

SEAI Equality, Diversity, and Inclusion Strategy Statement and Action Plan 2023 – 2025

Delivering part of the SEAI People Strategy strategic goals:



Strategic Goal 5 – Equality, Diversity, and Inclusion



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1 Our Equality, Diversity, and Inclusion (EDI) Statement

Throughout SEAI, we believe in being welcoming, diverse and inclusive in our workplace, and in the services that we deliver, where we are respectful and value different experiences and perspectives. We are committed to achieving this for the benefit of all who work with SEAI and for all whom we support through our services.

We, the members of the EDI Committee, are personally invested in making this strategy a reality in SEAI through the delivery of our action plan.

EDI Committee Team:

Graham Brennan

Pia Fennel

Hannah Julienne

Helena Hughes

(Co-Chair)

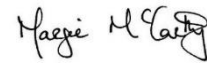
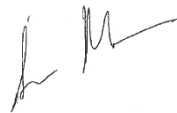


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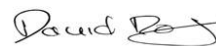


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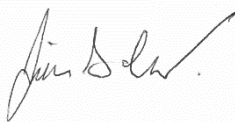
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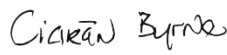
The SEAI Executive Leadership Team (ELT) strongly supports the SEAI EDI statement, and we will work to support the organisation and the EDI Committee in achieving this action plan. We are committed to upholding the principles outlined in this strategy and we will be vocal and demonstrative in our support of these efforts. The SEAI ELT recognise the value and benefit of a diverse and inclusive workforce, and services.

Executive Leadership Team:

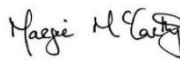
*William Walsh,
CEO*



Ciarán Byrne



*Margie
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(Sponsor)*



Declan Meally



Marion O'Brien



Prepared by EDI Committee, and approved by ELT in January 2023

2 Context

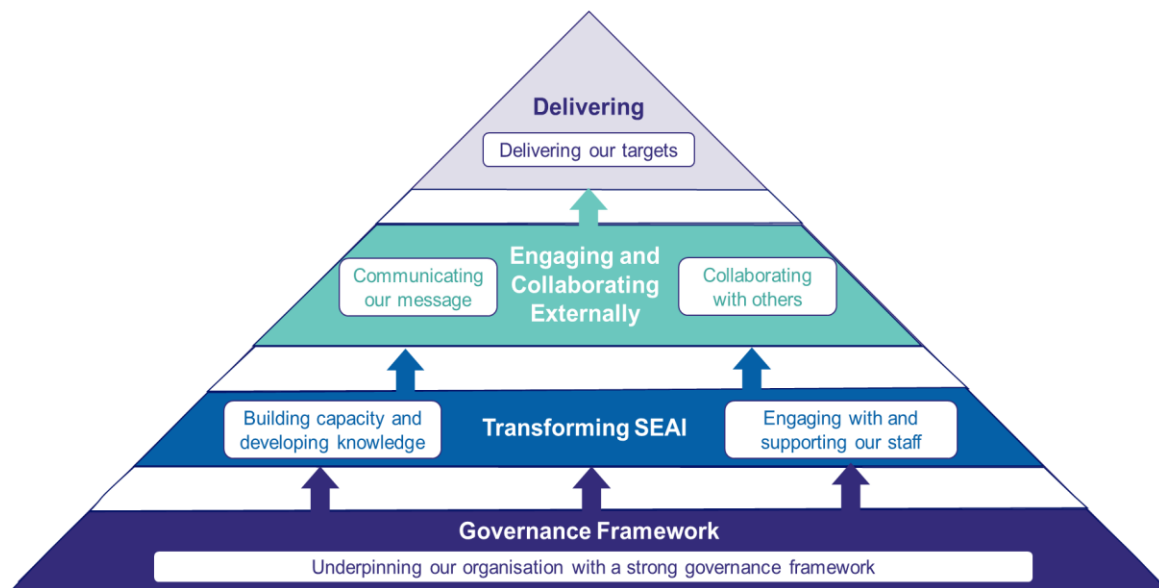
In this section, we briefly outline how this EDI strategy aligns with other SEAI strategies, as well as the fulfilment of our duties under the Public Sector Equality and Human Rights Duty.

