



A-Z OF EMPLOYING

Equal Employment Opportunities

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BUSINESS**

Business**Central** 

Equal Employment Opportunities

Our guide for Employers and Managers

Contents

This is only a guide.
It should not be a
substitute for
professional advice.

Please seek advice
from our AdviceLine
Team if you require
specific assistance.

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Overview

EEO (Equal Employment Opportunities) means eliminating barriers to ensure that all potential employees are considered for the employment of their choice, and that they have the chance to perform to their maximum.

In 1990 when the Employment Equity Act 1990 was repealed, the Working Party on Equity in Employment was established. On the Working Party's recommendation, the Equal Employment Opportunities (EEO) Trust was established in 1992 to promote the business benefits of equal employment opportunities to all employers throughout New Zealand. EEO Trust is known today as Diversity Works New Zealand (DWNZ).

DWNZ is a charitable trust and membership organisation with a mixture of public, private sector and not-for-profit members. Its operations are managed by a small team based in Auckland, and it is governed by a Board of Trustees. Funding comes from membership donations, government funds and sponsorship.

DWNZ's aim is the voluntary promotion of equal employment opportunities to employers as good business practice. The functions of the organisation include the promotion of the benefits of EEO practices, developing EEO resource material, and liaising with employer and union networks and tertiary institutions to promote the organisation's resources and services.

Since its inception, DWNZ has worked to move employers from awareness and acceptance of EEO, to action. This is achieved from the four platforms of partnership, research, information and influence.

It is, of course, possible to be an "EEO" employer without being a member of DWNZ's Employers Group; however membership of this group allows employers to use DWNZ's logo. Additionally, members are seen as employers of choice by applicants, employees, clients, the media and the public. This perception is based on evidence: DWNZ Employers Group members are more likely than other employers to be active in diversity and EEO activities on a range of benchmarks.

In the current employment environment being an EEO employer means that it is your policy to encourage and accommodate difference in the workplace, not only as a means of ensuring compliance with the Human Rights Act 1993, but also as a means to attract a broad base of skills and talent from all sectors of society.

Being an EEO employer (as a member of DWNZ's Employers Group) means implementing EEO policies and programmes throughout your organisation. It may also involve developing a policy statement, appointing an EEO manager or coordinator, conducting a workforce assessment to determine its current make-up, implementing meetings, training and orientation courses to educate your workforce on EEO issues and strategies.

An EEO policy impacts on many aspects of employment. It affects your recruitment and selection of employees and your training and staff development. It is a living policy that changes as your organisation, and the workplace, changes. It can be especially relevant to working conditions, the working environment, and in preventing harassment.

Business Central AdviceLine and DWNZ can advise and assist employers with the process of implementing an EEO policy. A range of resources are available through DWNZ's website including workplace toolkits, staff turnover calculator, checklists and sample staff survey. DWNZ can be contacted through its website at: www.diversityworks.nz

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Diversity/EEO in the Workplace

Business Central supports the principle of equal opportunities in employment, education and training, emphasising how important it is that employment decisions be made on the ground of relevant merit, not on the basis of personal characteristics unrelated to ability. Diversity/EEO means ensuring that no one is excluded from a job for which he or she is skilled and qualified by inappropriate processes, rules and attitudes. Further, it means eliminating barriers to ensure that all potential employees are considered for the employment of their choice, and that they have the chance to perform to their maximum. Recognising and embracing diversity in the workplace has benefits for organisations as well as individuals.

The Human Rights Act 1993 itself provides a practical reason why Diversity/EEO policies and programmes should be introduced and put into practice. With these in place, policies, procedures and other institutional barriers that cause, or tend to cause, or to perpetuate inequality of opportunity, can be eliminated and compliance with the Act more readily guaranteed. More particularly, however, there are good business reasons for promoting diversity. Greater workforce diversity reflects far better the changing nature of the community and demonstrates a willingness to be open to the changes that are occurring. It makes sense to recognise and respect employee differences and to treat uniqueness as a valued asset.

Moreover, demographics point to an ageing population, with the likelihood not only of older workers seeking employment, but of the question of care for the elderly gaining increasing prominence for employees and, consequently, for their employers. Understanding that employees have domestic as well as work responsibilities helps to create and promote a more efficient working environment.

