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Research conducted January 2022-November 2023



#Operation Transparency: Often Tolerated, Never Acceptable

The diversity data gap in charitable funding and governance



About Money4YOU

We are tackling economic inequality through financial education, entrepreneurship training, and capacity building tools for funding sustainability.

Money4YOU, formerly Money4Youth, is a UK-based Charity founded in 2014 by AmickyCarol Akiwumi MBE. Our mission is to eradicate the economic inequalities experienced by youth, entrepreneurs and non-profit organisations from underrepresented communities.

We prioritise individuals and organisations from more marginalised communities as a long-term solution to inequality and multi-dimensional poverty.

We are a Foundation CIO with our trustees with lived experience mirroring those we serve.

Through our interventions, we inspire people to be the architects of their own lasting change.

A group of diverse people, including men and women of various ethnicities, are gathered in what appears to be a meeting or workshop. They are looking towards the right side of the frame. The image is overlaid with a semi-transparent dark grey layer, and white text is superimposed on this layer. The text reads: "This report attempts to go some way to furthering transparency, but the rest of the journey is yet to come..."

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Note from our CEO



AmickyCarol Akiwumi MBE

CEO & Founder, Money4YOU

Dear #WorldChangers,

Without abandoning all that we know, we need to transform funding parity. Charities are essential, but they will need to be built and experienced differently in the future. They need to continue to build skills, but work is changing rapidly and the point can't be left in the dust. At present, there are too many digital divides, too many aspects of discrimination.

Our report projects a foundational principle, an extended view of charities as being more transparent, extending the perspective of inclusion for participants and the recognition of all forms of diversity.

This principle recognises that we live in a world of interdependencies and that Charities need to 'see' each other. Charitable funding as a public endeavor for the common good, is also a global common good, which implies new responsibilities at an international level.

With substantial input from across the charitable sector, sharing their hopes and fears and ideas - we are pleased to present this commissioned report. Its findings go some way to furthering transparency, but the rest of the journey, as the #OperationTransparency campaign cites, will require the Charity Commission to collect and report diversity data.

Over the last 9 years it has been my privilege to lead Money4YOU and today, to present: 'The Diversity Data Gap in Charitable Funding & Governance' report. It's an all-important stepping stone to a new social contract for the Charitable Funding sector, where the concept of transparency is its leading precept.

I believe that the most important thing about this report is that it centers the major challenges and opportunities before us in the Charitable Funding Sector.

Introduction

In 2020, as the covid-19 pandemic began to hit communities of colour and community organisations disproportionately hard, Money4YOU received more and more calls for help. As we expanded our services, we began to wonder: How many organisations could we reach?

Or, a more basic question: How many non-profits led by people of colour sustainably operate in the UK?

We quickly discovered there was little relevant data. For example, if you wanted to find out how many land-owning charities there are in the UK, you could do so quite easily from the Charity Commission's Register of Charities, but there's nothing on diversity at a per-charity level. The lack of data also makes it very difficult to see which board diversity initiatives have worked and which haven't.

So, in January 2022, we launched **#OperationTransparency: a call to the Charity Commission to make diversity and equalities data part of the Register of Charities.**

Alongside our campaigning work, this report asks a set of specific questions, targeted at various aspects of discrimination in the sector, with a particular focus on racism. We focused on several specific modes: representation and transparency around diversity in the Charity Commission's workforce and senior leadership; funding parity for organisations led by people of colour; the inclusion of lived experience in senior leadership at the UK's largest and most influential charities; and the regulation and enforcement of equality duties.

In 1962, the West Briton and Cornwall Advertiser reported that the purpose of the Register of Charities, established under the Charities Act 1960, was to "make the best possible use of funds": it would "provide the public, including social workers and potential beneficiaries and benefactors, with information about all charities." The Charity Commission's own research indicates public trust in charities decreases when the public suspects they are not "living their values," that data about charities helps people decide how and when to donate, and that the public is alert to whether "the work of a charity is informed by individuals with relevant lived experience related to the cause, and therefore an understanding of the realities of the cause" (Charity Commission, 2022b).

This report attempts to go some way to furthering transparency,

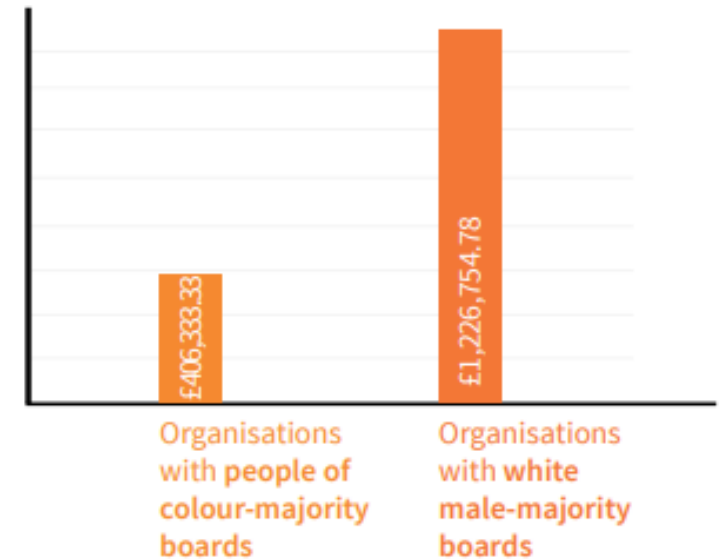
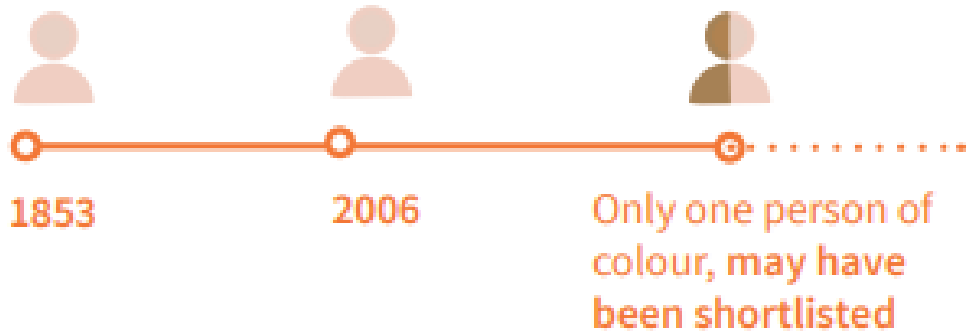
but the rest of the journey is yet to come.



Executive Summary

- As far as we can tell, no person of colour served as Chief Charity Commissioner between 1853 and 2006, nor Chair of the Charity Commission from 2006 onwards, and it is possible that only one person of colour has ever been shortlisted. It is also possible that no person of colour has ever served on the interview board for shortlisted candidates. We have not been able to obtain definitive answers on these questions from DCMS, which oversees the appointments process.
- Significant central government departments, including the Department for Levelling Up, Housing and Communities (DLUHC) and the Department for Business and Trade (DBT), do not follow any specific guidance on complying with the Public Sector Equality Duty (PSED) when choosing the recipients of general grants to the private and voluntary sectors. Grants from DLUHC to women-led organisations in that year apparently made up 0.08% of the £5.6 billion total disbursed.
- We see a ‘triangle effect’ when comparing grant amounts with board diversity: small grants go to a diverse range of organisations, but the larger the grant, the more likely the grantee board is to contain a large proportion of white people and men. The effect is more pronounced for ethnicity than for gender.
- Within our sample of grants from the UK’s 10 largest grant funders, the average amount awarded to organisations with a majority of white men on the board was £1,226,754.78. The average awarded to organisations with a majority of people of colour on the board was less than a third of that, at £406,333.33. The overall average grant amount was £1,119,983.20.
- The dataset we built shows £29.8 million in grants to organisations with what appear to be all-white boards within one-year funding periods for a total of 10 funders. At least one such grant came from each funder we looked at.
- The average grantee board for the grants we examined was judged to be about 81% white and 52% male.
- Some grantee boards that were judged to be all-white were also judged to have very diverse groups of target service users or beneficiaries, suggesting a mismatch between charity leaders and the communities they claim to serve.
- It is difficult to judge whether the Charity Commission’s current efforts to encourage charities to recruit a diverse range of trustees—or, in the Commission’s words, “support and engage with opportunities and schemes to increase diversity of trustees and to understand what barriers are having an impact” (Wait 2023)—are effective, because the Commission does not monitor diversity in the sector in a sufficiently systematic way.
- Large UK-based charities often try to draw on the expertise of people with lived experience, but they rarely embed lived experience in their leadership or governance.
- None of the five super-large charities we reviewed had a dedicated executive, board member, or senior committee for lived experience.
- The Equality and Human Rights Commission, which has a statutory responsibility for enforcing the Equality Act 2010 (which itself contains the public sector equality duty), has been systematically underfunded for over a decade. Adjusted for inflation, its 2020-21 spending was 70% lower than its 2010-11 spending. Day-to-day expenditure limits on average across all departments increased by 7% over the same period.





