

MINDTRIBES

Practitioner Guidance Series

Race & Ethnicity Data, Target Setting, and Pathways to Diverse Leadership

Evidence, guidance and practical approaches for organisations seeking to improve racial and cultural diversity in senior leadership

2026 Edition | Based on MindTribes' 14 years of specialist research and practice

About this guide

This guide draws on MindTribes' 14 years of specialist practice in CALD and racial equity, delivered across more than 50 organisations in the Australian public and private sectors. The evidence base includes MindTribes' own longitudinal research - Levelling the Playing Field (2023), a five-year advocacy study with culturally diverse women and women of colour, and Safer Workplaces for Women of Colour (2023), a study of 188 employees across the Victorian Public Sector - as well as current academic research and practitioner insights from the design and delivery of organisational change programs. It is intended as a pre-read for leaders, people practitioners, and ERG members engaging with racial and cultural equity strategy.

Section 1 - The Current Picture: What the Evidence Tells Us

Across the Australian public and private sectors, the underrepresentation of racially and ethnically diverse staff in senior leadership is persistent, measurable, and well-documented. It is not improving on its own.

1.1 The leadership cliff/ceiling across sectors

In organisations that track CALD or NESB representation by grade, a consistent pattern emerges: racially and ethnically diverse staff are fairly well-represented at junior and mid-career levels, then fall sharply as seniority increases.

- Breunig, Hansell and Win (2026), studying the full 20-year dataset of the Australian Public Service, found that NESB promotion prospects have stagnated or worsened over two decades, while gender-related promotion prospects improved significantly following targeted policy action. A persistent leadership gap exists.
- Research across major financial, professional services, and public sector institutions consistently finds NESB employees to be 10–15 percentage points less likely to reach management level than English-speaking-background colleagues, even after controlling for tenure, gender, and group.
- Staff born in Asia are among the most underrepresented cohort at executive level - a pattern that holds even for those born in Australia or who arrived before school age, pointing to racial rather than language or cultural factors.
- Despite lower promotion rates, racially and ethnically diverse employees are less likely to leave organisations than their English-speaking-background colleagues. This suggests constrained external options, not disengagement - making internal structural change the most powerful lever available.

"The leadership gap for culturally and linguistically diverse staff is not explained by qualifications, tenure, or the types of roles they hold. Once you control for all of those factors, a significant and statistically unexplained gap remains. The most plausible explanation is racial disadvantage - not deficits in the people themselves." - Breunig, Hansell and Win (2026)

1.2 Two structural conditions that are rarely measured

Most organisations measure CALD representation as a headcount at each grade level. What they rarely measure are the two structural conditions that most reliably explain why the leadership cliff exists and why it persists despite genuine effort:

Condition 1 - Underemployment at entry

Racially and culturally diverse professionals disproportionately enter organisations in roles that are already below their skill level, experience, and leadership capability. This is not visible in headcount data. Underemployment trails across five to ten year career trajectories, creates a persistent pay gap, and almost never self-corrects without deliberate structural

intervention. It is one of the most powerful explanatory mechanisms behind long-term underrepresentation in senior leadership.

Condition 2 - Occupational segregation within grades

Within any management or senior analyst grade, there is a distribution between roles with high promotion-pathway visibility - policy advisory, senior stakeholder management, strategy - and roles with lower career trajectory potential - technical, specialist, coordination. Racially and culturally diverse employees are often disproportionately concentrated in the latter, creating a structural barrier to upward mobility that is invisible in headcount data. MindTribes' research describes this as the 'exposure opportunity gap': the chance to be visible and vocal to the right audience at the right time is what mobilises careers, and this chance is not equitably distributed.

1.3 What MindTribes' own research tells us about lived barriers

MindTribes has conducted its own primary research into the barriers experienced by culturally diverse employees. Two key studies inform this guide:

- Levelling the Playing Field (MindTribes, 2023): a five-year longitudinal study drawing on 18 deep interviews with senior culturally diverse women and women of colour across Australian private and public sector organisations, and surveys of more than 90 CaLD women and 40 senior Anglo-Saxon leaders. The study was conducted in partnership with the University of Melbourne.
- Safer Workplaces for Women of Colour (MindTribes / CPSU, 2023): a mixed-methods study involving five focus groups (42 participants) and a survey of 188 employees across the Victorian Public Sector, examining lived experience of racism, discrimination, and the barriers to psychological and cultural safety at work.

Across both studies, seven consistent barriers to career mobility and safety emerge.

