

Diversity, Equity, and Inclusion Audit (DEI Audit)

Towards a more intersectional and evidence-based diversity management at GIZ Nigeria & ECOWAS

Why we did it



Societal context: The Black Lives Matter (2020) and Me-too movement (2017) revived debates around diversity management and anti-discrimination across various sectors, including the international development context. Given these long-standing asymmetrical power structures and links to the colonial era, the development sector by default is situated within a context of diverse set of actors who are vulnerable to exclusionary societal structures, such as white supremacy, patriarchy, capitalism, ableism and others.

As a result, aside the overall global impact of these structures, international development organisations face several challenges within their internal structures where staff can call out systematic privileges.

In 2021, the (then new) German Government has committed itself to a feminist foreign policy. In 2023, the adoption of a feminist development policy and publishing of a clear strategy by the Ministry of Economic Cooperation and Development further created a conducive environment in which there is increased sensibility to power imbalances within the development context. And ultimately, the feminist school of thought where knowledge is power, including over the state of diversity, equity and inclusion at the workplace.

Also, in the context of GIZ, efforts have been made to document how these exclusionary societal structures are manifested in the organisational culture, everyday practices and institutional policies, ultimately making the workspace not safe for empowering a diverse group of people (Breaking the Silence Report, Cultural Diversity Initiative, 2021). In the context of GIZ Nigeria & ECOWAS, national (Nigeria) and regional (West African) historical, socio-economic and political developments and structures shape interactions of the diverse staff body, in addition to these global dynamics described above.

Against this background, we, as initiators

of this process assumed that staff, stakeholders of the projects and partners of GIZ Nigeria & ECOWAS may experience discrimination along various dimensions in the context of their work.

As diverse group of staff (and members of the then *Diversity Task Force*), we noted in 2021 that if inequality and institutionalised exclusionary systems are not consciously and strategically addressed, **GIZ Nigeria & ECOWAS as an institution and its staff may unconsciously uphold or contribute to a system that shores-up and reproduces relationships of privilege and poverty, of domination and subordination under the guise of sustainable development.**

Institutional context: To address the described inequalities in the workplace, the collection of equality data and the incorporation of evidence-based approaches to analyse and understand experiences of staff members have become a best practice in the international context. However, within GIZ, efforts had long been one-dimensional, limited to Gender (i.e. in 2014 and 2018 external Gender Audits were conducted). A widened approach, considering also other diversity dimensions, gained traction as in 2020 the in-house surveys were conducted in GIZ Benin and Togo to document discrimination experiences. Building on these efforts, under the auspice of the *Cultural Diversity Initiative*, efforts were made throughout 2021 to conduct a company-wide survey to collect equity data to provide quantitative evidence on discrimination experiences by diverse staff and to further assess the adequacy of response mechanisms and available strategies and frameworks.

However, over concerns of Data Protection many internal efforts never came to fruition (but we were able to find a way to make it work 🙌🙌🙌🙌).

How we did it



The preparation phase: The primary intention of the Diversity, Equity and Inclusion Audit (DEI Audit) was to collect equality data to build a basis for an

evidence-based diversity management within GIZ Nigeria & ECOWAS. It was clear from the outset that the audit should be carried out by an external service provider and, as far as possible, independent expert with good knowledge of the Nigerian and the development cooperation context.

The main objective of the audit was then determined as:

- **Analyze and identify** internal and external discriminatory practices, exclusionary mechanisms and impeding factors for a diversity-embracing environment of GIZ Nigeria & ECOWAS and make their impact on diverse groups visible,
- **Provide insights** on the staff diversity and representation within various salary bands and sectors,
- **Develop a plan of action** to respond to those findings by formulating equal opportunity and anti-discrimination measures.

In the process of the DEI Audit, certain key principles were essential to comply with. **Firstly**, an interactive, multi-layered mix of method that takes an intersectional perspective into consideration, was required to avoid reproduction of essentialized narratives and to identify dynamics between various diversity dimensions.

