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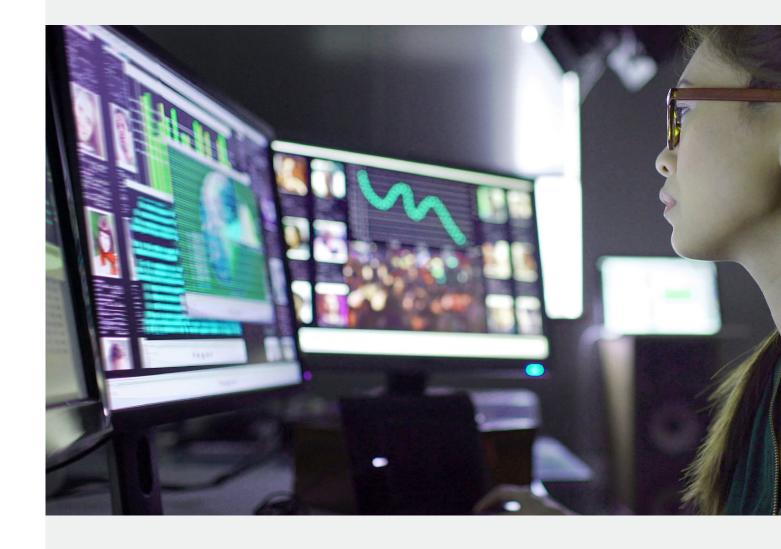




Introduction

Talent acquisition professionals have a critical role to play in realizing an organization's diversity, equity, and inclusion (DE&I) goals.

In this guide, we explore your compliance obligations (primarily with a US focus), the data management principles that will help you manage risk, and the processes that will help you ensure that every great applicant is treated with minimal bias, regardless of their background.











Your Obligations

Before we get onto the more exciting and innovative side of talent acquisition considerations, it's worth reviewing things you simply have to do in order to stay within the law. These obligations help establish a useful baseline—besides, plenty of organizations trip up on some of these considerations, so this is a great opportunity to take some new tips on board and steer clear of some common mistakes.

Understand the Law

Obviously, the bare minimum of any non-discriminatory hiring program needs to be compliance with all the local and national laws that apply wherever your organization operates. These can depend on the size of your business and may apply even if a very low percentage of your workforce is within a certain jurisdiction (such as a specific US state), so it's important to ensure that you're 100% sure that you're keeping track of your obligations.

It goes without saying that this is an intricate area, but one worth summarizing here:

Employment Law in the United States

The US Equal Employment Opportunity Commission (EEOC) is responsible for enforcing federal-level discrimination laws including:

- Title VII of the Civil Rights Act of 1964: Title
 VII prohibits discrimination on the basis of race,
 color, religion, sex, or national origin (or because
 of association with an individual on the basis of
 those characteristics). Later supreme court rulings
 interpreted 'sex' to cover discrimination on the
 basis of sexual orientation and gender identity.
- The Age Discrimination in Employment Act of 1967 (ADEA): Similar to Title VII but focused on age-related protections.
- Title I of the Americans with Disabilities Act of 1990 (ADA): As above, but focused on protections for persons with disabilities.
- The Genetic Information Nondiscrimination Act of 2008 (GINA): Prohibits the use of genetic information (e.g. predisposition to certain medical conditions discovered via medical tests) in employment and health insurance decisions.

Additionally, organizations that do business with the federal government must comply with and operate under the assumption of audit by the Office of Federal Contract Compliance Programs (OFCCP). The OFCCP enforces the following laws related to hiring practice:

- **Executive Order 11246:** Covers discriminating on the basis of race, color, religion, sex, sexual orientation, gender identity, or national origin and requires organizations to take Affirmative Action. Applies regardless of number of employees as soon as your organization's federal contracts exceed \$10k USD.
- Section 503 of the Rehabilitation Act of 1973:
 Concerns individuals with disabilities specifically.
 Applies if contracts exceed \$15k USD.
- The Vietnam Era Veterans' Readjustment
 Assistance Act (VEVRAA): As above, but
 concerning veterans. Applies if contracts exceed
 \$150k USD.