1. Anglo-normative leadership standards disadvantage culturally diverse employees

100% of participants in the Levelling the Playing Field study reported that Anglo decision-makers continued to prefer Western and Anglo leadership traits - assertiveness, extroversion, 'gravitas', a particular style of self-promotion - and expected culturally diverse employees to adapt to these norms. Feedback on promotion readiness consistently reflected these cultural biases rather than genuine capability assessment.

“How you dress, present yourself, introverted nature vs extroverted nature, assertiveness, how you speak/accent and mannerism of leadership - there is still a long way to go to fully encourage all cultural strengths that come with leadership.”

“As an aspiring executive, I believed I had to think and behave similar to western counterparts to be treated with equal respect and seriousness. It is not 'til recently I have felt empowered to be who I am and bring my cultural heritage into everyday conversations.”

This finding directly connects to what MindTribes describes as 'credibility policing' - the tendency to evaluate culturally diverse employees against a culturally narrow standard of leadership, holding them to different evidence thresholds and rewarding assimilation rather than unique contributions.

2. Access to exposure opportunities is unequally distributed

MindTribes' Levelling the Playing Field research identified cultural bias embedded in everyday talent decisions: who gets to present to senior audiences, who receives high-profile project assignments, who is given developmental stretch experiences. These 'exposure opportunities' - the moments that signal a leader's confidence in someone to their peer network - are the primary mechanism by which careers advance. They are not equally available to racially and culturally diverse employees.

"People of colour and women of colour rarely get the kind of work that raises their profile and mostly wind up doing behind-the-scenes work in contrast to 'glamour work' given to co-workers deemed high performers. Their work is highly visible and helps make a name for themselves and leads to promotions."

This is the mechanism behind occupational segregation within grades - not the grade itself, but the nature of work within that grade. Employees can hold the same title and receive very different trajectory-building opportunities based on the biases of those allocating work.

3. Sponsorship is the lever that works - but access to it depends on luck

Across both MindTribes studies, the presence of an Anglo sponsor who was trusted within their senior peer network was identified as the single most effective career accelerant for culturally diverse women and women of colour. 100% of participants in the Levelling the Playing Field study confirmed that Anglo sponsor advocacy produced tangible career results.

"Irrespective of my accomplishments I was unable to get promoted or a pay rise, despite the advocacy of my direct people leader (a Woman of Colour). It wasn't until an Anglo executive sponsor advocated on my behalf to another hiring manager that I was successful in securing both a raise and promotion."

However, access to this advocacy depends on informal relationship capital - luck in having a good manager, an accidental connection. Without structural programs that create intentional sponsor matching, the distribution of sponsorship remains unequal and career advancement for culturally diverse talent continues to be contingent on chance.

- Anglo men were found to be more willing sponsors of culturally diverse women than Anglo women - who often held affinity biases toward making reparations for women similar to themselves and were challenged to prioritise other gender intersections.
- The 'trust circle' of the sponsor matters enormously: if the sponsor is trusted in their senior peer group, the person they advocate for gains that trust almost instantaneously - bypassing the normal credibility barriers that culturally diverse employees face.

4. Psychological and cultural safety are significantly lower for racially diverse employees

MindTribes' Safer Workplaces for Women of Colour study found that 76% of all respondents had either witnessed or directly experienced discrimination at work. Among women of colour and people

of mixed heritage, this figure was higher. More than 50% of respondents reported that systemic racism had a high or very high impact on their psychological safety, job motivation, and career prospects.

- Gaslighting was the most commonly reported form of discrimination (41% of survey respondents), followed by exclusion from social events and meetings (28%), being blamed for others' mistakes (25%), and overt bullying and harassment (21%).
- The majority of women of colour who experienced racism chose not to report it: 65% did not trust the system to manage it to a satisfactory conclusion, and 64% felt it would be ignored or dismissed. Only 1% of all respondents expressed high confidence in reporting processes.
- Feelings of disempowerment (78%), anxiety (66%), and low self-esteem (65%) were consistently reported as impacts of discrimination - with direct consequences for participation, motivation, and willingness to put themselves forward for advancement opportunities.

“Because it can be quite covert, very micro in its form - it can cut you off from your peers and others. You don't say it. And in speaking out, you know you are wrong.”

5. Code-switching exacts a sustained personal and professional cost

Both studies documented the pressure on culturally diverse employees to constantly adapt their communication style, physical presentation, and interpersonal behaviour to conform to Anglo-normative workplace culture. MindTribes' research found this pressure is not merely uncomfortable - it is fatiguing, identity-eroding, and corrosive to the authentic leadership contribution of culturally diverse talent.

