead as it is for Blacks.
6. Racial discrimination in the work place is a problem in the United States.*
7. It's easier for Whites to get ahead than Blacks.*
8. Blacks get respect and support from their supervisors.
9. Personnel decisions are primarily based on employees' training and experience rather than race.
10. Managers promote cooperation between Blacks and other racial/ethnic groups.
11. Black employees have little say in decisions that affect the functioning of their organisation/place of employment.
12. There is an understanding and acceptance of cultural differences among employees of different racial/ethnic groups.
13. Non-black employees go out of their way to make Black employees feel welcome
14. Extensive changes have been made to make services (resources) available to Black employees.
15. Black and White employees have good working relationships.
16. Race determines who gets the most desirable work or assignments.*

Scale: Scores range from 1 (Strongly Disagree) to 5 (Strongly Agree). Higher scores denote perceptions of a more open opportunity structure.

***Denotes reverse-scored items**

**EMPLOYEE PERCEPTION OF DIVERSITY MANAGEMENT PRACTICES SCALE
(OTAYE-EBEDE, 2018)**

1. This organisation communicates diversity training objectives to employees
2. In this organisation, role models from minority ethnic backgrounds are nurtured and coached to be mentors
3. This organisation has formal procedures for obtaining feedback on diversity management practices
4. This organisation spends money and time on diversity awareness and related training
5. This organisation evaluates the effectiveness of diversity training provided to employees
6. Employees of this organisation normally go through training in diversity-related issues
7. This organisation shares diversity management-related issues/memos with employees
8. The management of this organisation puts a lot of emphasis on having a diverse workforce
9. Employees have access to diversity materials used in this organisation

Scale: 5 point Likert-type scale ranging from (1) “Not at all” to (5) “To a very large extent”

**WORKPLACE PREJUDICE/ DISCRIMINATION INVENTORY (JAMES ET AL,
1994)**

1. I have sometimes been unfairly singled out because of my racial/ethnic group.
2. Prejudice exists where I work.
3. Where I work, all people are treated the same, regardless of their racial/ethnic group.
4. At work I feel socially isolated because of my racial/ethnic group.
5. At work minority employees receive fewer opportunities.
6. There is no discrimination on my present job.
7. Where I work members of some racial/ethnic groups are treated better than members of other groups.
8. At work people are intolerant of others from different racial/ethnic backgrounds.
9. Supervisors scrutinize the work of members of my group more than that of members of other racial/ethnic groups.
10. Where I work, people of different racial and ethnic groups get along well with each other.
11. At my present job, some people get better treatment because of their racial/ethnic group.
12. Telling racial or ethnic jokes is not common where I work.
13. There is discrimination where I work.
14. At work I am treated poorly because of my racial/ethnic group.
15. At my present place. of employment, people of other racial/ethnic groups do not tell me some job-related information that they share with members of their own group.
16. Where I work promotions and rewards are not influenced by racial or ethnic group membership.

Scale: Subjects indicated their level of agreement with 'I', each item using a 7-point Likert-type scale ranging from disagree completely (1) to completely agree (7).

THE MOR BARAK INCLUSION-EXCLUSION QUESTIONNAIRE (MOR-BARAK ET AL, 1998)

1. I have influence in decisions taken by my workgroup regarding our tasks.
2. My co-workers openly share work-related information with me.
3. I am typically involved and invited to actively participate in work-related activities of my workgroup.
4. I am able to influence decisions that affect my organisation.
5. I am usually among the last to know about important changes in the organisation.
6. I am usually invited to important meetings in my organisation.
7. My supervisor often asks for my opinions before making important decisions.
8. My supervisor does not share information with me.
9. I am invited to actively participate in review and evaluation meetings with my supervisor.
10. I am often invited to contribute my opinion in meetings with management higher than my immediate supervisor.
11. I frequently receive communication from management higher than my immediate supervisor (i.e. memos, emails).
12. I am often invited to participate in meetings with management higher than my immediate supervisor.
13. I am often asked to contribute in planning social activities and company social events.
14. I am always informed about informal social activities and company social events.
15. I am rarely invited to join my co-workers when they go for lunch or drinks after work.

Scale: 1 – Strong Disagree 2 – Moderately Disagree 3 – Slightly Disagree 4 – Slightly Agree 5 – Moderately Agree 6 – Strongly Agree

Annex C: Method Used to Arrive at Policy Review Dimensions

Step 1: Combined the closely related dimensions we had from the three rubrics ([Equileap Gender scorecard](#), [DEI Meyer Spectrum 2018](#) and [Anti-Racism Rubric](#)), and ended up with only 12 dimensions.

Step 2: Mapped all the statements in [Appendix A, B, C, D, E and F](#) to the dimensions in step 1, matching each statement to the dimension it can best fit.

Step 3: Modified all the statements to fit IRC policy language

Step 4: Statements best suited to assess the status of justice, equity, diversity and inclusion at IRC were then selected.

Step 5: Classified the selected statements into six categories, i.e. opportunity, diversity management, diversity climate, inclusion, gender diversity and inclusion, and workplace discrimination

Note: Questions highlighted in light blue have been selected as the survey questions in every dimension

Dimension	Questions	Category/ Dimension
DEI Vision	1. IRC communicates equity, diversity and inclusion training objectives to employees.	Opportunity
	2. Equity, Diversity and Inclusion is relevant to IRC work.	Workplace Discrimination
	3. IRC's manifesto is actively being used as a guide for the organisation's programs and operations. (<i>IRC manifesto: We want every person in the world to enjoy their human right to safe water, sanitation and hygiene, now and forever</i>)	Inclusion
Commitment	1. IRC inspires me to do my best work every day.	Opportunity
	2. IRC motivates me to go above and beyond what is normally required of my role when necessary.	Opportunity
	3. IRC spends enough money and time on equity, diversity and inclusion awareness and related training.	Opportunity

Note: Questions highlighted in light blue have been selected as the survey questions in every dimension

Dimension	Questions	Category/ Dimension	
Leadership/Decision making	1. People of colour (non-white) have sufficient say in decisions that affect the functioning of IRC.	Inclusion	
	2. IRC managers give feedback and evaluate employees fairly, regardless of employees' race, gender, sexual orientation, religion, or age.	Diversity Management	
	3. IRC most senior management has a sufficiently diverse representation of races.	Diversity Climate	
	4. Senior management at IRC are committed to ending racial discrimination in the work place. 5. Personnel decisions are primarily based on employees' training and experience rather than racial group. 6. Supervisors scrutinize the work of members of my group more than that of members of other racial groups. 7. I have influence in decisions taken by my work group regarding our tasks. 8. I am able to influence decision that affect my organisation. 9. My supervisor often asks for my opinions before making important decisions. 10. I am often invited to contribute my opinion in meetings with management higher than my immediate supervisor. 11. I frequently receive communication from management higher than my immediate supervisor (i.e. memos, emails). 12. I am often invited to participate in meetings with management higher than my immediate supervisor. 13. Managers here make layoff decisions fairly, regardless of factors such as employees' race, gender, sexual orientation, religion, or age. 14. Managers interpret human resource policies [such as sick leave] fairly for all employees regardless of race. 15. Managers give assignments based on the skills and abilities of all employees instead of race.	None	
	Policies/Infrastructure/Programs	1. IRC has formal procedures for obtaining feedback on diversity management practices. <i>(Diversity management refers to organisational actions that aim to promote greater inclusion of employees from different backgrounds into an organisation's structure through specific policies and programs.)</i>	Diversity Management