Recommendations

- 1 The Charity Commission should collect and report on diversity data in the charity sector in line with the proposal established in #OperationTransparency.
- 2 The Charity Commission should make a public commitment to antiracism and antiracist practices.
- 3 The Government should restore funding for the Equality and Human Rights Commission (EHRC) to its original 2010 level, adjusted for inflation, i.e. to about £91 million per year.
- 4 Charities should be asked to describe and explain the level of lived experience in their leadership structures when they publish annual reports.
- 5 In general, government equalities statistics should pay greater attention to intersectional disadvantage, as far as possible within best practice on data protection.
- 6 The Charity Commission should publish a review of diversity and inclusion in appointments to the post of Chair, using its own data and within best practice on data protection, as soon as possible.
- 7 DCMS should publish a complete list of Chief Charity Commissioners and Chairs of the Charity Commission as far back as records can be found, or commission the archival work necessary to compile a list.
- 8 The Charity Commission should add a search function to the Register of Charities which shows the board as it stood at any point in time defined by the user. This would allow users to see trusteeship history much more easily than they can now.



Part 1: Workforce

How many women of colour have been shortlisted to the Charity Commission's Chair position?



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“Philanthropic paternalism often reflects a common inattention on the part of donors to the importance of egalitarian social and political relations and to the kinds of respect that are due to prospective beneficiaries. ... Paternalistic relationships may be structured by non-coercive forms of influence and control and be promoted in non-coercive ways (e.g. by the incentives created by background inequalities and injustices).”

Saunders-Hastings

2019:116-119



Part 1: Workforce

How many women of colour have been shortlisted to the Charity Commission's Chair position?

We chose this question as a test case for whether government diversity statistics can address intersectional leadership diversity. As far as we can tell, no person of colour has ever served as Chief Charity Commissioner, nor as Chair of the Charity Commission, and it seems likely that no woman of colour has either.

To our knowledge, the Chief Charity Commissioners before 2006 included Mr Peter Erle (HC 1876), Sir James Hill (HC 1881), Sir William Robert Seymour Vesey Fitzgerald (HC 1888), Sir Henry Longley (Morning Post, 1890), Sir Charles Henry Alderson (Dover Express, 1903), Sir George Young, Mr Charles Archer Cook (Western Daily Press, 1906; Morning Post, 1906), Mr Herbert Picton Morris (Evening Mail, 1919), John Frobisher Mills (Edinburgh Gazette, 1921), Francis William Walker McCombe (Birmingham Daily Post, 1955), Mr C.P. Hill (West Briton and Cornwall Advertiser, 1962), Mr T.C. Green (Birmingham Daily Post, 1970), Robin Guthrie (Liverpool Echo, 1988), Richard Fries (HC 1998), John Stoker (Stoker, 2001), and Geraldine Peacock; she became the first Chair of the Charity Commission (Social Finance [2023]), whose Chairs since then have been Dame Suzi Leather, William Shawcross, Baroness Stowell of Beeston, Ian Karet (acting Chair), and Orlando Fraser.

It is possible that only one person of colour has ever been shortlisted, and that is certainly the case for the last two application rounds, covering 10 years, 74 applicants, and nine BAME applicants, as DCMS defines them. It is also possible that no person of colour has ever served on the interview board for shortlisted candidates, and this appears to be the case since at least 2006. DCMS told us it “does not publish any information relating to the diversity of assessment panels, as this is ultimately personal data and would not be consistent with our privacy policy.”



Civil Service workforce and senior leadership diversity have been deliberately monitored and published since 2011 (Cabinet Office, 2022a). So has overall diversity in public appointments—but with breakdowns provided per department, not per role (Cabinet Office, 2022b). The Chair of the Charity Commission post comes with significant power and we are deeply concerned that diversity in the role is not deemed important enough to measure and report on its own terms.

At the time of research, the words ‘racism’ and ‘antiracism’ did not appear on the Commission’s blog at charitycommission.blog.gov.uk. They also do not appear in its published tweets (@ChtyCommission). None of the words ‘racism,’ ‘antiracism,’ ‘diversity,’ ‘inclusion,’ or ‘equal’ appear in its Business Plans for 2021-22, 2022-23, or 2023-24 (Charity Commission 2021a, 2022a, 2023a). In general, the Commission very rarely mentions these issues publicly outside its dedicated four-year Diversity and Inclusion Strategies. A blog post published by CEO Helen Stephenson, for example, less than two months after the murder of George Floyd, with the phrase ‘Recent events’ in the headline, does not mention inequality of any kind, nor diversity or inclusion (Stephenson, 2020), but only “people of all backgrounds” making contributions to the sector.

A large variety of charitable organisations have committed to antiracism, especially since 2020 (Weakley, 2020). They include Comic Relief (2020), Arts Council England (Henley 2020), Shelter

“The Court of Appeal has made it clear that public bodies should place considerations of equality, where they arise, at the centre of formulation of policy, side by side with all other pressing circumstances of whatever magnitude. ... Compliance with the [public sector equality] duty should result in a better understanding of the needs of service users, resulting in better quality services which meet varied needs.”

Equality and Human Rights Commission (2021). ‘Technical Guidance on the Public Sector Equality Duty: England.’



How has public sector outsourcing affected the level of workforce diversity (and transparency around it) of those delivering public services?

External suppliers make up roughly a third of government spending (Institute for Government, 2018) and deliver critical services in almost every sector, including prisons and probation, employment, health, immigration, education, environment, IT, and transport. But the people delivering services in this way are not part of government workforce diversity reporting. Following the Financial Conduct Authority’s decision to require diversity statements and statistics from listed companies (FCA, 2022), private sector workforce diversity is now reported by large companies. However, there remains a significant data gap in the charity sector, which often delivers public services through contracts and general grants, especially social services (see Part 2c in this report). Similar issues have already arisen through the gender pay gap reporting requirements: agency workers, consultants, and subcontractors are counted by their primary employer, not the body they carry out functions for (GEO, 2023), making the gender pay gap difficult to track in organisations that outsource significant amounts of work.

Public sector procurement is guided by the idea of “value for money,” which the Crown Commercial Service (2023) defines as “the best mix of quality and effectiveness for the least outlay over the period of use of the goods or services bought.” We believe ‘value for money’ should include more than quality and cost. Public procurement should be about investing public money equitably, using the enormous financial engine of government to build a fairer society, and not repeatedly awarding large contracts to the same people out of an exclusive focus on cost. To make better public investments, we need good equalities data on the private and voluntary sectors (see Davies 2011).



Part 2: Funding Distributions

What proportion of charitable funding in the UK is currently awarded to BAMER-led organisations?



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Introduction

Charitable organisations led by people of colour in the UK have long struggled to win funding, particularly when it comes to large grants. To take just one recent example, the National Lottery Community Foundation (NLCF)'s Phoenix Way programme was announced in July 2021 (Ricketts 2021), delayed indefinitely in March 2022 (Hargrave 2022), and partially launched in April 2023 with just £1 million in funding, none of which came from NLCF (Hargrave, 2023). Serious issues also plagued Comic Relief's Global Majority Fund, under which some grantees delivered their programmes at a loss after being awarded smaller grants than they had applied for (Money4YOU, 2023b). These kinds of issues are by no means unique to charities and social enterprises led by people of colour but they do appear to be concentrated around such organisations, as this section makes clear.

To compile an overview of gender and ethnic diversity in large grants from major funders in 2019-22, we reviewed the top 10 grants in the most recent annual reporting period from 10 of the UK's largest funders (ACF 2021) and estimated the board demographics of each grantee organisation. We carried out data collection in the Spring and Summer of 2022 and our analysis is based on the most up-to-date information available at that point unless otherwise stated.

The research question presents a difficulty on its face: almost no charities publish statistics on senior leadership diversity. The only way to measure it at scale is to look up photographs of individual board members and guess their gender and ethnicity. The methodology is obviously very problematic, but without it we would have to rely on large-scale surveys, which only the Charity Commission has the combined authority and resources to conduct.