“Women felt fatigued and emotionally burdened to maintain this adaptation to receive the respect they deserved.”

In the Levelling the Playing Field study, women critically questioned 'resilience' as a success factor - noting that being asked to be more resilient is used as a mechanism to dismiss culturally diverse employees who speak out about unsafe or inequitable conditions. MindTribes concurs: resilience language places the burden of structural change on individuals, not systems.

6. Promotion criteria and talent processes lack transparency

Both studies found that advancement in organisations frequently depends on unwritten rules shared through informal networks. Culturally diverse employees - who have less access to the informal social and political capital through which these rules are transmitted - face structural disadvantage in promotion processes that appear neutral but are not.

“We often get told what to develop and where we should be in terms of career, and that is often from an Anglo and biased mindset. What I truly want to develop and where I want to go is seldom part of a genuine conversation with my leader.”

The Levelling the Playing Field study found that suggestions by Anglo leaders for culturally diverse women to improve their prospects - networking internally, finding a mentor, developing their personal brand - were consistently insufficient to produce career advancement. Without structural change to the criteria and processes through which advancement is decided, individual-level interventions make marginal difference.

7. Gender equity programs have not served women of colour

MindTribes' five-year advocacy research found that gender programs designed for 'all women' have disproportionately advantaged already-privileged women. In a 2016 survey of 90 CaLD women and women of colour conducted by MindTribes, women reported that unless they were specifically earmarked for women's leadership programs, they were rarely given the opportunity to participate - because they were not on the talent pipeline. When they did participate, programs were not designed for their needs.

"The current gender diversity agenda is founded on white feminism and neglects the nuance and hardships of diversity within. The intersectionality practiced by the white-led feminist sector serves to uphold white supremacy and other structural inequalities. As a Woman of Colour, our experiences and identities are marginalised by practices that treat race and gender as mutually exclusive categories."

This is the foundational case for an intersectional approach: women of colour and culturally diverse women are not served by gender programs that treat 'women' as a homogenous category. They require programs designed with their specific intersectional experiences at the centre.

Section 2 - Why NESB1 and NESB2 Classifications Are Not Enough

Many Australian organisations track CALD representation using Non-English Speaking Background (NESB1 and NESB2) classifications - categories defined by language background at home and country of birth. These categories were not designed for equity target-setting and using them as the primary framework for measuring racial and cultural equity carries significant limitations.

2.1 The homogenisation problem

NESB1 and NESB2 classifications group together people from profoundly different racial, ethnic, cultural, and socioeconomic backgrounds under a single label. A recent Korean-born migrant, a third-generation Lebanese Australian, an Indian-born professional who arrived aged 25, and a Vietnamese-background person raised entirely in Australia may all be classified in the same NESB category - despite having completely different experiences of workplace racism, structural disadvantage, and career barriers.

- Progress against an NESB-based target can be achieved by concentrating gains among the least marginalised within the NESB cohort - those closest to the dominant cultural norm - while the most structurally disadvantaged see no improvement. Kangas-Müller (2024) documents this dynamic precisely: programs built on broad categorical targeting tend to benefit those who are 'relatively more privileged within the group.'
- Target-setting against broad categories can create the appearance of progress while leaving structural barriers intact. Fraser (referenced in Kangas-Müller, 2024) describes this as 'empty gestures' - recognition without genuine redistribution of opportunity.
- The ABS no longer considers NESB a sufficient measure of CALD diversity, as it cannot separately identify different CALD communities. The APSC has moved toward language-at-home measures. NESB classifications will capture a declining proportion of the actual CALD population as Australian workforces evolve.

2.2 When NESB-based targets have not worked: two case examples

Case Example 1 - Major Global Law Firm (Australian Headquarters)

One of the four largest law firms globally, headquartered in Australia, set CALD targets based on NESB1 and NESB2 classifications early in their equity journey. After several years, the organisation was forced to roll back the targets. Gains had concentrated in the most structurally advantaged part of the NESB cohort.

The firm subsequently paused target-setting, invested in qualitative lived experience research, redesigned its approach around more granular ethnicity data and structural barrier removal, and then reinstated targets on a more robust foundation. Foundation first, targets second - this is the sequencing MindTribes recommends.

Case Example 2 - Major Australian Insurance Organisation

A large Australian insurance company set NESB1 and NESB2-based targets and was unable to achieve them. MindTribes was engaged to diagnose the approach. The ERG leading the initiative, while deeply committed, had not sufficiently understood the structural conditions of

underemployment and occupational segregation, or the specific career mobility barriers operating within the firm.