Note: Questions highlighted in light blue have been selected as the survey questions in every dimension

Dimension	Questions	Category/ Dimension
	2. IRC managers have a track record of hiring and promoting employees objectively, regardless of their race, gender, sexual orientation, religion, or age.	Diversity Management
	3. IRC has a parental leave policy which allows parents, regardless of their gender, to decide how to share roles at home.	Gender Diversity and Inclusion
	4. IRC is proactive in creation and implementation of safeguarding policies.	Workplace Discrimination
	5. People of colour are not discriminated against through hiring practices. 6. Extensive changes have been made to make services (resources) available to employees of colour. 7. Employees have access to diversity materials used in this organisation. 8. The present IRC structures and policies adequately address internal race-related complaints	None
Training	1. At IRC, role models from minority racial backgrounds are sufficiently nurtured and coached to progress their careers.	Opportunity
	2. IRC employees normally trained on issues relevant to equity, diversity and inclusion.	Opportunity
	3. IRC spends sufficient money and time on equity, diversity and inclusion awareness and related training.	Opportunity
Diversity/Members	1. The management of IRC puts sufficient emphasis on having a diverse workforce.	Diversity Management
	2. At IRC, it is unlikely that some staff will receive better treatment because of their racial group.	Diversity Climate
	3. IRC has an equal representation of gender in its workforce.	Gender Diversity and Inclusion
	4. I consider IRC diversity management to be mere tokenism to only create the impression of social inclusion and diversity. <i>(Reverse-scored)</i>	Diversity Management

Note: Questions highlighted in light blue have been selected as the survey questions in every dimension

Dimension	Questions	Category/ Dimension
	5. IRC shares diversity management-related issues/memos with employees 6. Do you feel discriminated against in your present job at IRC? (yes/ No). If yes, why? (because of my gender identity/ because of my age/ because of my race/ because of my sexual orientation/ other reason, please specify)	None
Data	1. IRC normally evaluates the effectiveness of equity, diversity and inclusion training provided to employees.	Diversity Climate
Accountability/Community	1. IRC regularly conducts staff evaluations with equity, diversity, and inclusion (EDI) lens	Opportunity
	2. IRC has an accountability mechanism which ensures that its projects, management, staff and board have EDI metrics in its performance evaluations	Diversity Climate
	3. Gender diversity is normally included when undertaking equity, diversity and inclusion evaluations within IRC.	Gender Diversity and Inclusion
Inclusion	1. There is an understanding and acceptance of cultural differences among employees of different racial groups within my organisation.	Inclusion
	2. At IRC, I experience feelings of social isolation because of my racial group.	Inclusion
	3. I feel that I have not been treated less favorably here because of my race, gender, sexual orientation, religion, or age	Inclusion

Note: Questions highlighted in light blue have been selected as the survey questions in every dimension

Dimension	Questions	Category/ Dimension
	4. Racial discrimination in the workplace is a problem in IRC. 5. Race determines who gets the most desirable work or assignments. 6. I have been unfairly singled out because of my racial group. 7. IRC employees are treated the same, regardless of their racial group. 8. At IRC, people of other racial groups do not tell me some job-related information that they share with members of their own group. 9. I am typically involved and invited to actively participate in work-related activities of my work group. 10. I am usually among the last to know about important changes in the organisation. 11. I am usually invited to important meetings in my organisation. 12. I am rarely invited to join my coworkers when they go for lunch or drinks after work. 13. I am invited to sufficient one-to-one meetings with my supervisor.	None
Power and Pay	1. At work minority employees receive equal opportunities.	Workplace Discrimination
	2. At IRC, promotions and rewards are not influenced by racial group membership.	Workplace Discrimination
	3. It's just as hard for whites to get ahead at IRC as it is for people of colour.	Workplace Discrimination
Culture	1. Managers promote cooperation between people of colour (non-white) and other racial groups.	Diversity Management
	2. At IRC, people of different racial groups get along well with each other.	Diversity Climate
	3. The IRC environment is safe and proactive in addressing violence, abuse and sexual harassment complaints.	Diversity Climate
	4. IRC, as an employer, goes out of their way to make people of colour feel welcome. 5. I feel White employees have good working relationships with employees of colour. 6. At work people are tolerant of others from different racial backgrounds.	None

Note: Questions highlighted in light blue have been selected as the survey questions in every dimension

Dimension	Questions	Category/ Dimension
	7. Telling racial jokes is not common where I work. 8. Management here encourages the formation of employee network support groups. 9. The “old boys’ white network” is alive and well at IRC.	
Colonialism	1. National and international staff are treated with the same level of respect	Workplace Discrimination
	2. At IRC, I have never heard of the usage of a language that reinforces racism and discrimination.	Inclusion
	3. Does IRC invest in indigenous knowledge and local researchers? <i>(Yes/ No/ I have no idea)</i>	Opportunity
	4. Do you think there is more need for an investment in indigenous knowledge and local research? <i>(Yes/ No/ I have no idea)</i> , If yes, how?	Opportunity

Annex D: Data Analysis Plan

RESEARCH QUESTIONS FOR FINAL IRC EDI REPORT (DATA ANALYSIS PLAN)

RESEARCH QUESTION	COMMENTS/ DEPENDENCIES	SURVEY QUESTION	Survey Section
1. What does EDI, intercultural competence and other relevant terminologies mean?	<ul style="list-style-type: none"> Potentially derived from the inception report Review intercultural competency 		
2. Does IRC organisational values and governance structure adequately reflect EDI within IRC?	<ul style="list-style-type: none"> What are IRC's values? Are they explicitly stated? Do they adequately reflect EDI within IRC? (<i>Values are identified on the IRC manifesto</i>) <ul style="list-style-type: none"> What might ideal EDI values for IRC look like? What does the literature say about EDI values? What is IRC's governance structure? Does this adequately reflect EDI within IRC? <ul style="list-style-type: none"> What does a good 'ideal' governance structure that reflects EDI look like? How does IRC's governance structure compare to the 'ideal' one? 	1. At IRC, people of different racial groups get along well with each other. 2. The IRC environment is safe and proactive in addressing violence, abuse and sexual harassment complaints.	Diversity climate
		3. People of colour (non-white) have sufficient say in decisions that affect the functioning of IRC. 4. IRC's manifesto is actively being used as a guide for the organisation's programs and operations. 5. There is an understanding and acceptance of cultural differences among employees of different racial groups within my organisation.	Inclusion
		6. At IRC, I do not experience feelings of social isolation because of my racial group. 7. I feel that I have not been treated less favorably here because of my race, gender, sexual orientation, religion, or age. 8. At IRC, I have never heard of the usage of a language that reinforces racism and discrimination.	
		9. Equity, Diversity and Inclusion is relevant to IRC work. 10. At work minority employees receive equal opportunities with others.	Workplace Discrimination
3. Are the internal policies, practices, and culture in relation to EDI appropriate? What can be improved?	<ul style="list-style-type: none"> Create a list of best practices regarding policies, practices, and culture with regards to EDI as the 'ideal' for IRC to strive for. Based on the above, determine what can be improved. 	1. IRC has a parental leave policy that allows parents, regardless of their gender, to decide how to share roles at home.	Opportunity
		2. IRC is proactive in the creation and implementation of safeguarding policies. 3. At IRC, promotions and rewards are not influenced by racial group membership. 4. It's just as hard for whites to get ahead at IRC as it is for people of colour (non-white).	Workplace discrimination