The implementation of policies and programmes assists employers to observe the requirements of human rights legislation but, at the same time, it has practical commercial advantages. It is obvious that the talents of all employees should be used in the best way possible. It is in an employers' own best interests for all employees to develop their full employment potential.

It has to be remembered, however, that in introducing policies and programmes it is essential to have the support, not only of senior management, but also of all supervisors and line managers. Being sensitive to the culture of the organisation will ensure this support is gained. Awareness of the need for diversity and commitment to its aims is fundamental to success.

Diversity/EEO policy

The nature of any Diversity/EEO policy and its manner of implementation will be likely to vary depending on the size and operational requirements of individual employing organisations. Smaller firms, for example, may require a lesser degree of formality. However, it's recommended all policies have the following elements in common:

- State the organisation's commitment to the principles of Diversity/EEO;
- Be in written form;
- Have explicit senior management commitment;
- Be signed by the Chief Executive Officer;

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- Be developed after staff consultation and discussion, including, as appropriate, employee representative involvement, so that employees have a proper understanding of what Diversity/EEO is about;
- Have a senior manager assigned, responsible for putting policy into practice and for monitoring progress;
- Be published through notice boards, staff newsletters, employee handbooks, e-mail and the like so that staff know the policy is in place;
- Give the name of the person or persons involved in the implementation of the programme;
- Provide for the establishment of staff records so that the effectiveness of the policy can be monitored. Employers will then know whether hiring, training and promotion procedures are helping to foster the development of equality of opportunity;
- Provide for an examination of jobs within the enterprise to ensure existing job criteria relate directly to the way in which jobs should be performed. Consider irrelevant job criteria that could contravene the Human Rights Act;
- Provide for an investigation of the reasons why some work areas are staffed by members of one particular designated group only so that steps can be taken to change this situation;
- Provide for recruitment and training literature (including advertisements and methods) and course materials to be checked for any bias;
- Provide for continuing training in the importance and application of Diversity/EEO.

Putting policy into practice

Management commitment

Effective policies have support at the highest level. The Board of Directors (or equivalent body) should issue a written statement setting out its commitment to Diversity/EEO. The policy statement may include:

- A declaration of the organisation's commitment to Diversity/EEO and to the elimination of all forms of discrimination;
- Information on the provisions of the Human Rights Act and other relevant legislation, in particular, the Parental Leave and Employment Protection Act 1987;
- An invitation to staff to take part in a process of consultation before the policy is implemented;
- A brief outline of how the policy is to be implemented and its objectives, including areas of activity to be concentrated on initially (such as recruitment and promotion) and the name of the senior manager responsible for policy co-ordination;
- The goals to be aimed for;
- The timeframe to be set;
- A statement of the benefits of Diversity/EEO in terms of the full use of human resources.

Management should decide on the most effective means of making employees aware of the policy and what is proposed. This might include translating the policy into other languages, or using alternative means of communication for putting the message across. But the success of any initiative will depend ultimately on the extent to which all in management positions are committed to it and have been given the right tools with which to promote it.

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Appointment of Diversity manager/co-ordinator

Appointing a capable and dedicated person as Diversity manager/co-ordinator is imperative to the success of any policy. The person should report directly to a very senior person in the enterprise. The person appointed will be responsible for:

- Co-ordinating the development of diversity planning;
- Arranging diversity training for employees, including senior management;
- Providing technical advice and assistance to those responsible for employment decisions - hiring, supervision, promotion and the like - and monitoring personnel data;
- Developing an effective system of internal and external communications;
- Designing and introducing audit and reporting systems;
- Devising effective methods of data collection for diversity purposes;
- On-going monitoring of personnel data;
- Discussing programmes with the organisation's administration, and with employees, to ensure these are operating effectively;
- Liaising with diversity designated group employees, e.g. via group networks;
- Determining the success of programmes and reporting on the efforts of those involved;
- Making necessary changes or revisions;
- Ensuring managers are kept informed of developments in the diversity area;
- Identifying problem areas;
- Conducting a periodic audit of training programmes, and hiring and promotion patterns so that remaining obstacles to the achievement of objectives can be identified and removed;
- Arranging counselling for employees as requested.

