

Socio-Economic Background in Global Financial Services

Workforce insight
and legal analysis
across jurisdictions

Progress Together
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Foreword



As organisations respond to shifting skills requirements, technological change and growing expectations around culture and governance, the ability to draw on talent from a wide range of backgrounds and experiences is increasingly recognised as central to long-term performance and competitiveness.

Across global operations, firms consistently observe that socio-economic background shapes confidence, access to opportunity, exposure to informal networks, and progression into leadership roles. These dynamics are often subtle and rarely captured through traditional talent processes, yet they have a material impact on workforce capability, productivity and retention. Ensuring that talent can progress on the basis of skill and contribution, rather than familiarity or starting point, is therefore not only a matter of fairness – but it is also a strategic imperative.

This is not a challenge confined to individual organisations. The World Economic Forum’s Global Social Mobility Report¹ highlights the macro-economic consequences of stalled social mobility, estimating that improving mobility could unlock significant productivity gains and long-term economic growth. For global employers, the implications are clear: access to opportunity is not simply a societal concern, but a determinant of workforce capability and competitiveness.

Operating globally, however, presents a structural challenge. Organisations span jurisdictions with very different legal frameworks, cultural norms and levels of readiness to measure socio-economic background. Even where commitment is strong, consistent global data collection is not always feasible. This makes socio-economic background distinct from other workforce characteristics and requires new, more adaptive approaches.

Progress Together commissioned this report to support organisations navigating that challenge. By bringing together qualitative research from multinational financial services leaders, conducted by the Financial Reporting Council (FRC), alongside a comparative legal analysis by Lewis Silkin, the report provides an integrated view of how firms are understanding, measuring and advancing socio-economic inclusion across regions.

While the qualitative findings are necessarily exploratory rather than exhaustive, they surface consistent patterns, shared challenges, and emerging practices that are highly relevant to global employers. Together with the legal analysis, they offer a practical evidence base for organisations seeking to strengthen workforce capability and leadership pipelines in legally sound and culturally credible ways.

We are grateful to the FRC for its insightful qualitative research and to Progress Together partners Lewis Silkin for coordinating a detailed global legal analysis with Ius Laboris, a global alliance of employment, immigration and pension law firms that advise businesses and of which Lewis Silkin is a member. We also thank the organisations that contributed perspectives to this work. We hope this report supports continued progress towards global workplaces where talent from all socio-economic backgrounds can thrive, contribute and lead.

Joanna Lindley
Director of Memberships & Programmes
Progress Together

¹ [Global_Social_Mobility_Report.pdf](#)

Foreword from FRC



The Financial Reporting Council (FRC) is responsible for both the Corporate Governance Code and the Stewardship Code, as well as the Wates Principles for Large Private Companies, which all promote high standards of governance, transparency and accountability.

To achieve long-term growth, good corporate governance is essential. Good governance is an enabler of strong leadership and helps create the conditions for success. It is important that boards are made up of individuals who have the right skills and cognitive ability to provide challenge and make the difficult decisions. Ensuring everyone has the opportunity to fulfil their potential helps facilitate this.

In 2024 the FRC updated the UK Corporate Governance Code, amending Provision 23 to reflect the broad nature of diversity and inclusion strategies. The Provision now asks companies to report on the policy and any initiatives in this area. As part of good governance, the FRC promotes a framework that encourages companies to recruit the best talent, including in the most senior positions, so that they can deliver for their investors and stakeholders, and achieve growth in the UK.

Shifting skills requirements, technological change and the need for long-term organisational resilience mean that having access to the widest pool of talent is of increasing importance. While information on socio-economic diversity is less frequently disclosed than other diversity characteristics, a small but growing number of firms are beginning to address this more visibly within their corporate reporting. Highlighting this can help signal the relevance of socio-economic diversity as an integral component of broader workforce, governance and sustainability discussions.

I am pleased to provide a foreword to this report, which provides an integrated view of how firms understand, measure and advance socio-economic inclusion across regions. The FRC's contribution involved qualitative workforce research, exploring how multinational financial services organisations understand and address socio-economic diversity across regions. Throughout the research, participants highlighted that socio-economic background influences career trajectories, through early exposure to professional norms, networks and confidence in senior settings. Participants described efforts made to counter this, emphasising their view that progression should be driven by performance, potential and contribution rather than starting point.

It also became evident during the research that social mobility is a relatively new focus for many companies, and the global approach to this issue is still in development. Obtaining socio-economic data continues to present significant challenges, requiring a balance between gathering information to support and evaluate programmes and ensuring the careful handling of personal data. Despite these challenges, companies highlight the many efforts they have undertaken to address them. This report aims to provide an overview of these approaches and highlight the ongoing efforts to improve socio-economic diversity in the financial services sector.

While the findings of this research are exploratory rather than exhaustive, I hope it is a useful resource for firms looking to make progress in this area.

Maureen Beresford
Director, Corporate Governance
and Stewardship

Foreword from Lewis Silkin



It has been a pleasure to assist Progress Together with this report, alongside our colleagues at Ius Laboris, a leading global alliance of employment, immigration and pensions law firms covering 57 countries across Europe, the Americas, the Middle East and Asia, and of which Lewis Silkin is a member.

Social mobility is a key part of the culture and ethos of Lewis Silkin. We firmly believe that the job your parents did, what school you went to or where you live should not affect your life chances. Our firm is named after Lewis Silkin, whose story of social mobility continues to inspire us. His family were refugees from Lithuania and he was brought up in poverty, but qualified as a solicitor before becoming an MP and government minister. His determination helped inspire our ethos of bravery and kindness, which underpins how we act as a socially and environmentally sustainable business. Our own staff come from a diverse socio-economic background, with many being the first in their family to go to university, or hold a role in professional services.

As this report highlights, global financial services firms are increasingly recognising the importance of socio-economic diversity as a key driver of workforce effectiveness, linked to organisational adaptability, innovation, and long-term capability. The research highlights this in the context of mounting operational pressures on firms that expose the limits of traditional, narrow talent pipelines – this is not limited to the financial services sector and, as a law firm, we struggle with and recognise the same pressures and challenges in our own business.

The report highlights how the ability to measure socio-economic background is seen as foundational to progress. And yet, the ability to collect and use data relating to an employee's or an applicant's socio-economic background varies widely across markets. This is particularly clear from the analysis we have provided, together with Ius Laboris,

as part of this report. It highlights how legal requirements, data privacy frameworks and cultural norms differ between jurisdictions, directly influencing what information organisations can gather and how it can be applied. While collecting the socio-economic background data of employees or applicants is generally permitted in most of the jurisdictions we surveyed, the feasibility of doing so varies.

For example, in several markets employers face strict data protection requirements that limit the types of questions they can ask or require additional safeguards. In others, socio-economic data may intersect with characteristics that are protected under anti-discrimination legislation, meaning that certain questions can create legal risk. Cultural expectations also play a role; in some countries, particular questions may be considered sensitive and unusual to ask in the workplace.

As is noted in the research, and when taken together, these factors create a landscape where consistent global measurement is not always possible. These challenges limit what can be achieved through compliance or measurement alone and so, as the report highlights, progress increasingly relies on leadership judgement and strategic prioritisation.

Understanding these nuances, and adapting approaches to reflect them, is essential for firms seeking to build responsible, credible, legally compliant and locally appropriate strategies for advancing socio-economic diversity.

Ultimately, this remains a tricky area for employers to navigate. We hope however that this report goes some way in helping financial services employers understand where they can and cannot gather socio-economic background data and therefore assist them in developing strategies to increase workforce effectiveness.

David Regan
Partner
Lewis Silkin

Acknowledgements

With thanks to the Progress Together member firms who participated in and informed this research.



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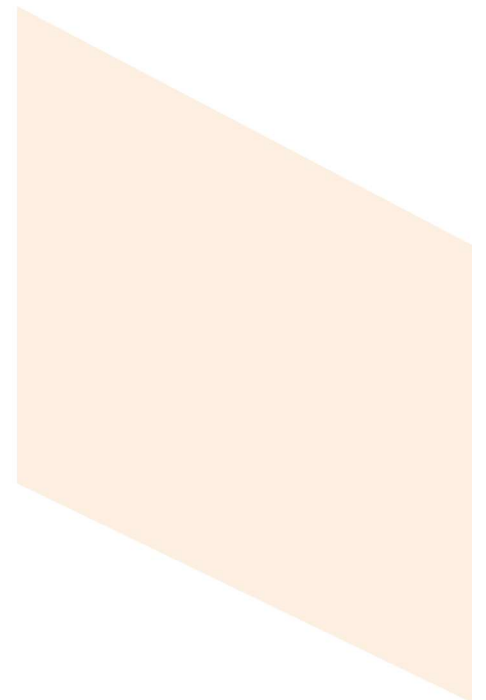
NorthStandard



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Executive summary

Global financial services firms are facing a workforce challenge that transcends borders. Skills shortages, technological transformation and increasing scrutiny of organisational culture are intensifying pressure on firms. To address this, it is crucial firms widen and strengthen their talent pipelines to achieve considered decision making and robust challenge at senior management and board level. Against this backdrop, socio-economic diversity (SED) is increasingly recognised by senior leaders as a critical – yet under-examined – factor shaping workforce capability and leadership progression.

Qualitative research conducted for this report highlights a consistent global pattern: socio-economic background influences how individuals navigate the workplace, their confidence in senior-facing settings, access to informal networks, and exposure to progression-shaping opportunities. These effects often accumulate over time, contributing to disparities in visibility, advancement, and leadership representation. Importantly, participants emphasised that these dynamics reflect unequal access to opportunity rather than differences in ability.

At the same time, the research makes clear that global employers face significant constraints in measuring socio-economic background. The Lewis Silkin legal review demonstrates substantial variation across jurisdictions in what data can be collected lawfully and appropriately. In some markets, structured socio-economic data collection is feasible; in others it is limited or highly sensitive; and in several it is effectively prohibited. Even where collection is legally possible, cultural norms can suppress disclosure.