RESEARCH QUESTION	COMMENTS/ DEPENDENCIES	SURVEY QUESTION	Survey Section
		5. At IRC, national and international staff are treated with the same level of respect.	
4. What are the EDI perceptions among IRC staff overall, and according to demographic characteristics such as age, gender, and other demographic characteristics such as duty station, role etc?	<ul style="list-style-type: none"> Which additional questions and/or amended questions (if any) will we take forward to the interview round? What are the final broad categories of EDI criteria we see as desirable to aggregate the results obtained into? 	Demographic survey questions against other survey questions	Demographic
5. Which areas do managers [senior staff, the company in general] need to improve on to enhance EDI within IRC?	<ul style="list-style-type: none"> What is already working for the IRC managers as they strive to promote EDI within IRC? Does IRC experience disparity in EDI between field offices and HQ? 	<ol style="list-style-type: none"> Only white people have decision making power at IRC IRC managers give feedback and evaluate employees fairly, regardless of employees' race, gender, sexual orientation, religion, or age. IRC has formal procedures for obtaining feedback on diversity management practices. IRC managers have a track record of hiring and promoting employees objectively, regardless of their race, gender, sexual orientation, religion, or age The management of IRC puts sufficient emphasis on having a diverse workforce. Managers promote cooperation between people of colour (non-white) and other racial groups. I consider IRC diversity management to be mere tokenism to only create the impression of social inclusion and diversity. When it comes to equity, diversity and inclusion strategies, I feel that my immediate manager is ____ Please provide an example of management behaviour that explains your selected response above. 	Diversity Management
		10. IRC most senior management has a sufficiently diverse representation of races.	Diversity climate
6. What are the EDI growth areas for IRC?	<ul style="list-style-type: none"> Where does IRC lag behind in terms of EDI? 	<ol style="list-style-type: none"> IRC spends sufficient money and time on equity, diversity and inclusion awareness and related training. IRC inspires me to do my best work every day. 	Opportunity

RESEARCH QUESTION	COMMENTS/ DEPENDENCIES	SURVEY QUESTION	Survey Section
		3. IRC motivates me to go above and beyond what is normally required of my role when necessary. 4. At IRC, role models from minority racial backgrounds are sufficiently nurtured and coached to progress their careers. 5. IRC employees are formally trained on issues relevant to equity, diversity and inclusion 6. IRC communicates equity, diversity and inclusion training objectives to employees. 7. IRC regularly conducts staff evaluations with equity, diversity, and inclusion (EDI) lens. 8. IRC has an equal representation of gender in its workforce. 9. Does IRC invest in indigenous knowledge and local researchers? 10. Do you think there is more need for IRC to invest in indigenous knowledge and local research? 11. How can IRC invest in indigenous knowledge and local research?	
		12. Gender diversity is normally included when undertaking equity, diversity and inclusion evaluations within IRC.	Diversity management
		13. At IRC, it is unlikely that some staff will receive better treatment because of their racial group. 14. IRC normally evaluates the effectiveness of equity, diversity and inclusion training provided to employees.	Diversity climate
		15. Is there anything else that you would like to say about equity, diversity and inclusion at IRC?	Workplace discrimination
7. What accountability measures do we recommend for IRC?	<ul style="list-style-type: none"> Need to identify appropriate accountability measures based on the literature 	1. IRC has an accountability mechanism which ensures that its projects, management, staff and board have EDI metrics in its performance evaluations.	Diversity climate

Annex E: IRC Policy Catalogue and JEDI Check

	Policy Document	Opportunity	Diversity Management	Diversity Climate	Inclusion	Workplace Discrimination
1	IRC Statutes 2006 - This document details the official translation of the Dutch version of IRC organisation laws to English.	✓	✗	✓	✓	✓
2	IRC Statues 2009 - This document details the official translation of the amendment of Dutch version of IRC organisation laws.	✓	✗	✓	✓	✓
3	Protection Against Sexual Exploitation and Abuse Policy - This document details IRC global policy which aims at protecting every individual including beneficiary communities, workers, programme participants and those in partner organisations from sexual exploitation and abuse.	✓			✓	✓
4	IRC Code of Conduct - This document details the IRC rules of conduct for all IRC staff including: staff members, members of the supervisory board, associates, consultants, interns, young professionals and volunteers.			✓	✓	✓
5	Disciplinary Procedure - This document outlines the disciplinary steps to be followed in case of misconduct by an IRC staff member (IRC staff, IRC interns and Staff seconded to IRC).	✓			✓	✓
6	Grievance procedure - This document outlines the process to be followed by all IRC staff members in making a formal complaint to the IRC management in cases related to sexual	✓		✓	✓	✓

	Policy Document	Opportunity	Diversity Management	Diversity Climate	Inclusion	Workplace Discrimination
	intimidation, harassment, aggression, violence, prejudice, or bullying in the workplace.					
7	Whistleblowing policy - This policy document details the ability to report suspicions directly to a Trust Person.	✓	✓		✓	✓
8	Collective Labour Agreement - This is an internal IRC document stipulating labour negotiations between IRC and its employees from 1st January 2020 to 31st December 2022	✓		✓	✓	✓
9	Board of Directors By-Laws (2007) - This policy document outlines composition, tasks, responsibilities and powers of the Board of Directors.		✗	✓	✓	✓
10	Supervisory Board By-Laws (2007) - This document briefly summarises the composition, profile, powers and responsibilities of the Supervisory Board		✗	✓	✓	✓
11	Partos Code of Conduct (2019) - This document outlines the rules, norms, proper practices and roles of the professional organisations working in the development sector in Netherlands.	✓			✓	✓
12	Human Resource Policy and Procedure Manual for Uganda - This manual document was developed to guide IRC staff deployment in Uganda from 1st June 2020 to 31st December 2022.	✓	✓	✓	✓	✓

	Policy Document	Opportunity	Diversity Management	Diversity Climate	Inclusion	Workplace Discrimination
13	Human Resource Management Guidelines for Ethiopia - This document provides IRC information regarding employment with IRC Ethiopia to the management and employees.	✓	✓	✓		✓
14	Career Development Policy - This policy document aims at ensuring personal and professional development for the IRC staff, while ensuring highly qualified, high-quality and motivated workforce.	✓	✓		✓	✓
15	IRC Associate Policy - This document details a policy document for associates and consultants in IRC.	✓	✗			✓
16	New talent policy - This document outlines IRC's principles governing new Talent such as internships, traineeships and young experts.	✓	✓			✗
17	Associate Programme Policy - This policy document seeks to provide guidelines on the associate program within IRC.	✓	✗		✓	✓
	Total score	14 (82%)	5 (29%)	8 (47%)	14 (82%)	16 (94%)

Further to this catalogue, a more detailed version is linked [here](#).

Annex F: Dutch laws that regulate information and diversity.

The Constitution of the Kingdom of Netherlands, 2018

Chapter I of the Constitution provides for fundamental rights. Article 1 of the Constitution provides that all Dutch people shall be treated equally in equal circumstances. It also prohibits discrimination. It also allows for the freedom of religion or belief. This freedom is given if there is no prejudice to a person's responsibility under the law. The Constitution provides for the right to work as a fundamental right. Article 19 (2) provides that the rules concerning working persons shall be laid down by an Act of Parliament.