The approach was redesigned around a workforce composition analysis, a development planning audit, and a sponsored talent program. These foundational elements produced measurable improvement that the target alone had not.

2.3 The gender equity parallel - and why intersectionality changes everything

The gender equity trajectory in the Australian Public Service offers both encouragement and a cautionary lesson. Breunig, Hansell and Win (2026) found that over 20 years, women moved from being less likely than similar men to be promoted to being more likely at senior levels - with improvement accelerating following the Workplace Gender Equality Act (2012). Concerted, policy-backed effort can produce measurable change.

However, MindTribes' own longitudinal research - Levelling the Playing Field (2023) - documents clearly that gender programs designed for 'all women' have disproportionately benefited women who were already positioned to advance. Women of colour and culturally diverse women have been systematically excluded from or underserved by these programs. Intersectionally, the organisations that made gender equity progress concentrated it among the least marginalised women.

- The same dynamic applies to CALD programs built on NESB classifications. Both gender equity and racial equity are better served by an intersectional approach that names and prioritises the most marginalised cohort: women of colour, women from culturally diverse backgrounds, people at the intersection of race, gender, disability, and other compounding dimensions of disadvantage.
- For organisations with gender equity commitments - including reporting obligations under the Workplace Gender Equality Act - an intersectional approach creates compounding returns: talent programs and development audits can simultaneously advance women's representation and CALD representation goals by directing resources toward the cohort that sits at both intersections.

Section 3 - Assessing Organisational Readiness for Targets

Representation targets are a powerful tool - but their effectiveness depends entirely on the conditions in which they are implemented. MindTribes' experience across more than 80 organisations has identified four readiness conditions that determine whether a target will drive genuine change or create the illusion of progress while undermining trust.

Readiness Condition	What 'ready' looks like	What 'not ready' looks like
Racial literacy among senior leaders	Senior leaders can articulate the structural mechanisms behind underrepresentation; understand the difference between sponsorship and mentoring; and can hold direct conversations about race and privilege without defensiveness.	Leaders have visibility of data but have not received structured racial literacy development. Risk of tokenistic identification of talent or performative support for diverse appointees.
Granular diagnostic data	Ethnicity data is sufficiently complete (60–70%+) to identify which communities are most underrepresented at which levels. Structural conditions of underemployment and occupational segregation within grades have been mapped.	Only broad NESB classifications available; ethnicity at low completion rates. Structural conditions unmeasured. Target progress cannot be attributed to the right cohort.
Buy vs build workforce planning	Analysis exists of which specific roles represent the internal promotion pipeline, what natural attrition creates over the target period, and what the external talent market can supply.	No workforce planning analysis exists. A target is set without knowing how many appointments need to be internal vs external, or over what timeframe.
Internal process quality for selection	Selection processes have been reviewed through a cultural bias lens. Promotion criteria are transparent, rubric-based, and consistently applied. Diverse panel composition is standard.	Selection processes favour informal network access and Anglo-European communication norms. Promotion criteria are opaque and applied inconsistently.

3.1 The specific risks of premature target implementation

- **Risk 1. Tokenistic identification of talent:** identifying racially and ethnically diverse individuals for advancement primarily because of identity, without genuine assessment of readiness and without adequate structural support - placing people in roles where they are set up to fail.
- **Risk 2. Internal trust damage:** if individuals advanced through target-driven processes are not adequately supported and struggle in their roles, the resulting internal narrative - 'targets don't work,' 'they weren't ready' - can damage the credibility of both the individuals and the equity agenda itself.
- **Risk 3. Target rollback:** organisations that implement targets before foundational classification and structural work is done frequently have to withdraw or revise them. The reputational and cultural damage from rollback can set a genuine equity agenda back by years.

- **Risk 4. Cohort misidentification:** with broad NESB classifications, it is mathematically possible to reach a numeric target by concentrating appointments within the most advantaged segment of the NESB cohort, while the most structurally marginalised employees see no improvement at all.

MindTribes' recommended sequencing

An organisation that meets all four readiness conditions is well-placed to set and achieve representation targets. An organisation that meets none - or has broad NESB classifications, low ethnicity data completion, unmeasured structural conditions, and leaders without racial literacy - is likely to experience the risks above rather than the benefits. The recommended approach is to build the foundational conditions first, so that targets succeed when set rather than fail.