As a result, firms are adopting hybrid approaches: combining quantitative measurement where feasible with qualitative insight, leadership engagement and workforce interventions where data collection is constrained.

The FRC qualitative research shows that many organisations are therefore focusing on globally transferable practices – such as inclusive leadership behaviours, early-career pathways, storytelling, reverse mentoring and transparent progression criteria – that do not depend on sensitive data.

The findings clearly position socio-economic diversity not as a standalone inclusion agenda, but as a workforce and capability issue, with direct implications for productivity, innovation, leadership resilience, and long-term competitiveness. While this research does not claim to be representative of all markets or organisations, it surfaces consistent, cross-regional insights that can inform practical action.

Together, the qualitative and legal strands of this research reinforce a central conclusion: socio-economic diversity matters everywhere, even where it cannot be measured everywhere.

Organisations that succeed will be those that combine clarity of purpose, legal rigour and culturally credible workforce strategies to ensure that talent from all backgrounds can progress and lead.

Chapter 1

Why having employees from a range of socio-economic backgrounds matters globally

The representation of employees from all socio-economic backgrounds has moved decisively from the margins of inclusion practice to the centre of workforce and capability strategy for global financial services firms. Across the qualitative research carried out for this report, senior leaders consistently described socio-economic background as a powerful, though often invisible, factor shaping confidence, progression, and leadership potential.

Participants emphasised that socio-economic background influences how individuals navigate professional environments long before performance assessments or formal talent processes begin. Differences in early exposure to professional norms, familiarity with organisational culture, access to informal networks, and confidence in senior-facing settings all shape career trajectories in ways that compound over time. Crucially, these patterns appear consistently across jurisdictions, regardless of region, firm size or business model.

The research highlights a clear shift in how firms frame this issue. Rather than being viewed as a standalone inclusion concern, socio-economic diversity is increasingly understood as a driver of workforce effectiveness.

This framing is grounded in operational reality. Financial services firms are navigating acute skills shortages, rapid technological change, and growing expectations around governance and culture. In this context, reliance on narrow or traditional talent pipelines is seen as a strategic risk.

A consistent theme across the interviews was that socio-economic disadvantage should not be understood as a lack of capability, but as unequal access to opportunity prior to entry and uneven

exposure to informal career-shaping mechanisms after entry. Where organisations fail to recognise these dynamics, progression patterns risk reflecting background rather than performance.

Importantly, this challenge is not geographically specific. Whether operating in Europe, North America, Asia or the Middle East, firms described similar dynamics in how confidence, visibility, and access to opportunity are distributed. This universality is a key reason why firms are seeking global approaches to socio-economic diversity, even in the absence of consistent global data.

The Lewis Silkin legal analysis reinforces this imperative: while the legal feasibility of measurement differs across contexts, the workforce challenges associated with the impact of socio-economic background on access and progression remain the same. This creates a defining tension for global employers: socio-economic diversity matters everywhere, but it cannot be measured everywhere in the same way.

As a result, firms increasingly treat socio-economic diversity as a core capability issue - one that must be addressed through leadership behaviour, culture, talent systems, and access to opportunity, rather than through data alone.

Chapter 2

Defining socio-economic diversity across regions

Although firms share a common purpose when addressing the lack of senior leaders from lower-socio-economic backgrounds, the research demonstrates that defining it in a globally consistent, yet locally meaningful way is one of the most complex challenges faced by organisations.

Across the FRC interviews and roundtable, participants broadly aligned on a single foundational principle: career progression should be shaped by performance, potential and contribution - not by an individual's starting point in life. This principle provides a shared anchor for global organisations, even as the indicators used to understand socio-economic background vary widely.

The diversity of definitions reflects the fact that socio-economic experience is culturally constructed. It is shaped by national education systems, labour markets, patterns of inequality and social mobility, and the extent to which background is discussed openly or regarded as private. At the same time, participants emphasised the value of a degree of consistency of definition across regions, with some organisations viewing the use of a common definition as important for coherence, comparability and credibility at a global level. The evidence suggests that while imposing a single, rigid definition risks disengagement and low trust, entirely fragmented approaches can also undermine shared

understanding - reinforcing the need for frameworks that balance global consistency with local adaptation.

In European markets, particularly the UK and Ireland, firms described socio-economic background as relatively well understood and measurable through indicators such as parental occupation, type of secondary school attended and access to educational support. These measures are familiar within policy and academic frameworks, and disclosure rates are comparatively higher as a result.

In contrast, across many Asian markets - including Singapore, Hong Kong and India - participants described socio-economic background as more closely associated with educational pathways and access to opportunity than with family occupation or income. Competitive examination systems, scholarship routes, private tuition and the prestige of educational institutions were repeatedly cited as shaping early career opportunity and confidence.

In these contexts, questions about family background are more culturally sensitive, and firms often prefer to focus on education route or early-career experiences rather than direct socio-economic identifiers.

India emerged within the research as a particularly complex and instructive example. As a major global talent market for financial services, India brings together highly diverse educational pathways, significant regional variation and large early-career cohorts entering multinational firms. Participants noted that socio-economic background is often highly visible through differences in schooling, language fluency, access to professional networks and exposure to global workplace norms. At the same time, firms reported heightened sensitivity around how background is discussed or measured, leading many to rely on education route, scholarship participation and first-generation professional status as more appropriate indicators. This has reinforced an emphasis on structured development, confidence-building and equitable access to progression opportunities rather than data-heavy approaches.

In North America, one participating firm described socio-economic background as closely intertwined with income, neighbourhood and access to higher education, often intersecting with other protected characteristics. This intersection increases both the analytical value of socio-economic insight and the sensitivity of data collection, requiring careful justification and communication.

With respect to the Middle East, Lewis Silkin's legal analysis highlights that in the UAE, socio-economic background is not a standard or widely collected employment data category, and is considered sensitive in nature across the country (including in the Dubai International Financial Centre and the Abu Dhabi Global Market). There are also no nationally recognised metrics or culturally specific predictors used in the UAE to assess socio-economic background. To the extent that organisations voluntarily seek

such data (e.g. in connection with diversity and inclusion initiatives), any questions may be adapted from international practices rather than reflecting a UAE-specific metric, so long as they comply with the applicable legal frameworks.

Across all these contexts, the Lewis Silkin legal review underscores that legal constraints further shape how socio-economic diversity can be defined operationally. In some jurisdictions, collecting information about family background is subject to strict limitations or heightened scrutiny, meaning that definitions must be translated into locally lawful and culturally appropriate proxies.

To navigate this complexity, many firms have adopted a dual approach: a global conceptual definition grounded in fairness, opportunity and performance, combined with locally adapted indicators that reflect cultural meaning and legal feasibility. Participants stressed that what matters most is not perfect consistency of metrics, but clarity of purpose and trust in how definitions are applied.

Across the evidence from the FRC qualitative research three conditions consistently emerged as critical to effective definitions:

- Cultural resonance - language must feel relevant and non-judgemental in local contexts
- Simplicity - definitions that are overly technical or opaque undermine engagement
- Transparency of intent - employees are more willing to engage when they understand why socio-economic information matters and how it will be used

Taken together, the research points toward an emerging global model: one shared purpose, a small number of carefully chosen core indicators where feasible, and locally adapted approaches that preserve trust while enabling action.

Chapter 3

Measuring socio-economic background in a global context

For global financial services firms, the ability to measure socio-economic background is widely recognised as foundational to progress - yet it is also the most constrained element of socio-economic diversity strategy at a global level.

Across the FRC qualitative research, senior leaders consistently emphasised the value of data in helping organisations understand where progression stalls, which groups are under-represented at senior levels, and whether interventions are genuinely improving opportunity. Without data, firms described operating “on instinct”, relying on anecdote rather than evidence to diagnose where structural barriers persist.

However, the research also made clear that global consistency in socio-economic background data collection is currently unattainable. Legal permissibility varies sharply by jurisdiction, as demonstrated by the Lewis Silkin review, which shows that while some markets allow structured collection of family or education background, others restrict it altogether. Even where collection is technically lawful, cultural norms can limit disclosure.

In high-feasibility jurisdictions such as the UK, Ireland and Australia, firms are increasingly able to collect indicators such as parental occupation, school type or first-generation professional status, enabling more robust analysis of progression and representation. In contrast, medium-feasibility jurisdictions – including parts of North America, Europe and Asia – require more cautious, limited approaches, often reliant on indirect or optional indicators. In low-feasibility jurisdictions, including Germany, Switzerland and Hong Kong, legal and cultural constraints significantly restrict the ability to collect any meaningful socio-economic background data, particularly where it relates to family background.

Across all regions, legal feasibility does not naturally equate to organisational readiness. FRC interview and roundtable insights indicate that even in jurisdictions where data collection is permitted, disclosure rates can be low if employees do not trust how information will be used or fear unintended consequences. As a result, firms described data maturity as a staged process: building trust, communicating purpose, and demonstrating action before expanding measurement.

India: navigating scale, sensitivity and talent demand



India presents a particularly instructive example of global complexity. As a major talent market for global financial services, India combines large early-career populations, highly competitive education pathways, and significant variation in access to opportunity. FRC participants operating in India described caution around collecting explicit socio-economic background data, particularly where questions could be interpreted as probing family circumstances or inherited disadvantage.

While the collection of socio-economic data is permitted in India, organisations from the FRC research reported that cultural sensitivity and data-minimisation considerations play a decisive role in shaping approach. As a result, firms tend to rely on education route, scholarship history, or first-generation professional indicators, alongside qualitative insight from listening sessions and career-pathway analysis.

What distinguishes India is not an absence of commitment, but the scale of the challenge: firms are focused on ensuring equitable access to development, confidence-building and progression for large early-career cohorts, rather than on data-heavy measurement models. This mirrors a broader global pattern: where feasibility is constrained, firms shift emphasis from diagnosis through data to action through structure, leadership and culture.





As the Lewis Silkin comparative review makes clear, the global legal environment for collecting socio-economic background data is uneven. While some jurisdictions allow structured collection of indicators such as parental occupation or education route, others restrict this entirely.

