

CERTIFICATION OF DIVERSITY IN THE WORKPLACE

**(With particular reference to disabled
people)**

AUDITOR'S MANUAL



FUNDED BY THE EUROPEAN COMMISSION



ASOCIACIÓN INICIATIVAS Y ESTUDIOS
SOCIALES

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With support from the European Community –

**The information contained in this publication does not necessarily reflect the position
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I - INTRODUCTION

This manual is a key component of a DG-V supported project which consists in awarding formal certification to employers who successfully implement inclusive employment policies. Although the idea of social auditing is not new, the object of this project is to devise an approach in consultation with representatives from groups who are at risk of exclusion themselves, in particular disabled people.

This manual has been written as a reference for social auditors to adopt a consistent approach and to develop a framework of performance criteria that will secure fair outcomes.

This Manual has been conceived in the light of the positive contributions made to the field of diversity in the workplace. It reflects the spirit of The Amsterdam Treaty, the new European Employment Strategy, the newly adopted Articles on social cohesion and on anti-discrimination, the partnership approach adopted by social partners and the development of the business case for diversity.

The isolated and “curative” measures, which previously aimed at improving the employment of disadvantaged groups, have now been replaced by a more preventive and integrative strategy. The Employment Guidelines which have emerged from this Strategy now integrate the contributions of a variety of partners including Member States, the contributions of employers and the contributions of other social partners who have their own roles to play. Actors from

diverse sectors bring their influence to bear on each other to create policies towards a fully participative and diverse workforce.

The adoption of Article 137 on “social exclusion” and then with the adoption of “article 13”, the “anti-discrimination package” now extends the anti-discrimination coverage beyond the equal treatment of men and women by inviting Member States to “combat discrimination based on sex, disability, age or sexual orientation”. Furthermore, the monitoring process that relates the EU Guidelines to the national Action Plans ensures that Member States take appropriate steps to mainstream the inclusion of disadvantaged groups in national employment policies.

In parallel, fundamental shifts are taking place in the business community:

- There is a sense that globalisation, deregulation, the impact of new technology, the shift in demographic trends etc. call for greater overall adaptability. Many key corporations recognise that unemployment is a major threat to social cohesion and that a fragmented and polarised society is a potential cost to the balance sheet.
- The “business case” for diversity is gaining wider acceptance by employers who count the cost of not reflecting a diverse customer base.
- Research evidence shows that consumers are more likely to buy from a company which demonstrates its active involvement with “causes”, and companies are becoming sensitive to the fact that public image, reputation and fulfilling consumers’ expectations bring financial advantages.
- In order to meet these expectations organisations are developing performance indicators and standards to measure their performance and assist with improvements.

As its title suggests, this Manual is not only about the implementation of equal opportunities policies. Where implementing equal opportunities policies responds to legal, social and moral concerns, diversity policies take this forward. Managing diversity consists in reviewing workplace policies, practices and organisational culture to ensure that employees from diverse backgrounds do not face obstacles, that they compete on equal terms and contribute their own creative talents for the benefit of personal development and business advantage.

The object of this project is to ensure that the principles of diversity also apply to the development of the auditing process. In securing the participation of representatives of groups who are “at risk” of exclusion in the development of a process of certification, this project aims at encouraging better practices and also, hopefully, feed into the momentum which the field of social auditing is gathering.

This manual constitutes a key stage in the development of the certification process.

At this stage of development, the manual provides the first building blocks with a dual role :

- to provide the basis for developing the appropriate assessor training
- to provide the basis for the development of a certification process based on a multi-discrimination approach which will have been fully validated by the appropriate social groups at risk of exclusion.

In this spirit, we have provided the following material :

1. Arguments in favour of carrying an audit (The Business Case)
2. A clarification of the aims of auditing and certification
3. Directions on how to use the manual
4. Benchmarks and indicators to be discussed and revised in the course of piloting
5. A scoring framework

II – THE PRELIMINARIES

1. THE BUSINESS CASE : WHY DIVERSITY AT WORK IS IMPORTANT

Why should companies recognise that the employment of a diverse workforce is key to maintaining a competitive edge ?