Workforce assessment

Assessing the makeup of the existing workforce is an essential step in any policy implementation. As well, an organisation's rules, practices and policies can, intentionally or otherwise, create invisible, institutional barriers to employment. A statistical analysis of who is in the workforce, e.g. in terms of age, gender, ethnicity, family responsibility, will help to establish what these barriers are.

How an analysis is carried out will depend on an organisation's size and structure. In many cases, personal information will have to be sought specifically for analytical purposes. Employees should understand that providing information is voluntary. How well employees co-operate will depend on how well the reason for information gathering is explained to them. It is important that employees are assured of the confidentiality of the information and know who will have access to data collected.

Suggested methods of analysis are:

- Dividing the workforce up into major areas of activity;
- Analysing lines of progression - that is, the order of jobs that employees pass through in the process of promotion.

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- Establishing the levels at which members of different groups are working (for example, women, members of different racial groups, people with disabilities and so on) will help identify where barriers to employment promotion have been operating. Once these have been identified, an employer may, for example:
 - Consider taking particular initiatives such as providing on- site childcare or funding community-based childcare.
 - Look at how jobs are currently carried out – in some cases, with a degree of modification (particularly in the light of technological assistance now available) or with a willingness to accept non-routine methods, the employment of people with disabilities in areas and jobs not previously considered suitable will become possible. Moreover, people with disabilities often develop different ways of doing things.
 - Asking an employee or potential employee how a job can be done is likely to provide some new ideas;
- Analysing wage and salary levels. Establishing who is being paid what may also help to determine whether, or where, structural discrimination exists;
- Analysing educational qualifications. This kind of analysis will often identify many staff members who are not making full use of their skills and talents;
- Analysing future organisational plans. Analysing future plans will enable organisations predicting expansion to incorporate diversity in their growth plans. It will also help an organisation considering retrenchment to ensure staff cutbacks and diversity initiatives are not in conflict;
- Analysing job applications and applications for promotion. Knowing the kind of people who apply for jobs acts as a monitoring system and helps to ensure that any discriminatory practices in the hiring and promotion areas are eliminated.

Getting the Diversity/EEO message across

Policy implementation, through the introduction of programmes, will be smoother if all levels of the workforce know what is intended and what progress is being made. Managers in particular need to be aware of how implementation is progressing.

Communication is an essential factor. Diversity/EEO networks, or support groups, are useful tools for improving communication and ensuring acceptance of policies and plans. They are also a direct way of tapping into the expertise of Diversity/EEO groups.

Employers, or senior managers responsible for Diversity/EEO implementation, should:

- Hold a series of briefing meetings to ensure the policy is understood, particularly by those who have influence over work opportunities and career progression. This applies to personnel and line management staff (including supervisors) and to all employees, such as telephonists and receptionists, who have contact with job applicants;
- Understand the importance of front or first line management in promoting diversity and in giving encouragement to individuals and groups considered affected by discrimination. For example, some people with disabilities may need particular assistance during the first days and weeks of employment.
 - Supervisors can play a big part in ensuring that a new employee gets off to a good start, helping to encourage the feeling of belonging to a team. In some instances -

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- though by no means all - work procedures may have to be explained more slowly and a longer learning time allowed.
- Other employees with disabilities may need to be watched for signs of fatigue or strain - often the results of trying too hard to “prove” themselves.
- Others will need no special treatment and should not be treated as if they did.
- A supervisor will be in a position to work with the employee and/or a network to decide which approach should be taken.
- Supervisors can also make sure that other staff are not over-protective to someone who cherishes independence and that an appropriate balance is kept.
- Encourage all employees to discuss their career prospects and training needs with their immediate superior, who should also involve the personnel/training officer;
- Provide regular and continuous support and advice to employees at all levels so that misunderstandings can be dealt with and help given with implementation difficulties. Senior management and the Diversity/EEO co-ordinator should hold regular progress meetings;
- Recognise that any change is likely to cause concern and make staff aware that Diversity/EEO is not a threatening process. Any fears should be dealt with as soon as they arise;
- Integrate the policy into day-to day activities so that it becomes standard workplace practice;
- Where appropriate, establish monitoring systems directed to particular groups in need of encouragement;
- Report progress in implementing programmes through in-house news forums, intranet etc.