2.1 SEAI Statement of Strategy 2023 – 2025

At SEAI, our mission is to be at the heart of delivering Ireland’s energy revolution. To support this mission, SEAI’s Statement of Strategy¹ outlines six strategic goals to 2025:

1. Delivering our targets
2. Communicating our message
3. Collaborating with others
4. Building capacity and developing knowledge
5. Engaging with and supporting our staff
6. Underpinning our organisation with a strong governance framework

Figure 1: SEAI’s strategic framework:



The EDI strategy is a key enabler of the delivery of these goals. We recognise the importance of an equal, diverse, inclusive, and respectful culture engaging and supporting our staff. We also recognise the importance of inclusive and fair practices that consider diversity in its broadest meaning to be trusted as collaborators and to successfully communicate our message to others. All of this will serve to enhance our ability to deliver our targets and drive Ireland’s sustainable energy transformation for the benefit of society.

¹ <https://www.seai.ie/publications/Statement-of-Strategy-2022-2025.pdf>

2.2 SEAI People Strategy 2023 – 2025

SEAI's People Strategy² aims to build an organisational culture that reflects our values, where all our colleagues feel included, supported, and engaged to deliver our targets.

Figure 2: SEAI's values



The SEAI People Strategy identifies EDI approaches as fundamental to the achievement of our people and business goals. The People Strategy has six strategic goals.

Figure 3: SEAI's People Strategy – strategic goals



Strategic Goal 5 has as one of its target outcomes to achieve a diverse, inclusive, and positive working environment where everyone in our organisation feels safe, respected, and listened to regardless of their background or personal circumstances. The launch of this EDI strategy and implementation plan is listed as a key action to achieve this goal.

² Insert hyperlink here when available

2.3 Public Sector Equality and Human Rights Duty

As a public body, SEAI has a legal obligation to promote equality, prevent discrimination and protect the human rights of our employees, customers, service users and everyone affected by our policies and plans. This is mandated by the Public Sector Equality and Human Rights Duty, under Section 42 of the Irish Human Rights and Equality Act 2014.

Many of the issues covered under the Public Sector Equality and Human Rights Duty will be addressed through this EDI strategy. Strategic Objective 1 includes an action to establish a project to undertake an assessment of equality and human rights issues relevant to our functions and services, to identify any further gaps that might need to be addressed.

3 Activities informing the strategy

SEAI has completed several activities that have informed this EDI strategy statement and action plan. A summary of these is provided in this section.

3.1 SEAI Diversity and Inclusion Strategy 2019 – 2021

In 2019, we published our first Diversity and Inclusion Strategy, to cover the period up to 2021. A significant number of the strategy actions were achieved, despite the significant impact of COVID-19 on work practices.

Completed actions included the roll out of unconscious bias training, improved communications, a gender recruitment tool for job specifications and a portfolio of wellbeing supports. Other typical EDI-related activities such as internships and participation in diversity parades were not possible under the circumstances, but the importance of wellbeing came to the fore as we supported staff through large scale changes such as the switch to full remote working.

The following remaining actions have been considered in the development of the current EDI Strategy Statement, and incorporated, where appropriate:

- *Looking at provisions for flexible working post-pandemic* – A full Blended Working Policy has been developed and launched. EDI will be considered as part of the review of the first-year adoption of the Blended Working policy.
- *Organising further training, reviewing policies and procedures, embedding best practice* – These are all addressed through the actions outlined in section 7.
- *Completing an annual inclusion and diversity survey, Complete External Accreditation* – SEAI partnered with the Irish Centre for Diversity in 2022. This is detailed in section 3.3.

