

**ENAR'S SEVENTH EUROPEAN
EQUAL@WORK SEMINAR**

TOOLKIT

MANAGING RELIGIOUS DIVERSITY IN THE WORKPLACE: A GOOD PRACTICE GUIDE



european network against racism

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Foreword



The document you are presently reading is a much needed resource for all employers wishing to fully engage in creating an equal, dignified and diverse workplace by respecting religious diversity within their workforce.

“Managing religious diversity in the workplace” is a toolkit that aims to support employers to identify the main challenges and barriers of accommodating religious minorities in European workplaces and how to practically respond to those challenges; it also includes a checklist that was compiled in consultation with employers, trade unions and NGOs to facilitate employers looking to improve their diversity management policies.

This toolkit is the result of the 7th edition of ENAR’s annual Equal@work seminar, which focused on religious diversity in the workplace and explored the challenges, barriers and difficulties associated with religious obligations and practices in secular spaces of employment. The various stakeholders who took part in that conversation looked at the overlap between religious and other forms of discrimination, identifying the need to find specific and more inclusive approaches to accommodate religious minorities in the workplace.

This was always a topical issue and I safely predict that it will be for another while; reconciling a secular vision of what the workplace should be and the respect of diversity and personal religious choices of an employee is no easy task. Nevertheless we are attempting through this toolkit to contribute constructively to the discussion. We particularly want to highlight the experiences of members of religious minorities who recounted their stories of discrimination in the form of case studies.

To me, the success stories and the examples of best practice, even though they all varied, were the ones across Europe who saw religious diversity as an asset rather than a cost, the ones that were based on the acknowledgement that religious expression is an intrinsic aspect of individual identity and dignity, and that such expressions are not merely to be tolerated by employers but upheld as rights.

We join the participants of Equal@work in their call for a radical shift in our approaches to religious diversity management placing equality, respect and dignity at the forefront.

We would like to thank all the participants of the seminar for their innovative and valuable insights, and for their dedication to the vision of workplaces which are simultaneously productive and inclusive of the needs of religious minorities. A particular thank you to CEJI - A Jewish Contribution to an Inclusive Europe, UNITEE - New European Business Confederation, the *Confédération française démocratique du travail* (CFDT), UNITED SIKHS, JLO Conseil and Sodexo for their inputs and support in this endeavour. Finally we would like to extend our thanks to the long standing supporters of the Equal@work Platform: Adecco Group, L’Oréal, Sodexo, the European Commission and the Open Society Foundations.

Amel Yacef
ENAR Chair

About the Equal@work Platform

Since 2009, ENAR has been working closely with employers, NGOs and public authorities to facilitate the access of workers from ethnic minority and migrant backgrounds to the labour market. Since then, subjects as diverse as monitoring diversity from the employers' perspective to addressing reasonable accommodation have been examined. One of the main characteristics of ENAR's work in this field is the attention its members pay not only to theoretical debates but also to the real practical issues that impact on individuals as they seek to make a positive influence on the practices of employers.

The Equal@work conference in 2010 looked at issues around monitoring diversity and considered employers' perspectives. The 2011 conference looked at reasonable accommodation of cultural diversity in the workplace and at what is being done on the ground by companies. In 2012, the conference looked at third country nationals' ability to access the labour market, and at the glass ceiling for ethnic minorities in 2013. Last year, in 2014, participants discussed the collection of equality data as a mechanism for improving diversity practices. Following these meetings, a number of recommendations were put forward to relevant stakeholders at all levels.

Over the years, ENAR has worked to ensure the social inclusion of ethnic and religious minorities and migrants and to enable their full participation in the EU labour market. Since 2009, ENAR has been actively transferring and testing good diversity management practices in different national contexts, in collaboration with its members and corporate partners in a multi-stakeholder dialogue, thereby broadening respective horizons, generating trust and inspiring innovation, from European to local levels.

ENAR has succeeded in establishing a trusting network of key international companies, trade unions, public employers, academia and civil society organisations that develop innovative approaches to diversity management, which merged into the Equal@work Platform in 2011.

The Equal@work Platform aims to provide innovative solutions to combat racial discrimination in employment. At the European level, stakeholders:

- anticipate future trends regarding diversity in the labour market;
- share best practices and facilitate mutual learning;
- design new projects and actions; and
- provide feedback and recommendations to European policy makers

1. BARRIERS TO RELIGIOUS DIVERSITY:

Discrimination, divides and gaps in understanding

Religious diversity in the European workforce continues to present difficulties at various stages of employment, from the recruitment process, to progression in work, to the daily work routine. This section outlines the different barriers faced by religious minorities in the workplace. With reference to real case-studies, we explore experiences of discrimination, misunderstandings and cultural divides which hinder the effective inclusion of religious minorities in the workplace.



1.1. Access to employment: discrimination in recruitment

Discrimination in access to employment is a major barrier to achieving fair employment for minorities. Discrimination is increasingly detrimental as low representation of religious minorities in the workplace perpetuates a lack of understanding of different cultures and religions within the workplace and the broader society. In the case of religious minorities, the recruitment process often involves a number of specific problems.

a. Discrimination at interview

A major barrier for religious minorities is the persistence of discrimination against perceived religious minorities. Discrimination at interview, particularly when the candidate wears specific religious dress or symbols, can take many forms:

- **Conscious exclusion:** Interviewers may knowingly exclude the interviewee based on their religion, race or associated ethnicity by rejecting them or showing hostility in the interview (a body of anecdotal evidence shows an increased fear of hiring Muslims as “they might turn violent one day, you never know” since the 2015 Paris terrorist attacks). Exclusion can also occur more subtly, when jobs are only posted within closed networks, and when recruitment policies do not advertise to a diverse range of applicants.
- **Stereotypes or prejudices** may be used against the minority based on the interviewer’s perception of the religious group as a whole.
- **Inappropriate interview procedure:** Interviewers may ask different questions to the interviewee relating to their religion or religious symbol, putting the focus on the visible difference rather than on suitability for the role. Further, a lack of conscious religious awareness in the recruitment policy can lead to insensitive or invasive questions being asked in the interview. This may not affect the likelihood of the candidate being successful but may cause tension and discomfort (such as questions about dietary restrictions, supposed origin of the candidate, marital traditions, or if they hold conservative views on society).
- **Anticipated discrimination:** As a result of a climate of hostility toward religious minorities, candidates may choose to remove the symbol for the interview. This can lead to confusion, affecting the relationship with the employer and potentially presenting problems at later stages of employment.

Wearing religious symbols - be it a Muslim woman’s headscarf, a cross or a Sikh’s beard and turban - is a manifestation of the freedom of a person to practice their religion and is often a central aspect of the individual’s life. If discrimination based on such grounds happens, it can have the effect of significant exclusion and hold back many religious minorities from entering the workforce.