Section 4 - Four Evidence-Based Approaches to Improving Representation

The four approaches below form a connected pathway. Approaches 2 and 3 are the primary levers for improving representation within a two to three year horizon. Approaches 1 and 4 are the foundational and sustainability layers respectively. All four are designed to be applied with an intersectional lens, enabling simultaneous progress on race, ethnicity, and gender equity goals.

APPROACH 1

Strengthen the Data and Listening Foundation

Continuous | Deepen understanding of race, ethnicity, and lived experience across the organisation

🕒 Ongoing - begins immediately, sustained across a five-year period

Core data activity	Move toward ethnicity-based data collection - replacing or supplementing NESB classifications - through a structured, trust-building voluntary self-identification campaign. Ethnicity completion rates are a useful proxy for organisational trust: employees disclose their identity when they believe their information will be used to create genuine opportunity, not surveillance.
Addressing concerns privacy	Ethnicity is sensitive personal information under the Privacy Act 1988. Any collection requires a privacy impact assessment, clear purpose statements, robust data security, and access controls. The pathway to higher disclosure is not primarily technical - it is a trust question. Visible structural action is the most effective driver of voluntary disclosure. A well-communicated sponsorship program (Approach 2) is the single most effective trust signal.
Qualitative cadence listening	Commission structured qualitative listening - focus groups and interviews with employees from racially and ethnically diverse backgrounds across career levels - focused on development planning, promotion process experiences, and structural barriers. MindTribes' own research demonstrates that this listening surfaces barriers invisible to quantitative data. It should be an ongoing cadence, not a one-off exercise.
Racial identity and privilege assessment	Introduce MindTribes' Racial Identity and Privilege Self-Assessment as a structured personal reflection tool for all leaders and aspiring sponsors. This instrument builds individual awareness of how racial identity shapes workplace experience - from both privilege and marginalisation - and is the foundation for authentic sponsorship and allyship. It is strictly personal - not submitted to the organisation.
Country of Birth as active diagnostic	Country of Birth typically has near-universal completion and provides an actionable diagnostic lens without requiring new collection. Using it to identify which specific communities are most underrepresented at which levels - reported with the same granularity as gender data - enables targeted action immediately.
Risk to manage	Communication of intent without evidence of structural change will not move voluntary disclosure rates. Visible, credible action is the prerequisite - not campaigns to fill in forms.

EXPECTED OUTCOMES

Improved ethnicity data quality (target 50%+ completion within 18 months); a qualitative understanding of structural barriers that headcount data cannot reveal; and a leadership cohort with the racial literacy to implement the approaches below.

APPROACH 2

Sponsored Talent Program

Program-level representation goals | The highest-leverage single intervention for improving senior representation

🕒 12–18 months to first cohort outcomes; measurable representation improvement within 24–30 months

What sponsorship is - and is not	Sponsorship is not mentoring. A mentor advises. A sponsor advocates - actively opening doors, recommending sponsees for promotion decisions and stretch assignments, and using their positional power to increase the visibility and opportunity of people they sponsor. MindTribes' Levelling the Playing Field research confirmed this unanimously: Anglo sponsor advocacy produced tangible career results where mentoring alone had not. Sponsorship consistently outperforms mentoring in producing measurable promotion outcomes because it directly disrupts the informal network advantage.
How voluntary self-identification solves the data challenge	Rather than requiring the organisation to target individuals based on incomplete demographic data - creating privacy risk - a well-designed sponsorship program invites eligible employees to self-nominate through a voluntary expression of interest process. Participation is transparent and voluntary. Employees choose to identify as potential sponsees, signalling trust in the program's intent. This is the model used by the NSW Public Service Commission: open invitation, voluntary participation, with managers empowered to proactively encourage eligible staff to come forward. Self-identification for program participation builds the ethnicity dataset organically, while creating the trust environment that makes broader voluntary disclosure feel safe.
Program design	Recruit expressions of interest from racially and ethnically diverse employees and First Nations people at the management feeder grade, with an explicit intersectional invitation - actively including women of colour and women from culturally diverse backgrounds as a priority sub-cohort. MindTribes' research confirms this cohort is systematically excluded from general women's programs and requires explicitly designed pathways. Match carefully with senior sponsors. Prepare sponsors rigorously - MindTribes' research shows that sponsorship capability is almost universally underdeveloped in senior leaders, and the program will underperform if sponsors are not developed alongside sponsees.
Program-level targets	Set a program retention target and a program promotional target (e.g. 40% promoted or in acting senior roles within 24 months). These are program targets, not organisational quotas - a critical legal and reputational distinction. They create accountability without the risks of broad-category target implementation.
Evidence base	MindTribes has delivered this model in NSW Public Sector agencies, Suncorp, AGL, Rio Tinto, Vicinity Centres, and the NSW Department of Communities and Justice. The NSW Public Sector Elevate and Advocate program produced a 4% increase in CALD representation at SES level over two to two-and-a-half years.
Risk to manage	MindTribes' research identified that sponsees who are advanced without adequate preparation face the 'trust circle' limitation - advocates can open doors, but only if other stakeholders in hiring are also prepared. The program must include preparation of the organisational environment, particularly through selection process improvement (Approach 4).