1. Demographic drivers

1. 1. Demographic changes in the workplace : In the EU the number of women in paid work increases every year. More women with children are now in employment and there is an expectation (71% of German women) that career development should not be hindered by a lack of childcare.

1. 2. The ageing of the workforce : By 2010 **% of the UK workforce will be over 45 years whilst 16-24 years old will make up only 17%. In Germany 3 out of 5 employees will be older than 45 years.

By 2020 there will be 20% fewer young people and 20% more older people in the UK labour market. In Italy half of the population will be over 50 years.

1. 3. The growth of minority ethnic communities : Ethnic minority groups will soon make up 25% of London's workforce and this trend is to be found in other major cities like Rome, Paris, Vienna, Amsterdam and Berlin. However, they are almost twice as likely to be unemployed compared to their white counterparts.

1.4. Disabled people

For many years, statistics have shown that disabled people are 3 to 4 times more likely to be "economically inactive" than non-disabled people. A more recent survey shows no improvement (1997-1998) and that disabled people are as willing to work as their non-disabled peers.

2. Career expectations :

Increasingly employees expect fair and equal access to opportunities, feel they have little loyalty to a single employer and wish to move where their talents are recognised. Furthermore, they wish to be able to have a balance between work and family life. (A survey by Coopers and Lybrand revealed that 47% of students said that achieving a balanced lifestyle with a rewarding life outside of work was their top priority).

3. Accessing new markets:

Disabled Europeans represent 19 million potential customers. Employing disabled people can help increase the number of disabled customers using the service. Their personal experience and insights can constitute a unique source of practical and innovative solutions. They can contribute to the strategy to win new markets: In the UK, it is estimated that disabled people (approximately 10% of the population) spend around £40 billion a year in goods and services.

4. Stakeholders expectations

Consumers increasingly make decisions according to their consciences, and they favour organisations which they feel operate fair and responsible policies: 86% of consumers agree that they have a more positive image of a company if they see it is doing something to make the world a better place. This is also supported by the findings that organisations, which are serious about diversity, show better overall financial performance.

The impact of corporate image is such that financial analysts increasingly take equal opportunities and diversity performance into account when they evaluate business potential.

Also, there is the possibility that employers who do not commit themselves to equal opportunities may fail to get business from government agencies and other organisations.

5. Legal considerations

With regards to disability, the most common approach by European governments to get disabled people into employment has been the imposition of an obligation to employ a “quota” of disabled people within the workforce. Also, a number of countries are looking to the experience of USA and the United Kingdom where it is illegal for employers to discriminate against disabled people. The diversity approach takes issues of equality beyond issues covered by the law: In recognising the business case for equality and diversity, employers are less likely to adopt discriminatory procedures.

6. Quality of the workforce and the value of its contributions

Having applicants from disadvantaged groups in the recruitment pool offers more choice and increases the chances of recruiting the best person for the job. But this approach will only be successful if their abilities and experience and their value as employees are fully explored. This applies in particular where the tendency is to look at the disability rather than the abilities of a candidate.

Employers have found that disabled employees stay in their job for longer, have a strong commitment to work and have good records of punctuality and absenteeism.

Disabled people are no more likely to be generally ill than their non-disabled colleagues.

Employing people from disadvantaged groups improves staff morale as the organisation demonstrates that it is more representative and diverse.

7. Achieving economies

The adjustments made in helping to employ a disabled person such as wide doors, ramps, audible instruction etc. often benefit other employees and customers. Furthermore, in some countries, funds are available from public and other sources to finance these costs.

Research has shown that 70% of economically active disabled people acquired a disability during their working lives. Keeping an employee who becomes ill or disabled at work generally costs less than having to recruit and train someone new. Re-organisation of work and provision of technical aids (often subsidised by government schemes) can be more economical than termination of employment and replacement. In the UK, recruiting a new employee has been costed at 5010 Euro.