Religious minorities are also likely to experience differential treatment relating to matters other than wearing religious symbols. For instance, the interview can be a difficult time for religious minority candidates wishing to openly and frankly discuss the employers’ policy on leave for religious holidays and flexible working times for prayer. In many cases the very expression of these needs has disadvantaged candidates, particularly in the case of employers operating inflexible working patterns.



Case Study 1: Job interviews and Jewish holidays - CEJI - A Jewish Contribution to an Inclusive Europe¹

Elisabeth interviews for a job in a car rental firm. She is Jewish and needs to take Friday afternoons off work in winter to get home before dark and prepare for the Shabbat.² However her interviewer decided to introduce a shift pattern, which will not accommodate her preparing for the Shabbat. Elisabeth, who is a single mother, is not in the position to forgo the job. She will have to agree to the shift pattern until she finds another job which will allow her to fully keep Shabbat and the other Jewish holidays.

¹ See <http://www.ceji.org/>.

² According to halakha (Jewish religious law), Shabbat is observed from a few minutes before sunset on Friday evening until the appearance of three stars in the sky on Saturday night. Shabbat is a festive day when Jews exercise their freedom from the regular labours of everyday life. It offers an opportunity to contemplate the spiritual aspects of life and to spend time with family.

b. Biased recruitment procedures

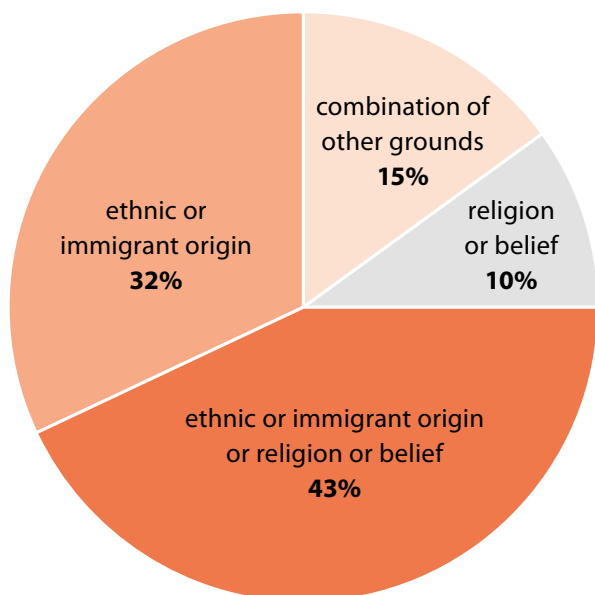
Beyond the interview, recruitment processes may exclude or disadvantage religious minorities in a number of ways:

- Employment agencies may only propose certain types of jobs to certain religious communities.
- Culturally biased selection procedures, such as tests and group exercises, may disadvantage some religious groups.
- Broader structural inequalities along religious, racial and ethnic lines may be perpetuated when recruitment processes have a qualification focus.



Case Study 2: Discrimination against Muslims in the EU

In a study by the EU Fundamental Rights Agency on discrimination against Muslims in Europe,³ Muslims reported a range of overlapping grounds when asked about discrimination experiences in the last 12 months:



The study noted that where Muslim respondents were interviewed, discrimination in employment and private services tends to dominate people's experiences of discrimination.

c. Proving discrimination

Discrimination in employment is extremely hard to prove in individual cases, due to the range of different recruitment criteria and the general freedom of employers to recruit on the basis of broad ideas of merit and suitability for the role. In addition, even if proved, the intersecting and overlapping nature of different grounds of discrimination makes it difficult to assess whether discrimination occurs due to the supposed religion of the candidate. For example, some employers may have no problems recruiting people from specific minority religious communities as long as they correspond to specific stereotypes (e.g. 'liberated Muslim woman', 'invisible Jewish man').

1.2. Religion, work and career progression

Religious minorities also face a range of difficulties once they have passed the recruitment stage. Cases of stunted progression are commonplace among religious minorities and can be attributed to a range of factors ranging from direct discrimination (including dismissal on the basis of religion) to general cultural gaps in understanding which can disadvantage minorities when seeking to move up the career ladder.

a. Wearing religious symbols and discriminatory dismissal

In extreme cases, religious minorities are dismissed for the ways in which they choose to manifest their religion in the workplace. These situations are the absolute opposite of an inclusive form of diversity management, halt the progression of religious minorities and show the breakdown of healthy employer-employee relationships.

Two cases of dismissal on the basis of the manifestation of religion in the workplace are currently being considered in the Court of Justice of the European Union. Whether these dismissals, presented in Case Study 3 on page 8, were legal or not will be decided as a matter of EU law relating (a) to an interpretation of 'discrimination' and (b) to the scope of an exception to the prohibition on indirect discrimination.

³ European Union Agency for Fundamental Rights. 2009. *EU-MIDIS Data in Focus Report: Muslims*.

This exception holds that differences in treatment of employees may be justified if “such a characteristic constitutes a genuine and determining occupational requirement, provided that the objective is legitimate and the requirement is proportionate”.⁴

Therefore, in the *Asma Bougnaoui* case, the court will have to decide whether creating a “policy of neutrality” is a genuine and determining occupational requirement. The court will balance the general prohibition on discrimination with considerations relating to the ability of employers to treat employees differently if there is a valid reason relating to the employment itself. ENAR’s position is that creating a policy of neutrality cannot constitute a genuine and determining occupational requirement justifying a limitation on the headscarf (or other religious symbols).⁵ This is explored further in Chapter 2.

b. Cultural gaps and the glass ceiling for religious minorities

Gaps in culture, knowledge and understanding between the ‘dominant’ religious or secular culture in an organi-

sation and religious minorities is often a major barrier hindering religious minorities’ career progression. Even implicitly, these cultural gaps can create an environment in which minorities are less understood, trusted, and therefore less likely to be promoted than their peers.

Cultural gaps exist in a number of forms and can affect how minorities are treated and accepted in the workplace:

- **Visible differences:** When wearing religious symbols, dress, or forms of grooming, many minorities face barriers to progression or limitations on the type of work they are allowed to perform. This can include:
 - Formal, blanket bans on the wearing of religious symbols at work;
 - Hygiene or safety regulations, when used as a pretext to refuse or restrict the access of people wearing certain religious clothing/symbols to specific positions in a company. In many cases these restrictions are not objective and proportionate work requirements, or the employer does not offer reasonable accommodation to cater for the needs of both parties.



Case Study 3: Wearing the headscarf at work - Cases in the CJEU

Two cases of dismissal on the basis of the manifestation of religion in the workplace are currently being considered in the Court of Justice of the European Union (CJEU).⁶ Both cases relate to a female employee who was dismissed for wearing the headscarf to work.

Samira Achbita v G4S

In Belgium in 2006, the private undertaking G4S Secure Solutions dismissed Samira Achbita from her post as a receptionist because she informed

the company of her decision to start wearing the headscarf at work. The company said that employees were not allowed to wear visible religious, political or philosophical symbols in the workplace, although this rule was unwritten. When Samira was dismissed, G4S added this rule to the employee code of conduct.

