

Dear Mrs von der Leyen,
President of the European Commission,

Dear Mrs Jourova,
Vice-President of the European Commission, in charge of Values and Transparency,

Dear Mrs Dalli,
EU Commissioner for Equality,

Dear Mrs Moua,
European Commission Anti-Racism Coordinator,

Dear Mr Kurz,
Federal Chancellor of the Republic of Austria,

Dear Mr De Croo,
Prime Minister of the Kingdom of Belgium,

Dear Mr Radev,
President of the Republic of Bulgaria,

Dear Mr Plenković,
Prime Minister of the Republic of Croatia,

Dear Mr Anastasiades,
President of the Republic of Cyprus,

Dear Mr Babiš,
Prime Minister of Czech Republic,

Dear Mrs Frederiksen,
Prime Minister of the Kingdom of Denmark,

Dear Mr Martin,
Taoiseach of Ireland,

Dear Mrs Kallas,
Prime Minister of the Republic of Estonia,

Dear Mrs Marin,
Prime Minister of the Republic of Finland,

Dear Mr Macron,
President of the Republic of France,

Dear Mrs Merkel,
Federal Chancellor of the Federal Republic of Germany,

Dear Mr Mitsotakis,
Prime Minister of Greece,

Dear Mr Orbán,
Prime Minister of Hungary,

Dear Mr Draghi,
Prime Minister of Italy,

Dear Mr Kariņš,
Prime Minister of the Republic of Latvia,

Dear Mr Nausėda,
President of the Republic of Lithuania,

Dear Mr Bettel,
Prime Minister of the Grand Duchy of Luxembourg,

Dear Mr Abela,
Prime Minister of the Republic of Malta,

Dear Mr Rutte,
Prime Minister of the Netherlands,

Dear Mr Morawiecki,
Prime Minister of the Republic of Poland,

Dear Mr Costa,
Prime Minister of Portugal,

Dear Mr Iohannis,
President of Romania,

Dear Mr Heger,
Prime Minister of Slovakia,

Dear Mr Janša,
Prime Minister of the Republic of Slovenia,

Dear Mr Sánchez,
Prime Minister of the Kingdom of Spain,

Dear Mr Löfven,
Prime Minister of the Kingdom of Sweden

We, Equal@Work, are a multi-stakeholder initiative created by the European Network Against Racism (ENAR) that brings together businesses, social partners, NGOs, public authorities and academics committed to diversity and inclusion, to find solutions so that ethnic and religious minorities can fully participate in the labour market. As such, we welcome the EU Action plan against racism proposed by President von der Leyen in September 2020.

We are confident that the EU Action plan against racism will be a game-changer and will support our organisation and employers in making racial diversity and inclusion a cutting-edge of the development

of companies on the European and global markets, by levelling up the playing fields for all employers in the European Union.

One key component of the action plan is the implementation of equality data collection measures on the grounds of race, ethnicity and related categories to ensure we can objectivise where discrimination takes place in the labour market, including within private organisations, from recruitment to retirement, with the view to bring adequate measures of redress.

We have seen how relevant gender analysis, based on sound data, has catered for progressive and positive changes within organisations, by leveraging equal opportunities for women at all levels of structures, making companies perform better, be more resilient and be ready to confront the challenges of fast-changing and complex global markets. We are confident that equality data collection measures on the grounds of race and ethnicity as well as other grounds of diversity will have the same impact and will contribute to improving organisations. The Equal@Work Business Partners believe that companies will be in a much better place to measure the impact of their decisions and processes and ensure that they are truly embracing the diversity of European societies, enhancing equality and addressing discrimination once they will be able to collect and analyse disaggregated data based on race, ethnicity and other grounds of diversity.

However, to fully implement data collection measures on the basis of race and ethnicity, employers need legal certainty in their operations. The European Commission has published relevant guidelines on how to carry out data collection. We are concerned that most EU Member States have so far not taken appropriate steps, based on the above-mentioned EU guidelines to ensure that public and private organisations that wish to proactively and voluntarily develop and implement equality data monitoring systems on the ground of race and ethnicity will not face legal issues and court cases for discrimination or breaches of data protection¹.

We seek to improve inclusion processes and be in the position to demonstrate that our joint efforts to make a positive difference in the life of racialised people in the EU, specifically in the aftermath of the Black Lives Matter movement and the impact of the COVID-19 pandemic on our economies and on their most vulnerable segments, in particular racialised people. We will need all talents to rebuild our economies and ensure that nobody is left behind on the ground of their race, ethnicity, skin colour, culture or religion.

Therefore, we encourage EU Member States, with the support of the European Commission, to design, adopt and implement in the shortest possible time, conducive legal frameworks that will bring operational and legal certainty to organisations willing to implement equality data collection measures on the grounds of race, ethnicity and other related categories. We also call on the European Commission to take measures towards harmonizing equality data collection in EU Member State to ease public and private organisations' processes when collecting, processing and analysing disaggregated data based on race, ethnicity and other categories.

Signed by
Equal@Work Business Partners

To know more about Equal@Work and the Member Business Partners please visit our [website](#)

¹ E.g. within the framework of the ICC/ESOMAR Code on Market, Opinion and Social Research and Data Analytics, legal hurdles arising from the use of sensitive data may be prevented by ensuring that sensitive data collection and use are limited to their initial research purposes.