The tables that follow provide a feasibility overview across representative jurisdictions, illustrating why global firms must adopt hybrid approaches that combine quantitative measurement where possible with qualitative insight and leadership-driven cultural interventions elsewhere.

Nothing in the tables at pages 14-31 and 34-39 (inclusive) of this report should be treated as an authoritative statement of the law and the opinions expressed should not be taken as fact. The information in these tables should in no circumstances be relied upon without first taking legal advice.

Links to country feasibility overviews



Australia



Singapore



France



South Korea



Germany



Switzerland



Hong Kong



United Arab Emirates (UAE)



India



UK




Ireland



USA



Italy


| | Feasibility | Legal status | Common in practice? |
|--|--------------------|--|---|
| <p>Australia</p>  | <p>High</p> | <p>There is no express prohibition against employers in Australia, including those in the financial services (FS) sector, from collecting data about their employees' socio-economic background. However, they must be cautious about how that information is used. Information should only be collected where it is reasonably necessary, and it must be maintained securely. FS sector employers may also collect additional integrity-related data for "fit and proper person" assessments required under sector specific laws. This is not specifically linked to the socio-economic background of employees, however.</p> | <p>It is not common practice for Australian employers (generally or in the FS sector) to collect data on employees' socio-economic background and employers typically avoid asking about personal attributes (including socio-economic background) unless there is a specific legal or employment-related reason to do so. That said, there is increasing discussion about introducing protections for 'social disadvantage' or 'class', and governments and large organisations are encouraging inclusive hiring through supplier requirements. Some Australian employers also commission voluntary surveys of employees to collect this type of data.</p> |
| <p>Further details:</p> <p>The collection of any personal information must comply with the Privacy Act 1988 (Cth). Under s6 of the Privacy Act 1988 (Cth), "socio-economic background" is not expressly listed as "sensitive information" and therefore does not attract a higher level of privacy protection than other "personal information" (unless it includes or references other traits that do comprise of sensitive information). However, as a matter of good governance (and to ensure compliance for organisations subject to the Privacy Act), information should only be collected where it is reasonably necessary, and of course, maintained securely.</p> <p>Employers in the FS sector are subject to the same employment and privacy laws as all Australian employers. They do not have a positive legal obligation to collect socio-economic background data from their employees. However, FS sector employers may collect additional integrity-related data (e.g. bankruptcy status, criminal records, credit history checks) for "fit and proper person" assessments required under laws like the Banking Act 1959 (Cth), the Corporations Act 2001 (Cth), and Australian Prudential Regulation Authority/Australian Securities & Investments Commission regulatory frameworks - although this is about financial probity, not specifically socio-economic background.</p> | | | |

Australia



The Fair Work Act 2009 provides for the protected attribute of “social origin”, which is intended to protect an individual who is subject to unfavourable treatment because of their class or socio-occupational category. A claim of adverse action due to social origin may arise where an individual’s membership in a class or socio-occupational category determines their occupational future, either because they are denied certain jobs or activities, or because they are only assigned certain jobs, in particular where certain groups are considered inferior and therefore confined to the most menial jobs.

While it is ultimately uncommon practice for Australian employers to collect information about social origin (as distinct from ethnic background), in recent years, there has been growing commentary in relation to whether there is a need to introduce a new attribute of ‘social disadvantage’ (as was considered in Western Australia) or ‘class’ (as was discussed in a 2020 Diversity Council of Australia), to more directly address potential discrimination based on concepts such as class, occupation or socio-economic status (noting the somewhat limited legal avenues above). This has not been introduced into law at this time, however the Government and large corporates increasingly use their purchasing power to require suppliers to provide opportunities to candidates from socially disadvantaged backgrounds.

| | Feasibility | Legal status | Common in practice? |
|--|----------------------|--|---|
| <p>France</p>  | <p>Medium</p> | <p>The overall rule is that employers can only collect personal data if it's relevant, necessary, and proportionate. Thus, it is not possible to collect data on the socio-economic background of applicants during the recruitment process since this information is unlikely to be deemed relevant to assess their capabilities and may give rise to discrimination claims. Organisations can, however, collect data on the socio-economic background of employees provided this collection complies with the above principles and so long as it is done through a voluntary and anonymous survey that complies with guidance from CNIL, France’s data protection authority.</p> | <p>It is not common practice for employers to ask employees about their socio-economic background, although certain companies and public organisations do make use of voluntary and anonymous surveys to collect this data.</p> |

France



Further details:

In France, the collection of personal data in the workplace is strictly regulated. Employers may collect personal data only under strict conditions, in compliance with the principles of relevance, necessity, and proportionality. The position is, however, slightly different between applicants and employees.

Applicants: During the recruitment process, information requested from applicants should be used solely to assess their ability to perform the offered position and evaluate their professional skills. More specifically, this information should help identify the candidate best suited to the role and verify their qualifications and competencies. Recruiters must respect candidates' privacy and therefore avoid asking questions unrelated to the professional context. Consequently, collecting information that has no direct and necessary connection with the offered position or the assessment of professional abilities is prohibited.

Furthermore, the principle of non-discrimination in France prohibits employers from making employment decisions (e.g. recruitment, promotion, disciplinary measures, training, etc.) based on factors such as origin, gender, lifestyle, family situation or pregnancy, particular vulnerability resulting from economic circumstances and place of residence. Because of this, the collection of socio-economic data that does not serve a clearly defined and legitimate purpose and is not proportionate to the aim pursued is prohibited.

Therefore, it is not possible to collect such information during the recruitment process, since this information is not relevant to assess the applicant's capabilities. If the application is rejected, the applicant could claim that the decision was based on discriminatory grounds and seek damages.

Employees: With regard to employees, and according to the CNIL guidelines of 10 April 2025,² it is possible for companies, based on their legitimate interest, to distribute anonymous questionnaires to their staff as part of their efforts to promote equal opportunities and measure diversity within their workforce, whether in terms of disability, age, gender or diversity linked to the social, geographical or cultural origins of their employees or agents. These are known as diversity measurement surveys and CNIL recommends several measures that should be implemented if they are used:


- Companies must ensure that participation in such surveys is voluntary and that responses are optional. No pressure should be exerted on employees to complete them.
- In addition, the CNIL recommends the use of a trusted third party (i.e. an external service provider who secures the collection and analysis of employees' personal data on behalf of the employer) as a guarantee for the implementation of a diversity measurement survey. The service provider selected by the employer must undertake to comply with several obligations relating to data security and confidentiality. To this end, a contract defining the responsibilities and obligations of each party must be drawn up between the employer and the designated service provider.


² CNIL. (10 April 2025). *Recommandation relative au traitement des données à caractère personnel dans le cadre d'enquêtes de mesure de la diversité au travail*. Available at: https://cnil.fr/sites/default/files/2025-06/recommandation_mesure_de_la_diversite_au_travail.pdf?lang=en


France



- These surveys must be anonymous and conducted for statistical purposes only. Data collection must be limited to what is strictly necessary to achieve the objective pursued and comply with the information obligations under Article 13 of Regulation (EU) 2016/679 (General Data Protection Regulation) (the ‘GDPR’).
- The results of the survey must be produced in an aggregated statistical form that makes it impossible to identify individual employees.
- Finally, as a diversity survey is likely to pose a high risk to the rights and freedoms of the individuals concerned, the CNIL strongly recommends that a data privacy impact assessment be carried out beforehand.

| | Feasibility | Legal status | Common in practice? |
|---|-------------------|---|---|
| <p>Germany</p>  | <p>Low</p> | <p>While it is technically possible, due to Germany’s strict data protection framework employers are not permitted to request or collect socio-economic data during job interviews or the employment relationship. This is certainly the case in the hiring process due to the heightened risk of discrimination claims arising. One possible avenue to collect this information is by seeking the voluntary consent of staff with the corresponding prerequisites. However, from a legal and practical perspective, this is often not recommended.</p> | <p>The systematic collection of socio-economic data by employers is uncommon in practice, and asking these sorts of questions would be rather unusual in Germany. This is due to the high risk of ineffectiveness (i.e. where there is a lack of a legal basis and strict consent requirements) and legal restrictions that prevent comprehensive implementation in practice. This is particularly the case in the hiring process. The questions needed to collect employee socio-economic data are not considered necessary for the employment relationship in most professions.</p> |
| <p>Further details:</p> <p>There is no definitive legal provision that specifically covers the collection of employee socio-economic data in Germany. As a general rule, however, questions asked to employees are regulated by data protection and general personal rights.</p> <p>Under Germany’s strict data protection framework, the collection of socio-economic background data is generally not deemed necessary for the fulfilment of the employment relationship. This is a basic requirement for the collection of data according to s26 of the German Federal Data Protection Act, Germany’s main data protection legislation. This regulation is stricter than the GDPR, as legitimate interest does not apply, and in most cases, only voluntary consent will be considered a valid justification to collect the socio-economic data (with the corresponding prerequisites). From a legal and practical point of view, this is often not recommended and/or is incompatible with German law.</p> | | | |

| | |
|---|---|
| <p>Germany</p>  | <p>The situation is potentially even more restricted in the hiring process, as the collection of such data may violate the German General Equal Treatment Act ('AGG'). The AGG stipulates that certain characteristics such as race or ethnic origin, gender, religion or worldview, disability, age, or sexual identity may not be taken into account in employment decisions. These characteristics are broadly defined and may therefore be engaged where questions are asked about the socio-economic background of an applicant. This can give rise to potential complaints of discrimination and compensation payments.</p> |
|---|---|


| | Feasibility | Legal status | Common in practice? |
|--|-------------------|--|---|
| <p>Hong Kong</p>  | <p>Low</p> | <p>It is generally not recommended for employers in Hong Kong (whether in the FS sector or otherwise) to specifically collect data about employees' socio-economic background (e.g. by asking questions about their parents/spouse's occupation, level of income and education etc). Culturally these questions are considered quite sensitive and could potentially suggest stereotyping, while legally, the collection of such data may give rise to complaints of unlawful discrimination and/or of a breach of the data protection principles.</p> | <p>It is not common practice for employers to collect the socio-economic data of their employees, whether in the FS sector or otherwise. Employees may also feel uncomfortable providing such information, particularly where it has no direct correlation to their job duties.</p> |
| <p>Further details:</p> <p>In Hong Kong, there are no laws expressly prohibiting the collection of data about employees' socio-economic status. In practice, some typical employee data collected by employers for HR/employment-related purposes, such as correspondence addresses or education, may already provide some hints about the employees' socio-economic background. However, it is uncommon (and generally not recommended) for employers in Hong Kong to do so.</p> <p>In addition to the cultural risks, from a legal perspective, the collection of such data may give rise to complaints of unlawful discrimination on grounds such as family status and/or marital status which are prohibited under the Hong Kong Family Status Discrimination Ordinance and Sex Discrimination Ordinance. If no clear and legitimate purpose is provided, the collection of such data may also be considered excessive and therefore in contravention with the data protection principles under the Hong Kong Personal Data (Privacy) Ordinance (the 'PDPO').</p> | | | |