Asma Bougnaoui v Micropole SA

In France, Asma Bougnaoui, a design engineer, was dismissed by her employer Micropole SA. Asma wore the headscarf to work; however after a complaint from a client she had visited, the company asked that she remove her headscarf to respect a policy of neutrality when representing the company.

⁴ Article 4(1) Directive 2000/78/EC.

⁵ For further information, see ENAR and Amnesty International, 2016. *Wearing the headscarf in the workplace: Observations on discrimination based on religion in the Achbita and Bougnaoui Cases*. Available at: <http://www.enar-eu.org/IMG/pdf/eur0150772016english.pdf>.

⁶ Samira Achbita and Centrum voor gelijkheid van kansen en voor racismebestrijding v G4S Secure Solutions NV (case C-157/15); Asma Bougnaoui and Association de défense des droits de l’Homme (ADDH) v Micropole SA (case C-188/15).

- **Perceived ‘political’ differences:** Wider socio-political perceptions about particular religious groups (such as Muslims) inevitably impact how they are treated in the workplace. Broader discourses which link ‘extremism’ with Islam can influence perceptions and associate Muslim colleagues with such ideologies. As a result the behaviour of Muslims in the workplace is understood through this lens, leading to misunderstandings, e.g. attributing a decision to begin wearing religious symbols such as a headscarf or growing a beard or the demand for a prayer place, to a particular ideology or ‘radicalisation process’.
- **Practices and beliefs:** Some religious beliefs may create a specific limitation for the religious minority which is at odds with the mainstream working culture. This may include requiring specific holidays which conflict with important work periods, different body language, or strong feelings about working with other genders. Such cultural gaps can be difficult for both employees and employers to navigate, striking the balance between maintaining an open working culture, respecting all cultural views, but also not inhibiting the business environment.

Cultural gaps in these various forms have contributed to stagnated progression for religious minorities in a number of national contexts.

Such differences can contribute to the creation of barriers to the career progression of religious minorities, known as a ‘glass ceiling’.⁷ This can be problematic as such barriers relate to the way individuals choose to manifest their religion (be it by a need to pray at certain times, or wear religious symbols or dress) which is often a highly personal and important matter, and in many cases cannot be compromised. However, many religious minorities may be willing to negotiate how and when such practices are carried out, providing a basis for employers to accommodate them.

⁷ See European Network Against Racism. 2014. *Glass ceiling for ethnic minorities: report of ENAR’s 5th Equal@work conference*. Available at: http://enar-eu.org/IMG/pdf/5thequalatwork_report_final.pdf.

1.3. Religion and the daily routine

For religious minorities, even mundane daily activities such as eating, dressing and existing in the workplace can present a problem for how they manifest their religion. This can range from the facilities and working policies that are incompatible with particular religious practices, to the attitudes and behaviour of colleagues toward them on the basis of their religion.



Case Study 4: Glass ceiling for Hindus in London - City Hindus Network⁸

A study from the United Kingdom explored experiences of stunted progression and religious discrimination among Hindu professionals in London. Although a famously diverse city, 48% of respondents said they had experienced the glass ceiling effect in their career. This differed according to gender, with 51% of male respondents experiencing the glass ceiling effect, while 39% of women did.

Respondents also noted that progression was affected by a complex range of factors, rather than direct discrimination on the grounds of religion. Such factors included race (Hindus in the UK are generally racialised as Asian), educational background and class.

Social capital and cultural norms were identified as highly influential to progression opportunities, with unspoken expectations to assimilate to mainstream cultural norms. The extent to which minorities participate in such cultural integration was identified as a factor affecting progression.

a. Religious symbols and practices

Dress and symbols

The issue of religious symbols and dress can also create difficulties for employers and employees in terms of the day-to-day aspects of work. This may not result in dismissal, but can cause employees to feel restricted and unaccepted in the workplace.

⁸ See <http://www.cityhindusnetwork.org.uk/>.

1 Barriers to religious diversity



Case Study 5: Jewish religious dress and progression - CEJI - A Jewish Contribution to an Inclusive Europe

Leonard works in a law office. He practices Judaism and he is a conscientious and dedicated worker. Like many observant Jews, Leonard wears a *tallit catan*⁹ under his clothing. One day his boss told him that he does not have the “right look” to meet clients. Thus he was asked to stop wearing it (actually the *tzitzit* knotted fringes are the only visible part of the *tallit catan*). Leonard refused to stop wearing the *tallit catan*. Since then he has the impression that his boss prefers not to assign him important clients.

There are a number of reasons an employer may decide to restrict employees from wearing religious symbols. As discussed above, this may be to create a ‘neutral’ work environment, to maintain a uniform policy, or for health and safety reasons. However, in many cases these restrictions do not consider the perspective of the minority and the importance attached to religious symbols. As such, employers have made restrictions even when they are not completely necessary to the role, and attempts at a compromise are not explored.

Practices

Similar barriers exist concerning the ability of religious minorities to combine religious practices and obligations with their work schedule. These difficulties can arise in relation to many different aspects of work life:

- **Prayer space and work schedules:** The absence of dedicated spaces for prayer, meditation and associated rituals is a particular barrier for some religious minorities, for example for observant Muslims.¹⁰ A lack of provision for prayer spaces or flexibility of working schedules puts individuals wishing to pray in the difficult position of reconciling apparently conflicting moral injunctions and holds them back from performing their religious duties in the way

they wish to. This can generate feelings of discomfort and impact levels of enthusiasm in the workplace.

- **Holiday policies:** In many European countries official holidays reflect Christian (or other majority) religions. This disadvantages religious minorities if they do not have access to vacation time for their own religious occasions, and have to use their own personal annual leave. In some cases, employers even refuse the use of personal leave on minority faith festivals under the pretext of workload management. This issue also presents difficulties for employers to design policies which acknowledge a diverse range of religious holidays, yet still providing access to state holidays.
- **Food:** Many religious minorities adhere to religious dietary restrictions, e.g. halal, kosher, vegetarian or vegan (for religious reasons) diets. When these needs are not considered in the workplace (on an everyday basis or for special events) this hinders and isolates religious minorities.

b. Harassment at work

For many religious minorities, harassment in various forms can be a daily experience at work. This can be particularly so for visible religious minorities; the visible marker being either the wearing of religious symbols and dress, or belonging to particular ethnic groups associated with religions. Harassment can take the form of derogatory remarks, insults, ‘micro-aggressions’,¹¹ and even physical violence. It is commonly reported to come from colleagues, but also management, customers and service users.

It is important to recognise that harassment in the workplace is often the result of deteriorating political and social contexts, and cannot be viewed in isolation to broader trends of racism, xenophobia, sexism, and in particular growing antisemitic and anti-Muslim sentiments across Europe.