All organizations will also want to consider:

- The 1978 Uniform Guidelines on Employee
 Selection Procedures: Though not a law, the
 guidelines are often treated with similar weight in
 court and describe how selection procedures should
 be used and validated for use.
- State and Local Laws: While states mostly replicate federal hiring laws, some have notable additional laws. For example, Illinois has an Artificial Intelligence Video Interview Act. One of the things this law dictates is that employers must obtain consent from candidates if their hiring process involves the use of an Al solution that monitors facial expressions. They must also be informed about what that Al is assessing (e.g. it may be used to suggest if the candidate is providing a dishonest answer to a question).

Employment Law in Europe

Though laws differ from country to country in Europe, key European Union directives on discrimination provide a helpful baseline for what organizations can expect while operating in the area. The directives include:

- **Directive 2000/43/EC:** Covers equality of treatment between people irrespective of racial or ethnic group.
- **Directive 2000/78/EC:** Accompanies the above and deals with discrimination on the basis of disability, sexual orientation, religion/belief, or age.
- **Directive 2006/54/EC:** Consolidates previous discrimination directives relating to equal treatment on the basis of sex.

Individual EU member states have their own laws implementing these directives, and these laws may actually pre-date the directives. For example, in the UK, the Equality Act 2010 consolidated, updated, and supplemented several of its own legacy acts while complying with the EU's directives. Notably, this law still remains in place now that the UK is no longer a member state.









The Basics of Talent Acquisition Compliance in the US

In order to comply with Title VII and its associated federal laws, every organization doing business in the US should make sure that they're:

- Assigning every applicant a disposition code accurately recording the stage they reached in your hiring process and their status once reaching that stage (i.e. the reason they weren't selected for a role)
- Collecting and storing race and gender information using appropriate online forms and tear-off sheets
- Testing hiring processes to uncover adverse impact
- Ensuring that job descriptions and basic qualifications are up to date
 - For example, you may have acquired new machinery that has made certain physical requirements (e.g. ability to lift certain weights) irrelevant and your qualifications unnecessarily discriminatory.
 - Consider also how language usage may be exclusionary.

Additional Considerations for Federal Contractors

A key responsibility as a federal contractor is ensuring that candidates are aware of their Equal Employment Opportunity rights, or at least pointed in the direction of the policies you must abide by as their employer. In reality, non-compliant job postings are common both online and off—Affirmity's experts estimate that in 95% of investigations on behalf of clients, they've discovered at least one instance of this information not being properly provided.

- **EEO Taglines:** Every solicitation or advertisement for employees must either state that "all qualified applicants will receive consideration for employment without regard to race, color, religion, sex, sexual orientation, gender identity, or national origin", or feature an abbreviated form of this statement such as "We are an Equal Opportunity/Affirmative Action Employer" (or "EOE/disabled/veteran employer").
- **EEO Law Poster and Supplement:** Both the original "Equal Employment Opportunity is the Law" poster and the poster supplement detailing EO 11246 revisions (Fig 1 and 2, right) should be available to all applicants. You should therefore hyperlink both documents on your job listings.
- Pay transparency notice¹: In addition to the above, you must post the Pay Transparency Nondiscrimination Provision poster setting out the non-retaliatory practices around salary nondisclosure.

1 The EEO Law Poster, EEO Law Poster Supplement and Pay Transparency Nondiscrimination Poster are available to download in multiple languages from https://www.dol.gov/agencies/ofccp/posters







Fig 3.