Secondly, the DEI Audit had to follow best practices of data equality collection, such as

- 1 self-identification,
- 2 voluntary participation,
- 3 sensitization prior to the data survey,
- 4 anonymity,
- 5 participatory design and evaluation,
- 6 intersectionality,
- 7 do no harm.

Following consultations with the Country Director and the Management Team in Nigeria in 2021 and 2022, the DEI Audit was included in the Country Planning for 2022. Consequently, the funding arrangements were clarified to allocate costs fairly to all projects, and the competitive tender process could start.

In February 2023, a firm was selected, which had specialized expertise in equality assessments, especially regarding **privacy-sensitive collection of data**. This was crucial to ensure that we would be able to **tackle the big challenge of complying with GIZ Data Protection Guidelines according to the EU GDPR**. Therefore, we

opted for a solution where the consulting firm acts as an independent data controller.

Nonetheless, for us to be able to establish the contract that involved the transfer of names, e-mail addresses and telephone numbers of both GIZ colleagues and staff on partner institutions to the consultancy to ensure the greatest possible independence, the contract required specific conditions.

Those conditions included a

- 1 **VVT-approval**, as well as
- 2 **data confidentiality agreement**.
- 3 To further enable the liaison with partners we requested a **signed declaration of consent by the partners** to share their contact details.
- 4 Furthermore, we informed our colleagues about the planned audit and **highlighted that any participation is voluntary**, while also encouraging them to play an active role in it.

In addition, an Askallo account was opened for the planned online questionnaire, whereas only the external consultants were authorized to access the survey responses.

The implementation phase: The DEI Audit started with **explorative consultations sessions** in a virtual format with different staff groups across salary bands, and representative groups to identify main areas of interest (see fig. 1) that should then be reflected in an online survey in the next auditing stage.

Figure 1 - Key topics emerging from the DEI Audit



Based on the findings, the consultancy then developed a survey questionnaire open to the entire staff of GIZ Nigeria & ECOWAS. Notably, the areas of inquiry included diverse patterns of discrimination, however the data collection also facilitated an intersectional analysis along the categories of

- 1 role in the organisation,
- 2 employment band,
- 3 gender identity,
- 4 age group,
- 5 disability,
- 6 staff category and
- 7 years in the company.

One essential step prior to publishing the survey was the **review of the questionnaire by the Data Protection Unit** to rule out the possibility of drawing conclusions about any individual. The questionnaire was ultimately approved by the HQ Staff Council.

Additionally, during the phase before launching the survey, the consultancy held three preparatory workshops:

- **General information session** about the Audit and relevant terminology for all staff.
- **Virtual onboarding workshop for volunteering survey multipliers** who had the task to promote and assist survey participation.
- **In-person unconscious bias workshop** for selected management staff.

Subsequently, the Askallo survey was open for a duration of two-and-a-half weeks.

After an initial analysis of the results, **focus groups** were put together to contextualize the results and, in particular, to provide explanations for unexpected outcomes.

Ultimately, a report was submitted to the Country Director and the Diversity Secretariat (as the parties responsible for DEI initiatives), and a presentation of the main findings was made to all staff during the GIZ Day in November, whose theme was „Cultivating Cohesion: Celebrating Diversity, Building Relationships and Enhancing Collaboration“.

What is the impact?

In the context of the DEI Audit and with input from the consultant team, a **Diversity Secretariat was set in GIZ Nigeria & ECOWAS in July 2023.**

The Terms of Reference of the newly hired Diversity Officer include the implementation of the recommendations of the DEI Audit and the development of a data informed strategic and action plan.

Feedback from the Management Team:
„Being conscious about the existence of unconscious biases is a first step. Once you have this perspective, additional measures can be implemented as, for example, having focal points on diversity in the team, sharing information among the colleagues and having separate, dedicated sessions on diversity.“

Examples for key findings and corresponding recommendations:

1 🗝️ The DEI Audit discovered **underrepresented groups** with DEI dimensions such as gender, disabilities and nationality across various salary bands.

Priority hiring was recommended with a focus on people with disability (increase to 5% according to the Disability Inclusion Act 2018) and women (salary band 1 and management positions).