Many funders do not publish their own data on the demographic diversity of their funding decisions, so we were also unable to approach the question from funders' perspectives. The DEI Data Standard, first published in 2021, contains space for nine protected characteristic categories to be applied to service users, the mission and purpose of the grant, and the grantee's leadership, and thus proposes a consistent and consensus-driven way for funders to report on who they fund with respect to marginalised groups—but it is voluntary, and involves just 34 funders as of September 2023 (Funders Collaborative Hub, 2021). The data are not yet published by 360Giving, so they do not appear on GrantNav, the leading grant data publication platform for the UK. Funders like Esmée Fairbairn do publish data they have collected through the DEI Data Standard, but so far they have done so in aggregate, without mentioning specific organisations (Esmée Fairbairn Foundation, 2022).



While the group includes large funders like Garfield Weston, Esmée Fairbairn, NLCF, Henry Smith, BBCiN, Comic Relief, and Trust for London, major funders like Wellcome, Leverhulme, CIFF, Arcadia, Gatsby, Wolfson, and Sigrid Rausing have not joined.

Several other voluntary initiatives on transparency and diversity have emerged in recent years, like RACE Report and the Foundation Practice Rating (FPR). Voluntary initiatives help, but they are not enough. Only half of what ACF judged in 2022 to be the top ten funders by distribution—Comic Relief, Esmée Fairbairn, BBC Children in Need, Henry Smith Charity, and Paul Hamlyn—are members of the Foundation Practice Rating group (ACF, 2022).

We believe this tension arises in what are essentially regulatory data initiatives when they are undertaken by private actors. The private-initiative-based approach promotes what Anand Giridharadas (2020) has called “the idea that social change should be pursued principally through the free market and voluntary action, not public life and the law and the reform of the systems that people share in common ... and that the biggest beneficiaries of the status quo should play a leading role in the status quo’s reform.”

Grant-makers managing private endowments have no legal obligation to distribute money to organisations led by women, people of colour, or any other marginalised group if their mission and vision do not rest on principles of equality. In practice, however, most funders claim to operate fairly and for the good of all.

“Privately-funded trusts and foundations are almost uniquely unaccountable.”

Tania Mason (2022), Foundations Unwrapped

FPR aims to measure best practice in grant-making by assessing funders’ levels of diversity, accountability, and transparency (FPR, 2022). The Wellcome Trust, which we estimate distributed £10.1 million to organisations with all-white boards of trustees in the financial year 2020-21, received an overall A rating on the first FPR research round, and a B for diversity. The FPR found that “so few foundations published a breakdown of their staff or trustees by gender, ethnicity or disability that this data could not be used.” In the second FPR research round, completed in 2023, diversity “remains the weakest” of the assessment areas, with no foundation achieving the top score (FPR, 2023).



Methodology

Amongst funders, we did not include government departments, nor Leverhulme, Harding, Football Foundation, and Gatsby, because most of their grants go to exempt charities (like universities and colleges), social enterprises, individual researchers, or other government bodies. The remaining grant-makers by this rubric are the Wellcome Trust, Children's Investment Fund Foundation, Comic Relief, Garfield Weston Foundation, Arcadia, Esmée Fairbairn Foundation, Sigrid Rausing Trust, BBC Children in Need, Paul Hamlyn Foundation, and Wolfson Foundation. Recipient organisations that have boards in multiple countries have been judged on their UK-based board.

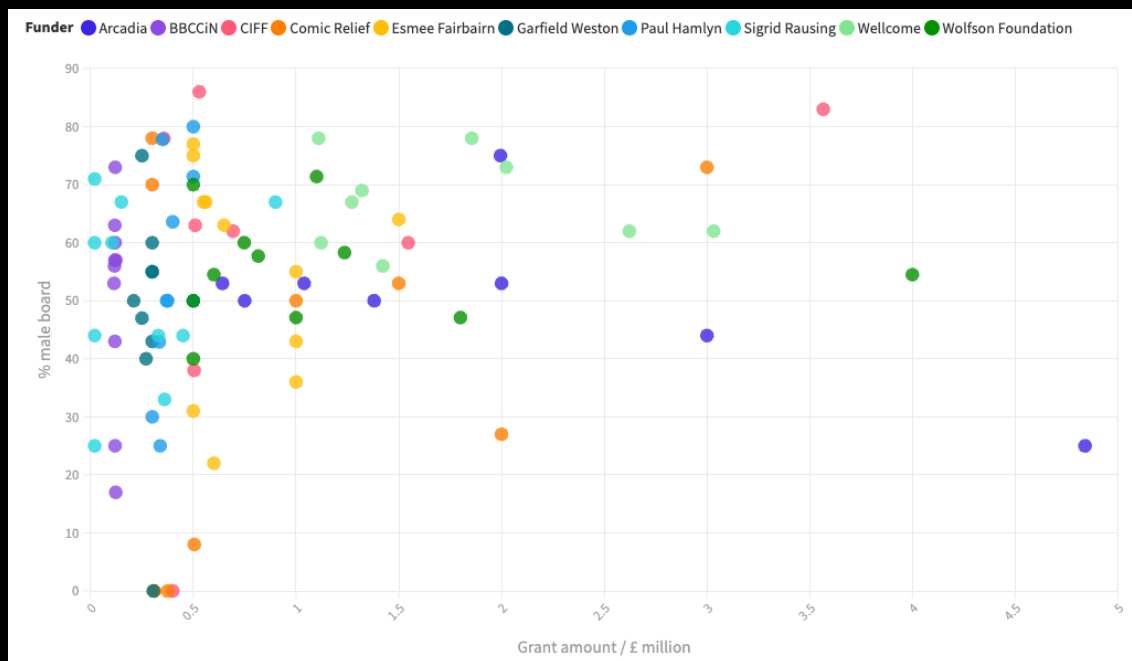
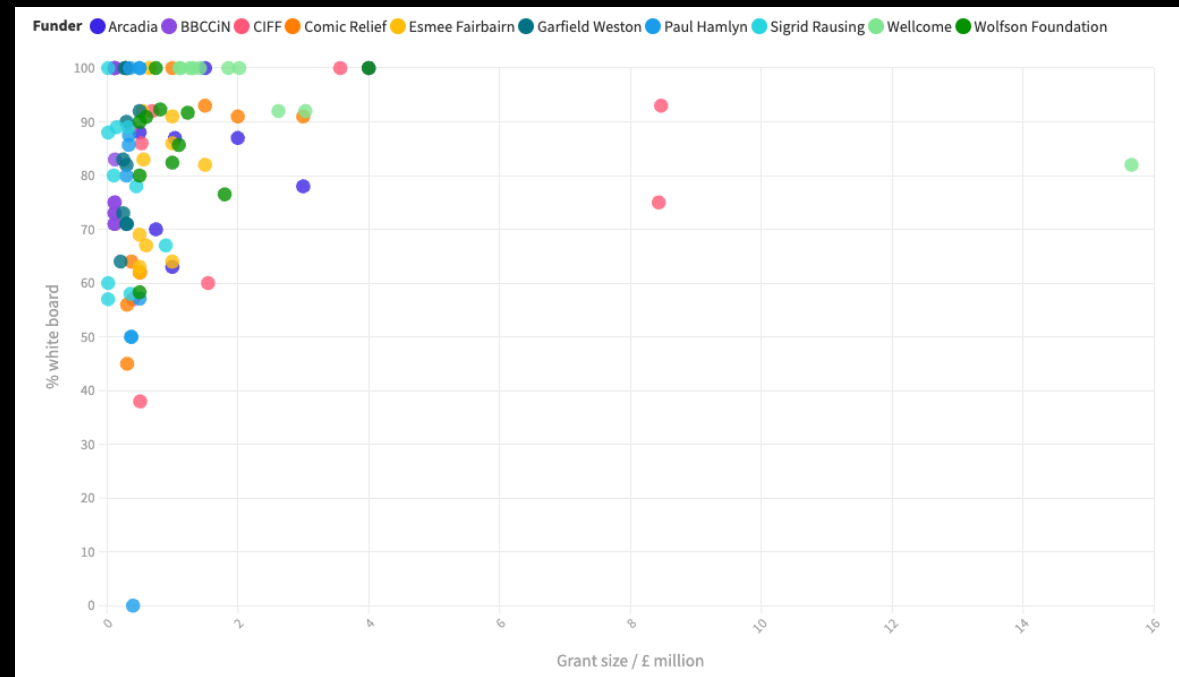
Funders' publication of grants data is patchy at best, even leaving aside equalities data. The data used by ACF to compile tables of funders by size are not readily available in a standardised format and are particularly opaque from CIFF, the Leverhulme Trust, the David and Claudia Harding Foundation, and the Football Foundation. CIFF does not break down its awards by country and we were therefore obliged to check each grantee's country of registration for every grant on its Annual Report (CIFF, 2020) to compile a list of grants awarded in England and Wales.