PAY TRANSPARENCY NONDISCRIMINATION PROVISION

The contractor will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with the contractor's legal duty to furnish information, 41 CFR 60-1.35(c)

If you believe that you have experienced discrimination contact of 1.800.397.6251 | TTY 1.877.889.5627 | www.dol.gov/ofccp











Your Obligations

The other main area of responsibility is record-keeping:

- Your organization needs to maintain copies of requisitions, applications, dispositions, and reasons for not selecting people for at least two years. Logs regarding disability and veteran status must be maintained for three years.
- Make sure you link all applicants to where they're sourced from, so that you can prove the effectiveness of any measures you have taken to increase the likelihood of getting diverse candidates.
- While collecting protected demographic info, you
 must take care to keep it separate from applications
 so that the information is not available to decisionmakers. With paper forms that means making the
 self-identification element a tear-off.

As alluded to above, you should be making sure that you're posting jobs to diversity-focused job boards, as well as proactively reaching out to organizations that can help you increase the number of relevant candidates from diverse backgrounds. If your organization has federal contracts in excess of \$150k USD, you must list job openings on the Employment Service Delivery System (ESDS, the VEVRA-related One-Stop Career Center).

Goals, Not Quotas

It's important that everyone responsible for and adjacent to your hiring process understands that there are fundamental differences between the concept of a diversity goal and a diversity quota:

- Diversity Goals concern desired outcomes and the good faith efforts made to reach those outcomes.
- Diversity Quotas are mandated counts or percentages.

Diversity Goals

- Currently lawful
- Achieved by:
 - Modifying fixed processes
 - Conducting outreach
 - Ensuring fair hiring practices
 - Strategic sourcing
- Part of Affirmative Action Plans and DE&I programs
- You might need to shift a lot of pieces to achieve a goal

Diversity Quotas

- Currently unlawful
- Can be achieved in the same way as goals
- Are often achieved by selecting based on race or gender instead of, or in preference to, appropriate qualifications
- Create pressures that lead to selection based on protected characteristics

The table above describes the difference between the two concepts. We could summarize the difference like this: quotas are an unlawful, low-effort way of achieving a diverse workforce that is likely to have poor results for everyone concerned. Appropriately executed diversity goals are a concerted effort within the scope of the law aimed at benefiting both businesses and qualified individuals from diverse backgrounds.









Why You Must Make Accessibility a Priority

The almost wholesale shift to online applications in the last two decades has made the process of applying for work convenient for many, but not for all. Even assuming that the vast majority of your applicants can access an internet-enabled device at home, on your premises, or in another venue such as a public library, accessibility remains an issue. You may be overlooking any of the following factors:

- Is your website accessible? Assistive devices such as TDD (Telecommunications Devices for the Deaf) and screen readers rely on websites being built to standards such as those of the W3C Web Accessibility Initiative (WAI). A lot of the hooks that these devices rely on are invisible to mainstream users—without proper testing, you may not be aware there is an issue.
- Are in-person applications accessible? For example, if you have kiosks for accepting applications, can every suitable candidate use them?
- Will your interviews be accessible? You should prominently display verbiage on your website regarding how to request an accommodation, such as:

If you have a disability and would like to request an accommodation in order to apply for a position with ABC COMPANY, please call xxx-xxx-xxxx or email our HR staff at xxxx.xxxx@xcompany.com.

 While being prepared to accommodate applicants is important, you should always remain within the law: an employer may not ask disability-related questions until after it makes a conditional job offer to the applicant. More information is available from the EEOC².

Your Obligations: How Affirmity Can Help

Affirmity's experts are well-established practitioners in Affirmative Action planning software and services, and we're here to assist with any questions you have regarding diversity and inclusion-related compliance in the US. If you need to navigate the often complex reporting requirements, please contact us for more information about our Affirmative Action Plan (AAP), EEO-1 and VETS reporting services.



2 U.S. Equal Employment Opportunity Commission. (Oct 1995). 'Enforcement Guidance: Preemployment Disability-Related Questions and Medical Examinations'. Available online.