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2 - THE AIMS OF CERTIFICATION

While the Manual will constitute a tool to train social auditors and to pilot the auditing methodology, the overall aim of the initiative is as follows:

1. To apply the principles of diversity in the very process of devising a social auditing methodology. The object is to ensure that the process by which we assess the degree of progress in terms of diversity at work has been developed with the participation of the people who are at risk of social exclusion, and in particular disabled people.
2. To encourage consistency in the process of assessing how far companies in different countries have developed their capacity to employ a diverse workforce.
3. To assist employers in assessing their own performance in implementing equal opportunities and diversity policies.
4. To assist with continuous improvement: The assessment process could provide a basis for an action plan for further improvements.
5. Delivering a certificate to good organisations will improve their reputation and encourage the transfer of good practice to their competitors.
6. The aims of this project are modest but it is hoped to build up its scope in due

course. Nevertheless, the assessment as it stands will provide a basis for planning further improvements.

3 - HOW TO USE THE MANUAL

1. Some definitions

1. **Social auditing**

Social Auditing is known as “the process whereby an organisation can **account** for its social performance, **report** on and **improve** that performance. It assesses the social impact and ethical behaviour of an organisation in relation to its aims and those of its stakeholders”. (New Economic Foundation).

Although the term “social audit” appears in this manual, the scope of the initiative cannot be so ambitious at this stage. As we have seen in the introduction the aim of this project is to devise an approach to developing an audit process which is fully validated by agents who are at risk of exclusion themselves. But it does not envisage formal reporting and making public the outcome of the audit. Instead, the plan is to engage in a process of Certification as a means to encouraging the take up of good practice.

The process devised in this manual is therefore more akin to a process of social accounting for the purpose of delivering accreditation.

Also, because of the limited resources, the project focuses primarily on issues of disability.

2. **Benchmarks, targets and indicators**

- benchmarks are points of reference against which performance can be judged
- targets are a desired level to aim for
- indicators are measures that can be compared to either benchmarks or a target: They “indicate” whether there is progress.

In the text that follows, we have selected performance indicators, which, as far as possible, are measurable. We have also endeavoured, where we felt it necessary, to define concepts which may feel purely British or Anglo-Saxon.

2. **The Manual in practice**

1. The content of this manual has been influenced by the need first to train assessors. To this effect we hope that the first sections providing a business case

and a summary of the aims of certification will form a useful starting point.

2. We envisage that at least one preliminary visit will have to be made to the candidate companies in order to define the scope of the audit. In order to assist with this initial task, we have attempted to identify which type of documentary evidence might be most appropriate for each item. These are only suggestions:

Against each numbered criterion, we have indicated the following:

R : For Record (paper records)

I : For Interviews

FG : For Focus Groups

3. The Scoring Framework :
The Scoring framework affords considerable flexibility.

- a. Assessors in different Member States may decide to apply different weighting to different criteria in step with national conditions.
- b. Assessors in different Member States may agree on different levels of attainment to grant Certification.
- c. In some cases, Assessors may wish to assign independent scores to components of criteria.
For example: Individual scores may be allocated under Quality Systems – Management Responsibilities: 1.6, 1.7 and 1.10,
Or under Audit of Premises (Physical access 2.3 and 2.4).
- d. Likewise, Assessors may wish to allocate global scores only, either to sub-headings or to each chapter.

Choices may be made based on the piloting experience.

III – INITIATING AN AUDIT

In initiating an audit, we would suggest the following steps:

1. Step one: First meeting
Meeting with the Chief Executive and/or Senior Managers to establish that:
 1. the organisation is interested in improving its reputation
 2. the organisation understands/or seeks to understand the business case for diversity in the workplace
 3. the organisation is interested in improving its performance
 4. the organisation has policy statements regarding equal opportunities and diversity.

- 2 Step two
Request the preparation of paperwork prior to a first visit.
Provide a checklist of material, which the organisation might be able to collect for inspection by the assessors.