We assessed gender and ethnicity with photographs from organisations' websites and by cross-referencing and verifying with social media, news media, and the websites of other organisations. Where conflicts existed between the organisation's website and the Charity Register—as they very often did—the organisation's website was taken as the authoritative source. Where we could not find photos of an individual we excluded them from the board count, and where photos were not retrievable for 25% or more of the board members, we excluded the organisation from the study.

This methodology is problematic, to say the least; it is the best available solution given that self-reported data on trustee diversity do not exist, but the results will inevitably be imprecise. Nor do funders appear able to solve the problem on their own. Arcadia told us that it does not “ask grant holders to provide ... personal data about their trustees or staff, or collated demographic data that isn't publicly available,” but it does “take into account the make-up of [the] executive leadership team and board (if relevant).” If Arcadia is not asking for any demographic data, we are unclear about how it is taking the “make-up” of the leadership team and board into account.



Results



The average grant awarded to organisations with a majority of white men on the board was £1,226,754.78, which is just over three times that awarded to organisations with a majority of people of colour on the board, at £406,333.33. In fact, only three grants were made to such organisations: £400,000 from Paul Hamlyn Foundation to Action for Race Equality in 2022, £509,000 from CIFF to the Doc Society in 2020, and £310,000 from Comic Relief to the End Violence Against Women Coalition in 2019.

The dataset we built shows £29.8 million in grants to organisations with all-white boards, with at least one grant from every funder.



We expect some funders' systems and processes to have changed since the reporting period that we have used, although when we conducted data collection in early 2022, some of their statistics were two years out of date. Importantly, though, present future improvements do not neutralise past failures. There can be no excuse for funders to have been operating inequitably at any time.

After Dominic Raab was found in April 2023 to have bullied civil servants in departments he led, Simon McDonald, a retired diplomat and former Permanent Under-Secretary for Raab, was interviewed by BBC journalist Justin Webb on Radio 4's Today programme. It was put to McDonald that Raab's behaviour had, rather than revealing outright malice, simply failed to keep up with shifting expectations of workplace behaviour. McDonald responded: "Although it might previously have been tolerated, [it] was never actually acceptable."

It is encouraging to see that the average proportion of both people of colour and women is higher on most of the boards represented in these major grants than it is on trustee boards more generally, as reported in the Charity Commission's Taken on Trust report in 2017. That study found that roughly 92% of trustees were white and 67% were men; the average proportion of white people on the boards under consideration here is 81% and of men is 52%.



Discussion: The Triangle Effect

We can see a ‘triangle effect’ in grant amounts: organisations of all demographic proportions are winning small grants, but as we move up the funding scale towards larger grants, the proportion of people of colour and women on the board decreases. We see the effect in terms of both gender and ethnicity, but it is more pronounced in ethnicity.

Many organisations with 100% white boards have very diverse groups of service users. In 2019, Arcadia awarded £4.84 million to the Illuminated River Foundation, which creates LED light installations on London’s bridges, following a £6.16m grant in 2017 (Arcadia [2023]). The Illuminated River Foundation has an all-white board of four people, but is pitched as a public art installation for London, one of the most ethnically and culturally diverse cities in Europe (BBC, 2016).

Many other organisations appointed one or two people of colour to a board of 10 to 15 people. At the time of our research, the National Churches Trust [2023] had 12 trustees, of whom 11 appeared to be white, and the British Academy had 26 trustees, of whom 24 appeared to be white and none appeared to be women of colour.

No funders in our dataset awarded any grants to organisations with 100% male boards, but questions about gender balance remain. The Institute for Strategic Dialogue, which studies global human rights and disinformation, was awarded £529,000 in total by CIFF in 2020, and appeared to have a UK board of six men and one woman.



Prisoners Abroad, which aims to help all British people detained abroad, appeared to have an all-white board until Desmond Skyers was appointed in March 2022, and did not respond to our request for comment. As of December 2022, Plymouth Marine Laboratory’s website claimed that the organisation is made up of “a diverse range of people” before listing what appeared to be an all-white Board of Trustees.

The Paul Hamlyn Foundation’s Director of Strategic Learning, Insight and Influence, Holly Donagh, said the Foundation is “committed to the principles of greater diversity, equity and inclusion” and “seek[s] to address historic imbalances in funding patterns” in “some funds.”

The Charity Commission’s current emphasis is on “encouraging people from a greater range of backgrounds to consider being a trustee” (Money4YOU, 2022). It is hard to judge whether this emphasis is working because of the present lack of data on how trustee diversity is changing over time: as of September 2023, the last available report is from 2017. Secondly, encouraging new trusteeships does not directly encourage greater awareness, networking, and visibility for charities already led by and for underrepresented people.

Thirdly, improving future recruitment practices will not create public accountability for past failures. After so many revelations of appalling workplace conditions at large UK-based charities over the past five years, assurances are not enough; as this report goes to print, Arts Council England has published an internal review (2023) that reveals workplace ableism and racial stereotyping. Monitoring and evaluation are routinely, and rightly, required of charities; they should also be required of the Charity Commission.



Case study: The Power of Nutrition

The Power of Nutrition, whose board appeared to consist of four white men and one white woman at the time of this study, aims “to raise money and create partnerships to advance the fight against malnutrition in Africa and Asia”; it was awarded US \$3.57 million by the Children’s Investment Fund Foundation (CIFF) in 2020, and won substantially larger grants from 2015 to 2019. Its total award from CIFF over five years was over US \$60 million. (The Power of Nutrition added five people of colour to its board between November 2022 and June 2023.)

As of September 2023, Mark Cutifani was the Chair of its board. From 2013 to 2022, Cutifani was CEO at the mining giant Anglo American, which is currently fighting a class action lawsuit brought by the residents of Kabwe, Zambia, along with several UN bodies and Amnesty International, on allegations that a mine run by its South African subsidiary between 1925 and 1974 caused acute lead poisoning affecting approximately 100,000 people (Amnesty International, 2023). Another of its board members, Al Cook, is an Executive Vice President at the Norwegian oil company Equinor, and was Chief of Staff at BP. Cook worked at BP for two decades up to 2016, when the company was accused of deliberately exporting high-sulphur diesel to Ghana (Ross 2016).

The Power of Nutrition is an extreme case in which the experiences and interests of a charity’s trustees diverge from those of the people it aims to serve—apparently without disqualifying the charity from enormous grant awards. In this case, we noticed that the board of a charity aiming to serve exclusively people in Africa and Asia appeared to contain only white people, and decided to look further into the board’s level of relevant lived experience. Several of the recommendations in this report could have made this apparent discrepancy more evident to the general public and to people considering donating to The Power of Nutrition, including simply adding space on Annual Returns for charities to describe and explain the level of relevant lived experience amongst their board members. The Children’s Investment Fund Foundation did not respond to our requests for comment.



Limitations

Ethnicity and gender are deeply personal characteristics. The idea of having your ethnicity and gender judged from a photograph, or even a selection of photographs, would be offensive to many people.

It is also inaccurate: people of varied ethnic backgrounds who do not easily fit the white/non-white binary are likely to have been miscategorised, and the binary itself racialises people in misleading and inaccurate ways. Variety in lighting conditions, the camera's white balance, and skin tan can all affect the assumed ethnicity. The methodology is used here because it is the only distinction that we felt able to make based purely on names, biographies, and photographs. People from minoritised white backgrounds, including Traveller communities and Eastern European backgrounds, face severe racialised discrimination in the UK and yet are grouped with white British people here.

We could not consider invisible characteristics which give rise to widespread and severe forms of discrimination, including disability, sexuality, religion, age, and gender reassignment, simply because they are not legible from trustees' photographs and biographies.

In many cases, it was not possible to establish exactly who had been on the board at the time when the grant we examined was awarded; in such cases we took the board composition at the time of the research, which was up to two years later.

Despite all the limitations and ethical problems outlined above, we believe that the work is necessary for two reasons. Firstly, we have made every effort to ensure its accuracy and so the broad strokes of its conclusions can be taken as indications of where the problems might lie, at least in large grants from large funders.

Secondly, this methodology section demonstrates just how opaque the funding landscape can be. Seeing whether funders are living up to their word should not be this resource-intensive. We need a reliable data source that puts responsibility for equality, diversity, and inclusion, which is so central to the health of the sector and to public trust, in the hands of the regulator.



To what extent do the largest and most influential charities in the UK represent relevant lived experience at the senior leadership level?

Our research indicates that large UK-based charities often draw on the expertise of people with lived experience, but rarely embed such people in their leadership or governance structures.

Experts by experience should be present at every level in any organisation that aims to help people. The grassroots-only model of lived experience engagement relies on knowledge extraction from people with lived experience while denying them authority in the very organisations that rely on their expertise.