Your Data

The data you collect while complying with diversity-related hiring laws is an important springboard to more innovative DE&I processes. Refining your data-collection methodology will help streamline the overall process, giving your team more time to dive into potential issues and proactively address them well before they ever reach the desk of a compliance officer.

How to Clearly Define Your Applicant Pool

One of the challenges of working with candidate data in the modern talent process is that you may receive a large number of queries, and these have to be separated from the actual applications in your data. This requires that you clearly define (and stick to) rules for your applicant pool from the outset. Failure to do so can make it very difficult to defend rejections in the event of a complaint.

Key Rules for Your Applicant Pool

These rules should cover:

- Method of acceptance: Will you only accept applications via email, job boards, paper applications, or your organization's online application system?
- Required documentation: Should applicants provide a resume and/or cover letter?

- Timeframe: Will applications need to be made before a deadline?
- Scope of application: Can applicants apply
 to multiple positions with a single application
 or declaration of interest or should they apply
 individually to specific positions (a 'single position
 at a time' approach is generally easier to deal with).
- **Data management techniques:** How are you going to make the applicant pool manageable, and when will filtering occur?
 - For example, if the position is oversubscribed, will you only look at the first 50 applications (starting with the earliest)? Be careful—your method needs to not favor certain groups (e.g. geographical filtering may not be neutral).
 - Regarding filtering, it's important to define whether it occurs before or after you check whether applicants meet your basic qualifications.

 Basic qualifications: Define a process for determining the basic qualifications that are required for any given role. This needs to be sufficiently robust so that you avoid having basic qualifications that discriminate unnecessarily.

Consistency needs to underpin these rules: if you apply them in some cases and not in others, you'll have a hard time defending them.

How the OFCCP and EEOC Define Applicants

Though employers are able to define and work to a definition of who qualifies as an applicant, these definitions have to take into account OFCCP and EEOC definitions in the US (and equivalents outside).









The OFCCP defines an internet applicant as someone who satisfies the following four criteria³:

- "The individual submits an expression of interest in employment through the *Internet or related* electronic data technologies."
- "The contractor considers the individual for employment in a particular position."
- "The individual's expression of interest indicates the individual possesses the basic qualifications for the position."
- "The individual at no point in the contractor's selection process prior to receiving an offer of employment from the contractor, removes himself or herself from further consideration or otherwise indicates that he or she is no longer interested in the position."

Some of the italicized terms above leave some room for interpretation. For example, a candidate can arguably be considered to have "removed himself or herself from further consideration" by ignoring communication, not showing up to interviews, or some other passive means.

The EEOC's equivalent definition4 is:

- "The concept of an applicant is that of a person who has indicated an interest in being considered for hiring, promotion, or other employment opportunities. This interest might be expressed by completing an application form, or might be expressed orally, depending upon the employer's practice."
- "A person who voluntarily withdraws formally or informally at any stage of the selection process is no longer an applicant or candidate for purposes of computing adverse impact."

This is a looser definition, partly as a consequence of its age (pre-dating widespread internet access by a couple of decades).

How to Get Disposition Data Right

The disposition data you record about each applicant should be informative and accurate (without getting too over-complex). Recording that a candidate was rejected is not enough from a compliance perspective: primarily, it fails to record when and why this happened, potentially obscuring some bias (unconscious or not) that is working to undermine applicants and making a hiring analysis impossible.

A good model for covering all bases in disposition terms, without making the process too unwieldy, is to describe three key areas: the **step**, the **status**, and the **reason**. Define a list of valid terms that accurately describes your process (and potentially enforce them via fixed-value dropdowns in your spreadsheet or hiring tool), or use our suggestions below:

Step:

Firstly, indicate the furthest stage in your hiring process that each candidate reached:

- Applied
- Basic qualification screen
- Preferred qualification screen
- Hiring manager review
- Interview
- Second interview
- Offer
- Post-offer checks
- Hired

(Obviously, if your hiring process involves additional steps, you should include them).