How to introduce Diversity/EEO programmes

Having established a policy, co-ordinators should develop specific programmes. These might include:

- Orientation courses for staff so they can learn what diversity is and become involved in the process of change;
- Training in the use of non-discriminatory interview techniques for selection personnel. Much will be done to reassure job applicants with disabilities (and, indeed, all job applicants) if it is understood that selection is always on merit and ability to perform the job. In the case of disability, emphasising that this will not affect the consideration which an applicant receives will go a long way towards dispelling natural anxiety;
- Training for all involved in the recruitment process, to provide an awareness of diversity and to make sure no-one is biased against any particular group in society;
- Incorporating a diversity segment into relevant training courses such as public relations, supervisor development, skills for effective management, interpersonal relations and organisational effectiveness;
- Examining existing training materials for bias and preparing new material specifically for use in diversity orientation courses and as a segment in other training courses;
- Ensuring that all who act in a managerial capacity or hold supervisory positions understand the importance of their role and responsibility in promoting diversity.

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Implementation plan

Diversity/EEO implementation will not be achieved overnight, so a plan of action is essential.

- First, the immediate objective must be described in specific terms.
- Second, the steps needed to achieve the objective must be detailed.
- Third, the person responsible for achieving the objective must be decided on.
- Fourth, a realistic target date must be set.
- Fifth, a procedure for evaluating the action taken must be established.

Examples

Example 1

Objective: To ensure all employees understand the reasons for introducing a Diversity/EEO policy and programme.

Steps to achieve objective

Develop relevant information material for use on staff notice boards, publish in in-house newsletter, on intranet etc. and work out a programme of staff meetings. Seek both an individual employee response and reports from meetings held.

Responsibility

Appoint a senior manager to supervise the diversity awareness process.

Target date

Determine as appropriate.

Evaluation

Determine, from replies and reports received, whether further education on the reasons and need for diversity implementation is necessary.

Example 2

Objective: To ensure recruitment procedures encourage Maori applicants to apply for advertised job vacancies.

Steps to achieve objective

Consult with Maori to determine strategies to increase applicants, give name of Maori contact person in ad, use iwi media etc. State only the skills and/or qualifications necessary to do the job and advertise all positions widely.

Responsibility

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Departmental managers/supervisors.

Target date

Determine as appropriate.

Evaluation

Senior manager responsible for diversity/human resource department to check on job responses and persons appointed.

Example 3

Objective: To ensure people with disabilities, in varying age groups etc. are not unnecessarily excluded from certain jobs because of a too-rigid adherence to existing job criteria.

Steps to achieve objective

Encourage departmental managers/supervisors to examine, with people with disabilities, other ways in which jobs might be performed, and be willing to make changes and modifications to accommodate people with disabilities. Because of the range of disabilities, job modification must be carried out on a case by case basis. What is important is to recognise that job modifications are often possible. If necessary, seek advice from organisations involved in finding employment for people with disabilities, for example, Workbridge.

Responsibility

Departmental managers/supervisors.

Target date

Determine as appropriate.

Evaluation

Senior manager responsible for diversity/human resources department to check whether more people with disabilities have been employed as a consequence of the exercise.

Example 4

Objective: To eliminate all forms of sexual and racial harassment.

Steps to achieve objective

Develop, publicise and put into practice a company/departmental policy and complaints procedure.

Responsibility

Senior manager responsible for Diversity/EEO.

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Target date

Four to six months development period.

Evaluation

Human resources department to monitor policy effectiveness - extent to which complaints have diminished/procedure used.

Special measures to promote Diversity/EEO in employment

The following strategies - which the Human Rights Act either permits or insists on - have all been used in successful programmes. Those that are optional may not be needed in every organisation and not all can be adopted at once.