⁹ The tallit katan (Yiddish/Ashkenazic Hebrew tallis koton; ‘small tallit’) is a fringed garment traditionally worn either under or over one’s clothing by Jewish males. It is a poncho-like garment with a hole for the head and special twined and knotted fringes known as tzitzit attached to its four corners.

¹⁰ Prayer is one of the five pillars of Islam which relates to the duty to remember God, facing Mecca, five times a day.

¹¹ A micro-aggression is an underhanded insult, assumption, or stereotype relating to a person’s race, gender, disability, class or religion which intentionally or unintentionally targets, delegitimises or dehumanises another person. The term micro-aggression is particularly useful in the workplace context to demonstrate that cultures of politeness do not prevent racism and other forms of discrimination from being conveyed.



Case Study 6: Muslim women and harassment at work - ENAR Forgotten Women project ¹²

Testimony from Aaliyah, Sweden:

“I have not experienced any discrimination by my employer, not that I can recall. But I have experienced discrimination by colleagues. My former colleagues have used racist and offensive expressions such as the n-word, others have questioned my choice of wearing the headscarf, while others have reproduced stereotypes that my parents would probably force me to marry against my will. There are also colleagues who have tried to make me into this suspicious subject by associating me with people travelling to Syria.”

c. Misunderstandings on multiple identities, politics and religion

In a similar vein, many religious minorities are subjected to a range of overlapping stereotypes, assumptions and negative opinions on a regular basis. Although perhaps not amounting to harassment, such incidences overlook the individual's personal merits and characteristics in favour of an essentialised version of them based on broad generalisations about the religious group as a whole.

To understand this it is important to acknowledge that religious discrimination does not always exist in isolation, but often intersects with prejudices and stereotypes based on race, ethnicity and gender. It is also highly linked to prevailing political views about certain religions, particularly in climates of generalised hostility to certain religions, e.g. Islam.

This can be problematic in a number of ways. Particularly for women of a number of religions, particular stereotypes are applied due to conceptions about the 'oppressive' nature of their culture. Such misunderstandings are based on assumptions about gender, race, ethnicity and religion combined (e.g. towards Hindu, Muslim and Jewish women).

¹² European Network Against Racism. 2016. *Forgotten Women National Report - Sweden*.

2. MANAGING RELIGIOUS DIVERSITY:

Solutions and best practice

Creating an environment in which religious minorities feel included, respected and valued for their work is a process; one which requires concerted effort from employers. As the previous section shows, numerous barriers exist which inhibit this culture of dignity and respect, stemming from restricted access to employment, discrimination, limited career progression, and major and minor obstacles to the manifestation of religion at work.



Barriers highlighted in Chapter 1 create a situation in which religion (or some associated practices, behaviours and values) is seen as incompatible with working in and contributing value to an organisation. However there need not be a trade-off between religious freedom and a productive working environment. On the contrary, employees who feel accepted and respected for who they are will be the most productive.

The Equal@work seminar on managing religious diversity identified a range of practices and principles to positively manage religious diversity in the workplace. This section will explore three main principles of religious diversity management:

1. **Valuing difference**
2. **Creating a culture of freedom, respect and dignity for all employees**
3. **Reasonable accommodation and universal solutions**

Under each, we outline some specific good practices and recommendations for employers to adopt in their own organisations.

2.1. Valuing difference

One fundamental principle identified by employers, faith groups and NGOs working on religious diversity is the need for employers to fully understand the benefits of including religious minorities in the workplace and meeting their needs in the process. Often, employers market themselves on diversity and inclusion, but minority staff do not see the return of this in the work environment.

How can we start to value difference in a genuine way, going beyond empty statements on diversity?

a. Valuing difference as a strategic issue

Employers interested in adopting an effective policy of religious inclusion must start with a robust analysis of why they need such a policy. Such reasons are wide-ranging, and may differ depending on the sector and nature of business. However, all organisations and companies can benefit from thorough, open and inclu-

sive ways of managing religious diversity as part and parcel of broader diversity management efforts:

- A religiously diverse workforce expands the range of ideas, opinions, world perspectives and experiences within the organisation.
- Religious diversity increases the cultural and religious understanding of all employees. This awareness is necessary, not only in a global business environment, but also at the local/regional/national level to reflect the diversity of the customer base and society as a whole. A diverse team caters for increased cultural and religious sensitivity in business development and market exploration.
- Fair religious diversity policies will make minority staff feel valued and respected, increasing productivity, loyalty to the organisation and staff retention.

Once the employer has established the rationale for improving their policies on religious diversity, a **holistic diversity strategy** can be developed which includes objectives and specific steps for improvement.

b. Rethinking 'neutrality'

The second implication of valuing difference is the need to review policies of neutrality. As documented in the barriers section, notions of neutrality in the workplace are often adopted to restrict the religious freedom of employees, particularly in relation to the wearing of religious symbols and garments.

Setting aside whether restricting religious freedom on the basis of neutrality is legal, employers must consider whether such policies are acceptable and helpful for their workplace. Policies of neutrality need to be reassessed alongside the aims of diversity and inclusion.

So what is a policy of neutrality at work and what does it achieve? How should we view the pursuit of 'neutral work environments' in the context of religious diversity management? The below analyses the place of neutrality in the workplace from the perspective of how organisations manage difference. Is difference a benefit or a threat?

2 Managing religious diversity



Good Practice 1: Diversity, strategy and business benefits - JLO Conseil¹³

JLO Conseil is a consultancy which aims to help companies improve their diversity policies and practices. Employing approximately 100 experts, JLO works on a range of diversity areas including disability, gender, ethnicity, and increasingly, managing religious diversity.

JLO works with companies to understand diversity as a strategic issue when helping them to design their diversity policy. This includes thinking about the need to recognise that in a global business environment diversity is invaluable to the company.

“We help companies define their diversity policy. To do so we identify the reasons and business levers that make diversity a strategic issue for their companies. Is this important for my co-workers? For my customers? What can it bring to my area of work?”

“We help the company take into account the expression of religious beliefs within the organisation. We ask them to consider how religious expression can be an advantage for the company.”

By asking companies to do this analysis JLO can help them to develop a diversity strategy which explores how the company can improve its approach to religious diversity, including how to communicate respectfully, and how to allocate time and space for religious expression.

Recognising difference

The first step in assessing neutrality in spaces of diversity is to recognise that all employees bring differences into the workplace. These differences present themselves in various ways. They include the manifestation of religion, but extend also to gender, race, sexual orientation, physical ability, age, class, and political, moral and philosophical views.

Employees bring all of these differences to work with them; some differences are visible and others are not.



Evidently, these differences impact the way individuals think, act and react to people and situations. In addition, it is important to note that employees from ‘majority’ backgrounds will also have their own religious and cultural influences, and as such are not fully neutral on the issue of religion. ‘Neutrality’ is normalised according to the historical development of the majority population of any country (e.g. in France, when the principle of *laïcité* was incorporated in law in 1905, practicing/devout Christians dressed in the same way as the rest of the population). If the principle of ‘neutrality’ was to be thought through today from scratch, taking into consideration the diversity of the populations of European countries, it is extremely likely that it would be different. It is important that employers are aware that there is no ‘neutral neutrality’, and what is being understood currently as ‘neutrality’ is a historical social construct, which is itself subject to change.