EXPECTED OUTCOMES

A measurable improvement in racially and ethnically diverse representation at senior levels within 24–30 months; a growing pool of self-identified participants that builds the ethnicity dataset organically; and a visible trust signal that the organisation is genuinely committed to action.

APPROACH 3

Workforce Composition Analysis and Development Planning Audit

Structural diagnostic | Makes invisible barriers visible and actionable

🕒 6–12 months for analysis; 18–36 months for representation impact

Workforce composition analysis	Map the distribution of racially and ethnically diverse employees not just by grade but by role type within grades - identifying which specific roles at the senior management feeder grade represent genuine promotion-pathway positions and which represent structural career endpoints. MindTribes' research on the 'exposure opportunity gap' demonstrates this is the mechanism most organisations cannot currently see in their data.
Development planning audit	Conduct a structured audit of development plans for employees at senior management feeder grades, disaggregated by voluntarily disclosed racial and ethnic identity. MindTribes' practitioner experience - including the NSW DCJ Leaky Pipeline for CALD Women program - consistently finds that racially and ethnically diverse employees receive skill-building development rather than executive readiness development: strategic visibility, stakeholder portfolio, board exposure, access to sponsorship. An explicitly intersectional audit design surfaces the experience of women of colour simultaneously, enabling progress on gender and racial equity in a single activity.
Two-year development glide path	Based on audit findings, design a structured two-year development glide path for the identified pipeline cohort - specifying development activities, timing, and direct linkage to promotional criteria required for senior management readiness.
Buy vs build strategy	The composition analysis will determine what proportion of any representation improvement is achievable through internal development and what requires external recruitment. This workforce planning intelligence is essential before committing to a target timeline.
Risk to manage	Audits surface uncomfortable findings about existing people management practices. Senior leadership must be genuinely prepared to act on findings - commissioning the analysis and then not acting on it causes more damage than not doing it.

EXPECTED OUTCOMES

A clear picture of where the internal pipeline is strongest and weakest; an evidence-based development program for the pipeline cohort; a two-year glide path with explicit milestones; and a buy vs build strategy that gives the organisation realistic workforce planning intelligence for any future representation target.

APPROACH 4

Inclusive Recruitment and Selection Process Reform

Sustainability layer | Structural reform to reduce and eliminate racial and cultural bias from people processes

🕒 6–12 months for design; ongoing implementation

Selection methodology review	Conduct a structured review of internal and external selection processes through an anti-racism and cultural bias lens. MindTribes' research found that advancement frequently depends on unwritten rules transmitted through informal networks, and that selection processes are perceived to favour those with access to these networks. Most organisations have never formally assessed the degree to which their processes favour Anglo-European communication norms, cultural fit assumptions, or behavioural interview formats that disadvantage people without informal insider knowledge.
Work sample and structured assessment	Introduce work sample assessments - which assess current skills and problem-solving ability directly, rather than relying on candidates' ability to narrate past experiences fluently - for senior management roles. Work sampling is consistently less biased and more predictive than behavioural interview formats, which tend to reward communication style and cultural familiarity rather than capability.
Assessor capability development	Train hiring managers and selection panel members on racial and cultural bias in assessment, credibility policing, and rubric-based scoring. MindTribes' Levelling the Playing Field research documented that feedback given to culturally diverse employees focused on adaptation to Anglo norms rather than substantive capability. Assessor training directly addresses this. A diverse panel composition requirement should be standard for senior roles.
Job description and advertising audit	Audit job descriptions for Anglo-European normative person specifications - extroversion, assertiveness, 'executive presence' defined in culturally narrow terms. Assess whether roles are advertised through channels that reach diverse talent pools. Transparent, specific selection criteria are a prerequisite for equitable access to advancement.
Behavioural experiment design	MindTribes recommends running selection process reforms as structured behavioural experiments - measuring candidate diversity outcomes before and after process changes to build an evidence base for what works in the specific organisational context. This enables iterative improvement rather than wholesale redesign.
Risk to manage	Selection process reform requires sustained capability investment in people leaders. Without it, improved process design is not consistently applied. This approach works best in combination with Approaches 1 and 2.