Specific measures should be chosen as appropriate and a decision made about the order of implementation and the time implementation should take. Most importantly, managers, in particular, need to have the ability to put appropriate measures into practice. Strategies might include:

Recruitment

- Developing specific recruitment programmes for occupations where, for example, women, people with disabilities and members of ethnic groups are under-represented. Recruiting efforts might involve communication with relevant networks and the use of the ethnic press and radio;
- Ensuring advertising - both verbal and visual - is non-discriminatory;
- Developing mature-age entry programmes and generally facilitating workforce re-entry through retraining programmes and the like;
- Re-examining existing job criteria. For example, where appropriate, allow for relevant voluntary work experience to be taken into account;
- Identifying jobs where experience of particular problems - such as those likely to be experienced by people with disabilities or with family responsibilities - or a knowledge of other cultures and languages would be a relevant job qualification;
- Liaising with relevant groups to determine strategies, e.g. with Maori either in the enterprise or the community;
- Liaising regularly with educational institutions to facilitate the recruitment of technically and professionally qualified members of minority groups;
- Reviewing career information literature to eliminate any existing bias in content, language and pictures;
- Periodically reviewing recruitment strategies for any remaining bias.

Selection and appointment

- Ensuring that relevant merit is always the criterion for any appointment made. For example, if Maori language or cultural expertise will benefit the organisation, ensure that it is included in relevant criteria to be assessed;
- Including, where possible, designated-group members (for example, women, members of particular racial groups, people with disabilities) on interview panels or selection committees;

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- Developing non-discriminatory interview guidelines, and training selection staff in their use;
- Examining selection practices, tests and required qualifications to identify and eliminate any element of discrimination;
- Examining induction literature and procedures to eliminate any discriminatory effects, together with an examination of base grade recruitment;
- Establishing a mechanism for the periodic evaluation of selection practices and procedures and their outcomes;
- Considering, where appropriate, whether alternative employment arrangements should be made, for example, flexible hours, part-time work or working from home arrangements, to accommodate family responsibilities.

Training and staff development

- Establishing appropriate career development courses;
- Extending training activities to provide courses in necessary basic skills such as English language, letter writing and basic office administration skills. Course access should not be limited to people already in positions requiring the use of these skills;
- Providing induction courses for all employees, including, where relevant, for specific groups of employees;
- Making provision for individual career counselling and ensuring all employees are told about this service;
- Identifying training needs for designated groups in consultation with those groups;
- Encouraging members of particular groups to apply for and to enrol in both external and internal training programmes, and reviewing course nomination procedures;
- Developing training courses in selection techniques where possible sources of discrimination are described and discussed;
- Introducing periodic diversity orientation courses for all staff, to provide information about the nature of diversity and to promote continuing awareness of the need for Diversity/EEO;
- Examining existing training materials for bias and developing new training material for use in Diversity/EEO orientation courses and in relevant segments in other training courses;
- Incorporating a diversity segment into relevant training courses, such as public relations, supervisor development, effective management skills, interpersonal relations and organisational effectiveness courses.

Promotion and career opportunities

- Developing upward mobility programmes for low-level employees so that they have the opportunity to gain skills which will enable them to compete for higher-level positions, for example, through “bridging” positions;
- Identifying career structures with limited opportunity and, where appropriate, consolidating these with related career structures which provide more scope for advancement, or create greater opportunities for lateral transfer;
- Breaking down occupational stereotyping. Not only men, for example, are engineers, nor women early childhood educators;

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- Implementing job redesign and job rotation programmes;
- Establishing elective, permanent part-time employment for a broad range of positions, including those at senior levels;
- Compiling registers and/or skills inventories using objective criteria so that managers become more aware of who is available for management and top-level jobs;
- Ensuring that relevant merit is always the criterion for any appointment or promotion.

Practical steps

Job descriptions and competency profiles

Developing job descriptions which specify only necessary skills and experience and avoid making reference to unrelated job criteria is essential to the proper functioning of any policy of Diversity/EEO. A job description/personnel specifications checklist can help in this process. Managers should ask:

- Does each job have a written description?
- Are job descriptions based on a systematic analysis of key factors, including cultural and linguistic requirements?
- Are methods of measuring performance standards as objective and as flexible as possible?
- Do managers' job descriptions define their responsibility for staff development?
- Have job descriptions been accepted and are copies held by the job holder, his or her superior and the human resources department?
- Are job descriptions kept up to date, compared for consistency and given to job applicants?
- Is there a personnel specification for every job based on an analysis of necessary job skills and knowledge requirements?
- Are skill and knowledge requirements separately categorised as essential or desirable and do requirements reflect diversity needs?
- Where personnel specifications are used in recruitment, is a variety of job applicants attracted (men, women, people with disabilities, members of different ethnic minority groups)?
- Do current job holders, particularly successful ones, meet the personnel specifications?
- If the specification is used to identify training needs, does this result in comparable training recommendations for a range of employees?