3.2 EDI committee

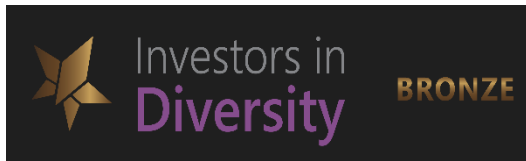
One crucial action achieved under the first strategy was the re-establishment of the Diversity and Inclusion Committee. The focus of the committee was broadened to Equality, Diversity, and Inclusion and an invitation issued across the organisation seeking representatives. People were asked to provide details on why they were interested in joining, and what they would bring to the committee. The selection process was conducted by the two committee co-chairs in such a way that the committee would include two representatives from each directorate, with a mix of gender, grades, and stated contributions.

Our EDI Committee met with a number of representatives from other organisations to learn from their experiences in developing and implementing EDI work practices. This informed the approach to developing the actions identified within this strategy.

3.3 Irish Centre for Diversity partnership

The Irish Centre for Diversity (ICD)³ works in partnership with organisations across Ireland on their EDI journey, including through the Investors in Diversity accreditation programme, an EDI quality mark for businesses.

In 2022, SEAI engaged with the ICD to conduct a review of our policies, to provide inclusive leadership training to the SEAI senior leadership team, and to conduct a staff survey on current EDI practices.



SEAI achieved the bronze level accreditation in June 2022, following a review of our current policies. This accreditation included a report with recommendations on further work required to update our policies to reflect best practice that have been included in our action plan.

SEAI achieved the silver level accreditation in July 2022, following a staff survey run in May. This survey was confidential, with responses submitted directly to the ICD, and achieved a response rate of 70%. The ICD provided SEAI with a summary of the results along with an action plan, which has formed the basis of the plan included in section 7. To maintain our accreditation, a review by the ICD will be required in 2023.



3.3 EDI data

Collection of EDI data has taken place through several channels:

- Annual staff disability survey
- Staff survey conducted in 2019
- Staff survey conducted in 2022 (ICD silver survey)
- HR collection of gender data

Current data collection practices have room for improvement and enhancement of our recording and analysis of EDI-related data forms a key part of this strategy. Our existing data are nonetheless informative in tracking our progress in EDI to date.

³ <https://irishcentrefordiversity.ie/>

We have seen improvements in gender diversity at senior levels – in 2022, the Level F grade was 27% female and 73% male, as opposed to 100% male in 2019, and the newly introduced Director level has a 50/50 gender split. Modest improvements have also been made with regards to racial diversity – 6% of staff identifying as non-white or mixed in 2022 compared with 2% in 2019. However, there is clear room for improvement in other areas – no member of staff disclosed themselves as being a member of the travelling community in either 2019 or 2022.

4 Equality, Diversity and Inclusion at SEAI

4.1 Our EDI principles

The goals and actions identified in this strategy reflect the following principles:

- We value our people for who they are
- We articulate and promote the value of diversity of thinking to achieving our climate action goals
- We reinforce diversity and inclusion values through action
- Our actions support SEAI to:
 - Reflect the diversity of the society we serve at every level in our organisation
 - Drive a welcoming, honest, and just work culture, with senior leadership setting the example
 - Help all our people to understand why diversity and inclusion is important, and behaviours that we value in SEAI
 - Inform progress by monitoring how we are doing

Our aim is to go beyond legal compliance and to support a diverse, inclusive, and positive working environment where everyone in our organisation⁴ feels safe, respected, and listened to regardless of their background or personal circumstances.

We aspire that this strategy be a living document, laying foundations that drive and support EDI.

4.2 Why we believe EDI is important

SEAI commits to recognising, valuing, and creating awareness of the benefits of diversity and inclusion in all we do. The benefits include the following, in no particular order:

- It enhances a sense of belonging for all in SEAI, allowing people to perform better when they can be their authentic self
- It will help us achieve the growth needed in our workforce to deliver our targets due to our enhanced reputation
- It helps unlock value by increasing innovation and improving problem-solving by allowing different perspectives and ideas to emerge
- It supports balanced decision-making
- It helps us to support and celebrate each other

We believe supporting a fair, welcoming, and inclusive workplace will equally support SEAI to deliver fair and inclusive services for our stakeholders, clients, and customers.

⁴ Including permanent staff, contract staff, students and where relevant sub-contractors who have team members located in SEAI offices.