Dutch Privacy Laws

The law considers information of current or potential employees on: racial or ethnic origin, physical or mental health, religion or similar beliefs and sexual orientation as sensitive or special personal data. This information should not be processed by employers unless the [European Union \(EU\) General Data Protection Regulation \(GDPR\), 2018](#) requirements are satisfied. The GDPR applies to all companies that do business in, or with, the EU, of which IRC is one of them.

The main provisions for personal data and how it should be processed are found in [Article 9](#) and [Article 6](#) of the GDPR. The information that is regarded as personal data is the one dealing with racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation shall be prohibited. Under GDPR you are only to process and/or retain personal data one has a specified lawful basis to do so. This will usually be one of the following reasons:

- the performance of the employment contract;
- to comply with a legal obligation;
- and/or for the purposes of legitimate interests pursued.

Diversity Quota and Targets Act (New legislation)

The Dutch Parliament ratified the Act in September 2021 to diversify the workplace. It is intended to come into force in January 2022. The bill implements the advisory report by the Social and Economic Council (SER) entitled '[Diversity in the boardroom: Time to accelerate](#)'.

This legislation provides two measures to improve diversity in the workplace. First, an appointment quota to ensure men and women each hold a third of the seats on supervisory boards of listed companies. Second, mandatory for large public and private limited liability companies are mandated to set ambitious target ratios. It also requires companies to report

annually on their progress.²⁴ However, it limits the provisions to positions in the boardroom and senior management. It also only applies to listed companies and large companies. A company is considered large if it meets at least two of the following criteria on two subsequent balance sheet dates:²⁵

- The value of their assets is more than 20 million Euros;
- Their net revenue is more than 40 million Euros; and
- They have an average of 250 or more employees.

²⁴ [Government of Netherlands. \(2021\). New Legislation will Improve Gender Diversity on Corporate Boards.](#)

²⁵ [Dam, E. v. \(2021\). New Dutch Law to Require More Women in Top Jobs.](#)

Annex G: Rules of the Code of Conduct

All staff shall:

- Comply with the terms of their employment contract and all rules, policies, and procedures of the IRC
- Comply with the applicable laws of the country in which they are present.
- Take into account the sensitivities of people's customs, habits, and religious beliefs and avoid any behavior that is not appropriate in a particular cultural context
- Ensure that individuals and their circumstances are fairly represented in terms of their capacities and vulnerabilities. Every effort should be made to explain how data including photos and stories will be used and to obtain permission from the individuals for the use of the material
- Conduct all official duties with integrity, free from any taint of dishonesty or corruption, including not engaging in any act of favoritism, cronyism, or bribery. This includes not accepting from any external source or without authorization any decoration, gift, remuneration, favor, or economic benefit which is more than a "token gift". In case of doubt please consult your line manager
- Not intentionally misrepresent their official functions or title to any entities or persons
- Not act in any way likely to bring the IRC into disrepute
- Adhere to the Protection against Sexual Exploitation and Abuse policy (PSEA)
- IRC staff will not engage in party-related activities and political campaigning as part of their work activities. However, it is recognized that the positions taken by IRC in seeking sustainable water services for all will sometimes be political. Communications and advocacy statements should be in line with established IRC positions and evidence, and where in doubt, should be discussed with the responsible line manager
- Not produce, process, distribute or use illegal, discriminatory, pornographic or racist material in IRC offices, or on IRC equipment, including reading, surfing, illegal, discriminatory, pornographic or racist websites or message boards or sending illegal, discriminatory, pornographic or racist emails
- Comply with any security procedure and/or instruction that may be issued
- Comply with all local traffic laws and regulations, including drinking and driving laws
- Administer the funds and/or supplies entrusted to them with the utmost care and be accountable for their use
- Not commit the IRC financially unless officially authorized to do so.
- Not unlawfully manufacture, distribute, possess or use a controlled substance (a drug or chemical whose manufacture, possession, or use are regulated by a government) in the working place
- Refrain from the possession or consumption of alcoholic beverages at the workplace place unless it is on a formal occasion initiated by the IRC

- Where IRC determines that the infringement has brought IRC into disrepute or the code of conduct has been broken, IRC may not provide any legal assistance

Annex H: Detailed Survey Findings

Opportunity

The analysis of the occupational opportunity within IRC indicated high staff motivation, with 93% of the survey respondents feeling inspired to do their best work and 75% motivated to go above and beyond their usual role. [Goal-setting theory \(Locke and Latham\)](#) posits that motivation and task performance are positively correlated with setting specific and measurable goals. This provides a great starting point for influencing JEDI at IRC.

However, a small proportion (17%) of the staff survey respondents self-identified as marginalized. Figure 20 demonstrates that a majority (76%) of the respondents that felt marginalized were female.

Figure 20: Marginalization Statistics

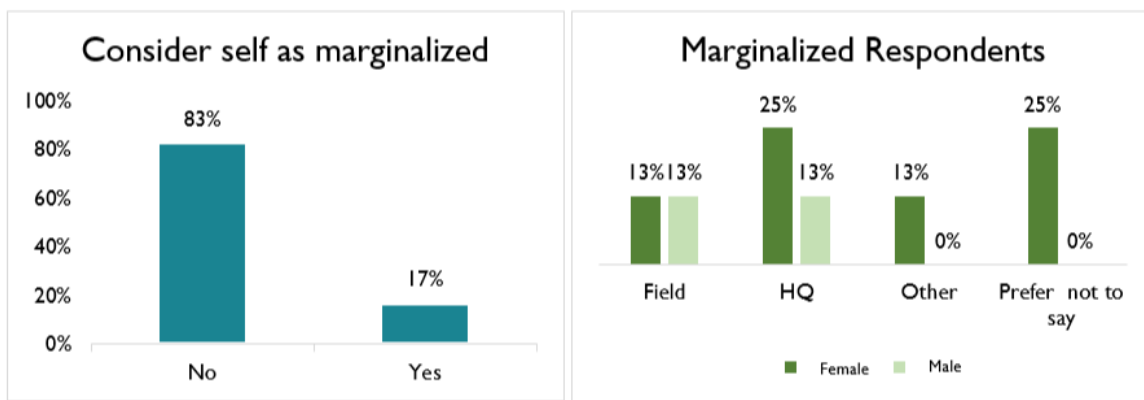
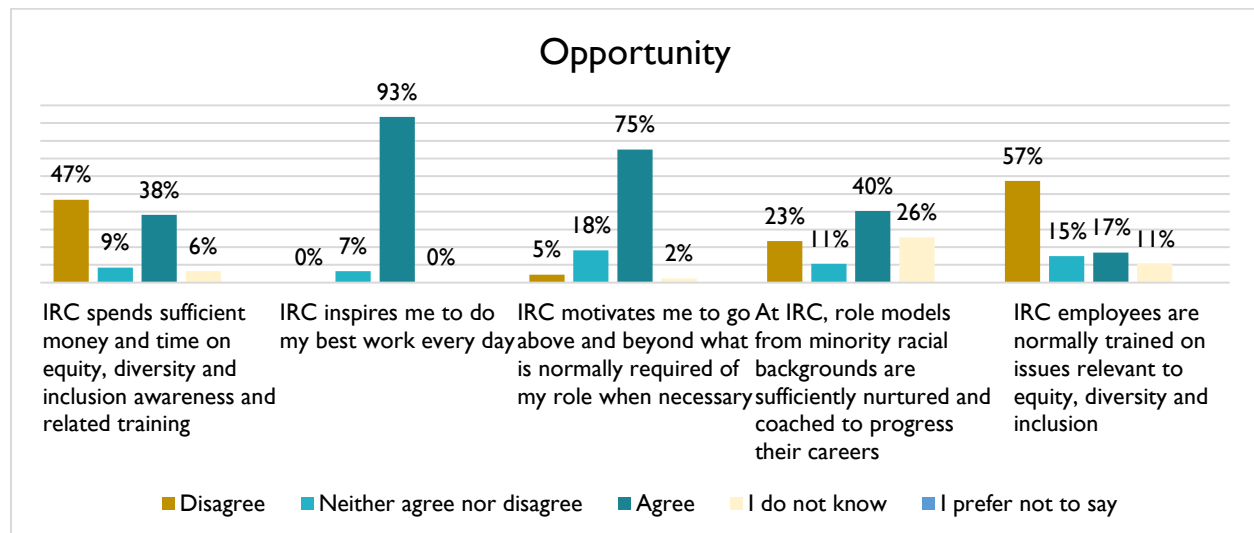