Provisions taken by GIZ Nigeria & ECOWAS: Introduction of a HR policy according to which interview panels must represent a diverse team of employees responsible for evaluating candidates.

„I hope for more women in leadership positions, more women in band 5. In addition, I hope for more women in band 1 (e.g. drivers). Women should have more opportunities on all levels. Male roles and male tasks should be re-considered to see if women can play a role. People should become more aware of their rights as GIZ staff“

Suzan, GFP - Multiplier

2 🗝️ Some staff groups with DEI dimensions such as gender, disabilities and nationality believe they do not have the same access to **career progression opportunities** compared to other staff groups.

It was recommended to establish a **comprehensive mentorship programme** that encompasses employees across all bands irrespective of their gender, race, age, sexual orientation, disability or any other characteristic.

Provisions taken by GIZ Nigeria & ECOWAS: The Diversity Secretariat will revisit the previously existing gender mentorship initiative to establish a sustainable and comprehensive culture.

„I can say the Audit is a welcomed development, with the Audit the Management will see if there is a difference in the field work, between the

male and women and between religions and other diversities. I think the Audit is trying to find out whether there is any bias in practicing your religion, your culture, etc.“

Auwal, Project driver - Multiplier

3 🗝️ Most respondents disagree that their **compensation is comparable to that of their colleagues** who perform similar work of equal value within the organisation.

Thus, it was recommended to regularly conduct **pay equity analyses** to identify and rectify pay gaps based on gender, ethnicity and other diversity factors. Employees with similar roles, similar qualifications and experiences should be compensated equally.

Provisions taken by GIZ Nigeria & ECOWAS: Pay Audit will be organised by HR to identify pay inequity especially for national staff and to develop corresponding actions.

What did we learn?

1 💡 *Partnering up with external experts for audits around DEI provides added advantages:*

- Expertise and experience on data collection in alignment with EU GDPR,
- Independence of the analysis prevents any backlash or suspicion of bias that an in-house assessment may receive.

2 💡 *A holistic approach to an audit can contribute to overall increased sensitization to DEI topics and engage all staff meaningfully on the topic:*

Did you experience any changes in your gender competence or the gender competence of others?

„Not really a change in the competence, but a raised awareness. People are more aware of their rights. If there is harassment, they can approach Gender Focal Points or their line managers - they know now that something can be done if they feel discriminated. It helped to build awareness and consciousness. So, I do not see my role only as Gender Advisor but beyond this. Hopefully it will translate to the activities in the field“.

Suzan, GFP - Multiplier

3 💡 *Cooperation across all staff bands can be a catalysator for active involvement and buy-in:*

While the process was prepared and managed by a team of Gender Focal Persons at country level, also the National Staff Representatives and multipliers played a critical role in facilitating the implementation of this process. The survey reached a **77.1%** response rate, which attests to the efforts made to tailor communication and pick up all staff where there are.

Challenges encountered

1 ⚡ Plan extra time for liaison with the Data Protection unit and potential review cycles in contracting and implementation.

2 ⚡ Caution when using the term „independent“ audit - state clearly that the consultancy's independency solely covers data collection and processing, not report quality.

3 ⚡ The overall budget for this process was 50,000 EUR. Therefore, start early to consult with relevant stakeholders on cost allocation / funding solution.

4 ⚡ Be intentional about which sessions can be hosted virtual vs. in-person sessions. Also focus group discussions and consultative sessions on DEI may trigger participants and therefore rather reinforce negative experiences and trauma.

5 ⚡ Accompanying capacity building initiatives are crucial to ensure that terminologies are interpreted in the same way by everyone, but consider the composition of the target group and safety of participating staff (i.e. unconscious bias workshop).

DEI Audit Working Group (Diversity Secretariat)

Alena Fesser, Lilian Seffer, Kate Okoh-Kpina, Anika Malinowski, Helen Igboka, Zula Tesfai, Maria Camila Garcia Jimenez

📄 You can find the final report here:

[DEI Report 2023](#)

List of abbreviations:

- DEI: Diversity, Equity and Inclusion
- GDPR: General Data Protection Regulation
- VVT-Approval: Report data processing of personally identifiable information