4.3 Equality grounds

The Equal Status Acts 2000 – 2018 were established to promote equality and ban certain kinds of discrimination against nine grounds. The legislation bans sexual harassment, victimisation and promotes positive actions including reasonable accommodation of people with disabilities. This informs the EDI Strategy Statement. The nine grounds are:

- **Gender** – a person’s gender identity including male, female, transgender or non-binary
- **Age** – a person’s age once over 18 (as per legislation)
- **Civil status** – a person’s civil status (such as single, married, divorced, widowed, civil (or formerly) partnered)
- **Disability** – including people with physical, intellectual, learning, cognitive or emotional disabilities
- **Family status** – being a parent or carer of a person under 18 or a person with a disability
- **Sexual orientation** – a person’s sexual orientation including gay, lesbian, bisexual, and heterosexual
- **Religion** – a person’s religious belief, background, outlook, or none
- **Traveller community** – recognised as an ethnic group
- **Race** – including race, skin colour, nationality, or ethnic group

5 What we can do individually

Every member of the SEAI team has a responsibility to commit to, support and contribute to the success of the actions set out in this plan to ensure it succeeds and contributes towards the achievement of the strategic goals.

We recognise that any change begins with how we act and behave in our own place of work and in our dealings directly or indirectly with our customers and clients. It is through our individual actions, supported by organisational actions, that we collectively deliver our EDI statement. It is important to recognise the role of the individual including:

- How our actions and the language we use creates an open place for everyone to be themselves
- The need for leadership at all levels to own diversity and inclusion and instil the understanding that we all play a role in creating and sustaining an inclusive culture.
- The need to be conscious about inclusion when managing people – recruiting diverse staff based on merit and measuring success on performance and quality of output.

6 Strategic Objectives

The following six strategic objectives have been identified for the next SEAI EDI Strategy and Action Plan (2023 – 2025). The objectives are presented in no particular order – they are interdependent and equally important. The actions to achieve these objectives are detailed within the action plan.



Strategic Objective 1 – our EDI structure and policies

To establish and maintain the right structures, policies, and supports for a diverse, inclusive, and positive working environment, and the delivery of welcoming, respectful services.



Strategic Objective 2 – learning and leadership

To establish awareness of, and a culture enhanced by, equality, diversity, and inclusion practices through structured training and knowledge sharing, and through leadership.



Strategic Objective 3 – recruitment and progression

To enhance our equality, diversity, and inclusion through our recruitment and progression practices, to be an employer of choice for all including those from underrepresented groups



Strategic Objective 4 – communicating and celebrating EDI

To create awareness of and celebrate equality, diversity, and inclusion.



Strategic Objective 5 - our services

To better understand the people we serve, external to SEAI, so that we can provide our services to them in a way that considers their diversity, and that is inclusive.



Strategic Objective 6 – recording and monitoring

To understand how we are doing and to be transparent in our EDI journey.

7 Action plan

This section outlines the key actions that will be carried out to achieve our strategic objectives, along with indicative timelines. The need for additional actions may emerge over time, and timelines may shift depending on organisational needs, learning from the EDI strategy implementation and alignment to delivery of activities under the SEAI business plan and People Strategy.

This phased plan is set out following this key:

● Set up/completion





○ Ongoing implementation

There are a wider range of stakeholders across SEAI with responsibility for implementing actions to mainstream EDI practices. The EDI Committee will have an oversight role, reporting to the SEAI Executive Leadership Team through the Executive Sponsor. The leadership and HR & OD teams hold responsibilities for delivery of several actions, others will fall to teams across the organisation or specific working groups.