Generally, policies of neutrality are used to justify restrictions on the ability of religious, ethnic and racial minorities to manifest their religion. Neutrality policies do not tend to be used to counter the effect of broader, mainstream and more invisible influences in the workplace. Policies of neutrality disproportionately affect minorities, and as such are not neutral.

Assessing the purpose of neutrality

What is the purpose of neutrality? Is it a legitimate policy with clear benefits for the workplace? Or does it single out some employees, creating a hostile and unequal work environment?

¹³ See <http://www.jlo-conseil.com/>.

To answer this it is important to look at the arguments commonly put forward for neutrality against the value of promoting difference:

Neutrality	Valuing difference
<p>Claim 1: “Restricting the wearing of religious symbols helps to create an objective work environment where employees are seen to be neutral”</p>	<p>It is impossible to create an objective work environment. Employees bring a range of differences to the workplace, and in their differences there is value. This is seen in a diversity of opinions, ideas and knowledge, which makes the workplace a site of continuous learning. Manifesting one’s worldview is not limited to symbols or dress, but includes a broad range of behaviours which cannot be made ‘neutral’. Taking away symbols merely removes certain visible signs but does not erase these diversities which are conveyed implicitly or explicitly in daily interactions between colleagues, with customers or management. As such, employees cannot ever really be ‘neutral’, and the desire to create the impression of neutrality is misleading.</p>
<p>Claim 2: “Religious symbols and dress infringes the religious freedom of other employees”</p>	<p>The presence of difference does not have to be a threat to religious freedom. Rather than trading off different religious freedoms, it is important to create a work environment in which differences are understood and actively accepted and the agency of individuals is respected.</p>
<p>Claim 3: “Wearing religious symbols at work puts minority employees at risk of racism and discrimination”</p>	<p>Employers’ concern for the well-being of their employees is both commendable and important. However, restricting employees from wearing religious symbols can also amount to discrimination, which cannot be justified by hypothetical risks. Employers could take steps to foster more accepting work environments rather than placing the burden of avoiding racism onto minorities. Employers concerned with diversity should aim to empower all their employees to feel self-confident about their own diversity and characteristics, wherever they constitute a minority or not in their working environment.</p>
<p>Claim 4: “Visible religious symbols hinder the integration of employees into the working culture”</p>	<p>Integration is commonly presented as a duty for minorities. However, in the workplace it is the duty of all (employers and employees) to adapt to create the most productive and accepting environment. Rather than focus on ensuring uniformity in the way employees dress, employers could focus on ways to bridge understanding of other religions and cultures, aimed at non-minority staff members.</p>
<p>Claim 5: “Many religious symbols denote the oppression of women and as such are incompatible with gender equality promoted in the workplace”</p>	<p>When attempting to promote diversity, stereotypes about religions or cultures as a whole should be avoided. It is also important to consider the oppressive effect of excluding women from the workplace simply because they choose to wear religious symbols.</p>

2 Managing religious diversity



Good Practice 2: The Muslim penalty - CV testing in France¹⁴

A study conducted in France monitored responses to CVs sent with different combinations of religious names and ethnicities with similar qualifications and experience. When analysing the responses to Senegalese women with Muslim sounding names against those to Senegalese women with Christian sounding names, the study revealed a significant Muslim penalty, even when controlling for race and gender.

Muslim Senegalese women got 8% of positive responses whereas Christian Senegalese received 21% positive responses. Therefore women perceived to be Muslim were 2.5 times less likely than Christians to be invited for an interview.

Assessing the arguments for policies of 'neutrality' in the workplace highlights some major contradictions:

1. Policies of neutrality are not neutral - they exclude some symbols of difference (religious symbols) but not others (clothing signifying gender).
2. They are based on the idea that similarity means equality, rather than the idea that embracing the differences of employees is a way to promote equality in practice.
3. Policies of neutrality disproportionately affect those choosing to visibly manifest their religion over those who do not or those who do not have a religion. As such they are not neutral as they express a bias in favour of not manifesting religion.

c. Self-assessment

The last step employers can take to value religious difference within their workforce is to create internal systems to measure performance. Companies can take steps to collect data, evidence and opinions of staff to answer the question: "How much do we really value difference?"

¹⁴ Adida C. L., Laitin D. D., Valfort M.-A. 2010. 'Identifying barriers to Muslim integration in France'. *National Academy of Sciences* 107 (52): 384-390.



Good Practice 3: Principles of good equality data collection - Open Society Foundations, Migration Policy Group and ENAR¹⁵

1. **Self-identification:** Identification should be based on the individual data subject's perception of her/his ethnic or racial origin.
2. **Voluntary participation:** Every individual has the right to opt into data collection (there is therefore no need to reach a consensus among all communities/individuals), and no one can be forced to provide sensitive data.
3. **Confidentiality of personal data:** Sensitive data should always be treated confidentially; this implies anonymisation of all information linked to sensitive data.
4. **Informed consent:** Every individual shall receive clear, transparent information regarding the purpose of the data collection. They shall then be asked if they are willing to consent or not.
5. **Community participation:** Groups at risk of discrimination should actively participate throughout the process, directly or through the intermediary of representative organisations, in particular for the definition of categories, the analysis and evaluation of the data collected, and the dissemination of the data.
6. **Multiple grounds/identities:** Data subjects should have the right to choose multiple and intersectional identities and it should be possible to combine grounds when analysing the data.

Employers can take a range of steps to self-assess their performance on religious diversity.

Self-assessment in recruitment

Taking part in CV testing is one way to test how employers react to applicants from diverse backgrounds. The below example demonstrates how CV testing has

¹⁵ Open Society Foundations. 2014. *Ethnic origin and disability data collection in Europe: measuring inequality - combating discrimination*. Available at: <https://www.opensocietyfoundations.org/sites/default/files/ethnic-origin-and-disability-data-collection-europe-20141126.pdf>. See also: European Network Against Racism. 2014. *Measure, Plan, Act: How data collection can support racial equality*. Available at: http://www.enar-eu.org/IMG/pdf/20084_equalitydatacollectionpublication-8-low.pdf.

been able to help understand whether discrimination occurred on the grounds of religion.

This demonstrates that imaginative and accurate ways of measuring discrimination do exist, enabling us to coherently identify religious discrimination.

Collecting evidence

A vital aspect of measuring performance on diversity is the collection of data and evidence. This can include data on the composition of the workforce to give an idea of the scope of religious (and other forms of) diversity, but also to measure how diversity is spread through the organisation. For example, are religious minorities present in senior management or are they mainly frontline staff? Such data can give an indication of the accessibility of progression opportunities to religious minorities within the organisation.