Hong Kong





The below steps are recommended to mitigate the above legal risks should an employer wish to collect data about employees' socio-economic background:

- Identify the (employment-related) purpose for collecting such data (for example, in the FS sector, employers might ask employees about their spouse's occupation for conflict-clearance purposes (for certain transactional roles));
- As with other types of personal data, collect such data in line with the requirements under the PDPO. In particular, employees must be informed of the purposes of the collection of the data, the consequences of refusing to provide the data, the parties with whom the data might be shared, access and correction rights, and the contact person for any data access/correction requests. This is usually done by way of issuing a personal information collection statement, or 'PIC Statement', to employees.
- If an employer already has a PIC Statement in place, it should check whether it covers the collection of such data and if not, it will need to issue a fresh PIC Statement specifically dealing with the collection of such data.
- If an employer is already collecting such data in accordance with its current PIC Statement but intends to use the data for a new purpose not covered by the PIC Statement, under the PDPO, the employer will need to seek express consent from employees for this change of use.
- Wherever possible, when collecting such data, participation should be optional and voluntary, employees should be reassured that their decision to provide or withhold data will not affect their employment, and the data should be collected anonymously or in a way that minimises identification.
- Employers should further use separate, secure systems for storing such data, restrict access to only those who need it, and aggregate data for reporting to further protect individual privacy (e.g. using statistics where possible, rather than raw numbers).

| | Feasibility | Legal status | Common in practice? |
|--|--|---|--|
| India  | Medium (private sector) Mandatory (public sector) | <p>The legal position varies significantly between the public and private sectors in India. Government employers are legally required to collect constitutional category data. This includes whether the individual belongs to, what in India are known as, the ‘Scheduled Castes’, ‘Scheduled Tribes’, ‘Other Backward Classes’ or the ‘Economically Weaker Section’. Private sector employers, including in the FS sector, face no such mandate and while the collection of socio-economic data is permitted, it requires careful consideration. This is due to the potential risks of unlawful discrimination and the fact that such data is not seen as being relevant to employment decisions.</p> | <p>Multinational corporations and large listed entities, together with private banks and financial institutions, consciously avoid asking their employees about socio-economic background, viewing such questions as irrelevant and potentially discriminatory. However, in certain sectors, particularly manufacturing units in remote areas and traditional industries, it remains common to ask about socio-economic background for practical considerations like housing allocation and transport arrangements. Public sector bodies, including government organisations and public banks, universally collect constitutional category data as mandatory practice.</p> |
| <p>Further details:</p> <p>Public sector</p> <p>India operates a dual framework. Government employers are mandatorily required to collect constitutional category data (i.e. data on what are known as the ‘Scheduled Castes’, ‘Scheduled Tribes’, ‘Other Backward Classes’ and ‘Economically Weaker Section’, or ‘SC/ST/OBC/EWS’) to implement a 59.5% quota (known as ‘reservations’) under Articles 15 and 16 of the Indian Constitution.</p> <p>Private sector</p> <p>Private sector employers face no such obligations, and although collection is permitted, multinational companies and listed entities actively avoid asking such questions to their staff, considering them irrelevant to job performance and potentially discriminatory. In this respect, the Digital Personal Data Protection Act 2023, read with the Digital Personal Data Protection Rules 2025, permits collection with consent, but does not classify socio-economic status as sensitive data. This framework was officially announced on 13 November 2025. Some parts apply straight away, but the substantive requirements will come into force on a phased basis, with all key obligations applying by May 2027. At the same time, the previous regime under India’s IT Rules 2011 will be gradually replaced. In substance, however, the legal position remains unchanged under both frameworks. To manage potential risks, private sector employers seeking to collect the socio-economic background data of their employees should put in place appropriate safeguards, such as ensuring participation is voluntary, anonymising data, clearly defining the purpose of collection, and avoiding any use of the data in employment related decisions.</p> | | | |

| | |
|---|---|
| <p>India</p>  | <p>FS Sector</p> <p>Although permitted, private financial institutions tend to avoid collecting socio-economic background data as it is not considered relevant to employment decisions. SEBI's Business Responsibility and Sustainability Reporting framework requires the top 1,000 listed companies in India to report diversity metrics focusing on gender and disability rather than socio-economic indicators. Public sector banks are required to collect category certificates for reservation implementation, but do not extend collection to broader socio-economic indicators like parental occupation or family income.</p> <p>Position in practice</p> <p>The India Workplace Equality Index 2024 suggests that leading companies have focused on LGBTQ+ inclusion and gender diversity rather than socio-economic metrics. Indian private employers generally avoid collecting what might be referred to as “caste-related socio-economic data” due to discrimination concerns and legal sensitivities.</p> |
|---|---|

| | Feasibility | Legal status | Common in practice? |
|--|--------------------|--|--|
| <p>Ireland</p>  | <p>High</p> | <p>An employer should ensure that they have a valid legal basis under Article 6 of the GDPR before processing data relating to an employee's socio-economic background. If the collection of socio-economic data is voluntary and wholly anonymised, it's unlikely that any legal issues will arise.</p> | <p>It is not common practice for Irish employers, in the FS sector or otherwise, to ask employees about their socio-economic background.</p> |
| <p>Further details</p> <p>In Ireland, employers must have a legal basis to collect data about the socio-economic background of their employees. In practice, explicit consent is likely to be the only available basis for this, though relying on consent in an employment context can be challenging due to questions around whether it is freely given. To mitigate risk, any collection should be voluntary and supported by a Data Protection Impact Assessment. The data should also be anonymised with access restricted, to the greatest extent possible.</p> <p>Looking ahead, the Irish Government has indicated that revised Heads of Bill for the Equality and Family Leaves (Miscellaneous Provisions) Bill 2025 are in preparation. This proposed legislation would add socio-economic status to Ireland's equality framework. No indicative timescale for the publication of the revised Heads of Bill has been provided.</p> <p>While it is currently not common practice for Irish employers to ask employees about their socio-economic background, we may see more Irish employers consider collecting this data in the future if socio-economic status becomes a protected ground under Ireland's equality framework.</p> | | | |

| | Feasibility | Legal status | Common in practice? |
|---|-------------|---|--|
| Italy  | Low | Employers are allowed to collect data on the kind of school individuals attended, as long as it is relevant to assess their suitability for a job position. However, the collection of other data about the social and economic circumstances in which individuals grew up, such as their parents' occupation and level of education, is not advised. This is due to the risks of unlawful discrimination and contravening Italy's data protection legislation. | It is common practice for employers in Italy to collect information on the type of school employees attended, but not specifically about employees' socio-economic background. |
| <p>Further details:</p> <p>According to the Italian Workers' Statute, employers cannot carry out investigations on facts which are irrelevant for the purposes of assessing employees' suitability for a job (including any request or investigation regarding employees' opinions and personal beliefs), neither during the hiring process, nor during the employment relationship. The purpose of this provision is to avoid such data, which is deemed to be unnecessary for the purposes of the employment relationship, influencing employers' decisions. If it is proven to have done so, then it will likely result in a discriminatory act.</p> <p>Furthermore, Italian data protection legislation prohibits the processing of personal data revealing, among other characteristics, racial or ethnic origin. This prohibition does not apply if:</p> <ul style="list-style-type: none"> • The employee has given explicit consent to process such data for specific purposes; or • The processing of such data is necessary in connection to the rights and obligations related to the employment relationship or for a legitimate purpose (subject to an additional requirement that the processing is authorised by a law or collective agreement that provides appropriate safeguards for the fundamental rights and interests of the employee). <p>That withstanding, and when applied to the scenario of collecting data relating to the socio-economic background of employees:</p> <ul style="list-style-type: none"> • Considering the different contractual power of the parties to an employment contract, even if employees accept to provide data about their socio-economic background "on a voluntary basis" (which may also reveal racial or ethnic origins), their consent may be considered forced and not genuine. • A legitimate purpose is not a broad aim of the company (such as diversity and inclusion purposes) but requires a specific action that the employer wants/has to comply with. • Data processing must be minimised and proportionate to the purposes it is needed for. | | | |

Italy




That all withstanding, employers are generally permitted to collect data on the kind of school individuals attended, as long as it is relevant to assess their suitability for a job position. However, the collection of other data about the social and economic circumstances in which individuals grew up, such as their parents' occupation and level of education, is not advised.

Possible consequences

Sanctions for processing prohibited data depends on a wide variety of issues (e.g. nature of the breach, whether there is a psychological element, the number violations and their duration) but they can broadly be divided into:

- Administrative privacy related sanctions up to 4% of the employer's income, or up to EUR 20 million;
- Criminal sanctions of up to six years of imprisonment for a more serious breach.