“I really can’t think of a sector where the “Nothing about us without us” mantra should hold more true than our sector, than the voluntary sector, by nature.”

Maurice Mcleod, Earning Trust: How do we Design Fair, Impactful and Equitable Charity Diversity Data?
(07/07/22)

Measuring lived experience is inherently difficult: each cause has different relevant experiences, and even then, a grey area separates having lived experience from not having it—with further subjectivity on what counts as relevant lived experience. Faced with these kinds of problems, regulators often ask for statements to be published in annual reports, or at least create an optional space where regulated bodies can do so. The Charity Commission should do the same here.

For the present research, we started with 15 of the largest UK-based charities by income, excluding funders, hospitals, and religious and education institutions. We then chose the 10 with the largest lobbying footprints by number of government meetings since 2012 according to Transparency International’s Open Access UK database: CR-UK, Mencap, Save the Children, Oxfam, Macmillan, Barnardo’s, British Red Cross, British Heart Foundation, National Trust, and Shaw Trust. From that list, we chose the most widely known charities as identified by YouGov in Q4 2022: British Heart Foundation (BHF), Oxfam, Macmillan, British Red Cross (BRC), and Cancer Research UK (CR-UK).



Some board members and executives choose not to mention their lived experiences in public biographies, and even where they do, biographies cannot capture the fullness of people’s lives. We therefore looked at organisation structure and communications as well, and reached out to each organisation individually for comment.

British Heart Foundation spokesperson Laura Piercy said: “Although we do not specifically mention lived experience in these public statements [biographies], it is important to highlight that many of our people are impacted by heart and circulatory diseases, either personally or through family members or friends. This is often a contributing factor in wanting to volunteer or work for BHF.”

None of the five organisations we looked at had a dedicated executive, board member, or senior committee reporting directly to the board or C-suite that was solely focused on lived experience. In fact, outside Oxfam, which described clearly relevant lived experience in several trustees’ website biographies, lived experience was barely mentioned.

Non-executive positions in lived experience abounded, including Head of Lived Experience, National Engagement Lead, and Lived Experience Partner at Macmillan. Macmillan has eight directorates, but lived experience is part of the remit of a sub-directorate—Engagement—which sits within the Advocacy and Communications directorate (Macmillan [2023]).

All the charities we studied have service user groups in an advisory capacity, like BHF’s Patient Advisory Group, Macmillan’s Innovation Community, and various patient committees advising research and management teams at CR-UK. Other advisory work includes reviewing research grant applications and competitions at BHF, and lived experience on advisory committees, like BHF’s Clinical Studies Committee and Patient Data and Information Panels.

Experts by experience are often interviewed by third-party research firms, placing them at some remove from the decision-making centres of charities themselves. The firms include Revealing Reality (Macmillan, 2018) and OKO (2019), which both worked for Macmillan, and Savanta, which worked for BRC (2022a). Some charities in the ‘super-large’ group conduct regular direct user surveys, like Macmillan’s Cancer Patient Experience Surveys.

Some charities have a network for experts by experience, including BHF’s Heart Voices, Macmillan’s Cancer Voices Community, and the British Red Cross (BRC)’s VOICES Network, which it has described as “a collective of refugees and people seeking asylum” who “speak out about issues that affect them” (British Red Cross [2023a]), and which it says is the successor to the AVAIL (Amplifying the Voices of Asylum seekers and refugees for Integration and Life skills) project, co-ordinated by the BRC and co-funded by the EU’s Asylum, Migration and Integration Fund (British Red Cross [2023b]).



Arrangements in which refugees, asylum seekers, and other experts by experience are only offered advisory roles and not leadership roles reflect what Sonia Ben Ali (2018), Founder and CEO at Urban Refugees, has described as an inadequate status quo in humanitarian work. Ben Ali calls for humanitarian actors to “engage RLOs [Refugee-Led Organisations] within their structures and mechanisms,” including planning and co-ordination. Especially when RLOs are “seldom part of the formal humanitarian response and are almost never capacitated, engaged and financially supported for what they do or what they could do,” it is important to invite RLOs and people with refugee backgrounds to take on more power and influence than simply ‘reporting up’ to decision-makers.

Even within patient advisory groups, diversity is a problem. BHF said: “A current priority is to ensure that this network [Heart Voices] is more reflective of the demographics of the UK population.”

Tahera Bandali, Macmillan’s Head of Lived Experience, said: “We have a responsibility to recognise the barriers and inequalities that exist within both Macmillan itself and the wider sector. It is our duty to transfer power back into the hands of communities who are experts in their own experiences. “We recognise that providing an equal seat at the table for communities who experience cancer is critical to the quality and legitimacy of our work to tackle health inequalities—and we still have more to do. We’re also aware that there are communities who haven’t always turned to Macmillan for support. We’re working hard to rectify this and are starting to see some progress.”

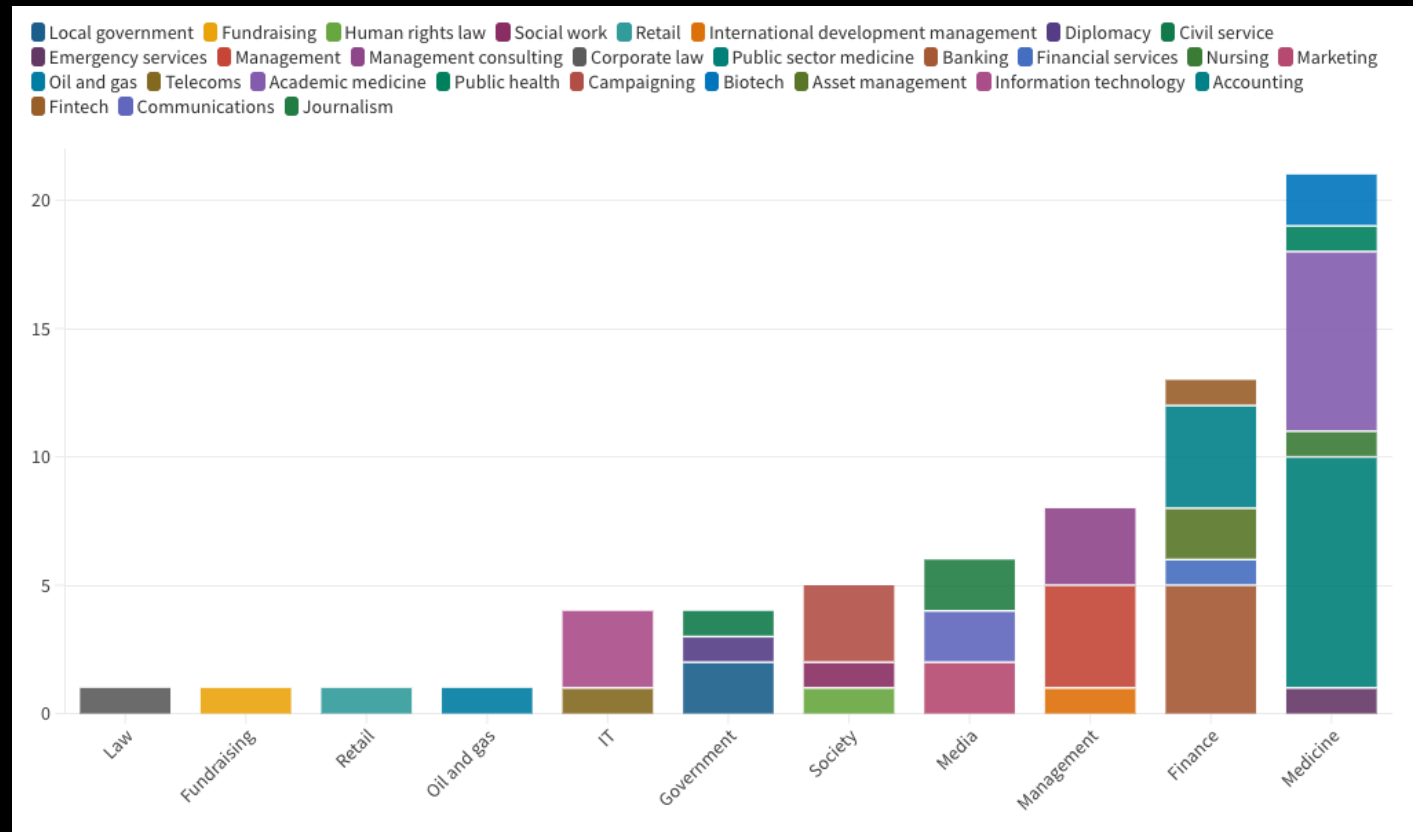
Medicine was by far the best-represented background profession on the boards we looked at, which is expected for a group including CR-UK, Macmillan, and BHF. Of the 65 trustees whose biographies we found, 22 had backgrounds in retail, oil and gas, IT, marketing, management consulting, financial services, banking, biotech, and asset management.