Data collection on sensitive topics such as identity can present difficulties. However, following the principles below will ensure that data is collected in a fair, voluntary and non-intrusive way, to be used solely for the purpose of improving diversity.

In addition, employers could work to collect other evidence of their performance on religious diversity. For example, employers could conduct anonymous staff surveys which include questions on how well they facilitate religious diversity and what could be improved.

Valuing difference - Recommendations:

1. Develop a diversity strategy which includes business benefits and objectives, and includes specific reference to measures on religious diversity.
2. Participate in initiatives testing recruitment processes, including studies, but also develop methods of self-assessment.
3. Collect equality data according to the good practice principles.
4. Include questions on religious diversity management in staff surveys.

5. Leadership and management to take active corrective steps in response to identified discrimination.

2.2. Creating a culture of freedom, respect and dignity for all employees

The second fundamental of religious diversity management is the need for employers to prioritise creating a working culture of freedom, respect and dignity for all employees. Importantly, this includes a complete rejection of discrimination on grounds of religion, as laid down in EU law (Framework Directive 2000/78/EC),¹⁶ and national legislation. However, managing religious diversity in a holistic sense also requires an active and bold move towards inclusion, beyond the prevention of discrimination.

a. Key principles

Creating a culture of freedom, respect and dignity specifically with respect to religious minorities requires employers to take account of a set of key principles:

1. Diversity is not about tolerance of difference but about the rights and freedoms of minorities to express their identity.
2. To maintain a culture of mutual respect and dignity, the expectation is not simply on minorities to 'integrate' but on all to adapt to and accommodate their colleagues' religious preferences and practices or absence thereof: everyone has to feel included. This also includes a firm stand against proselytising of any kind.
3. When employees receive respect and freedom they will add more value to their organisation.

¹⁶ Council Directive 2000/78/EC of 27 November 2000 establishing a general framework for equal treatment in employment and occupation.

2 Managing religious diversity



Good Practice 4: Mainstreaming dignity and respect in recruitment - UNITEE New European Business Confederation¹⁷

UNITEE is a business federation founded with the aim of representing entrepreneurs with a migrant background. With members from across Europe, UNITEE promotes the idea of 'New European' entrepreneurs, a notion which embraces the benefits of a diverse European workforce which includes innovators from a range of cultural, ethnic and religious backgrounds.

UNITEE works to promote these benefits and to advise its members about how to create **transcultural working environments**. UNITEE believes that creating such work environments from the start is the best way to prevent discrimination.

UNITEE adopts an internal recruitment policy which places diversity at the foreground. Once the competence of the candidate is established, UNITEE adds an extra recruitment criterion: *"Does the candidate demonstrate a commitment to the values of diversity, dignity and respect?"* The candidate is directly asked about this and these concerns are treated as essential criteria for employees.

Working toward a culture of freedom, respect and dignity will not automatically eliminate all instances of discrimination in recruitment or racial or religious hostility in the workplace. However, having this goal in mind is a necessary step to eliminating such problems.

There are a number of good practice examples of companies which have designed specific strategies to create such a culture. The best of these tailor such programmes to the nature of the work and sector, and the specific diversity issues facing the workforce.

It is also important to establish systems to deal with situations in which the culture of freedom, respect and dignity has broken down. As the 'barriers' section has

shown, this can manifest in instances of harassment, persistent micro-aggressions or a general culture of hostility towards religious minorities.

Employers should look to develop internal, confidential mechanisms through which incidents can be reported, considered and mediated. This could be through a help-line or simply by providing a specific contact person for such incidents. These procedures should be outlined in a policy with reference to clear guidance and solutions.

Creating a culture of freedom respect and dignity - Recommendations:

1. HR managers should develop tailored programmes on cultural and religious awareness and unconscious bias.
2. Employers should incorporate diversity as a principle of leadership, including such criteria into managers' (and other staff) performance appraisal.
3. Employers and HR managers could set up a complaints mechanism for perceived hostility in all its forms, clearly including religious discrimination. This should be accompanied by clear internal regulations and information for victims and witnesses, and have considered procedures for anonymity and victim support.

2.3. Reasonable accommodation and universal solutions

Once the benefits, strategy and general aims of religious diversity within the organisation have been established, employers can think about how the issues faced by religious minorities can be addressed in specific ways. This applies most specifically to policies on how employers regulate religious dress and practices within the workplace.

¹⁷ See <https://www.unitee.eu/>.

a. A general policy of reasonable accommodation

The first step is for employers to agree to adopt a general policy of reasonable accommodation.

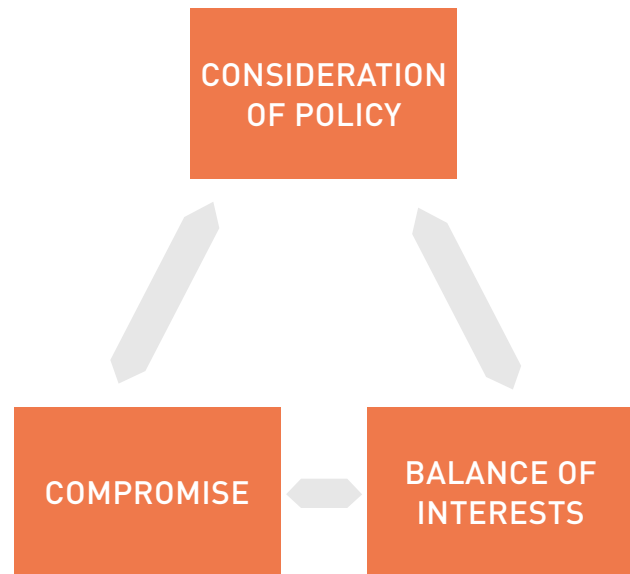
Reasonable accommodation can be understood as:

Good faith efforts made by an employer to take reasonable measures to guarantee protection from discrimination to certain categories of people.

In the case of religion, reasonable accommodation is the steps taken by employers to ensure that religious minorities are not disadvantaged in access to the labour market, or when they are in the work environment. Reasonable accommodation is not 'reverse discrimination' or 'preferential treatment', rather steps to be taken by responsible employers interested in addressing real discrimination. A large part of reasonable accommodation of religion thus centres on policies of religious symbols - when these have an impact on hygiene and safety regulations - and practices at work, which affect both the day-to-day life of the individual and their likelihood of being employed as a religious minority.

A general policy of reasonable accommodation does not mean that an employer must grant every request which relates to religion. However, it means that all policies which prove incompatible with the way minorities manifest their religion should be properly considered, and then carefully designed with a compromise in mind, balancing the interests of both the minority and the business.

To avoid discrimination, policies which do outwardly limit religious manifestation need to be justified by the nature of the role, and not go further than necessary. As such, employers and employees must aim for compromise, and continuously bear in mind the need to promote the freedom of choice of minorities while keeping in mind the imperatives of their business.