Damages can be claimed by the impacted individuals, both in cases of a violation of the data protection legislation and/or discriminatory acts.

| | Feasibility | Legal status | Common in practice? |
|--|--|---|--|
| Singapore  | Medium | The current frameworks and advisory guidelines do not explicitly mandate or encourage the collection of socio-economic data from employees. Similarly, there is no explicit mention of whether banks should collect socio-economic data for diversity and inclusion purposes. Nevertheless, in both cases it is permitted, so long as the requirements under Singapore's data protection framework are complied with. | It is uncommon for companies in Singapore to ask employees about their socio-economic background, as there is no legal obligation to do so and the adoption of diversity and inclusion practices is generally in the early stages for most organisations in the country. |
| | Further details: Diversity and inclusion There is generally no legal requirement for organisations to collect the socio-economic data of employees for diversity and inclusion purposes in Singapore, although the Ministry of Manpower does promote diversity and inclusion to foster workplace integration which employers may consider. | | |

Singapore



For instance, the Ministry of Manpower's Diversity Management Assessment checklist tool³ (intended to assist organisations to conduct a self-assessment to review their existing diversity practices) focuses on areas such as workplace inclusiveness, staff development and performance management. However, this checklist does not expressly promote or require the collection of socio-economic data. With regards to staff recruitment, retention and development, this checklist tool merely highlights at a broad level foundational practices such as evaluating employees based on "their ability to perform their tasks, regardless of age, nationality or gender".

Where the finance sector is concerned, the Tripartite Advisory on Human Capital Practices for Banking⁴ generally states that banks "should consider putting in place policies and processes, including to: (a) promote diversity in their workforce to avoid nationality concentration", particularly if banks are hiring foreign professionals in Singapore. There is, however, no explicit mention of whether banks should collect socio-economic data for diversity and inclusion purposes.

Data protection

To the extent that the socio-economic background information constitutes "personal data" under the Singapore data protection legislation (the Personal Data Protection Act 2012) and organisations have obtained the necessary consents from their employees to collect such data, organisations may generally collect socio-economic background information from their employees. However, there is no explicit recommendation from the authorities or legal obligation for employers in Singapore to do so. Importantly, where employees are sharing the personal data of other individuals (e.g. parents or other relatives) with the organisation, the organisation should obtain warranties from their employees that informed and valid consent has been obtained from such third parties in relation to the collection, use, disclosure and/or processing of their personal information.

In practice


According to a joint report entitled "The Maturity of Diversity, Equity & Inclusion Practices in Singapore Based Firms"⁵ and published by the Singapore National Employers Federation and Kincentric, 70% of Singapore-based firms have yet to introduce diversity and inclusion policies. That said, multinational corporations which have an international presence may seek to harmonise their diversity and inclusion policies across offices (including the Singapore office) and are more likely to collect socio-economic data from their employees.

For completeness, Singapore has recently passed the Workplace Fairness Act 2025, which is scheduled to take effect in end-2027. While it remains to be seen how this Act would influence Singapore employers' position and approach towards diversity and inclusion once commenced, it is worth noting that it presently does not explicitly mandate or address the issue of collecting socio-economic information from employees for diversity and inclusion purposes.

³ Ministry of Manpower & National Integration Working Group for Workplaces. (n.d.). *Managing Workplace Diversity: A Toolkit for Organisations*. (Section three; How is my organisation managing diversity?). Available at: <https://www.mom.gov.sg/-/media/mom/documents/employment-practices/wdm/dma.pdf>

⁴ Ministry of Manpower. (n.d.). *Tripartite advisory on human capital practices for banking*. Available at: <https://www.mom.gov.sg/-/media/mom/documents/employment-practices/guidelines/tripartite-advisory-on-human-capital-practices-for-banking.pdf>

⁵ Singapore National Employers Federation & Kincentric. (2021). *The maturity of diversity, equity & inclusion practices in Singapore-based firms*. Available at: <https://snef.org.sg/wp-content/uploads/2022/03/PRESS-RELEASE-SINGAPORE-EMPLOYERS-SHOULD-MANAGE-DIVERSITY-EQUITY-AND-INCLUSION-AT-WORKPLACES-MORE-PROACTIVELY-ACCORDING-TO-JOINT-REPORT-BY-SNEF-KINCENTRIC-1.pdf>

| | Feasibility | Legal status | Common in practice? |
|--|-------------|---|---|
| South Korea  | Low | <p>In general, personal information about <i>employees</i>, such as information about their socio-economic background, can be collected and processed in accordance with South Korean data-privacy laws. Doing so could, however, increase the risk of discrimination claims arising (discrimination among employees based on “social status” is prohibited under South Korean law). For job applicants, South Korea prohibits employers with 30 or more employees from requesting certain kinds of information unless relevant to the job. This may include certain information about their socio-economic background.</p> | <p>It is not common practice and may be regarded as intrusive by some Korean employees.</p> |
| <p>Further details:</p> <p>The position differs depending on whether the personal data is sought from employees or applicants.</p> <p>Employees</p> <p>In general, personal information about <i>employees</i>, such as information about socio-economic background, can be collected and processed in accordance with South Korean data-privacy laws. Those data-privacy laws require informed consent and compliance with various technical rules, to collect and process personal information that is not required to maintain the employment relationship, which would include an employee’s socio-economic background. Although permitted, subject to compliance with data-privacy laws, collecting socio-economic background information about employees could potentially increase the risk of discrimination claims. As mentioned above, discrimination among employees based on “social status” is prohibited under South Korean law.</p> | | | |


South Korea



Applicants

For job *applicants*, South Korea's Fair Hiring Procedure Act prohibits employers with 30 or more employees from requesting certain kinds of information unless relevant to the job. Those prohibited types of information include information about the applicant's place of birth and property, and the academic background, occupation, and property of the job applicant's lineal ascendants. So, in the case of applicants it may be regarded as prohibited to request certain information about their socio-economic background. The language of the Fair Hiring Procedure Act's prohibition only expressly applies to written application materials, but the labour authorities have taken the position that it applies to oral questioning as well.

The position is the same in the financial-services industry. However, it is common for financial-services firms to periodically collect or check the financial/economic information (such as financial transaction information and financial status) of their executives and employees during employment (based on their consent and compliance with the data protection rules in South Korea), to protect against the risk of illegal acts related to their financial operations. This might include the misuse of non-public information by executives and employees, and embezzlement or breach of trust.

| | Feasibility | Legal status | Common in practice? |
|--|-------------------|--|--|
| <p>Switzerland</p>  | <p>Low</p> | <p>The anonymised and aggregated collection of such data (e.g. for diversity reporting) could be lawful, provided employees are informed, participation is voluntary, and no individual is disadvantaged as a result. However, employers need to proceed with caution and including certain questions should be avoided. For example, collecting data about life partners and third parties (e.g. parents' occupation and level of education), religious affiliation and beliefs and financial circumstances is generally prohibited and thus not recommended unless there is a justifying reason, such as the employee's consent, overriding private or public interests or statutory provisions. In the FS sector, while additional data may be collected for regulatory "fit and proper" tests, collecting socio-economic data beyond risk and compliance needs lacks legal basis and may be deemed disproportionate.</p> | <p>No, it is not common practice (and generally not permitted) to ask employees about their socio-economic background, as this information is usually irrelevant to assessing their suitability for the job or not necessary for the performance of the employment contract.</p> |


Switzerland



Under Swiss law, the employer may only process personal data that relates to the employee's suitability for the job or is necessary for the performance of the employment contract. Collecting socio-economic background information generally does not meet this criterion, unless there is a very specific and justifiable link to the workplace or the work to be performed. This is, for example, the case for data about education (e.g. type of schools the employee attended), professional experience or language skills of the employee. Collecting this data on an anonymised and aggregated basis could be lawful, provided employees are informed, participation is voluntary, and no individual disadvantages result. However, and as noted above, collecting data about life partners and third parties, religious affiliation and beliefs and financial circumstances is generally prohibited and thus not recommended unless there is a justifying reason, such as the employee's consent, overriding private or public interests or statutory provisions.

Employers in the financial services sector are subject to specific regulatory obligations. These obligations relate to the financial integrity, reliability, and reputation of employees, particularly those in client-facing or risk-relevant roles (known as 'fit and proper' tests). Additional data may therefore be collected to assess integrity and financial soundness, such as criminal records, creditworthiness, and debt collection registry extracts to assess whether the employee poses a security or compliance risk, as well as professional background and qualifications checks. However, the collection of socio-economic data that goes beyond what is required for risk and compliance purposes lacks legal justification and could be challenged as disproportionate under Swiss data protection and employment law.



| | Feasibility | Legal status | Common in practice? |
|--|---------------|---|---|
| United Arab Emirates (UAE)  | Medium | <p>The collection of socio-economic background data in the UAE is permitted, provided there is a specific, lawful, and proportionate justification. Such data is, however, considered sensitive in nature, carries heightened risks of misuse, bias, or unlawful discrimination if not strictly safeguarded and is not strictly mandatory to collect. This is the case across the UAE, including in the Dubai International Financial Centre ('DIFC') and the Abu Dhabi Global Market ('ADGM'). It is also important to note that the collection of certain categories of data is prohibited across the UAE, including gender identity and sexual orientation data.</p> | <p>It is not common practice in the UAE, whether generally or specifically in the FS sector, for employers to request information about employees' socio-economic background. Employment data collection typically focuses on information necessary for contractual, regulatory, or immigration purposes (e.g. identification details, qualifications, visa status). Questions relating to family background, parental occupation, or type of schooling are not part of standard employment practices. Data collection in the financial services sector is usually driven by regulatory requirements (e.g. fit and proper checks, anti-money laundering compliance, professional qualifications), which do not extend to socio-economic indicators.</p> |
| <p>Further details:</p> <p>The UAE has a multi-layered data protection framework. At the federal level, the primary legislation is Federal Decree Law No. (45) of 2021 on the Protection of Personal Data (the 'UAE PDPL'), which applies across the UAE outside of the financial free zones. In addition, the DIFC and the ADGM are financial free zones with independent legal and regulatory systems, each of which has enacted its own data protection regime - the DIFC Data Protection Law No. (5) of 2020 (the 'DIFC DP Law') and the ADGM Data Protection Regulations 2021 (the 'ADGM DP Law').</p> <p>Further, from an employment perspective, there are separate employment laws governing the employment relationship. In the UAE, employment is governed by the Federal Law No.33 of 2021, as amended and its Executive Regulations Cabinet Resolution No. 1 of 2022 (together, the 'Federal Labour Law'). In the DIFC, employment is governed by the DIFC Employment Law No. 2 of 2019, as amended (the 'DIFC Employment Law') and separately in the ADGM, employment is governed by the ADGM Employment Regulations 2024, as amended (the 'ADGM Employment Regulations').</p> | | | |

United Arab Emirates (UAE)




Accordingly, when assessing the legal position on the collection of data in the UAE, it is necessary to consider the position of the federal law on one hand, and the DIFC and ADGM regimes on the other, as the latter operate independently from both federal law and from each other. The position on collecting socio-economic background data is the same in both the general context and the financial services sector.