Recruitment process

Unbiased publicity material, widely disseminated, should promote a response from the widest range of job applicants, encouraging people to enter into non-traditional occupations. Employers or managers should:

- Check job advertisements for arbitrary restrictions or unnecessary qualifications;
- Aim for those involved with recruitment to have an understanding of what is meant by employment diversity, so that applicants can more readily establish their worth;

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- Prepare structured interview questions;
- Check whether recruitment for management trainees and grades from which managers are developed are based on clearly defined needs;
- Make sure that recruitment literature includes information on flexitime, parental leave, part-time employment, English language courses, study time etc. No one should be passed over for recruitment on the basis of reasons unrelated to the job itself, such as responsibility for children or other dependants. Be prepared to consider flexible work arrangements, the provision of childcare facilities or childcare support;
- Ensure that recruitment techniques are periodically assessed for any kind of bias.

Appointment

In making any job appointment the merit principle should always apply. The aim is to select the best person on the basis of job requirements and ability to carry out the particular tasks and responsibilities involved. The selection process may contain several elements, for example, the application form, aptitude tests and a job interview. The process may present some applicants with unnecessary hurdles. Experience shows that, consciously or unconsciously, the selection process is probably responsible for more discrimination in employment than any other practice. Employers or managers should:

- Ensure selection criteria are based on an analysis of job requirements only;
- Ensure qualification barriers to selection have been assessed for relevance and for sex and cultural bias and for bias against people with disabilities. These include: internal and external examinations; IQ tests; psychological assessments; and medical examinations. In some cases it will be worth considering alternative tests for people with certain disabilities. IQ tests, for example, have a visual bias;
- Ensure there are measurable standards for assessing candidates against all selection criteria;
- Ensure those involved in the selection process are trained in assessing all kinds of candidates;
- Check whether a reasonably diverse range of people succeeds at the application forming stage;
- Check whether a reasonably diverse range of applicants passes any selection tests used;
- Check whether a reasonably diverse range of applicants passes the selection interview;
- Check whether results vary when selection is done by managers, by a specialist recruitment service or by a selection board;
- Ensure all potential interviewers have attended Diversity/EEO training courses, are familiar with the Human Rights Act and appreciate the need to get rid of discrimination in employment;
- Check consultants' knowledge and use of Diversity/EEO practices and brief them on their need to comply with the principles.

New employee

Induction introduces the new employee to the work environment. An effective induction programme will enable a new employee to understand and accept the culture of the organisation. It also offers, if

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designed and conducted appropriately, the opportunity for the employer to learn of the needs and potential of the new recruit. Managers or supervisors should:

- Ensure that induction training is provided;
- Check that induction programmes offered are appropriate to different needs, for example:
 - First time entrant to the workforce;
 - Internal job change or promotion;
 - Women returning to the workforce after time out for family responsibilities;
 - Mature entrants;
 - Maori and members of other ethnic groups;
 - People with disabilities;
- Ensure induction includes an indication of expected standards of performance;
- Check whether the induction process includes the appointment of a mentor to counsel trainees. Check whether the person acting in the mentor role requires training;
- Check that basic job training covers any specific needs identified for particular groups;
- Check that the range and scope of basic job training provides all employees with an equitable basis for career development;
- Check that work standards after training are comparable for all groups. All employees should be given suitable feedback on their performance;
- Check that job-training needs are reviewed regularly and that the identified training needs of all staff are met. Investment in initial training may otherwise be lost;
- Ensure that the needs of all staff receive consideration when training schedules are prepared.