Figure 21: Opportunity

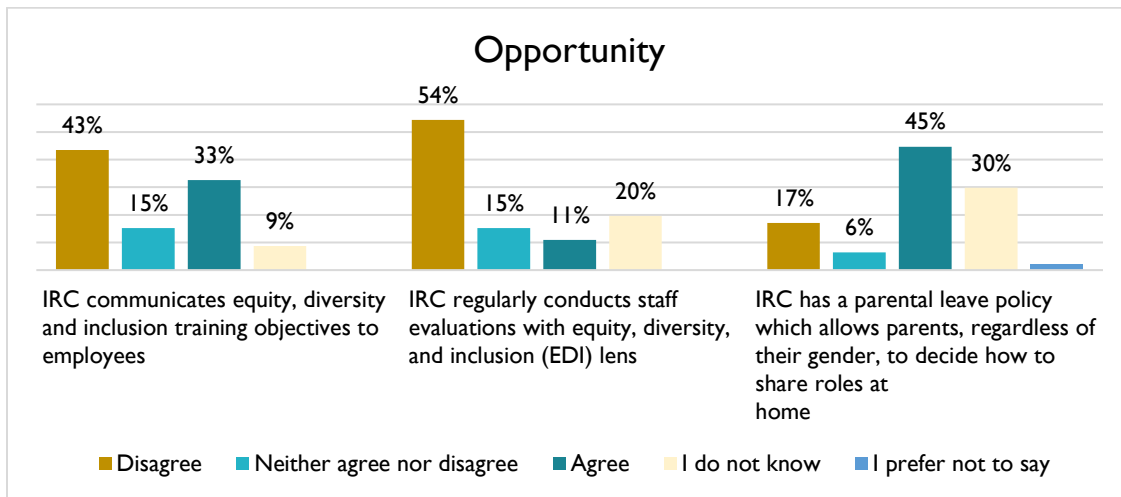


IRC Policies although developed to promote equality were sometimes inconsistently applied to and this caused differences in accessing opportunity. For example, whereas the large majority

(82%) of the 17 reviewed IRC policies were found to enable occupational opportunity for all, figure 22 shows only 45% agreement that IRC has a parental leave policy. The parental leave policy was selected for the survey to demonstrate the equal opportunity for all regardless of gender.

A deeper look at the IRC policies with regards to parental leave revealed inconsistency in the application of the policy. While The Collective Labour Agreement (applicable in the Netherlands) provides for the provision of pre-natal and post-natal maternity leave, birth leave, and supplementary birth leave for partners, and parental leave and Uganda’s Human Resource policies also provide for both maternity and paternity leave; in Ethiopia, only the maternal leave was provided for with no mention of paternity leave. This means that in practice men could access parental leave only in certain duty stations. This results in the same organisation, same corporate policy but different opportunity for that particular gender.

Figure 22: Opportunity



The staff survey further queried the perceptions of staff regarding JEDI practices at IRC that promote equal opportunity for all. The results showed that staff felt there was little organisational investment in JEDI in ways that promoted equal opportunity. See some results below:

- JEDI training- Only 17% agreed that IRC trains employees on JEDI.
- Allocation of time and budget to JEDI awareness and related training- 47% of the respondents disagreed that IRC spends sufficient time and money on JEDI awareness and training.
- Regular staff evaluations with a JEDI lens- Only 11% agreed that IRC conducts periodic evaluations with a JEDI lens.
- Nurturing role models from minority backgrounds- 40% agreed that role models from minority backgrounds are sufficiently coached to progress in their careers.

The staff survey results with regards to ongoing practices on JEDI are consistent with the qualitative data collected in which it was found that some respondents have no recollection of

JEDI being mentioned ahead of the CEO BLM statement and/or organisation wide performance review. Others thought that the intention had often been there, but IRC had no plan in place. Additionally, the qualitative data revealed micro-aggressions regarding the following themes:

- Pay and workload equity.
- Gaps in Information sharing

Micro-aggressions are defined as the everyday, subtle, intentional — and oftentimes unintentional — interactions or behaviours that communicate some sort of bias toward historically marginalized groups.

Pay and Workload Equity

Pay equity refers to equal pay for work of similar or comparable value. It is an issue which can be unintentionally perpetuated by the systems in place. Kaplan et al. (2011) found that pay satisfaction strengthened the positive relationship between employee perceptions of diversity climate and their calculative attachment (employees' satisfaction with career and job opportunities in their organisation).

The issue of pay equity at IRC seemed to arise from four main sources:

- Some national staff have different contracts where country directors are paid per the secretariat's terms. Upon further investigation, this practice seems to be supported by the [Collective Labour Agreement](#) (CLA). See Box 3.
- The introduction of remote working may favour employees who live in lower-income areas. The CLA supports this.
- Inconsistent remuneration salary scales and steps across the IRC offices- Table 11 presents extracts from the different Human Resource Policies of Netherlands, Ethiopia, Uganda, and Burkina Faso.
- Graduate interns only receive a stipend even though they do regular work-[The New Talent Policy](#) recognizes three groups of New Talent, Internships, Traineeships, and Young expert program. All three groups recognize new graduates as a target audience, yet, traineeships and the Young Expert Program offer a salary or minimum wage as opposed to internships which provide a stipend. It may be necessary to unpack this difference and make the policy more equitable for all New Graduates.

Box 3

1.3 Scope of application of the CLA

1. The CLA applies in respect of all employees who have an employment contract with IRC's head office in The Netherlands and who are subject to Dutch labour law, including those employees who have a work location other than The Hague (and thus 'work remotely' as such).

2. The CLA does not apply in respect of Country Directors and other employees who have a contract with one of IRC's country offices, due to the fact that they are not subject to Dutch labour law.

3. Those Country Directors will switch to a local employment contract at the time at which the CLA enters into force. However, the salaries of the Country Directors who were employed prior to 1st January 2017 will remain classified in the salary scale that is applied in the CLA.

Table II presents extracts from the different Human Resource Policies of Netherlands, Ethiopia, Uganda and Burkina Faso.