- 3 Office of Federal Contract Compliance Programs. (Sep 2012). 'Internet Applicant Recordkeeping Rule'. Available online.
- 4 U.S. Equal Employment Opportunity Commission. (Mar 1979). 'Questions and Answers to Clarify and Provide a Common Interpretation of the Uniform Guidelines on Employee Selection Procedures'. Available online.









Status:

You should then indicate what happened at the final step reached:

- Passed
- Failed or Rejected
- Withdrew

Reason:

Finally, you should record reasons for an applicant's status in the last step, for example:

- Lacked basic qualifications
- Did not show up for the interview
- Not willing to travel
- Not considered

How to Investigate Demographic Differences and Adverse Impact

Establishing the data management processes above makes it easier for your organization to uncover adverse impact. So what is adverse impact? Under the Uniform Guidelines on Employee Selection Procedures (UGESP), adverse impact is defined as a substantially different rate of selection in hiring, promotion or other employment decision which works to the disadvantage of members of a race, sex, or ethnic group.

The OFCCP and EEOC's rule of thumb for "a substantially different rate of selection" is a selection rate for any race, sex, or ethnic group which is less than 80% of the selection rate for the group with the highest selection rate. Any time this 80% rule is broken, the agencies will follow up with a more robust statistical test to determine whether there is a disparity of 2 to 3 standard deviations (a measure of the dispersion of a set of values). We usually advise that 1.96 or higher is really a red flag that needs a closer look.

The following analytical tools can be used to look at diversity yielded by different parts of your program versus expectation, or for other comparative purposes:

- Sourcing analyses: Analyzes whether there are specific hiring sources that are or aren't performing in terms of yield and quality
- **Labor market analyses:** Investigates whether the applicant pool is mirroring what is available to you in the qualified labor market.
- disposition analyses: Requires the full dispositioning of your applicant pool and allows you to investigate groups disproportionately being dispositioned out. For example, you may find that women are falling out of the process when they learn about the hours required. This could lead to you questioning whether you could be more flexible.
- Qualitative content reviews: A manual review of the content of interviews, tests, screens, and other process points to see if content is likely to lead to differential performance or motivation to continue in the hiring process.
- Step analysis: Looks at specific steps in the hiring process
- **Combination analysis:** Any combination of the above









Your Data: How Affirmity Can Help

Affirmity's PhD consultants use both qualitative and quantitative methods to analyze employment practices and inform employment decisions. This helps you minimize risk via comprehensive reviews of hiring processes using a range of software and services. These products will help you measure and determine the impact of your programs. Key examples include:

- **Applicant-to-hire studies:** Uncover adverse impact among specific demographic groups with a comprehensive statistical study of applicant and hiring trends.
- **Applicant data reviews:** We can help you assess the integrity of the data you collect and the process by which it is collected.
- Employment test evaluations: Allow our experts to bring an outside perspective to any tests necessary for employment that you run, and ensure they're both fair and effective.
- Hiring steps analysis: Taking a statistical approach, we perform an in-depth analysis
 of each stage of your current process to determine if specific stages display adverse
 impact and make recommendations accordingly.
- **Mock audits:** Test the robustness of your data management by conducting a mock audit and go through the same data reconciliation process we apply to our standard audit support service⁵. This will help you gain precious time to proactively address any issues.



5 See our OFCCP Audit Support Services <u>brochure</u> for more information.









Your Process

With your data management methods defined and forming a firm foundation for your work, it's important to examine your hiring process. In this final section, we look at some of the changes you can make to eliminate bias and create a fairer process for everyone

How to Minimize Individual Bias in Hiring

Biases are inevitable in the hiring process, but that doesn't mean that we should throw our hands up, admit defeat, and plan to make no changes to how we work. Counteracting bias requires a two-pronged approach: firstly, we can change the way we structure hiring to reduce the opportunities for our biases to be activated. Secondly, we can work to actively recognize and counteract bias when it occurs.