On the job

Training is the main process by which the composition of the existing workforce can be changed; it has a central role in promoting equitable career progression among all groups of employees. A review procedure should be established, and after a designated period of service, the performance of all staff should be subject to regular appraisal and performance assessment, to determine potential for development and promotion. Employers and managers should:

- Check that there is an overall training plan based on an analysis of training needs, but taking into account both group and individual needs. Individual needs can be identified through the personnel plan, through job analysis and performance assessments and through reviews of staff with promotion potential. Group needs can be identified through networks or support groups;
- Ensure that training objectives and programmes are agreed between individual managers and subordinates. Counselling can be an important part of career development, particularly for employees unsure of their employment potential;
- Check, in the case of on-the-job training, if coaching is provided and ensure designated staff are trained in appropriate coaching techniques;
- Ensure that all employees are provided with specific on-the-job training;
- Ensure off-the-job training occurs at times when all who should take part can attend and that those with family responsibilities are reimbursed for any extra-ordinary costs actually incurred;
- Ensure training courses are checked for unintentional bias;

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- Ensure that off-the-job training is subsequently applied on the job;
- Compare feedback from trainees;
- Compare post-training performance reviews;
- Ensure that informal social events occur at times when all staff have the opportunity to attend (and are not, for example, excluded by family responsibilities).

Promotion

Many people reach a plateau in their career progression. Take care to ensure that any plateau is determined by personal ability and motivation and not by the culture of the enterprise and limitations imposed by the attitudes of others. Aim for workplace diversity at all levels of the enterprise. Employers or managers should:

- Ensure that there is a formal promotion policy and procedure based on properly analysed enterprise needs;
- Check that promotion policies and criteria are known to managers and employees alike;
- Check that there is a formal process for identifying employees with promotion potential and ensure that this process is objective. Employment capability - ability to perform the job - should be the important factor;
- Ensure objectivity by checking, where the promotion process is based on an analysis of existing skills/qualities, that a systematic analysis has been carried out;
- Involve a more senior manager to help counter any bias (such as assumptions about women's career aspirations or those of employees with disabilities) where immediate managers are responsible for identifying employees with promotion potential. All managers need to be trained to minimise risks such as these;
- Check that the promotion process takes account of the aspirations and aptitudes of individual employees, as well as of current job performance (for instance, are employees counselled about what their aims should be in relation to the organisation's needs?);
- Keep a record of promotion appointments and examine this regularly to ensure that appointments are not limited to members of one particular employee group. Appointments should be made, on ability, across a broad spectrum of employees.

Staff records

Record keeping is essential to the proper monitoring of policies and programmes. While personal information must be voluntarily given, it is important that staff, and potential employees, know the reason why it is needed, and that as provided in terms of the Privacy Act, it will remain confidential. Employers or managers should:

- Check that information on workforce composition has been collected for:
 - Each section, division, branch etc. of the organisation;
 - Each geographic work location;
 - Major groupings within the organisation, for example, managerial and administrative, professional, clerical, skilled or unskilled employees;
 - Major occupational groups, such as, clerical, engineering, process work;

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- Types of employment - permanent, temporary, full or part-time, casual, seasonal;
- Length of time in positions;
- Resignations and transfers - why these occur and which areas have the highest staff turnover. Exit interviews are important here;
- Qualifications and capabilities required for promotion;
- Enrolment in internal and external training programmes;
- Employee aspirations and expectations;
- Educational study courses leading to qualifications relevant to career advancement;
- Skills, experiences, which may be regarded as “informal” qualifications yet, can still benefit the workplace e.g. supervisory/teaching skills developed through involvement with marae committees or kohanga reo.

Policy review

To function effectively, every Diversity/EEO policy and programme must be properly monitored. Regular, preferably annual, audits should be carried out.

The degree of formality needed will vary with the size of the organisation. In a small organisation with a simple structure, it may be enough to assess the distribution and payment of employees from personal knowledge. In a larger and more complex organisation, a more formal analysis may be required.

Sensible monitoring will show who applies for promotion and who does not, who is recruited and who is not, and whether particular groups of people are concentrated in particular occupations, particular jobs, or in certain sections or departments of the organisation.

A regularly updated workforce analysis will go a long way towards making sure that actions taken to promote workforce diversity are successful. Regular feedback from Diversity/EEO groups is a crucial part of monitoring progress.

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