Of the people on these boards with backgrounds in medicine, we found that nine were consultant physicians, one had a background in nursing, and one in the fire service. Combined with the preponderance of private sector roles, it is almost certain that this group of trustees has an average income far above the vast majority of their service users.

It is telling that, on the five pages of trustee biographies we looked at, we found the University of Oxford mentioned 16 times, Cambridge nine times, and no other university more than three times.

Trustees with professional backgrounds in civil society—including fundraising, campaigning, human rights law, journalism, and international development—numbered only eight, six of whom were at Oxfam. From the public sector there were 16, including civil service, diplomacy, local government, social work, and public sector health services. The rest were largely academics.





As far as we can tell, there is no publicly available lived experience policy at Oxfam, but it does have a Youth-Led Participatory Action Research Guide (2022a) and claims that its research is co-created [2023]. CR-UK [2023a] has an extensive set of ‘Patient Involvement’ guides. Macmillan (2023) has advertised for a Strategy Lead on Lived Experience. BHF does not mention lived experience as distinct from ‘diverse’ experience, nor the word “lived,” in any of its public policies, as far as we can tell.



To assess how policies translate into an emphasis on lived experience in important documents like Annual Reports, we looked through the most recent full annual report for each organisation and found the following:

- **The only mention of lived experience in Macmillan’s 2021 Annual Report is in its EDI section, under employee networks, about an employee network for employees with lived experience of cancer.**
- **Expertise through lived experience is not discussed in Oxfam’s Annual Report 2021/22 (2022).**
- **BHF’s Annual Report (2022) mentions the establishment of a lived experience advisory network and of an internal diversity and inclusion affinity and listening group that prioritises lived experience. It says affinity groups “provide a clear line of communication to senior leaders to voice concerns or issues and increase awareness of different lived experiences.” They notably do not provide leadership.**
- **CR-UK mentions the inclusion of people with lived experience on its new organisational and research strategy in its Annual Report 2021/22 (2022a), but the strategy itself (CR-UK 2022b) only includes a vague commitment in the acknowledgements to “inclusive public involvement and [to] make sure that people’s lived experiences of cancer guide, shape and inform everything we do.”**
- **BRC’s Trustees’ Report and Accounts 2021 (2022b) does not mention lived experience at all.**

Amongst other positive developments in the charity sector, Parkinson’s UK recently committed to more than doubling the proportion of people with disabilities in its workforce in the next three years (Legraien 2023). CR-UK signed a Patient & Public Involvement commitment in March 2022 [2023b], although the main document does not commit to any specific targets. But far too often, large and influential charities treat lived experience as a resource for researchers, not as a leadership quality.



What level of regulatory oversight is there to ensure that public funding distribution complies with the public sector equality duty?

Section 149 of the Equality Act 2010 requires public authorities to have “due regard” to equality. They must try to “eliminate discrimination and harassment ... advance equality of opportunity” and “foster good relations between persons” grouped by protected characteristics (EHRC 2021a:15-16). Equalities regulation could contribute to real progress towards social justice. In practice, the agency responsible for its enforcement, the Equality and Human Rights Commission (EHRC), has faced chronic and extremely severe underfunding since 2010. In 2012, the government halved EHRC’s workforce (Ramesh 2012); in 2020-21, its total operating expenditure was just under £17.5 million (EHRC 2021), down from £48 million in 2010-11 (EHRC 2011, Government Equalities Office 2013). Adjusted for 2021 inflation, that represents a real-terms cut of 70%.

In the same period, the Charity Commission’s total operating expenditure fell by 20.4% (Charity Commission 2021b, 2011), and Ofsted’s by 50% (Ofsted 2021, 2011); the Care Quality Commission’s spending rose by 31.9% (2022, 2011). Ofgem’s rose by 69.4% (2021, 2011). Average day-to-day spending across all departments for this period increased by 7% and investment spending by 31% (House of Commons Scrutiny Unit, 2021). Before 2017-18, the figure was –13%, and EU exit preparations and pandemic spending largely fuelled the increase up to 2020-21. Nevertheless, there is a clear gap between the level of spending cuts apportioned to EHRC and those given to other departments.

EHRC can conduct assessments of PSED compliance, but its scope to do so is inherently limited by its budget—and Departments can make an assessment much more resource intensive by keeping equalities data to a bare minimum.

When a plethora of equalities legislation was brought together under the Equality Act 2010 and enforcement placed in the hands of the EHRC, the rationalisation and streamlining had broad support, and made equalities rules easier to understand. But that concentration of responsibilities also makes enforcement extremely vulnerable to budget cuts.



For this study, we sent Freedom of Information requests to five departments about their distribution of general grants: Department for Levelling Up, Housing and Communities (DLUHC), Department for Transport (DfT), Foreign, Commonwealth and Development Office (FCDO), Department for Education (DfE), and Department for Business and Trade (DBT). They managed the five largest departmental general grant portfolios in 2020-21, apart from HM Revenue & Customs, which distributed funds for the Coronavirus Job Retention Scheme and so had an outlier year.

The Cabinet Office (2023) says general grants account for a third of government grant spending and “allow the government to secure policy objectives which the market cannot, such as innovation and research, and they allow an effective funding route for the voluntary and charitable sectors, for example to address homelessness and regional inequalities.”

We asked for any data each Department holds on what proportion of general grants in 2020-21 were allocated to women or to organisations whose boards are majority women, a basic equalities question whose answer should be part of ensuring PSED compliance. Of the five departments we asked, one responded with the figures we asked for.

DLUHC said it awarded “£5,154,061.20 [£ 5.15 million] in grants to women-led organisations” in 2020-21. Government grants statistics for that year show DLUHC awarded £6.7 billion in general grants, which suggests grants to women-led organisations made up 0.08% of the grants total. In its FOI response, the Department said it has “no specific guidance around the collection of data relating to PSED compliance in the department’s distribution of general grants.” It references the Government Grants Minimum Standards for Equality Impact Assessments (Cabinet Office 2022c), which highlight potential “difference[s] in levels of uptake or participation by different groups or differences in the impact of the proposal on different groups,” but adds, “the grants standards do not offer any guidance on who should receive grants.

The Department added: “DLUHC also has additional guidance on our intranet about equality and diversity considerations in policy making, including PSED considerations. This guidance is applicable across all policy areas, including those which relate to general grant schemes.” None of the guidance documents it enclosed in reference to this point make any reference to choosing grant recipients. In view of the fact that DLUHC holds these figures, it is disappointing to see them not published as part of the yearly Government Grants Statistics publication.



DfT said: “The Department for Transport does not have a process or system that captures the level of detail requested.”

DfE said: “The information you requested is not held by this Department as we do not currently have the means to collect gender specific information with regards to allocation of grants.”

The Department for Business and Trade (DBT) said it “does not have any central policies or guidance specifically relating to the distribution of general grants and the Public Sector Equality Duty (PSED). The Department ensures that the PSED is applied whenever a public function is carried out, including the distribution of grants.” We cannot see how DBT applies PSED in the distribution of grants given that it lacks the relevant policy and guidance.

DBT said it “do[es] not believe that [it] will be able to answer [the] request without exceeding the cost limit of £600 provided under Section 12 of the Freedom of Information Act (‘the Act’). This represents the estimated cost of one person spending 3.5 working days in determining whether the Department holds the information, including locating, retrieving and extracting it.” The response strongly suggests the data are not routinely collected: “The Department’s grant delivery spans a range of teams and in order to establish any relevant information the Department holds would require a search of correspondence held by all officials across all of the teams. We consider that doing this would place an unreasonable burden on the Department.” The Foreign, Development and Commonwealth Office (FCDO) declined to provide the information we requested under the same rationale.

FCDO publishes grants data under the International Aid Transparency Initiative (IATI) Data Standard, which does include a ‘gender equality’ policy marker specifically for projects aimed at gender equality financing, but the budgets published by IATI are all listed as 0 USD for ‘parent’ activities. ‘Child’ activities in the IATI classification do contain budgets, but the vast majority do not appear in search filters for policy objectives. Further, the IATI identifier numbers for each grant do not match FCDO’s own DevTracker database.

It is possible to find Official Development Assistance (ODA) data for the UK as a whole from OECD statistics [2023]. In 2020-21, for example, the UK committed 5.1% of its “screened bilateral allocable aid” to “gender equality and women’s empowerment,” or 68.6% when including both ‘principal’ and ‘significant’ objectives, but ODA comes from various government departments, not just FCDO.