In the UAE, there is no legal obligation for employers to collect socio-economic background data from employees, whether generally or within the financial services sector. The Federal Labour Law, the DIFC Employment Law and the ADGM Employment Regulations are silent on employers collecting socio-economic background data from employees. Socio-economic background data (e.g. type of school, parents' occupation, education level), under the local data protection laws, would be categorised as special categories of data or sensitive data. The collection of such data would need to comply with the principles of processing. Pursuant to Article 9 of the DIFC DP Law, Article 4 of the ADGM DP Law and Article 5 of the UAE PDPL, employers must ensure lawfulness, fairness, transparency, purpose limitation, and data minimisation. Absent a clear, proportionate business or regulatory purpose, collection of this type of data may be difficult to justify.

DIFC: With regards to justifying the collection of special categories of data, Article 11 of the DIFC DP Law permits collection of special categories of data where processing is proportionate and necessary to protect a data subject from potential bias or inaccurate decision making. On this basis, data may be collected because socio-economic background data would enable the identification and mitigation of potential disadvantages, support fair and objective decision-making, and help ensure that assessments, opportunities, or outcomes are not unduly influenced by systemic bias.

ADGM: Pursuant to Article 7(2)(k) of the ADGM DP Law, the processing of special categories of data is permitted where it is necessary for substantial public interest and equality of opportunity or treatment, subject to not causing substantial harm or distress to the individual. On this basis, data may be collected because socio-economic background data would support the promotion of equality, enable the identification of systemic barriers or disadvantage, and assist in ensuring fair and unbiased decision-making.

Mainland UAE (Federal): Unlike the ADGM and DIFC DP Laws, the UAE PDPL does not provide principles for the processing of sensitive data. Instead, the UAE PDPL provides compliance obligations for processing sensitive data. Where an employer undertakes systematic and comprehensive processing of sensitive personal data, a Data Protection Officer must be appointed. In addition, if large volumes of socio-economic background data are processed, the employer is required to carry out a personal data protection impact assessment.

| | Feasibility | Legal status | Common in practice? |
|--|--------------------|--|---|
| UK  | <p>High</p> | <p>The collection of socio-economic data is permitted and employers have complete discretion as to what is best for their business, and whether such data should be collected. Further, employees and/or applicants should be permitted to reply or not to reply to any questions in relation to socio-economic data. It is not a protected characteristic under the Equality Act 2010, and so the risk of discrimination claims arising from the collection of such data is low. Nor is it 'special data' as defined by Article 10 of the UK GDPR. This means that employers can rely on the fact that it is in their legitimate business interests to process such data, as long as the other principles of the UK GDPR are met.</p> | <p>While not common to collect such data, it is certainly not unusual, and the practice is increasing among employers, both generally and in the FS sector. The government is also keen to increase social mobility in the workplace, with various initiatives being established.</p> |
| <p>Further details:</p> <p>The UK government have established the Social Mobility Commission, an independent advisory non-departmental public body established under the Life Chances Act 2010 (as modified by the Welfare Reform and Work Act 2016) in order to assess progress in improving social mobility in the UK and to promote social mobility in England. The Scottish Government has introduced a Fairer Scotland Duty which requires certain public sector bodies to pay due regard to how they can “reduce inequalities of outcome caused by socio-economic disadvantage, when making strategic decisions” (although this has limited effect in practice). The UK celebrated its fourth national ‘social mobility awareness day’ in 2025. With this increasing awareness comes a greater collection of data to monitor progress in this area.</p> | | | |

| | Feasibility | Legal status | Common in practice? |
|--|---------------|--|--|
| USA  | Medium | <p>Collecting socio-economic background data of employees is permitted in the US. In fact, it is required under federal law, and the law of some states, to collect information regarding race/ethnicity and sex. Additionally, federal contractors are required to ask about veteran status. When collecting and processing socio economic data, employers must comply with the applicable state data privacy laws.</p> <p>Notwithstanding the above, a Memorandum from the US Attorney General dated 29 July 2025 may discourage employers from collecting such data (even though the memo's pronouncements are "guidance"). The memo confirms that: "Criteria like socioeconomic status, first-generation status, or geographic diversity must not be used if selected to prioritise individuals based on racial, sex based, or other protected characteristics." The memo cites the potential for unlawful employment discrimination under the Civil Rights Act and therefore would apply to programmes or activities receiving federal financial assistance, as well as to discrimination claims against private employers.</p> | <p>In light of the legal status set out, some collection of socio-economic data is common in the United States. There is, however, currently no <i>general</i> common practice for data that employers are not otherwise legally required to collect. There are also significant headwinds to continuing or adopting new diversity, equity and inclusion initiatives, given the current US Administration's pronouncements. As noted, this may discourage the collection of certain employee socio-economic background data.</p> |
| <p>Further details:</p> <p>The memo further states, "This guidance clarifies the application of federal antidiscrimination laws to programs or initiatives that may involve discriminatory practices, including those labelled as Diversity, Equity, and Inclusion ("DEI") programs. Entities receiving federal funds, like all other entities subject to federal antidiscrimination laws, must ensure that their programs and activities comply with federal law and do not discriminate on the basis of race, color, national origin, sex, religion, or other protected characteristics-no matter the program's labels, objectives, or intentions. In furtherance of that requirement, this guidance identifies "Best Practices" as non-binding suggestions to help entities comply with federal antidiscrimination laws and avoid legal pitfalls; these are not mandatory requirements but rather practical recommendations to minimize the risk of violations."</p> | | | |

Chapter 4

Common barriers to progression

Despite operating in vastly different legal and cultural environments, firms participating in the FRC research described a strikingly consistent set of barriers affecting employees from lower socio-economic backgrounds. These barriers are rarely formal or explicit; instead, they operate through norms, behaviours and informal systems that shape who is seen, supported and progressed.

Confidence, visibility and early career differentiation

One of the most cited themes was confidence - not as an inherent trait, but as a product of exposure and familiarity. Leaders noted that individuals who have had limited contact with professional environments prior to joining the workforce may be less comfortable speaking up, self-advocating or navigating ambiguity. These differences often emerge early in careers, influencing who volunteers for stretch assignments, who seeks sponsorship, and who is perceived as “ready”.

Participants were clear that these dynamics are structural rather than individual failings. Early differentiation, once established, compounds over time - meaning that small confidence gaps can translate into material progression disparities within a few career cycles.

Informal networks and sponsorship

Across all regions, access to informal networks and sponsorship was identified as a decisive factor in progression. While formal processes are typically framed as objective, much opportunity continues

to flow through informal channels: introductions, off-cycle feedback, or unadvertised opportunities.

Leaders observed that colleagues from higher socio-economic backgrounds are often better equipped to navigate these systems - understanding who to approach, how to build influence, and how to signal ambition without risk. By contrast, those without this familiarity may be less visible, even when performance is strong.

Unwritten rules and professional norms

Firms also highlighted the role of unwritten rules: expectations around communication style, professional presentation, and behavioural “fit” that are rarely articulated but strongly enforced. These norms vary by region and organisation, but the effect is consistent - advantage accrues to those who already know the code.

Importantly, the research showed that these barriers persist regardless of whether SEB data can be collected. Even in jurisdictions with strong measurement capability, cultural and behavioural dynamics continue to shape outcomes, reinforcing the need for intervention beyond data alone.

Chapter 5

What works: effective global practice

In response to these challenges, firms described a growing body of practice designed to support socio-economic diversity without relying solely on sensitive data. The most effective interventions share three characteristics: they are globally transferable, focused on capability rather than deficit, and visibly led by senior leaders.

Storytelling and lived-experience visibility

Many firms are increasingly using storytelling to surface diverse career journeys and normalise non-linear pathways. By highlighting lived experience - through internal communications, events or leadership forums - organisations help demystify progression and challenge assumptions about who “belongs”.

In regions where data collection is limited, storytelling functions as a form of qualitative insight, enabling organisations to understand barriers that metrics cannot capture.

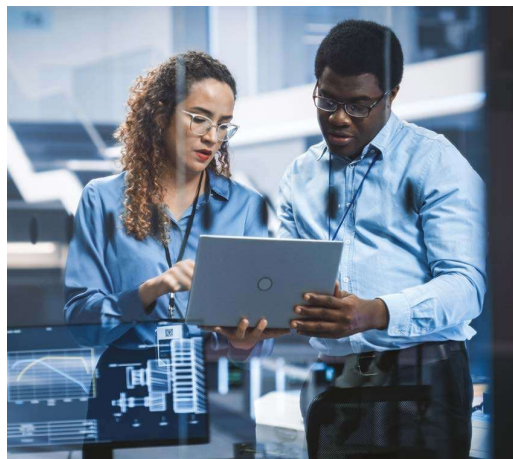
Reverse mentoring and leadership immersion

Reverse mentoring was repeatedly cited as a powerful tool for leadership learning. By pairing senior leaders with junior colleagues from different socio-economic backgrounds, firms create structured opportunities for insight, empathy and challenge. Participants reported that these schemes often shift leadership understanding more effectively than formal training, particularly in markets where open discussion of background is sensitive.

Early-career pathways and access to opportunity

Across all regions, early-career interventions emerged as a critical lever. Apprenticeships, alternative entry routes, contextual recruitment and partnerships with educational institutions allow firms to widen access without requiring retrospective data collection. Several organisations noted higher retention and engagement among cohorts recruited through these routes.