7.1 Strategic Objective 1 – our EDI structures and policies

Setting up and maintaining the right structures, policies, and support for EDI

1	Actions	Output	Outcome	Responsibility	Year		
					2023	2024	2025
1	Structures and policies						
1.1	Review & refresh existing policies in line with: (a) Recommendations made in the ICD bronze report (b) SEAI's statutory obligation under the Public Sector Equality and Human Rights Duty, as required under Section 42 of the Irish Human Right and Equality Act 2014 (c) Recent best practice developments	Up-to-date best practice policy aligned to Public Sector Duty	A supportive and positive environment for all staff Awareness of equality and human rights issues under Public Sector Duty	HR	●	○	○
1.2	Develop new policies as identified in the ICD bronze report: (a) Gender Identity and Expression Policy (b) Modern Day Slavery Policy (c) Mental Health at Work Policy (d) Develop an Equality Impact Assessment template for inclusion in process for development of new policies	Up-to-date best practice policy	A supportive and positive environment for all staff Protection for vulnerable workers within SEAI & wider supply chains Consistently retaining EDI focus with different people policies	HR	●		
1.3	Establish a project to undertake an initial assessment of equality and human rights issues relevant to our functions and services	Equality and Human Rights issues and ways to address them identified	Promotion of equal opportunity and treatment and protection of human rights of our people and the people to whom we provide services	EDI Committee, HR	●		
1.4	Develop a "communication map" for staff who feel they have been victims of or witnessed discrimination or inappropriate behavior	A clear & accessible step-by-step guide for staff	Reduced barriers to reporting inappropriate behaviour	HR	●		

1.5	<p>Refresh the EDI Committee and develop working plan to oversee delivery of this strategy and action plan. This will include:</p> <ul style="list-style-type: none"> (a) Schedule and process for review of EDI Committee membership (b) Schedule and management of meetings & oversight of reporting on actions (d) Formation of sub-committees, where appropriate, and assignment of responsibility (e) Consideration and response to progress reporting, including identification of additional or changed actions for recommendation to SEAI leadership (e) Communications planning 	<p>Establishment and operations for the EDI committee for the duration of the strategy reference period</p>	<p>Successful delivery of EDI strategy</p>	<p>EDI Committee and ELT</p>			
1.6	<p>Provide input to Blended Working Policy annual review regarding progress towards EDI targets</p>	<p>Recommendations for alterations needed, if any, to BWP, to support EDI goals</p>	<p>Inclusive workplace policy</p>	<p>EDI Committee / ELT</p>			

7.2 Strategic Objective 2 – learning and leadership

Embedding awareness of equality, diversity and inclusion through structured training and knowledge sharing, and leaders setting an example

2	Learning and Leadership	Output	Outcome	Responsibility	Year		
					2023	2024	2025
2.1	Develop & roll out an inclusive leadership training plan for ELT & SMT	Training sessions delivered, and reviewed regularly	Knowledgeable leadership team well-equipped to deal with EDI issues A supportive and positive environment for staff. Trust in leadership.	HR	●	○	○
2.2	Incorporate information on EDI policies & strategy in HR induction	Induction materials updated	Awareness of EDI policies, structure, and strategy among new staff	HR	●	○	○
2.3	Deliver regular reminders about existing EDI policies to staff	All-staff emails Planned reminders at Townhalls or similar events, where appropriate	Awareness of EDI policies & strategy among existing staff	HR	○	○	○
2.4	Include EDI activities as agenda item in at least 1 All Staff Townhall, 1 directorate and 2 department meetings per year. Content/guidance to be provided by EDI committee but update/discussion to be led by CEO, Director or Head of Department	Regular communication, awareness, and discussion to and with staff on EDI issues from ELT/SMT	Awareness and appreciation of importance of EDI among staff. Trust in leadership.	EDI committee chairs, SMT, ELT	●	○	○
2.5	Development and roll out of EDI training plan Topics to be considered for inclusion, as identified by staff:	A series of both mandatory & optional training opportunities	Awareness & understanding of selected EDI issues among staff.	HR (L&D)	●	○	○

<p>(a) Dignity and Respect at Work (b) Unconscious bias (c) Gender identity (d) Neurodiversity (e) Mental health (f) Courageous Inclusion</p>						
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7.3 Strategic Objective 3 – recruitment and progression

Enhancing our equality, diversity and inclusion through our recruitment and progression practices to be an employer of choice for all including those from underrepresented groups. Please note many of our progression actions are identified in other strategic objective actions, such as the review of related EDI policies and practices and subsequent awareness raising and training across the organisation.