Table II: Extracts from IRC HR Policies

IRC Office	Human Resource Policies
Netherlands	<p>7.1 Salary The employee will be placed in a salary scale. The salary scale will be determined based on the valuation of the employee’s position. The employee’s position will be valued on the basis of the job evaluation method certified and developed by HAY. In the event that the employee temporarily fills another position as a substitute, he will remain in the same salary scale that he received prior to the temporary posting.</p> <p>7.2 Salary scales The salary scales are listed in 0, Amounts and salary scales, of the CLA. The salary scales are based on a presumed annual structural salary increase in the amount of EUR 65.</p>
Ethiopia	<p>A series of levels (scales) and incremental salary steps, are listed in Annex I: IRC Ethiopia Salary scale. There are 10 salary scales, and each scale consists of 11 steps. The basic salary amount allocated to each level and scale is specified in United States dollars (USD). The salary scale steps are based on an annual salary increase of 3%.</p>
Uganda	<p>Each employee is placed in a salary scale (Appendix I) which is determined based on the valuation of the position according to the Hay Job Evaluation methodology. The generic profiles used as a basis for the Hay job Evaluation can be found on the IRC Intranet</p>
Burkina Faso	<p>Article 4.3: Principe de rémunération des salaires IRC a pour ambition d’offrir à ses salariés, une rémunération et des avantages sociaux équitables et compétitifs sur le marché national ou sous-régional, en fonction de ses capacités financières et conformément à son statut d’entreprise sociale. Pour ce faire, la Direction Pays sollicitera, sur la base de son plan stratégique, des services professionnels pour la mise en place ou la révision de la grille de rémunération de ses employés salariés.</p>
Burkina Faso (Translation)	<p>Article 4.3: Principle of remuneration of employees: IRC aims to offer its employees fair and competitive remuneration and social benefits on the national or sub-regional market, according to its financial capacities and in accordance with its social enterprise status. To do this, the Country Department will seek, on the basis of its strategic plan, professional services for the implementation or revision of the remuneration scale of its salaried employees.</p>

It appears that the issue of pay equity is one that the organisation is keen to address. According to the Human Resources plan, 2021-2022, Collective Employment Conditions are developed to ensure a solid employment package based on equity throughout the whole organisation. Key elements of the (Global) Collective Employment Conditions are:

- Collective (Hay based) salary scales, with local remuneration based on local benchmarks.
- General Function Profiles
- Global Policies and procedures, with Country-Specific Addendums to respect local legislation.
- Gaps in Information Sharing

Information Sharing

Data collected suggested that information sharing within the organisation is inconsistent. Contexts in which this case was reported were in regards to training opportunities, essential conference calls, and information on organisational decisions.

One of the practices that promoted information sharing that was noted to have diminished was sharing the management team minutes to all staff.

Reports from interviews stated that sometimes the training budgets go unused because staff had heavy workloads.

Informal decision-making structures within the organisation were noted to often favour native English-speaking or white people.

The organisation was seen to be making steady strides to address the gaps in information. Microsoft Office (includes Teams and SharePoint software) launched at IRC in 2018 was presented as one of the critical tools that have greatly assisted the organisation with information sharing. Additionally, informal activities including “Global Talks” (the interview respondent referred to these as What’s for Lunch sessions) was one of the practices that promoted general information sharing across the organisation. Francophone speakers particularly reported to feeling included by this activity.

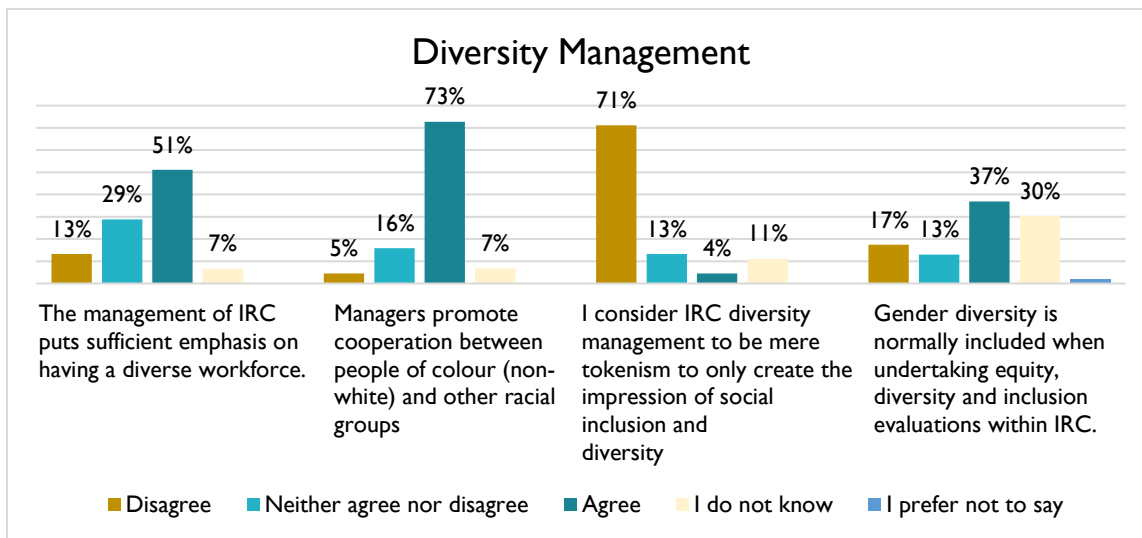
Diversity Management

In a study of federal employees, Pitts (2009) found diversity management to be strongly and positively correlated to job satisfaction and perceptions of workgroup performance. More recently, public organisations have been implementing diversity management to attract, retain and manage a diverse workforce to enhance their performance. This diversity management line of reasoning differs from traditional affirmative action or equal employment opportunity policies (AA/EEO), which focus solely on recruitment and selection processes.

According to a recent publication²⁶, a common perception held by non-profit professionals is that their employers value diversity but that those values do not translate into actions resulting in the creation of diverse and inclusive workplaces. This is also the case at IRC, where this disconnect presents itself:

- 73% of the respondents believe that managers promote cooperation between people of colour and other racial groups, yet only 51% believe that the management put sufficient emphasis on having a diverse workforce. See Figure 23.

Figure 23: Diversity Management



- 71% of the survey respondents find IRC’s diversity efforts to be authentic (not tokenistic), (in Figure 23) yet only 24% agree with the presence of formal procedures for obtaining feedback on diversity management practices in Figure 24.

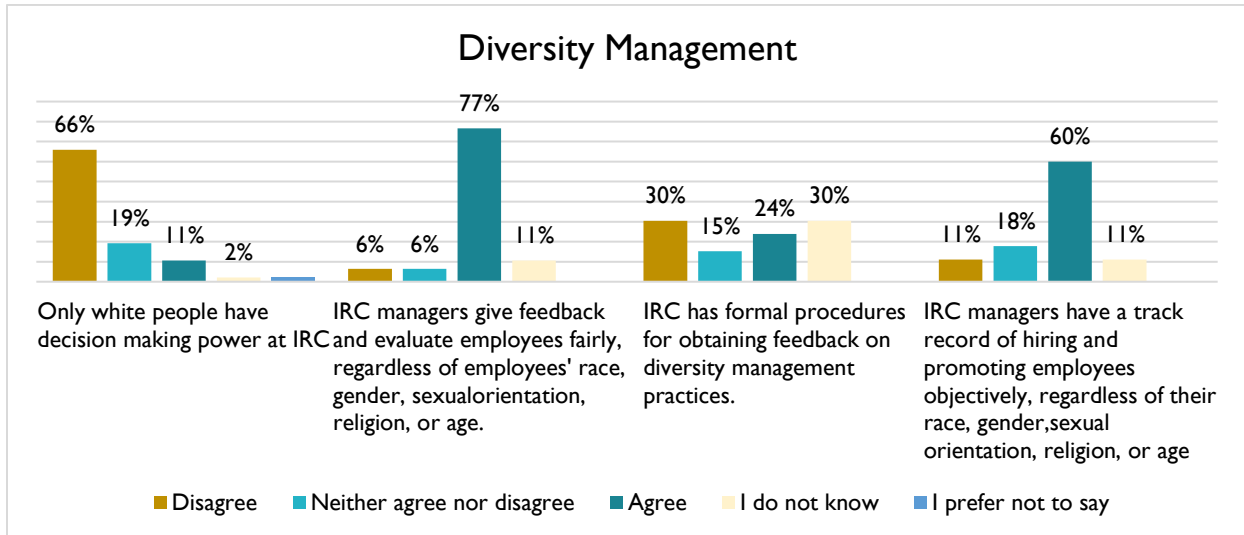
The qualitative data also suggested that most IRC offices do not have JEDI metrics present. Whereas the organisation has several policies, including the [Standard Operating Procedure](#), [Disciplinary Procedure](#), and [Grievance Procedure](#), there has been little mention of JEDI in each of these policies.