Good Practice 5: "Spirit of Inclusion" programme - Sodexo¹⁸

Sodexo is the worldwide leader in Quality of Life services, employing over 420,000 employees worldwide.

Sodexo has developed the "Spirit of Inclusion" workshop which aims to increase employees' understanding of diversity and inclusion and why this is important for the success of the organisation. The workshop is tailored for all employees from senior executives to frontlines with rich content and different approaches to promote inclusion.

In the workshop, employees are encouraged to explore their own awareness of cultural, religious, gender and generational diversity, and to confront personal biases and prejudices. They then develop personal action plans to create an inclusive working environment and behaviour.

The "Spirit of Inclusion" programme has trained 34,000 managers and 3,300 frontline employees of Sodexo.

In addition, the "Cultural Agility" series training is also available for leaders at Sodexo. The training enhances participants' cultural competences and allows them to develop skills on how to build a globally competent workforce.

18 See <http://www.sodexo.com/home/group/strategy.html>.

2 Managing religious diversity



Good Practice 6: Guidance on the wearing of Sikh articles of faith in the workplace - UK Equality and Human Rights Commission¹⁹

The Equality and Human Rights Commission is a quasi-governmental organisation with the mandate to challenge discrimination and to protect and promote human rights.

These guidelines seek to explain the main facets of Sikh religious dress to employers to inform their policies in the workplace. Below is an excerpt:

Turban

Employers should be aware that a ban on headgear or a requirement to wear particular headgear (for example, by having a hat as part of a uniform) could be discriminatory to Sikhs who wear a turban unless the requirement can be justified.

Kara

Some employers, as part of their dress code policy, ban employees from wearing any jewellery. They may perceive the kara to be a piece of jewellery, which it is not. The kara is an article of faith.

Kirpan

Employers' dress code rules which would prevent employees from wearing a kirpan may be indirectly discriminatory unless justified. Legislation which makes it an offence to carry bladed or sharply pointed articles and offensive weapons in a public place provides a specific defence for a person if they can prove that they wore the kirpan for religious reasons."

This guidance gives employers a better understanding of the significance of these symbols for Sikhs. As a result, employers understand that restrictions on wearing such symbols could, for initiated Sikhs, require them to leave the organisation.

b. Building knowledge of religious manifestation

One important way employers can make decisions according to the principle of reasonable accommodation is to build knowledge about the religious background of minority employees. A fuller understanding helps employers to understand core religious obligations, providing a better basis on which to (a) assess whether a compromise is necessary and (b) find a compromise that suits both sides.

Institutional approaches from the United Kingdom provide advanced examples of how building knowledge bases have helped employers to facilitate religious manifestation in the workplace.

c. Balancing interests and consultation

There are many reasons an employer may need to place some limit on the accommodation of a religious practice or symbol. This also varies according to the size and resources available, e.g. larger employers may have greater resources to develop solutions. However all employers must take time to balance the need for restriction (for example health and safety concerns) with the freedom of choice of employees to manifest their religion.

An important step in balancing interests is **consultation**. Firstly, knowledge of the importance of different obligations can be obtained through consultation with religious minority employees. This can be directly, through the establishment of employee working groups, or formally through trade unions and worker representatives. Secondly, consultation with health and safety committees and external consultants can help to determine the precise health and safety obligations, and may help in reaching compromise on the wearing of religious symbols and dress. In all cases, these steps initiate a dialogue between employees and allow them to participate in designing policies on religious diversity.

A range of creative solutions demonstrate the power of compromise in this area:

¹⁹ See <https://www.equalityhumanrights.com/en>.



Good Practice 7: Consultation with faith groups - UNITED SIKHS²⁰

UNITED SIKHS is an international non-profit organisation aimed at empowering disadvantaged and minority communities across the world. In particular, UNITED SIKHS works toward resolutions for individuals who have had their human rights infringed due to their identity or beliefs. This includes protecting the right of people to wear Sikh religious garments and symbols in the workplace.

UNITED SIKHS expresses the importance of consultation with religious minority groups and individuals when employers develop policies of

reasonable accommodation. When disputes arise, they emphasise the need for mediation.

Working with employers in mediation, UNITED SIKHS have helped employers to resolve conflicts and design policies which uphold the right to religious expression. For example, they obtained an apology from a leading British retailer following a dispute regarding their Health and Safety policy, which had limited the right of employees to wear the Kirpan within their retail stores. Following consultation, the retailer explained that the Kirpan could be worn within their retail stores and that staff members had now been given the appropriate training. Furthermore, the retailer's Health and Safety policy has been amended to allocate for Sikh articles of faith.

- Employers providing modified uniforms to allow for the incorporation of turbans and headscarfs;
- The adoption of flexible working schedules to accommodate different prayer or holiday schedules;
- When one small aspect of the role is incompatible with a religious belief, employers can find alternative ways to allocate tasks, e.g. in kitchens, allocating the meat-handling to other workers for individuals with religious concerns about meat.

d. Universal solutions

Devising a wholly inclusive religious diversity management scheme can be a long process requiring both time and resources. However, to simplify this process, employers can apply a range of universal solutions which can address concerns of multiple religious and cultural groups:

1. Employers can create general 'meditation spaces' which can be used for multiple spiritual purposes, including but not limited to prayer. These spaces should meet requirements for prayer as far as possible.
2. Adopting time management policies allowing for flexible break times to be used at the discretion of

the employee. Breaks can provide for prayer and religious obligations, but also secular activity.

3. Adopting a holiday policy which is not specific to certain religions, enabling leave allocation to be transferred for other religious holidays.

Reasonable accommodation - Recommendations:

1. HR managers should build their knowledge of diverse religious practices to inform workplace policy.
2. Employers can engage directly in dialogue with minorities before imposing rigid policy on dress, symbols and practices.
3. Employers can work toward universal solutions creating general policies on prayer space, flexible working, holiday and festival policies.
4. Employers can demonstrate awareness and acceptance of a wide range of religions by incorporating religious festival and holiday dates in the company calendar.

²⁰ See <http://unitedsikhs.org/>.



Good Practice 8: “Le fait religieux en entreprise” (Religious manifestation in companies) - A guide by the CFDT trade union in the French secular environment²¹

The *Confédération Française Démocratique du Travail* (CFDT) was founded in 1919 as a union of Christian workers. It is the largest French trade union in terms of members. It positions itself as non-partisan, on the side of employees, seeking to gain new rights for them. As a secular organisation, the CFDT is respectful of all beliefs and faiths as long as they do not lead to racism, exclusion and hatred.

Working in the highly secular French context, the CFDT published the guide “Le fait religieux en entreprise” to better equip French trade unions to address issues of religious manifestation in the workplace. This was extremely important in the context of increasingly negative perceptions of religion in France and the perception of the growing impact of religious manifestations in the workplace.