3. Step three : Second meeting
Inspect records and start allocating scores
Establish which key documents may be missing against the list provided during the first visit. Decide which focus groups and individual meetings to request from the organisation in order to complete the full assessment.

- 4 Step four
Run focus groups and conduct interviews.

5. Step five
Complete the scoring process.

IV – PERFORMANCE BENCHMARKS AND INDICATORS

COMPANY REPUTATION AND APPROACHABILITY

1. The enterprise recognises the business case for employing people from disadvantaged groups, including disabled people

R 1.1. Policy statements **reflect the “business case”** (as opposed to the philanthropic approach.)
The wording of the policy documents (such as mission statements and equal opportunities policies) reflects the organisation’s recognition that diversity is as good for the employees as it is for the bank balance.

I/R 1.2. **Evidence of Leadership:** Someone at Board level is responsible for promoting the values of equality and diversity.

R/FG 1.3. Mission statements, policies and strategies have been based on **stakeholders’ dialogue.**
Representatives of groups “at risk of exclusion” are involved in the communication process employed to reach agreement on mission statements, policies and strategies.

I 1.4. Someone at Board level is **responsible for monitoring the inclusion** of representatives of disadvantaged groups **in decision making at all levels of the organisation.**

R 1.5. The company’s **marketing department** has received **diversity and disability awareness training.**

R 1.6. The company’s high profile public events and its publicity include **positive images** of disadvantaged groups, including disabled

people.

R/I 1.7. Senior managers include equality and diversity issues in their **communications with all stakeholders** (internal and external communications).

R 1.8. Senior managers measure and **report the level of investment** in equal opportunities and diversity programmes.

R 1.9. The company carries out a **full “stakeholder evaluation”** of its operation.

R 1.10. The **company publicly reports** on the outcomes of its evaluation.

I/R 1.11. The results are fed back into a **continuous improvement process** and communicated externally.

I/R 1.12. The organisation **benchmarks** its results against comparable leading edge organisations.

2. Community involvement

I/R 2.1. Budgets are available for sponsorship of projects aiming at **empowering** excluded groups, including disabled people, so that they may become active in the community.
Empowering activities are a means to raise the individual to a level where he/she can enjoy equal opportunities. Such activities typically enable people to access services, participate in matters that affect their own lives and provide tools for self development.

I 2.2. Disabled people and representatives of other excluded groups are included in focus groups **to assess the impact of the firms’ advertising.**

D 2.3. Disabled people and representatives of other excluded groups are encouraged to **apply for work experience.**
The company has a program of affirmative action in offering internships, traineeships, staff development programs and internal promotion to members of traditionally under-represented groups.

I/D 2.4. The enterprise **sponsors disabled university students.**

3. Customer care

D The company has established a customer care policy to include :

3.1. A review of physical access;

3.2. Staff training in doing business with different cultures ;

3.3. Staff training in disability awareness;

3.4. Provision of diverse access to information, such as translations, interpretation, auxiliary aids and format of media;

3.5. A complaints procedure.

4. **Product Development (For manufacturing organisations)**

I/R 4.1. The company has considered applying the principles of inclusive design.

4.2. The company applies its equality principles to product design (for example, disabled customers or inclusive design institutions are consulted in the development of products).

QUALITY SYSTEMS - MANAGEMENT RESPONSIBILITIES
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1. **Quality Policies**

(Equal Opportunities and Diversity Management Policies)

I/FG 1.1. The Company **establishes corporate equal opportunities and diversity policies** endorsed by the Chief Executive Officer and by the relevant committee chairs and senior officers of individual service delivery directorates.

I/FG/ R 1.2. The Company has established a process to **identify key interested groups** for the purpose of policy making and consultation.

R 1.3. The policies have been subject to consultation with service users.

R 1.4. Trade Unions and staff representatives of excluded groups have been consulted about the policies.

R 1.5. Provisions are made in the policies to accommodate the **needs of disabled people**, with special attention to those who may simultaneously be discriminated against on grounds such as ethnic origin, age, gender, sexual orientation, marital status, religious belief, etc.