Structural Changes That Prevent Bias Activation

Have you ever noticed how your initial thoughts about a product or experience often determine your final conclusion about it? How a perfectly choreographed opening action sequence sets you up to love an otherwise unexceptional movie, or how a messy rental condo colors your impression of the rest of your vacation?

So it is with people too—the first thing you notice starts a chain of events that sends your associations toward

outcomes negative or positive. Knowing this, it's critical to structure your hiring process so that the things that actually matter most (at least, relative to the role) are those that you encounter earliest, and therefore become the focus of the process. This means you could:

- Mask faces and names in applications before review
- Hold initial interviews over the phone to create blind first impressions. Potentially, you could even do text-only interviews via a chat program
- Actively focus interviewer attention on characteristics required for the job before, during, and after interviews when scores or impressions are recorded

Another option is to use tools that require minimal human judgment to assess candidates. For example, you might use a test that assesses critical thinking skills, or a simulated environment to see how well applicants can use an important piece of software. If you go this route, bear in mind that tools are not automatically free of bias: they may be less accessible to certain groups and were ultimately created by humans with their own biases.

Recognizing and Countering the Bias of Decision Makers

Actively recognizing and countering bias is perhaps less straightforward than it sounds. We can't simply flip a switch and change our entire conscious and unconscious outlook. Instead, organizations need to start deploying a wide range of counter-measures that slowly tip the balance away from unexamined, placeholder thinking.

Change how you think: Note that this is as much about the how as the what. Decision-makers should be encouraged to slow down their thinking—pausing at each step to examine their thoughts, taking time to seek feedback from others, and make decisions as a group. This process will expose decision-makers to how others think, allowing them to better consider different perspectives in their decision-making.









- **Get involved with other groups:** Encourage team members to seek out and support projects and programs that encourage positive images of persons of color, LGBTQ+ people, veterans, individuals with disabilities, and women. These could be within the organization, such as companysponsored Employee Resource Groups (ERG), or initiatives in the community.
- **Counter-stereotypical imagery:** Train your brain to recall counter-stereotypical examples that could overwrite more entrenched and less useful ones. For example, if when someone says "doctor" you think male and white, work on thinking about all people you've encountered who contradict this.
- Train your decision-makers: Work with an external provider of unconscious bias training who focuses on cognitive processes, behavioral outcomes, and change, while helping employees develop a broad understanding of biases and their effects.
- Create a culture that values diversity: Work with the rest of the organization to project and realize your goal of a more diverse workforce. Everything from your workplace posters to your compensation of employees can be re-examined from the perspective of whether it is likely to give all employees a sense of inclusion and belonging.

How Different Assessment Types Can Cause Issues

Different modes of assessment have pros and cons. Some are better than others in finding an ideal candidate. However, they may also be a significant source of adverse impact, be actively avoided by applicants, and/or cost considerably more than other methods.

- **Structured interviews:** tend to be moderately good at determining effective future employees, while resulting in low adverse impact. They're also more likely to be well-received by interviewees because they're most familiar with them.
- **Integrity tests:** are relatively good at finding suitable candidates due to moderate to high validity, but they tend to be poorly received by interviewees. They do, however, have low adverse impact.
- **Assessment centers:** are great for finding the best of the best, have variable adverse impact, and good perception—but they're expensive.
- Cognitive ability tests: are very good at uncovering who will be good at various complex tasks, but are bad in terms of adverse impact.

How you administer tests matters as well.

- Smartphone-accessible assessments: are more accessible to more people, but produce lower scores without mobile-first design.
- **Gamification:** may produce age-related differences based on motivation, practice effects, familiarity, and job-irrelevant psychomotor ability differences.
- **Job simulations:** often cannot be adapted in the same way that the actual work easily can—even something as simple as text size may not be adjustable.







What Does a Best-Practice Interview Look Like?