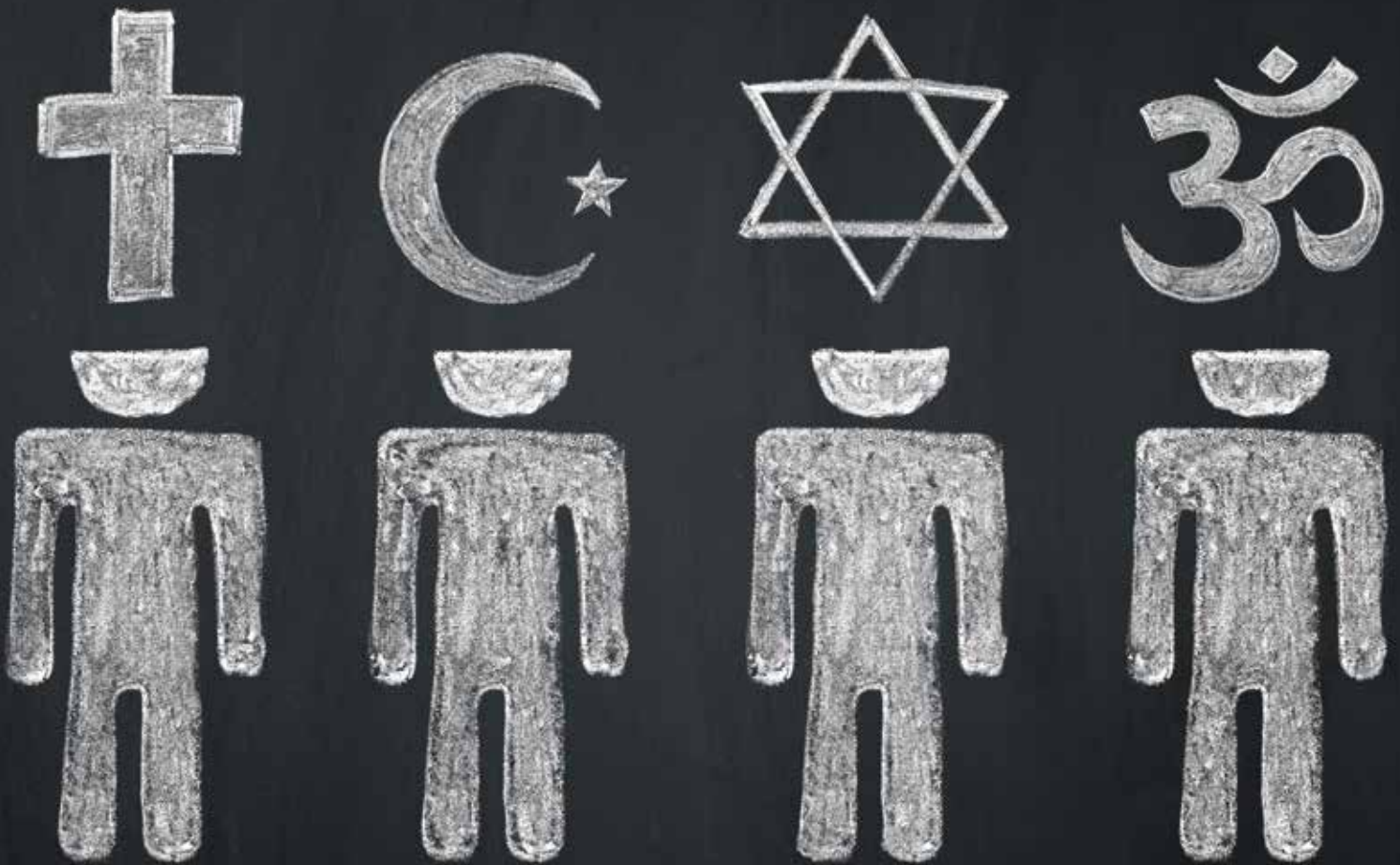
In the guide, CFDT advocates for managers to apply the principle of ‘*vivre ensemble*’: organising life together whilst respecting diversity. This includes the need to solve conflicts relating to religion in the workplace through dialogue with all those affected by the conduct or policy in question.

In solving issues around religious manifestation in the workplace, CFDT outlines the need for **universal responses** which accommodate a range of religious and spiritual practices (as well as non-religious demands). This is to ensure that employers are seen to be neutral and accommodate all employees equally in their policies on religious manifestation. Using policies and mechanisms which are not specific to particular religions can help to achieve this. For example, flexible holiday policies can be implemented which extend beyond accommodating religious festivals. Such approaches help to build cohesion between religious and non-religious employees and limit the perceived effects of differential treatment.

²¹ See [www.cfdt.fr](https://www.cfdt.fr/The_guide_Le_fait_religieux_en_entreprise). The guide “Le fait religieux en entreprise” is available at: https://www.cfdt.fr/upload/docs/application/pdf/2015-12/guide_fait_religieux_en_entreprises_-_bd.pdf.

ASSESSING RELIGIOUS DIVERSITY MANAGEMENT

The check-list on the next page provides employers with a tool by which to assess their performance on religious diversity. This list provides just a few of the basic principles and some non-exhaustive steps employers can take to improve the inclusion of religious minorities in the workplace.



Assessing religious diversity management

Principles	Practices	Implementation			Notes
					
Valuing difference	a. Valuing difference as a strategic issue				
	I. Developing a diversity strategy including business benefits, objectives and specific measures				
	b. Rethinking neutrality exercise				
	c. Self-assessment				
	I. Testing recruitment procedures for discrimination				
	II. Collection of equality data according to good practice principles				
	III. Staff surveys to include religious diversity questions				
	IV. Leadership to take active corrective steps in response to identified discrimination				
Creating a culture of freedom, respect and dignity	a. Key principles of freedom, respect and dignity				
	I. HR managers to develop specific and tailored programmes on cultural and religious awareness				
	II. Employers to incorporate diversity as a principle of leadership, including such criteria into managers (and other staff) performance appraisal.				
	III. Building an effective and robust complaints mechanism, alongside internal regulations and victim support				
Reasonable accommodation and universal solutions	a. A general policy of reasonable accommodation				
	b. Building knowledge of religious manifestation and consultation				
	I. HR managers to build their knowledge of diverse religious practices				
	II. Dialogue with religious minorities within the company when shaping policy, involving worker representatives				
	III. Consultations with health and safety experts				
	c. Balancing interests				
	d. Universal solutions				
	I. General meditation spaces				
	II. Adopting flexible time management policies providing for break times				
	III. Adopting a generic holiday and leave policy allowing transferrals to other religious holidays				
IV. Demonstrating awareness and acceptance of religious festivals and holidays					

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The European Network Against Racism (ENAR) stands against racism and discrimination and advocates equality, solidarity and well-being for all in Europe. We connect local and national anti-racism NGOs throughout Europe and act as an interface between our member organisations and the European institutions. We voice the concerns of ethnic and religious minorities in European and national policy debates.

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