EXPECTED OUTCOMES

Selection processes that surface the widest field of capable candidates; reduced structural penalty for racially and ethnically diverse employees in internal mobility and promotion; and a systemic improvement that sustains the gains made through Approaches 2 and 3, so that progress does not depend on individual advocate goodwill.

Section 5 - Managing Risks, Data Privacy, and the Self-Identification Solution

5.1 Why ethnicity data is hard to collect - and how to approach it

Incomplete and inaccurate race and ethnicity data is not an isolated problem - it is a structural reality across Australian public and private sector organisations. The reasons are understandable: employees from racially and ethnically diverse backgrounds have experienced data about their identity being used to classify rather than to support them. They need evidence that disclosure will lead to genuine benefit before they provide it willingly.

- The pathway to higher voluntary ethnicity disclosure depends on trust. Campaigns to fill in demographic forms, absent evidence of action, rarely move disclosure rates. Visible, credible programs that create demonstrable opportunity are the most effective drivers of voluntary identification.
- The Safer Workplaces for Women of Colour study found that 69% of respondents felt low or no confidence in organisational reporting and data processes. This lack of trust in systems is the primary barrier to voluntary disclosure of sensitive identity information.
- The sponsored talent program described in Approach 2 resolves the data challenge through voluntary self-nomination. Employees choose to identify as program participants, attaching their own demographic information to an expression of interest in a genuine opportunity.

The virtuous cycle: action builds trust, trust builds data

1. Organisation launches a credible, well-communicated sponsorship program with visible senior leadership support.
2. Employees from racially and ethnically diverse backgrounds voluntarily self-nominate, attaching their identity information to the expression of interest.
3. Program cohort experiences measurable development and promotion outcomes. These outcomes are communicated transparently.
4. Broader employee cohort observes that identity disclosure leads to genuine opportunity - not classification or surveillance.
5. Voluntary ethnicity disclosure rates in HR systems increase progressively over time.
6. Richer demographic data enables more targeted future interventions, more accurate progress measurement, and eventually the data foundation required for effective broad representation targets.

5.2 Legal framework: privacy and positive action

- Ethnicity is sensitive personal information under the Privacy Act 1988. Any formal expansion of ethnicity data collection requires a privacy impact assessment, clear purpose statements, robust data security, and access controls. These requirements are achievable with appropriate design.
- Sponsorship programs and targeted development planning directed at racially and ethnically diverse employees constitute positive action under Australian anti-discrimination law - legally permissible, well-established in case law, and explicitly distinguished from positive discrimination or quotas. Clear internal communication of this distinction is essential to manage perception risk.

- The Racial Identity and Privilege Self-Assessment is a personal reflection tool. It is not submitted to the organisation, not reviewed by anyone else, and does not constitute organisational data collection; however it does improve sponsors understanding of power and privilege.

5.3 Managing the belonging and perception risk

Any equity initiative carries the risk of being perceived as identity-based rather than merit-based. MindTribes' research - particularly the Levelling the Playing Field study - documents that this perception is itself a manifestation of cultural bias: the assumption that equity programs compromise merit rather than correcting for the structural disadvantages that prevent merit-based processes from operating equitably. Managing this risk requires:

- **Communication.** Transparent communication of the evidence base: the research finding that the promotion gap persists even after controlling for all observable productivity characteristics makes clear that the system is not currently meritocratic for everyone.
- **Leadership voice.** Consistent, credible messaging from senior leaders that diverse representation enhances the quality of decisions the organisation makes.
- **Process rigour.** The quality of process: rigorously designed selection and development processes, when applied consistently, make diverse outcomes easier to attribute to a fair process surfacing a wider field of capable candidates.
- **Post-program support.** Adequate support for people identified for development or advancement. MindTribes' research shows that the greatest belonging risk is not the program itself - it is the failure to support people adequately in new and more visible roles. Sponsorship programs must include ongoing support, not just placement.

Section 6 - Reflective Questions for Workshop Participants

The following questions are designed to prepare you for a structured facilitated conversation about racial and cultural equity strategy. There are no right answers. The purpose is to build shared understanding and support collective decision-making about the pathway forward.