Crucially, firms emphasised that early-career inclusion must be paired with structured development and exposure - ensuring that diverse entrants receive the same access to networks, sponsorship and stretch opportunities as traditional hires.



Data-lite, globally scalable approaches

In the context of the legal variability highlighted by the Lewis Silkin analysis, some participating members in the FRC research are increasingly prioritising interventions that can operate across jurisdictions, including leadership listening sessions, inclusive leadership capability frameworks, transparent promotion criteria, and manager training focused on recognising potential beyond polish or familiarity.

Illustrative question framing across jurisdictions

Legal considerations shape how multinational employers might frame questions to elicit information about socio-economic background, rather than determining a single set of indicators that can be applied uniformly. Even where organisations share a global purpose and conceptual definition, the questions used in practice must be adapted to local legal, cultural, and data-protection norms.

The table below draws on country insights provided as part of Lewis Silkin’s review which illustrate the types of questions employers in different jurisdictions might ask to understand socio-economic background, including whether these reflect nationally recognised metrics or culturally specific predictors. The insights suggest that employers across jurisdictions take different approaches when framing questions to collect data on their employees’ socio-economic background. These are shaped by each country’s legal frameworks, cultural sensitivities and available national metrics. In some countries, established national metrics offer clear reference points, while in others, employers do not ask direct questions at all, meaning that any understanding of background can only be inferred indirectly - for example through education or residential information.

The survey question informing this table was optional, and as a result not all countries represented in the wider Lewis Silkin research are included.

Links to illustrative question framing across jurisdictions



Australia



India



France



Singapore



Germany



United Arab Emirates (UAE)



Hong Kong



UK

Additional Insights on framing questions

Australia



The Australian Bureau of Statistics publishes Socio-Economic Indexes for Areas (SEIFA) which includes the Index of Relative Socio-economic Disadvantage. The SEIFA scores local government areas based on measures such as income and the number of households with people in unskilled occupations and distributes those local government areas into five quintiles of relative disadvantage to relative advantage.

From SEIFA data, employers may collect and report on the number of employees who are from areas of entrenched disadvantage. Alongside this, employers may also collect and report on the number of employees who are from historically disadvantaged or marginalised groups, which will generally include:

- Long-term unemployed people or those at risk of long-term unemployment;
- Single parents;
- Migrants, refugees and asylum seekers;
- Workers in transition (e.g. unskilled workers in industries facing transition and closure, such as offshored manufacturing); and
- Young people.


The collection of information from which to draw relevant data on these measures is typically derived from questions such as a person's residential address, school / university attended, current income band and highest level of education completed.


Additional Insights on framing questions

France



According to the guidelines published by the CNIL, “as free comment fields are likely to reveal a significant and uncontrolled amount of information, surveys should limit their use. Multiple-choice questions in the form of drop-down menus make it possible to limit the data collected and are a good practice to implement, as well as facilitating the production of statistics.” This should be borne in mind by employers looking to make use of diversity measurement surveys in the workplace.

| Additional Insights on framing questions | |
|---|--|
| <p>Germany</p>  | <p>In Germany, there are no set, standardised questions that employers use to assess socio-economic background. Such assessments are legally sensitive and uncommon in practice. It would be especially unusual to collect data about ethnicity and sexual orientation – these tend to be somewhat of no-go topics in employment relationships in Germany. It is more likely that an employer would ask about their employees’ religion because this can result in corresponding church taxes. Questions about a disability may be of relevance to the employment relationship (in order to meet minimum employment figures or to safeguard the special protective rights for severely disabled persons - like extra vacation or special protection against dismissal); however, such questions can, as a rule, only be considered admissible after the six-month probationary period has expired. Furthermore, employees do not have to answer and in this context, employees are also entitled to provide false or misleading information, which is then difficult for employers to verify.</p> <p>Notwithstanding this, data is sometimes collected indirectly, for example, when educational qualifications, professional experience, training, or foreign language skills are discussed in a job interview, as conclusions can also be drawn about socio-economic background from this information. However, direct questions are difficult to ask from a legal standpoint and are not typical. There are also no national surveys in Germany on socio-economic background.</p> |

| Additional Insights on framing questions | |
|---|--|
| <p>Hong Kong</p>  | <p>Employers in Hong Kong do not typically collect data on their employees’ socio-economic background. That said, typical employee data collected by employers for HR/employment-related purposes, such as correspondence addresses and educational background, may already provide some hints about the employees’ socio-economic background.</p> |

Additional Insights on framing questions

India





Questions generally asked about socio-economic background in India are limited to the following:

- Constitutional category, i.e. whether the individual belongs to SC/ST/OBC or the General category, and, if OBC, whether they are part of the so-called 'Non-Creamy Layer' (i.e. they earn an annual income that is less than INR 800,000), or, if EWS, they earn income below INR 800,000 and meet the relevant property restrictions;
- Gender identity (including transgender status under the Transgender Persons Act 2019); and
- Rural/urban background, primarily for logistics in manufacturing sectors.

These questions reflect India's constitutionally mandated reservation (or quota) system rather than a comprehensive socio-economic metric. Unlike the UK's National Statistics Socio-economic classification framework, India lacks a standardised socio-economic classification for employment. The National Classification of Occupations (NCO-2015) serves as India's occupational coding system for government employment exchanges but is not used for assessing socio-economic background. The Indian Socio-Economic Classification (ISEC-2024), designed for market research, is actively used by advertisers, research agencies and major corporations for consumer behaviour analysis rather than employment decisions.

The constitutional categories serve as India's 'culturally specific' predictor, with the 'creamy layer' concept excluding economically advanced OBC members (i.e. individuals who earn an annual income above INR 800,000) and the EWS criteria targeting those who are deemed to be economically disadvantaged from unreserved categories. This reflects India's unique approach of prioritising what might be referred to in India as "caste-based historical disadvantage" and current economic status over occupational lineage. The Socio-Economic and Caste Census (SECC-2011) parameters guide welfare distribution but do not translate to employment contexts, leaving a gap between policy frameworks and practical implementation in private sector hiring.

| Additional Insights on framing questions | |
|---|---|
| <p>Singapore</p>  | <p>There are no express or any nationally pronounced policies that the authorities would seek to track data to determine socio-economic background of its population in Singapore and which employers could use for inspiration. Also as mentioned above, Singapore employers do not usually pose questions to their employees to collect their socio-economic background information. Having said that, certain data such as educational qualifications or residential addresses (which can disclose the type of property that an employee is living in, such as public housing, private landed property etc) can be a barometer of the social-economic background of its employees.</p> |

| Additional Insights on framing questions | |
|--|---|
| <p>United Arab Emirates (UAE)</p>  | <p>There are no nationally recognised metrics or culturally specific predictors that are used in the UAE to assess socio-economic background. As such, there is no established framework or benchmark for employers to adopt in this context. Where organisations voluntarily seek such data (e.g. in connection with diversity and inclusion initiatives), any questions may be adapted from international practices rather than reflecting a UAE-specific metric.</p> |



Additional Insights on framing questions

UK



Guidance from the Social Mobility Commission provides recommendations on collecting socio-economic data.⁶ In summary, there are four main areas recommended.

The first is that the parental occupation of the main household earner when they were age 14 be the highest priority data point for employers to collect. It is described as being the best marker of socio-economic background. The responses are grouped and mapped onto one of three “socio-economic backgrounds”: lower socio-economic, intermediate and professional.

There are then three further data points that the Social Mobility Commission recommends employers obtain:

- Whether the individual received free school meals during secondary education. This is a marker for extreme economic disadvantage
- The type of schooling attended at age 14. This is a measure of extreme economic advantage. In the data collected, there should be a distinction between attending private school with a bursary covering at least 90% of the cost, and without a bursary at this level. Those who attended a private school where less than 90% of the fees were covered by a bursary are considered to have received extreme economic advantage.
- Asking whether an individual’s parents attend university by the time they were 18 – essentially finding out whether they were the first generation in their family to attend and graduate from university. This datapoint is more nuanced. It gives some indication of the cultural capital that the individual may have received, for example, family connections in professional roles able to enhance access to higher pay roles.

It is recommended that the first three data points are asked with the fourth being an optional question for employers with graduate schemes.

In practice, it can be challenging for employers to obtain sufficiently complete datasets without having a clear commitment to improving social mobility. It is only in this sort of environment where individuals provide their data.

⁶ The Social Mobility Commission. (Published November 2020 and updated 21 May 2021). *Simplifying how employers measure socio-economic background: An accompanying report to new guidance*. Available at: <https://www.gov.uk/government/publications/understanding-a-workforces-socio-economic-background-for-change/simplifying-how-employers-measure-socio-economic-background-an-accompanying-report-to-new-guidance#parentaloccupation>

Leadership and accountability

Insights from the FRC qualitative research with participating members point to leadership as a central determinant of whether socio-economic diversity progresses within global firms. Across the jurisdictions included in this study, progress was most evident where senior leaders positioned socio-economic diversity as a core workforce priority rather than a peripheral inclusion activity, regardless of differences in legal feasibility, cultural norms, or data maturity.

The Lewis Silkin legal review provides important contextual insight into the regulatory landscape within which these leadership approaches operate

The FRC interviews showed that leadership influence operates across three interconnected domains:

1. Setting organisational meaning

Participants described that when leaders frame socio-economic diversity as a capability and productivity issue, rather than a fairness endeavour, employees and managers are far more likely to engage. Leaders who emphasise the role of socio-economic diversity in strengthening decision-making, talent pipelines and cultural resilience create organisational legitimacy for the agenda that cannot be replicated through policy alone.

2. Creating legitimacy and building trust

FRC insights emphasised how employees calibrate their willingness to discuss background, and their confidence in organisational intent, based on leaders'

behaviour. Visible sponsorship, personal reflection, active participation in listening sessions, and consistent messaging about opportunity and fairness were cited as catalysts for higher trust and, where legally permitted, higher disclosure.