The FCDO’s latest Official Development Assistance report (2022) does not mention gender at all—nor women, except to mention that the Conflict, Stability and Security Fund targets a Government national security priority on “women, peace, and security,” and that the Home Office’s main overseas development priorities include “ending violence against women and girls.”

360Giving’s GrantNav database, which is widely used by UK grantmakers for publishing grants data, also lacks fields on the proposed service user group targeted by each grant. A study by 360Giving (2018) asking “what grants have been awarded for women’s causes” used only keywords in grant descriptions; a similar study in 2020 on grants for LGBTQI+ organisations (Rubinstein 2020) used keywords in grant titles, grant descriptions, and grant programme descriptions.



The Cabinet Office runs a Grants Centre of Excellence, which advises other government bodies on best practice in making grant awards, but its Guidance for General Grants paper (Cabinet Office 2021) does not mention equality, equity, or diversity under its “key benefits.” In the Guidance document’s 13 pages, PSED is mentioned once: “In developing new grant schemes, government grant making organisations should have regard to the requirements of the Public Sector Equality Duty.” Courts enforce the public sector equality duty piecemeal, through a variety of legal mechanisms, including judicial reviews. Many regulators, however, simply do not have the data to track whether or not the organisations they regulate comply with their equality duties.

“Reporting data is not necessarily the driver of change. But the production of data and the understanding of that data, apart from anything else, generates conversations externally. And it makes it possible for people to hold organisations to account. But probably even more importantly, it actually generates those conversations internally.”

Jane Ide, Earning Trust: How do we Design Fair, Impactful and Equitable Charity Diversity Data?
(07/07/22)



Conclusion

The inequalities and blind spots detailed in this report matter deeply because non-government bodies matter deeply, and they hold immense power to influence the public sphere. We admire the recent efforts of many colleagues in the charity sector to take anti-racist action into their own organisations, often in the face of government apathy or even hostility, but we cannot afford to ignore the wider picture. The diversity data gap needs and merits a structural solution, not a series of voluntary private initiatives.

If this research has shown anything, it is that funding inequality is a political problem and that political solutions are within our grasp.



Campaign Toolkit



What is the campaign aiming for?

Operation Transparency aims for a single, specific outcome: a commitment from the Charity Commission to add diversity data to the Register of Charities as soon as practically possible.

What should I do with this toolkit?

We've written this to help you get up to speed quickly with why our campaign started, how it's going, and how you can help.

Everyone has different reasons for using public regulatory data. Donors are often interested in finding out more about the operations of charities they might donate to. Researchers and campaigners might want a better understanding of the sector. Charities themselves could compare their own performance to their peers. At Money4YOU, our need for public regulatory data is rooted in our basic philosophy: all our interventions should be based on reliable, ethically collected, up-to-date evidence, including our groundbreaking work with BAMER-led nonprofits through the AVOCADO+ programme, BAMER HUB, and our other training and networking initiatives.

Your work might draw on public regulatory data in a different way. The more we can illuminate varying needs for good data (and what they mean for the way we structure the data), the higher our chance of achieving positive change.

What previous research should I be aware of?

The most comprehensive recent research is *Taken on Trust*, a large survey-based project on the diversity of charity trustees in the UK. It was conducted by the Charity Commission in 2017, along with City, University of London's business school (Cass at the time, now Bayes), NCVO, the Cranfield Trust, DCMS, and the Worshipful Company of Management Consultants. It sets out the most comprehensive picture we currently have of trustee diversity by age, ethnicity, and gender. It does not cover disability, sexual orientation, or socio-economic status. Out of an estimated 700,000 trustees active in England and Wales, *Taken on Trust* selected a stratified sample of 19,064, of which 3,617 were judged "suitable for analysis," out of 3,728 received in total; in other words, the survey represented just over 0.5% of the trustee population.



The report made 28 recommendations, of which numbers 25 and 26 are:

25. Capture information on the gender of trustees. It is apparent from discussion of the survey findings that diversity is an important policy issue, so information on gender is also important. The most straightforward way would be to request this information in aggregate form in the annual return, but consideration could also be given to capturing it for individual trustees.

26. Introduce a requirement to report on board diversity in the annual return for all charities with an annual income in excess of £500k.

Despite the Charity Commission's claim that its response to this report addresses the recommendations, the response makes does not mention diversity data and makes no policy commitments on it. Our 2021 FOI request to the Commission confirmed that it had not taken any policy decisions on this since 2017.

Second, we recommend reading Home Truths, jointly written by Voice4Change England and ACEVO in 2020. It draws on qualitative data from surveys, interviews, and group discussions to paint a detailed picture of racism in the charity sector. While short on statistics, it presents a very convincing case for action, particularly for those who are unfamiliar with the situation in the UK.

Inclusive Boards published reports on diversity in charity boards in 2016 and 2018. In 2022, it published a blog post, 'Representation of Protected Characteristics at Board Level in the Charity Sector,' summarising findings from both along with more recent data from elsewhere. The research data present ethnicity and diversity statistics on the top 500 charities by income at the time. 'Charities: Inclusive Boards 2018' also contains interview data and makes comparisons with the 2016 report.



Do It Now Now's Common Call Fund published a paper of insights from its second round of grant funding in 2022. The funding was specifically aimed at Black communities in the UK, so its observations help illustrate the problems that most often come up.

The Financial Conduct Authority published a consultation paper in 2021 (CP21/24) on its proposal to require listed companies to disclose gender and ethnic diversity for their boards and leadership teams as part of their annual reports. The final version of the paper is PS22/3 (Policy Statement 2022 Nr. 3). It makes useful reading because it sets out the logic behind monitoring diversity, the harm caused by the diversity data gap, and a practical approach to implementation. Along with the Government Equalities Office's implementation of gender pay gap reporting, we regularly cite this example to show that regulatory diversity data is both necessary and achievable.

Green Park's 'Leadership 2,000' report from 2018 uses a statistical model to predict the ethnicities and genders of 2,000 sector leaders based on their names, cross-checked with other sources including annual reports, charity websites, the Register of Charities, and LinkedIn. 'Leadership 2,000' has a much more detailed breakdown of diversity in various senior positions—Chair, executive teams, whole charities by income, funders and non-funders—than Taken on Trust.

Our campaign has also been covered in the press: the Civil Society piece headlined 'Increase charities' diversity data reporting requirements, Commission told' contains a concise explanation of the campaign, and has some quotations from the Shadow Minister for Civil Society at the time, Barbara Keeley MP. Operation Transparency has been covered in Third Sector, Civil Society News, the Charity Times, and UK Fundraising, often several times by each outlet (all the relevant links are on our campaign webpage).



Who else is part of the campaign?

We know that the Charity Commission won't move ahead with the changes we've proposed unless a broad range of charities support the changes. Our starting point was working with other organisations that aim to increase trustee diversity, like Getting on Board, Trustees Unlimited, Reach Volunteering, Action for Trustee Racial Diversity, I.G. Advisors, and the Young Trustees Movement.

We've reached out to larger-scale organisations too, and the Charities Aid Foundation, which is the UK's largest charity by income, signed a Statement of Support which you can read on our campaign page. Amongst funders, the Co-op Foundation has also signed.

Amongst umbrella bodies, we have a signature from Black Fundraisers UK, a special interest group of the Chartered Institute of Fundraising.

New Philanthropy Capital, one of the sector's most influential thinktanks, has signed the campaign. Other signatories come from the small charity sector, across many different areas of work, including Black Heroes Foundation, Charity Excellence Framework, The Kids Network, and The Good Trouble. Campaign groups like Charity So White, Race on the Agenda, and Charity So Straight have also signed, along with highly experienced professionals in the sector like Elizabeth Balgobin, Natsayi Sithole, Andy Gregg, and Louise Snelders.

What is the Charity Commission's public position?

After we launched Operation Transparency, the Commission committed to considering our proposal as part of its consultation on changes to the Annual Returns process for 2023-25. The purpose of a consultation is to release proposals to the public and report on their feedback, but our proposal was not included in the paper put out for consultation. The Commission's statement reads as follows:



With regard to diversity, we agree that an understanding of the trustee population, including the backgrounds and characteristics of trustees, is important. However, we think there are significant challenges to collecting this through the Annual Return. In particular, we have an obligation to ensure that we are collecting accurate information. Given that in the majority of cases a nominated respondent completes the Annual Return on behalf of charities (some of which have a large trustee population), we think there is a significant practical risk to requiring a nominated respondent to gather and share special category demographic data about others, which they may not currently collect, rather than trustees having the opportunity to self-certify and declare this data about themselves. However, our policy work on understanding the barriers to increasing the diversity of trustees is ongoing and through this we will consider where there are other opportunities to collect data on the trustee population.