- IRC managers were seen to have mastered the art of giving feedback and evaluating employees fairly. However, the organisation was found to face the following challenges related to diversity management; reduced emphasis on the recruitment of a diverse

²⁶ *The Voice of Nonprofit Talent - Smash*. (n.d.). Retrieved November 9, 2021, from https://www.smash.org/wp-content/uploads/2015/05/voice_of_nonprofit_talent.pdf.

workforce and the lack of formal procedures for obtaining feedback on Diversity Management practices.

Figure 24: Diversity Management

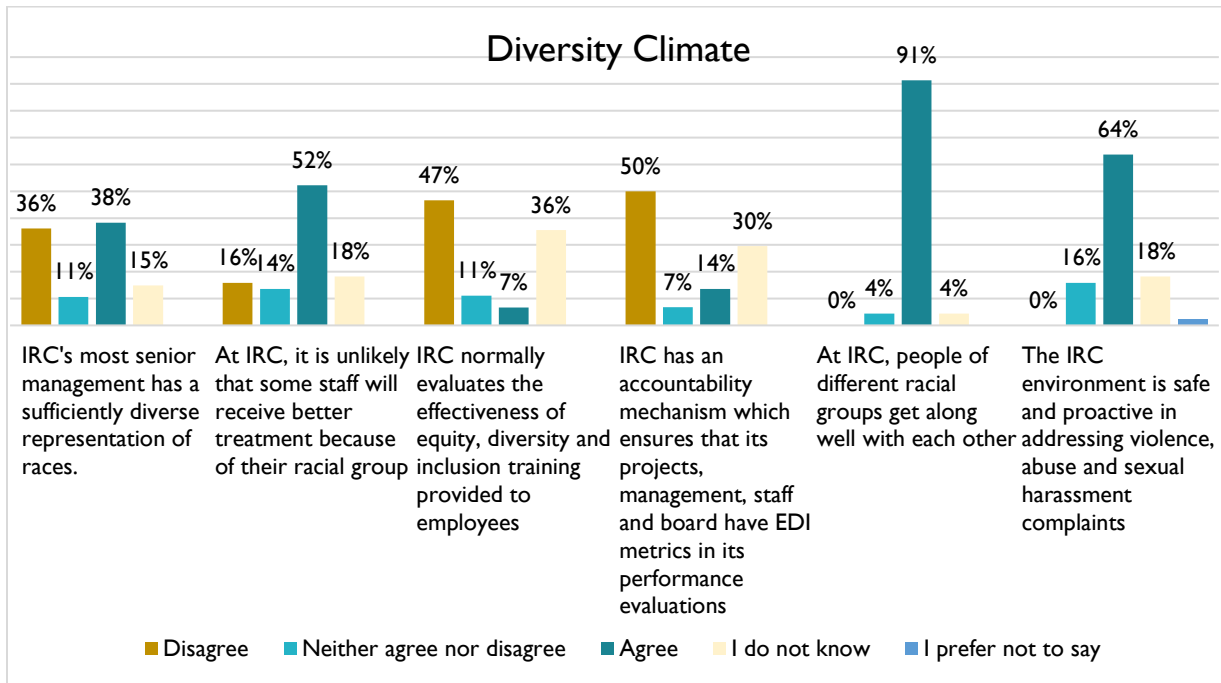


Diversity Climate

Only 40% of the survey respondents indicated the existence of racial diversity in the senior management. These results reflect that there is limited focus to foster diversity climate at the senior leadership level. See Figure 25.

Accountability is another key measure of diversity. At IRC, there were no policies that pointed to any critical metrics for JEDI, and the interviewees reported that there were no clear ways to measure or report on JEDI. The survey results also showed that only 14% agreed that IRC has an accountability mechanism that ensures its management, staff, board, have JEDI metrics in performance evaluations. Also, only 7% felt that the organisation evaluates trainings offered with a JEDI lens.

Figure 25: Diversity Climate



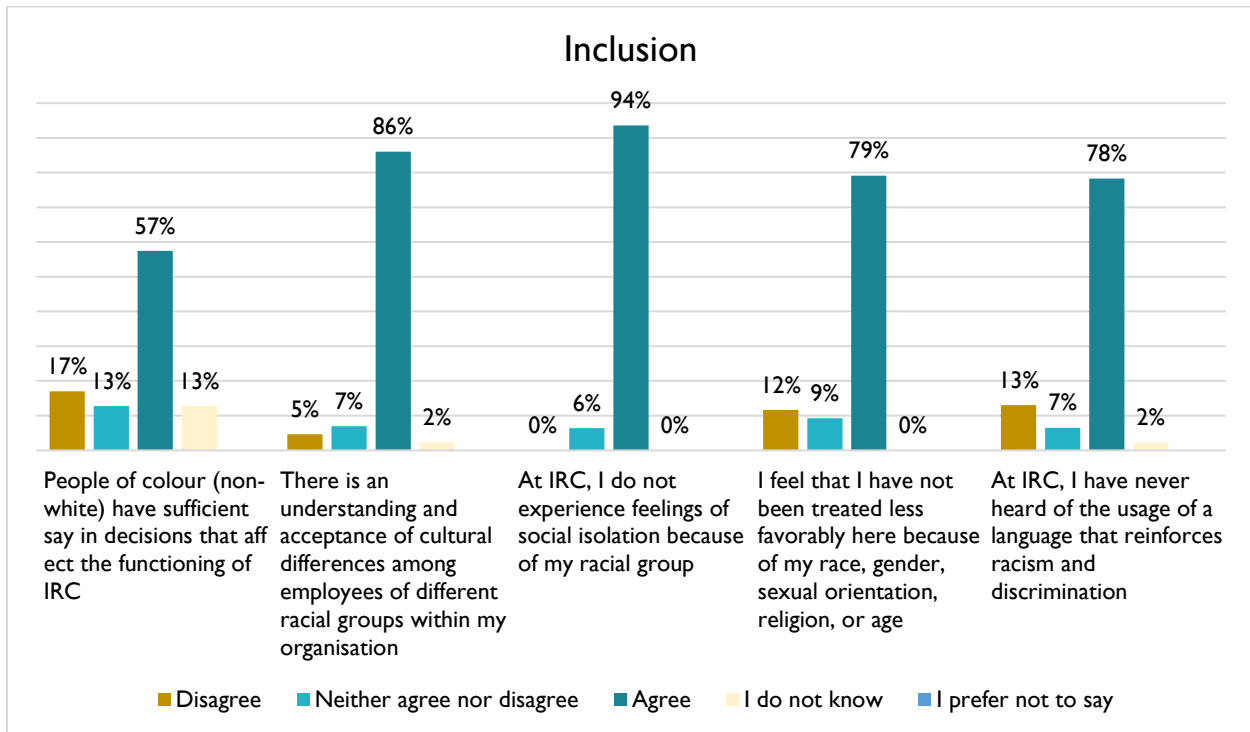
The diversity climate at IRC is considered to be emerging and only focused on compliance. IRC could articulate the business benefit of a diversity climate to encourage more focus and more accountability to develop this dimension.