3. Embedding accountability

The FRC research found that firms making the most progress embedded socio-economic expectations into leadership scorecards, business reviews, sponsorship roles and people-manager guidance. This was particularly important in jurisdictions that the Lewis Silkin analysis identifies as medium or low-feasibility, where firms are less able to rely on quantitative monitoring tools such as standardised workforce metrics. In these contexts, leaders drive progress by reinforcing cultural norms, scrutinising processes for hidden barriers, and modelling inclusive behaviours.

Taken together, we can extrapolate that leadership is central to sustaining socio-economic diversity progress amid legal and cultural variation. This conclusion is primarily drawn from the FRC member research, with the Lewis Silkin review providing us with important regulatory context.

Chapter 7

Looking ahead

Taken together, insights from the Financial Reporting Council qualitative research, considered alongside the Lewis Silkin legal analysis, point in our view to a shift in the global socio-economic diversity (SED) landscape in which workforce realities increasingly shape progress alongside, and sometimes beyond, regulatory frameworks. In many jurisdictions, regulatory and data constraints limit what can be achieved through compliance or measurement alone, placing greater emphasis on leadership judgement and strategic prioritisation in driving meaningful change.

Senior leaders are operating amid mounting operational pressures - including digital transformation, persistent skills shortages, demographic change, and evolving employee expectations - that expose the limits of traditional, narrow talent pipelines. Within this context, socio-economic diversity is increasingly understood as a strategic workforce consideration, linked to organisational adaptability, innovation, and long-term capability. There is growing recognition that overlooking capable individuals because they lack early familiarity with the sector or its unwritten rules risks constraining leadership pipelines and weakening future resilience and productivity.

Three future directions emerged clearly across both research strands:

1. Workforce transformation will accelerate action

Firms expect to widen early-career pathways, strengthen contextual recruitment, and invest in capability-building programmes for diverse cohorts. FRC insights show growing recognition that socio-economic background shapes confidence, access to opportunity, and progression throughout careers – influencing who advances, who is retained, and who ultimately reaches leadership. The Lewis Silkin analysis confirms that even where data feasibility is low, action can still be possible.

2. Global approaches will rely on flexibility, not uniformity

The Lewis Silkin review highlights regulatory variability across jurisdictions and therefore we imagine that legal harmonisation is unlikely in the near term. In this context, firms appear to be orienting around shared global principles – such as fairness, transparency, and opportunity – while developing approaches that can be adapted locally. Insights from the FRC qualitative research suggest a move toward hybrid models, combining quantitative data where feasible with qualitative insight, leadership engagement, and system-level interventions in more constrained environments.

3. Socio-economic diversity will continue shifting into the core of leadership and talent strategy

Some participating members in the FRC research highlight rising expectations that leaders actively model inclusive behaviours, challenge informal norms, and understand the subtle ways background influences progression, confidence, and visibility. Participants described a future in which inclusive leadership capability is assessed alongside technical competence and strategic judgement, reflecting its growing importance to organisational effectiveness and long-term resilience.

Across the evidence, the direction of travel is clear. The central question for global financial services is no longer whether socio-economic diversity matters, but how organisations build credible, legally sound, and culturally grounded approaches that ensure talent from every background can progress and lead. Firms contributing to this study in the FRC research emphasised a shared imperative: progress will come from deliberate action - not from waiting for conditions, data, or systems to become perfect.

Senior leaders are operating amid mounting operational pressures - digital transformation, skills shortages, demographic change, and shifting employee expectations - that make reliance on traditional, narrow talent pipelines increasingly untenable and undesirable. In this context, socio-economic diversity is increasingly understood as a strategic workforce asset, associated with adaptability, innovation, and long-term organisational capability.



Appendix: methodology

Overview

This report brings together two complementary evidence strands commissioned by Progress Together and received in kind:

- 1. Qualitative workforce research** undertaken by the Financial Reporting Council (FRC), exploring how multinational financial services organisations understand and address socio-economic diversity across regions.
- 2. A comparative legal analysis** co-ordinated by Lewis Silkin, examining the feasibility of collecting and using socio-economic background data across multiple jurisdictions.

The combined approach was designed to illuminate both the organisational reality and the legal context shaping global socio-economic diversity practice.

FRC Qualitative Research

Background and Objectives

The qualitative research was designed to explore how multinational financial services organisations conceptualise socio-economic diversity in a global context, the challenges they face in developing and implementing SED strategies, and the types of initiatives being pursued to improve progression and representation at senior levels.

Specifically, the research aimed to:

- Develop an understanding of how socio-economic diversity is defined and interpreted across different geographies and cultural contexts.
- Identify regional nuances in approaches to socio-economic diversity.
- Explore barriers organisations face when developing global SED strategies.
- Highlight initiatives that are perceived to be effective, alongside challenges encountered.
- Consider the extent to which emerging insights may be relevant beyond the financial services sector.

Approach and Sample

The research employed a qualitative methodology, comprising:

- One facilitated roundtable discussion.
- A series of follow-up in-depth interviews.

Fieldwork took place between **January and April 2025**.

The roundtable brought together senior representatives from multinational financial services organisations for a structured discussion focused on socio-economic data collection, global and regional initiatives, policy considerations and measurement of progress.

Subsequently, in-depth interviews were conducted between February and April. Interviews lasted between 30 minutes and one hour and included participants operating across the UK, North America, Continental Europe and Asia-Pacific regions. Some individuals took part in both the roundtable and interviews, allowing for deeper exploration of themes over time.

Throughout both stages of fieldwork, participants were asked about:

- How their organisation understands socio-economic diversity and social mobility.
- How these concepts translate across different operating regions.
- Barriers to recruitment and progression linked to socio-economic background.
- Existing initiatives and perceived effectiveness.
- Challenges associated with measurement, disclosure and implementation.

The findings are qualitative and exploratory in nature, and have been supplemented by wider discussions had with participants and other relevant parties outside of formal interviews. They are not intended to be statistically representative, but to surface patterns, insights and practical considerations relevant to global employers.

About the Lewis Silkin Legal Analysis

The Lewis Silkin legal analysis consists of two tables containing insights from global employment law and privacy experts within the Ius Laboris alliance.

The tables examine the legal and practical positions associated with collecting and processing employee socio-economic background data across 13 jurisdictions. The insights presented in the tables are based on an analysis of survey responses completed by Ius Laboris legal experts.

Survey design

The survey focused on three interrelated areas:

- The legal position when collecting the socio-economic background data of employees;
- Whether it is common practice for employers to ask employees about their socio-economic background; and
- The questions that employers typically ask employees, if at all, to collect such data.

The survey comprised of four questions. The first two related to the legal position. Question one asked respondents to categorise this position, selecting whether collecting this data is ‘mandatory’, ‘permitted (recommended)’, ‘permitted (not recommended)’ or ‘other’. Question two requests that respondents explain their categorisation.

The third question then relates to the practical position and the fourth focuses on how employers might frame questions to collect this data. Question four specifically asks whether questions asked by employers reflect any national metric or culturally specific predictor for determining the socio-economic background of the wider population. The fourth question was optional, and so information was not provided by all surveyed jurisdictions.

Questions one to three requested information on both the general position and, if different, the position in the financial services sector.

The following definition of ‘socio-economic background’ was set out in the survey: “Socio-economic background is the prevalent term to refer to the particular set of social and economic circumstances in which an individual grew up. This can be measured objectively by capturing information on, for example, the type of school individuals attended and their parents’ occupation and level of education.

The term ‘socio-economic background’ seeks to facilitate fair and objective discussion of the influence of social and economic circumstances on individuals’ educational and career trajectories. Individually, any one indicator does not necessarily determine whether someone is from a more or less advantaged socio-economic background (particularly in relation to school type), but collectively they can create a picture.”

Respondents

The survey was shared with Ius Laboris' legal experts specialising in workplace data privacy and protection and discrimination law in 13 different jurisdictions. The countries surveyed were deliberately selected to capture a diverse range of regulatory frameworks in operating markets relevant to the financial sector, and in particular to Progress Together members. The selected countries completed the survey between August and September 2025.

Metrics

It was clear from the survey responses that collecting the socio-economic background data of employees is permitted in most of the surveyed jurisdictions, but to varying degrees. To capture these nuances, a 'feasibility' rating was subsequently agreed upon with the respondents to highlight the potential difficulty of collecting this data and the risks involved. The feasibility ratings were agreed as follows:

- **High feasibility:** Broadly permitted under law; practical to implement with standard compliance.
- **Medium feasibility:** Allowed, but only with strong safeguards or in narrow contexts.
- **Low feasibility:** Generally not permitted or so restricted it's impractical.

To determine the rating for each country, the following questions were considered:

- Is there a risk of discrimination, in addition to a breach of data protection frameworks?
- Is it likely that the legal frameworks will be breached by collecting this data (even if standards are complied with)?
- Are there cultural sensitivities to consider?
- Do tighter restrictions apply when collecting this data in the recruitment process (i.e. for applicants, rather than employees)?

Tables

From the survey responses, and subsequent feasibility analysis, the tables at pages 14 and 35 of this report were created and agreed with the Ius Laboris legal experts in November 2025. The information contained in these tables was subsequently reviewed by the Ius Laboris legal experts in March and April 2026 to ensure that any legislative developments during this period had been captured.

The first table sets out the feasibility rating, legal status and practical position in each jurisdiction, reflecting the insights shared in questions one to three of the survey (plus the subsequent discussions on feasibility). The second table sets out additional insights around framing questions to collect socio-economic background data, reflecting the insights provided to question four of the survey.

Integration and limitations

Progress Together integrated the two research strands to produce a combined narrative that reflects both organisational experience and legal feasibility. While the qualitative research does not cover all regions or markets, it provides valuable insight into common challenges and emerging practice. The legal analysis complements this by clarifying why measurement approaches vary and, in our view, demonstrates why flexible, hybrid strategies are often necessary.

Together, the research offers an evidence-informed foundation for organisations seeking to strengthen socio-economic diversity as part of a broader workforce and talent strategy.

Nothing in the tables at pages 14-31 and 34-39 (inclusive) of this report should be treated as an authoritative statement of the law and the opinions expressed should not be taken as fact. The information in these tables should in no circumstances be relied upon without first taking legal advice.

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