R 1.6. The policies encourage a **fair and effective working environment**. They should cover:

- grievance procedures
- disciplinary procedures
- harassment and victimisation policies
- health and safety policy
- maternity and related provision
- policies for mentoring, shadowing, etc..
- training and lifelong learning for employees

R 1.7. The company encourages **employment flexibility**. The company considers alternative employment options. Examples could include:

- Job-sharing
- Compassionate leave (when an employee needs to care for self or a family member)
- Tele-working
- Reduced-time (with salary reduced accordingly)
- Sabbatical leave (time off to pursue personal interests with guarantee of the same job upon return)
- Secondment (working for another company for a specified length of time)

R 1.8. The policies include targets that are specific, measurable and time-tabled.

R 1.9. The Company endorses an **action plan**, flowing from policy at corporate and directorate levels.

R 1.10. The Company **identifies resource requirements** and establishes the financial feasibility of implementing its policies to include:

- the assignment of trained personnel to implement its policies
- the provision of reasonable accommodation to meet the needs of disabled staff
- the cost of training personnel in diversity issues, including issues of disability
- the cost of career development training for all staff including those from disadvantaged groups.

R 1.11. The Company **benchmarks** its targets against that of other companies.

I/R 1.12. The Company acts as an exemplar of equality and exchanges support in the development of policies and practices.

I/R 1.13. The Company participates in the creation of local, national and international networks to support the promotion of diversity.

R 1.14. The Company extends the policy of monitoring systems to **contractors and suppliers of services** through the contract procedure.

I/R 1.15. Contract compliance is guided by pre-contract evaluation and checks on the quality of service delivery with reference to equalities issues.

I/R 1.16. Appropriate action is taken against contractors who fail to effect their equality commitment.

2. **Multiplying levels of responsibilities**

R 2.1. **Defining responsibility and authority :**
The responsibility and authority of personnel who perform and verify work affecting quality in terms of management of diversity is defined and recorded.

R 2.2. Clear responsibilities are allocated to staff for implementation : **Equalities objectives are built into the job descriptions** and performance indicators of senior management staff.

I/R 2.3. Managers' ability to manage diversity policies (hiring, personal and professional development) constitutes part of the regular supervision.

I/R 2.4. **Representatives** of minority or disadvantaged groups **nominated**, for example, the election of a "champion of disabled people".

I/R 2.5. The Company allocates **resources** to personnel with executive responsibility in order to meet its published targets over:
- Training of staff
- Adaptation and reasonable accommodation
- Marketing and reputation building

QUALITY SYSTEMS - PROCEDURES

1. Departmental level

R 1.1. The objectives for each department are set in line with current policies. They are measurable and **constitute an improvement** over the objectives previously reviewed.

I 1.2. **Departmental managers are clear about expectations** made on them for the implementation of equal opportunities policies.

R 1.3. Managers' **accountability for implementation is built into personal work plans.**

2. Participation of employees from disadvantaged groups, including disabled people, in:

- I/R**
- a. departmental strategies
 - b. focus groups to advise on employment procedures and on customer cases
 - c. recruitment panels and promotion boards
 - d. career development training.

3. Promoting staff awareness of issues of diversity

R

3.1. Diversity and disability **awareness training is provided** to all staff, including marketing and customer service departments.

3.2. Disability awareness training is **provided by disabled trainers**.

4. Recruitment

4.1 Advertisements

R 4.1.1 Recruitment literature and advertisements demonstrate an understanding of impairments. (For example, an offer of providing recruitment literature in alternative media)

R 4.1.2 Vacancies are advertised where disadvantaged applicants, including disabled people, are most likely to be reached (for example: voluntary agencies representing disadvantaged groups, liaison with schools and universities, employment offices).

4.2 The Job Description and Person specification

R 4.2.1 The Job description is exclusively task specific.

4.2.2 The Person Specification specifies attributes exclusively related to the requirements of the tasks.
(No superfluous qualifications, competencies or attributes unrelated to the tasks).