We welcome the Charity Commission's update on its position. However, we struggle to understand the concerns it articulates around diversity data reporting in the Annual Return, and in particular the implication that any demographic data not directly self-reported by individuals are inherently inaccurate.

The idea that a regulator should refrain from asking for aggregated data in an annual report or return because of a risk that regulated bodies might report it inaccurately would not fly in any other sector and it should not fly here. The Financial Conduct Authority (FCA) has just asked for precisely this data from listed companies in their annual reports under PS22/3. Gender pay gap data is collected, analysed, and reported by employers to the Government Equalities Office. Data collection and aggregation by regulated bodies, followed by reporting to the regulator, is simply how regulatory data collection works.

“You can’t fix what you can’t see, so unless you’re gathering the data, you’ve got no chance of doing anything about it.”

Maurice Mcleod, [Earning Trust: How do we Design Fair, Impactful and Equitable Charity Diversity Data? \(07/07/22\)](#).

The Charity Commission has offered no comparison to best practice in other sectors facing similar challenges. It does not appear to have asked charities what support they would need to ensure accurate diversity data reporting.

The Commission’s consultation response commits to “understanding the barriers to increasing the diversity of trustees,” including “whether there are other opportunities to collect data on the trustee population.” Our understanding is that this could refer to the My Charity Commission Account system announced last year. We have privacy concerns about individuals being asked to disclose their protected characteristics directly to the Commission, particularly through a centralised online system that would be inherently at risk of a cyberattack. This is why we proposed anonymised reporting, aggregated per charity rather than per individual, with a ‘Prefer not to say’ option in all data fields, in line with FCA PS22/3.

In several external conversations during this campaign, several influential organisations have told us they cannot take a public position on our proposal because of the closeness of their existing relationship with the Charity Commission or with DCMS, despite expressing support for the campaign privately. We support discretion and the careful formulation of policy, but taking one position in private and another in public is not transparent and accountable policy-making: it simply closes down the conversation. We find the level of institutional secrecy we have encountered deeply troubling.



Why does the campaign not demand specific kinds of equality data?

We modelled our proposal on a Policy Statement the Financial Conduct Authority (FCA), which regulates financial services and financial markets, released last year (PS22/3). The FCA has asked listed companies to report on board and executive gender and ethnicity composition on a 'comply or explain' basis: they must either meet specified diversity targets on their board or explain why they don't.

We have referenced the FCA's proposal so we can focus on the bigger picture of accountability in the charity sector, rather than on the technicalities of implementation. Any change to the Annual Returns would go through a policy review by the Charity Commission and then be put out to public consultation. Ideally, we would like the data categories to go far beyond what the FCA asks for, especially by including age and disability, which charity boards often fail to diversify—and doubly so because disability was not included in the Commission's Taken on Trust research.

Right now, however, there is no diversity data on the Register at all. We are focused on forging an agreement in principle to put diversity data on the Register and we will separately argue for what we believe to be best practice in its implementation.

What about GDPR and data privacy?

Every field in both internal diversity monitoring and aggregated reporting will need to have a 'Prefer not to say' option, in line with general best practice in equality monitoring and HR. We would also like to see the Charity Commission advise charities to give 'Prefer not to say' wherever they can see a potential security or privacy risk: this could be where there are fewer than four people on the board or on the leadership team, for example.

Beyond that, the published data tables should only contain percentage figures, and should report each protected characteristic separately, so that no one can identify an individual from the tables.

We have asked the FCA to share its thinking with regards to data privacy on PS22/3 and have so far not received a detailed response. However, if the private sector can monitor and publish diversity data, we believe the charity sector can too.



Why don't you restrict your proposal to larger charities, such as those with over £500,000 annual turnover? Smaller charities might struggle with this requirement.

The current Register of Charities contains more than fifty unique data fields on every charity, covering everything from a charity's contact email to its legal structure, its accountant's qualifications to whether a trustee also directs a subsidiary, its geographic area of operations, policies, other regulators, which trustee is the chair, and whether or not the organisation owns land. It is insulting to suggest that in this reporting environment, diversity is the lowest priority.

Money4YOU works with hundreds of small charities. We still run the only accelerator programme tailored to small BAMER-led non-profits in the UK, and we are one ourselves. Take it from us: small charities are well aware of our compliance duties and we have the capacity to meet them—we would not be able to operate, much less increase our impact, if we didn't.

Small charities have the authority to speak about what they are and are not capable of. None of the small charities we have spoken with have raised concerns with us over compliance or resourcing for the proposed change.

Why is #OperationTransparency separate from initiatives like RACE Report and the DEI Data Standard?

Diversity, equality, and inclusion should be placed at the centre of good governance. When we ask how well a charity governs itself, we should ask how diverse its board and leadership teams are, and to what extent they represent relevant lived experience. That means diversity data is regulatory data, just like income and expenditure, vision, and performance. We do not believe voluntary reporting initiatives will close the diversity data gap.

Private initiatives might encourage organisations to give greater and more informed regard to diversity, but if members of the initiative do not publish the raw results, nobody outside their organisations can scrutinise them. Even putting aside the possibility that funders could cynically skew their presentation of results to hide problematic findings, they might also miss relevant questions that an external observer would want to ask of the data.

And as with so many other self-regulation initiatives, the organisations least likely to sign up are precisely the ones that are already the least accountable and that we most need to hear from.



Isn't lived experience more important than diversity? Aren't you just encouraging identity politics?

Diversity data should never be viewed in isolation. We are interested in how leadership diversity correlates with other characteristics like income, location, political influence, type of income, and a variety of other characteristics, so that we can build a detailed picture of inequalities and create the most effective interventions possible to counteract them.

In our research on workforce diversity and lived experience, our first recommendation was that charities should be required to write lived experience statements in Annual Returns. Clearly, individual charities should not be condemned for lacking certain kinds of diversity where it is not relevant. But we also need to be open to scrutiny in the first place.

Public services are close to collapse, many charities didn't survive the pandemic, and millions of people are struggling to make ends meet. Why should we care about charity leadership diversity data?

Oxfam's CEO, Danny Sriskandarajah, published an article last year arguing that we are living through an inequality crisis, not a cost-of-living crisis (Sriskandarajah 2022). We share his view.

To solve the inequality crisis, we need grant funders—custodians of enormous concentrations of wealth—to distribute funds fast and equitably. They stand little chance of creating positive impact, even if they have the best of intentions, without comprehensive and up-to-date equalities data.



Has the campaign organised any events?

Yes! We've had three events: two Zoom discussions and one in-person panel.

Watch or read 'Bridging the Data Gap: From transparency to decolonisation' with Malcolm John (Founder of Action for Trustee Racial Diversity), Penny Wilson (CEO at Getting on Board), Martha Awojobi (Director and Founder of JMB Consulting), Daniel King (Professor of Organization Studies at Nottingham Trent University), and Kunle Olulode MBE (Director at Voice4Change England).

Watch or read 'Earning Trust: How do we design fair, impactful and equitable charity diversity data?' with Jane Ide OBE (CEO at ACEVO), Paul Amadi MBE (Chief Supporter Officer at the British Red Cross), Maurice Macleod (CEO at ROTA), and AmickyCarol Akiwumi MBE FRSA FCIOF (CEO and Founder of Money4YOU). Our third event, Reimagining Funding and Finance for BAMER-led Nonprofits, with Julie Pal (CEO, COMMUNITY Barnet), Liz Pepler (Director, Embrace Finance), James Muphy (Founder, The Good Trouble and former CEO, Lincolnshire Community Foundation), Cris Ferreira (Engagement Manager, National Lottery Heritage Fund), James Lee (Consultant, City Bridge Trust), and Ali Habib (Consultant, Action Funder) took place at our 2022 Dragons' Den event. Read more about it in our blog post at <https://www.money4you.org/operationtransparency/operationtransparency-re-imagining-finance-and-funding-for-bamer-led-organisations/>.

What can I do to help?

It will take both external conversations (between the Charity Commission and third-party charities, individuals, and campaigners) and internal conversations (between the Charity Commission and other government bodies, MPs, and Peers) to make this change happen in a consensus-driven way.

You can contact the Charity Commission, either directly with your own message to them, or through Money4YOU, by signing our campaign letter, which is still open for signatures. If you work or volunteer for a charity, try to write on its behalf if you can: the Commission's statutory responsibility is to oversee charities.

You can also contact your MP and ask them to write to the Charity Commission about diversity data. The same goes for any Peers you are able to get in touch with.

Most MPs hold constituency surgeries where you can make an appointment. Again, try to make contact on behalf of your charity if you're part of one, and contact the MP in the constituency where the charity is based.



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