It's important to train your interviewers to focus on evidence of an individual's competency and to steer them away from lines of questioning that may stir biases, or veer into the unlawful (for example, asking about disabilities). This takes time to entrench—you should retrain interviewers at least once a year.

Some key ingredients of a best-practice interview are:

- Using standardized interview questions so that applicants get an equal opportunity to demonstrate the required skills and a consistent experience overall
- If the interview results in a score, make sure you define what different levels of competency look like ahead of time
- Using multiple trained interviewers—a diverse set of individuals can help to counteract individual biases. Best practice is to use at least three, and have them discuss the merits of each candidate.
- Ensuring that your questions are overwhelmingly focused on job requirements. While it's important to build rapport, the kinds of questions you ask on the "walk to the door" matter too.







15 **Your Process**

Your Process: How Affirmity Can Help

In conjunction with our partners, Affirmity can offer a wide range of talent acquisition-specific training courses. These courses address compliance obligations, as well as interview best practices and different forms of bias mitigation. Components available for your learning pathway planning include:

Masterclass for Recruitment Professionals: In these focused and intimate instructor-led sessions, recruiters at all levels will be supported in understanding the direct link between inclusion and tangible business goals. These practical workshops use your own recruitment process to demonstrate how to recognize and mitigate bias, inject inclusion, and address the most challenging situations your recruiters face.

- **Inclusion for Hiring Managers:** This training supports not only what hiring managers should address as they bring a new candidate into the organization, but also how to create an environment where everyone with the capability to excel can do so.
- **The All-Important Interview:** Delivered as a live-virtual or digital solution, we can help your interviewers to increase the effectiveness and fairness of candidate communications, mitigating bias creating equitable decision making. Interviewers will learn how to reduce the candidate's overall anxiety and consider how biases can impact their decision-making.
- **Digital Solutions for Blended Learning:** From interactive eLearning solutions on recognizing (and mitigating) the four most frequent biases in recruitment, to digital checklists of actions to take at every stage of the process, our digital

- recruitment solutions enhance and support our workshops. Alternatively, they can act as standalone, self-paced solutions.
- Just-in-Time Recruitment Nudges: Our posttraining series of timely, relevant 90-second nudges align directly to your recruitment workflow processes and act as 'in the moment' reminders of key inclusion actions to take during the recruitment process.
- **Recruiter Compliance Course:** As a talent acquisition professional you already have a lot to keep up with: if your company is a federal contractor, there's an extra layer of considerations. In the three 20-minute modules that make up this eLearning course, you will be provided with an overview of the regulations, the records you must keep, what the internet applicant rule is, dispositioning how-tos, and adverse impact analysis.

Our solutions cover the full measurement, design, application, and impact assessment of your hiring process.

Contact us today for more information.











Affirmity, provides a robust portfolio of software, consulting services, and blended learning solutions that help global enterprise and mid-market companies build inclusive workforces so that they can experience long-term business value, while minimizing workforce compliance risk, from their DE&I and affirmative action programs.

Drawing on more than 45 years of experience, our software, learning solutions, and team of experts guide HR, diversity, and compliance teams to easily analyze diversity across the organization, identify gaps and insights into causes, establish and execute toward goals, and continually track DE&I and affirmative action program effectiveness over time.

A part of Learning Technologies Group plc (LTG), Affirmity serves more than 1,100 organizations—including global corporations, mid-sized organizations, and small businesses.

For more, visit **affirmity.com.**

About GP Strategies

GP Strategies Corporation, part of Learning Technologies Group, is one of the world's leading talent transformation providers. By delivering award-winning learning and development solutions, we help organizations transform through their people and achieve meaningful change. GP Strategies has delivered our innovative consulting, learning services, and talent technology solutions to over 6,000 organizations globally.

Our extensive network of expert learning specialists, combined with our transformation focus and custom solutions, deliver superior business results. Whether your initiative requires developing the skills of your talent, the implementation and adoption of learning technologies, or refining critical processes, GP Strategies is a transformation partner you can trust.