3.2.4 Inclusion

“Diversity is being invited to the party; inclusion is being asked to dance”
- Verna Myers

Figure 26 shows that at IRC, staff of all races felt included- 94% agreed that they did not experience social isolation due to race. This statistic drops by 16% to 78% when gender, age, religion, sexual orientation, and race are factored in to the response indicating that inclusion may be highest at feeling of belonging to a corporate level and is not always a lived experience in daily work life.

Figure 26: Inclusion



This section discusses inclusion through three different angles; decision making, culture and language.

- **Decision making-** Only 57% of the survey respondents felt that IRC includes people of colour in decision-making. This was despite the introduction of Country councils and their representatives to the Global Works council. According to the [Works Council Proposal](#), the central mandates – of the Global Works Council- are:
 - To deliberate on the overall direction of the organisation and develop and articulate common positions regarding this,
 - To advise on intended decisions affecting the financial and organisational set-up of the organisation as a whole as specified in the Dutch Works Councils Act,
 - To advise on intended global decisions on (the principles of) human resources policies,
 - To act as formal point of contact between the Supervisory Board and staff. It also has a specific mandate to partake in the identification and recruitment of new Supervisory Board members.

It was reported in the interviews that staff in Asia and Africa often felt left out of the designing of policies and systems thinking or were only included when the process is already quite advanced.

- **Culture-** 88% of the survey respondents agreed that they understand and accept the cultural differences among their colleagues from different races. This is a key highlight for IRC because it demonstrates that the organisation has an inclusive culture- Inclusive cultures

are high performance cultures. The interviews however noted that it was challenging for staff from different cultures “when one culture is offered as a yardstick,” showing that despite a general understanding of the differences between colleagues from the variety of contexts, some voices did not feel heard, welcomed or respected.

One practice at IRC that was reported to have fostered an understanding of the different cultures was the exchange programs between country offices.

- **Language-** Language is a powerful tool for building inclusion (or exclusion) at work because words can perpetuate bias, uphold systems of inequity, and make individuals feel that they cannot see themselves thriving at the organisation. Individuals and organisations have the opportunity to advance racial equity and inclusion in language.

IRC has recently taken steps to use inclusive terminology for example offices in the focus countries are to be referred to as IRC Offices, instead of country offices, and The Hague office is to be referred to as The Secretariat instead of headquarters. Additionally, gender-neutral language has been used in the newer policies (i.e. The Collective Labour Agreement). However, English remains the primary language of instruction inadvertently leaving out native Dutch, French and Spanish speakers from important conversations. IRC is responding to this by providing translation as much as possible.

Workplace Discrimination

Non-discrimination is a core labour standard -alongside the freedom of association, the abolition of forced labour and child labour- according to the declarations by the United Nations in 1995, the World Trade Organisation in 1996, and the International Labour Organisation (ILO) in 1998.

In the Netherlands, where IRC is headquartered, everyone is entitled to equal treatment as enshrined in Article 1 of the constitution. The Dutch law further specifies the following aspects of discrimination as unacceptable; race, sex, hetero or homosexual orientation, political opinion, belief, religion, disability, civil status, age, nationality, working hours, or type of contract. This clarity is replicated in several country offices as captured in Table 12.

Table 12: Grounds for Discrimination

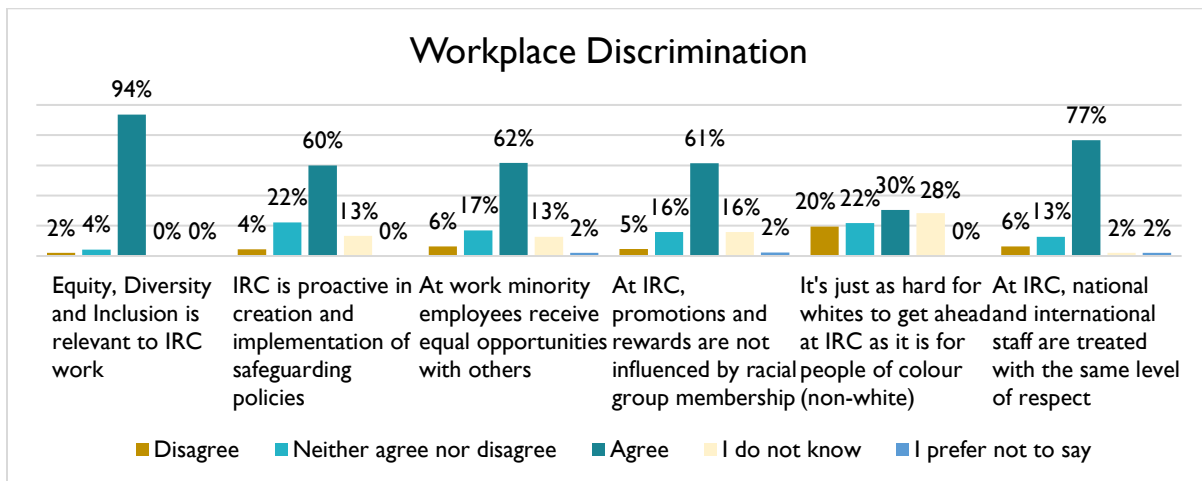
Discrimination That is Unacceptable	
Uganda	Race, colour, sex, religion, political opinion, national extraction or social origin, the HIV status or disability which has the effect of nullifying or impairing the treatment of a person in employment or occupation, or of preventing an employee from obtaining any benefit under a contract of service
Ghana	Race, sex, ethnic origin, creed, colour, religion, social, or economic status
Ethiopia	Nationality, sex, religion, political outlook or any other conditions.
Burkina Faso	Race, colour, religion, political opinion, national extraction or social origin

Enforcement is however an issue. Among the policies of IRC, only the [Ethiopia HR Guidelines](#) augments the country laws by listing discrimination in its annex of offences: “23. Discrimination of any kind against any employee on grounds of race or ethnic origin, sex, religion, colour, disability or political outlook.”

The [code of conduct](#) also states that “All staff shall... Not produce process, distribute or use illegal, discriminatory, pornographic or racist material in IRC offices, or on IRC equipment, including reading or surfing illegal, discriminatory pornographic or racist websites or message boards or sending illegal, discriminatory, pornographic or racist emails” The code of conduct applies to all forms of IRC employment everywhere.

At IRC, almost all people (94%) feel that JEDI is important to IRC’s work and that national and international staff are treated with the same level of respect (77%). However, some (30%) felt that career progression is easier for people of whites showing a recognition that the system of white privilege permeates into work places that are considered to be multi-cultural and respectful. This recognition (64%) came mostly from people based in The Hague. This is despite the Career Development Policy, which provides for equitable career and talent promotion for all staff. This demonstrates that while IRC has good policies prohibiting racial bias, but this is not always seen to directly translate in to practice.

Figure 27: Workplace Discrimination





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