3	Recruitment and Progression	Output	Outcome	Responsibility	Year		
					2022	2023	2024
3.1	Implement a recruitment tool to record sociodemographic data for applicants/interviewees and successful candidates	Insights into representation and success rates of different groups throughout the recruitment process	Identification of any issues with representation/bias	HR	●	○	○
3.2	Invite structured feedback on recruitment process.	Survey sent to all candidates invited to interview (both successful & unsuccessful)	Identification of EDI-related issues with the recruitment process	HR	●	○	○
3.3	Continue to enhance and review recruitment policies and processes from an EDI perspective to ensure there is a transparent process in place to attract people to SEAI from all backgrounds. Make changes where possible and pursue outstanding issues with relevant bodies. Issues to consider: (a) Visa requirements for non-EU nationals (b) Minimum education requirements in job advertisements (c) Availability of part-time positions	A recruitment process that is fair and inclusive	A broader pool of candidates leading to a more diverse and talented workforce	HR w/ support from EDI committee and/or external consultants	●	○	○
3.4	Provide mandatory training on recruitment policy for all staff likely to be involved in shortlisting/interviewing applicants	Short training session delivered on approx. quarterly basis	SEAI policy applied consistently in all recruitment processes	HR	●	○	○

3.5	Review recruitment process literature to ensure there is a transparent process in place to attract people from all backgrounds	Prominence of EDI info in job ads & on social media	SEAI is recognised externally as leading on EDI & is attractive to prospective employees	HR, MarComms	●	○	○
3.6	Engage with external groups, such as Open Doors, to identify best practise in supporting inclusion of underrepresented group	Targeted actions that address inclusion of all	Enhanced diversity and inclusion in SEAI people	HR, supported by EDI committee		●	○
3.7	Ensure the Developing Talent Pillar of SEAI's People Strategy is delivered in alignment to SEAI EDI objectives	Developing Talent Pillar in consideration of EDI objectives	Increase EDI consideration in opportunities for development and promotion		●	●	○

7.4 Strategic Objective 4 – communicating and celebrating EDI

Creating awareness of and celebrating equality, diversity, and inclusion themes

	Actions	Output	Outcome	Responsibility	Year		
4	Communicating and Celebrating EDI				2023	2024	2025
4.1	Develop a communications strategy to engage all our people in EDI topics, including updates on achievements and outputs under this strategy and action plan.	Various communications tactics including inclusion in ezines, all staff meetings, annual reporting, externally facing articles	Increased awareness amongst our people and external stakeholders of EDI developments at SEAI	MarComms, EDI Committee, HR	●	○	○
4.2	Leverage the staff ezine to align to EDI calendar through themed issues & information on specific events both within and outside SEAI	Integration of EDI with existing staff initiatives	Awareness of EDI issues	MarComms supported by EDI committee	●	○	○
4.3	Identify an EDI calendar containing relevant awareness days/weeks/months (e.g., pride, national festivals etc) and cultural events around which to structure activities, in consultation with staff	An EDI plan of activities informed by national and international events	A comprehensive/ systematic approach to celebrating EDI that facilitates forward planning and is aligned to external activities and discussion	EDI Committee, supported by MarComms	●	○	○
4.4	Invite and support development of staff champion networks/groups on topics, led by EDI Champions. These might include: (a) Menopause (b) LGBTQ+ (c) Race and Ethnicity (d) Neurodiversity (e) Mental Health and Wellbeing, including Men's shed	Hosted discussions on topics and if appropriate, the establishment of staff networks/support groups Support groups work on broadening discussions on topics and identifying specific needs	Fostering open discussions on diversity and inclusion topics A supportive, and inclusive working environment enhanced by and informed on specific needs	Volunteer staff members as EDI Champions, supported by EDI committee	●	○	○

4.5	Plan and organise events around key dates in the EDI Calendar and identify alternative ways of recognising important dates	4 events held annually to mark several EDI related dates. Alternative way to mark other dates including embedding into organisational communications	More understanding of and appreciation of EDI issues among staff champion networks activity and leaders' communications	Marcomms (Events) supported by EDI committee, and EDI staff champion networks where appropriate	●	○	○
4.6	To engage with organisations that work to support underrepresented groups and mainstream external involvement as appropriate	External involvement and collaborations as appropriate in events and staff champion networks	Best practice and lived experiences influencing our EDI journey	EDI Committee, EDI Staff Champion Networks as appropriate	○	○	○

7.5 Strategic Objective 5 – our services

Forming a better understanding of the people we serve, external to SEAI, so that we can provide our services to them in a way that considers their diversity, and that is inclusive.