On the evidence

- Which of the seven barriers identified in Section 1.3 - from Anglo-normative leadership standards to opaque promotion criteria - resonates most strongly with what you have observed in your own context? What is most surprising, and what is most familiar?
- MindTribes' research found that sponsorship from an Anglo leader with a trusted peer network was the single most effective career accelerant for culturally diverse women. What does this tell us about where organisations most need to invest structural effort?

On data and measurement

- If your organisation currently uses NESB1 and NESB2 classifications for equity measurement, what do those categories tell you accurately - and what do they obscure? What would you need to know that you currently cannot see?
- What would need to be true for employees from racially and ethnically diverse backgrounds to feel genuinely safe voluntarily disclosing their ethnicity? What evidence of action would build that trust?

On target readiness

- Reviewing the four readiness conditions in Section 3, which are most mature in your organisation - and which are most underdeveloped? What would it take to build the less mature conditions over the next 12–18 months?
- What is the difference between a target that creates accountability for genuine change and a target that creates pressure without the conditions to achieve it? How would you know which one you have?

On the four approaches

- Of the four approaches presented in Section 4, which two feel most actionable and highest leverage in your organisational context right now? What would need to be in place - sponsorship, resource, process - to begin within 90 days?
- Is there appetite for a sponsored talent program that explicitly includes women of colour as a priority sub-cohort, enabling simultaneous progress on gender equity and racial equity goals? What would the design need to look like to be credible and safe for participants?
- What would a development planning audit find in your organisation that leaders most need to see - and is the leadership group genuinely prepared to act on the findings?

On leadership and accountability

- What does it mean to be a genuine sponsor - not just a mentor, not just a supporter - for a racially or ethnically diverse colleague? What would you have to do differently?
- MindTribes' research shows that Anglo men were more willing to sponsor culturally diverse women than Anglo women, who tended toward affinity-based advocacy for women like

themselves. What does this mean for how sponsorship programs should be designed and who should be recruited as sponsors?

- What does success look like for racially and ethnically diverse employees in your organisation - beyond the numbers? What would a genuinely different career trajectory feel and look like?

Appendix - Evidence Base and MindTribes Resources

MindTribes Primary Research

- **Levelling the Playing Field: 5 Years of Advocacy for Culturally Diverse Women and Women of Colour - What Is Still Missing?** (MindTribes, 2023). Longitudinal study drawing on deep interviews with 18 senior culturally diverse women and women of colour, surveys of 90 CaLD women, and engagement with 40 senior Anglo-Saxon leaders. Conducted in partnership with the University of Melbourne. Available at: mindtribes.com.au
- **Safer Workplaces for Women of Colour: Summary Report** (MindTribes / CPSU, 2023). Mixed-methods study comprising five focus groups (42 participants) and a survey of 188 employees across the Victorian Public Sector. Examines lived experience of racism, discrimination, and barriers to psychological and cultural safety. Available at: mindtribes.com.au

Academic and Sector References

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- Kangas-Müller, L. (2024). 'Dilemmas of Recognition and Redistribution: Constituting Intersectional Subjects of Inclusion in Migrant Support Work.' *Gender, Work & Organization*, 31(6): 2568–2584. DOI: 10.1111/gwao.13109.
- Bank of England (2021). *Court Review of Ethnic Diversity and Inclusion*. Bank of England.
- Australian Human Rights Commission (2018). *Leading for Change: A Blueprint for Cultural Diversity and Inclusive Leadership Revisited*. AHRC.
- Diversity Council of Australia (2018). *Counting Culture*. DCA.
- Australian Bureau of Statistics (2021). *Australia's Population by Country of Birth*. ABS.
- Australian Public Service Commission (2023). *APS Culturally and Linguistically Diverse Employment Strategy*. APSC.

MindTribes Workshop Resources

The following resources are distributed alongside this guide as pre-work for workshop participants:

- **Racial Identity and Privilege Self-Assessment** (MindTribes, 2024) - Pework Document 1. A personal reflection instrument on race, ethnicity, nationality, and faith identity. Designed to support individual readiness for authentic sponsorship and allyship conversations. Strictly personal - not collected by the organisation.
- **12 Key Concepts for Racialised People and Allies** (MindTribes, 2024) - Pework Document 2. A shared conceptual vocabulary covering cultural taxation, psychological safety, cultural safety, credibility policing, code-switching, impact vs intent, and collective care.
- **NSW PSC Sponsored Talent Program Toolkit - Elevate and Advocate** (MindTribes / NSW Public Service Commission). Available at: <https://www.nsw.gov.au/nsw-government/equity-and-diversity/cultural-diversity/cald-sponsorship-guidance>