4.3 Selection of candidates for interview

I/R 4.3.1 Members of disadvantaged groups and disabled staff are involved on recruitment panels, as appropriate.

I/R 4.3.2 Members of the selection panel reach decisions based on purely work-related criteria.

I/R 4.3.3 Selected disabled applicants are invited to request any special arrangements that they may need for the interview.

R 4.3.4. The selection panel records reasons for selection or rejection.

4.4 The interview

I/R 4.4.1. Any questions about disability are only concerned with the requirements of the tasks.

5. Career progression

FG 5.1. Managers conducting appraisals and promotion interviews are fully **aware of equal opportunities** issues.

I/R 5.2. Details of in-house work and training opportunities are **circulated in appropriate media**.

FG/R 5.3. Disadvantaged staff members are encouraged to **seek career development courses** and activities.

FG/R 5.4. Disabled staff are invited to **participate in promotion boards**.

6. Retention of newly disabled staff

R 6.1. The company has involved an impartial, external service to manage the return to work of a newly disabled person.

FG 6.2. The service acts in the interest of its disabled employees.

I/FG 6.3. The company considers medical retirement only as a last option.

R 6.4. The company considers alternative options for continuing to employ the newly disabled staff member : retraining, re-deployment, part-time work, work adaptation, job re-design, tele-work etc..

7. Monitoring and evaluation

R The company monitors :

7.1. the **number of staff recruited in different staff categories**. This may be carried out on the basis of : race, gender, age, religion, ancestry, citizenship, marital status, sexual orientation, physical or mental disability or medical condition

7.2. **recruitment procedures** to ensure that the equal opportunities approach adopted is respected

7.3. the **career progression** of different staff categories

7.4. **resignation rates** and the reasons given for resignation.

7.5. The company **performs regular audits** to monitor the delivery of equality and diversity objectives.

7.6. Monitoring and evaluation initiatives are used by the company as tools for continuous improvement.

PHYSICAL ACCESS

1. Planning to make the environment accessible

- R 1.1. There has been an **access audit** of the premises by a specialist consultant.
- R 1.2. **Sources of advice** about the availability of technological aids have been established.
- R 1.3. **A survey of disabled staff** has been conducted to ensure that “accommodation” requirements are being met
- I/R 1.4. A member of staff has been given the **responsibility for managing the provision of the necessary adjustments.**
- I 1.5. This member of staff **is aware of the national legislation** concerning health and safety and planning permission regulations.
- I/R 1.6. **A budget has been allocated** for funding the needs for “accommodation” (equipment to allow the employee to perform his/skills).
- I/R 1.7. All the people involved in access issues have received **disability awareness training.**
- I/R 1.8. Local (departmental) emergency officers have been **informed of the location of disabled staff.**

2. The premises

- I/R 2.1. Design specification **complies with national legislation.**
- I/R 2.2. Design specification **extends beyond the minimum** national requirements.
- R 2.3. The environmental access audit has taken into account **the needs of people with the following impairments :**
- a. **visual**
 - b. **hearing**
 - c. **restricted mobility (wheelchair users)**
 - d. **lifting**
 - e. sitting and getting up
 - f. learning difficulties
- R 2.4. The environmental access audit covers the following :
- a. **Parking facilities**
 - b. **entrances, reception and rest areas**
 - c. **lifts**
 - d. **staircases**
 - e. **internal circulation areas**
 - f. **working areas, equipment (P.C.s etc.)**
 - g. **lighting and signs**

- h. **toilets, fixtures and fittings**
- i. **restaurants**
- j. **meeting rooms**
- k. **communications aids**

2.5 The premises are properly **maintained** for the safety and comfort of disabled workers and customers.

3. **Emergency**

- FG** 3.1. **Disabled staff are consulted** about the best methods of evacuation. Newly appointed disabled staff are informed of emergency procedures.
- I** 3.2. Evacuation procedures for disabled people are tested regularly.
- I/R** 3.3. Special evacuation chairs and flashing fire alarms for deaf employees are provided.

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