	Actions	Output	Outcome	Responsibility	Year		
5	Our Services				2023	2024	2025
5.1	<p>Review the RD&D programme from a gender equality perspective, looking at approaches adopted by other research-funding organisations.</p> <p>Actions to be considered include:</p> <ul style="list-style-type: none"> (a) Implementing gender quotas (b) Creating maternity/adoptive policies (c) Recognition of Athena Swan accreditation in marking schemes 	Process/policy changes to promote gender equality	Improved gender balance in research portfolio	RD&D and Finance team, supported by EDI committee	●	●	
5.2	<p>Identify ways to improve accessibility & inclusivity of SEAI communications:</p> <ul style="list-style-type: none"> (a) Continue communication advisory role in making communications accessible (b) Review communication channels used & consider how to reach broader audience (c) Improve diversity of representation in communications (e.g., case studies) <p>Consider external review, if necessary</p>	More accessible communications that reach and feel relevant to a larger group of people	Broader societal reach of SEAI services	Marcomms supported by EDI committee, with third party input if necessary	●	●	
5.3	Map outreach already in place with minority groups as part of our programme and scheme development, e.g., organisations, groups, communities	Short report giving an overview of initiative in place and learnings from this	Greater awareness of strengths and weaknesses in SEAI's services with regards to EDI	PM Office of CEO	●		
5.4	Conduct pilot EDI evaluation of one SEAI programme/grant scheme	Evaluation process that can be adapted for other	Better understanding of EDI considerations in scheme	Responsible PM w/ Programme		●	

		programs. Insights into chosen program	design to inform other programmes	Evaluation Unit & BEU			
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7.6 Strategic Objective 6 – recording and monitoring

Understanding how we are doing and to be transparent in our EDI journey.

6	Action	Output	Outcome	Responsibility	Year		
					2023	2024	2025
6	Recording and Monitoring						
6.1	Develop a process to capture and analyse EDI data when new staff join SEAI to understand the EDI make up of new team members. Consider potential to roll out to all existing team members. This should consider use of EDI staff survey demographic questions and will take account of data protection concerns	Data to inform pathways on SEAI's diverse and inclusive work environment Detailed monitoring and analysis plan	Streamlined monitoring and analysis process that is aligned with existing organisational initiatives	HR, EDI Committee	●	○	○
6.2	Monitor the impact and success of EDI related policies and using this and data in 6.1 and develop appropriate KPIs.	KPIs developed and monitored Annual review with short progress report	Data informed and underpinned KPIs Proven impact of progress against the EDI strategy and action plan	HR, EDI Committee		●	○
6.3	Collaborate with the Irish Centre for Diversity to assess progress in moving EDI activity in SEAI identified as levels of 'Starting Out' or 'Requiring Attention' to the next level in our 2022 Investors in Diversity Silver award.	Progress against 2022 level of achievement in our Investors in Diversity Silver accreditation	Enhanced EDI practices in line with best practice accreditation	EDI Committee, all actors in the strategy	●	○	○
6.4	Coordinate biannual EDI survey, and potential to seek further accreditation (e.g., with Irish Centre for Diversity)	External assessment of progress and potential accreditation	Present level of impact achieved over plan lifetime (2 years) and inform future	EDI committee		●	
6.5	Publish data where appropriate to enhance transparency around purpose of diversity and inclusion data collection. This will include gender pay gap reporting, even though we do not yet	Published data	Enhanced trust in data collection and awareness of impact of EDI strategy and actions	HR, EDI Committee	●	●	●

	meet the employee number threshold that requires publication.						
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