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## Barrier Analysis Toolkit

Prepared by RK Corporate Consulting (RKCC) | July 2025

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### Introduction

A critical step in employment equity compliance is understanding **why transformation is not happening**, not just ticking boxes. That is where **barrier analysis** comes in.

Under the **Employment Equity Amendment Act**, designated employers must identify and remove **barriers to employment equity** in their workplaces. These barriers may be **policies, practices, or attitudes**, either formal or informal, that unfairly limit opportunities for Black people, women, or persons with disabilities.

This toolkit helps South African employers understand what barrier analysis is, how to conduct it, and how to address the findings effectively.

### Key Purpose:

To uncover hidden or systemic obstacles that hinder transformation, so they can be removed, mitigated, or accounted for in your EE Plan.

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### What Is Barrier Analysis?

Barrier analysis is the **systematic assessment of internal workplace policies, procedures, and practices** to identify elements that may unfairly discriminate, either directly or indirectly, against designated groups.

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These barriers may exist in:

- **Recruitment and selection**
  - **Training and development**
  - **Promotions and succession planning**
  - **Performance appraisals**
  - **Retention and exit trends**
  - **Corporate culture and environment**
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## **Legal Framework**

**Employment Equity Act, 55 of 1998**, as amended:

- **Section 19(1)** requires employers to **conduct an analysis** of employment policies, practices, and the work environment to identify barriers.
- **Section 20(1)(c)** mandates the **elimination of barriers** identified in the employment equity plan.

**Regulation 6 of the EE Regulations** also provides clear guidance on how to conduct barrier analysis and integrate it into planning and implementation.

Official Source: [Employment Equity Act](#)

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## **Common Types of Barriers**

Use this list to spot possible problem areas in your business:

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Category	Example of Barrier
Recruitment	Job ads requiring “own car and licence” without reasonable justification
Promotion	Informal leadership pipelines favouring certain groups
Training	Exclusive access to mentorship or skills training for senior (non-diverse) staff
Policies	Disciplinary codes not translated into all languages used in the workplace
Facilities	Inaccessible buildings or bathrooms for persons with disabilities
Culture	“Old boys’ club” networks or a homogeneous leadership team

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### Case Study: Homogeneous Leadership as a Barrier

A medium-sized engineering firm in Gauteng had **no female managers** and very limited racial diversity in top roles. During its barrier analysis, it became clear that:

- **Promotion criteria were vague** and based heavily on referrals.
- **No leadership training** was being offered to junior staff.
- The leadership team was **entirely white and male**, creating a **homogeneous** environment that discouraged applications from underrepresented groups.

### Action Taken:

- Developed transparent promotion policies.
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- Introduced leadership training with EE targets.
  - Appointed an Employment Equity Champion on the board.
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### **How to Conduct a Barrier Analysis (Step-by-Step)**

#### ☐ **Step 1: Form a Barrier Analysis Team**

Include HR, line managers, union representatives (if applicable), and an EE manager. Diverse voices provide better insights.

#### ☐ **Step 2: Review Existing Policies and Practices**

Examine hiring processes, promotion protocols, training opportunities, disciplinary codes, and more.

#### ☐ **Step 3: Interview and Survey Employees**

Use anonymous feedback mechanisms to uncover issues that leadership may not see.

#### ☐ **Step 4: Compare Outcomes**

- Who is being promoted?
- Who is leaving?
- Who is applying but not being hired?

#### ☐ **Step 5: Identify and Document Barriers**

Example: "All senior roles are filled by internal referrals from the same demographic."

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#### ☐ **Step 6: Plan to Eliminate Barriers**

Update your Employment Equity Plan with corrective actions, timelines, and responsible persons.

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#### **Practical Examples**

##### **Example 1: Recruitment Barrier**

Barrier Identified: Recruitment relies on internal referrals, limiting diversity.

Impact: Black women underrepresented in skilled technical roles.

Action: Broaden advertising to include tertiary institutions and targeted employment portals.

##### **Example 2: Disability Exclusion**

Barrier Identified: Office lacks accessible bathrooms and ramps.

Impact: Candidates with mobility impairments excluded.

Action: Modify facilities and include accommodation questions in onboarding.

##### **Example 3: Promotion Bias**

Barrier Identified: Promotions based on informal manager nominations.

Impact: Qualified Black employees overlooked.

Action: Implement transparent promotion criteria and a scoring system.

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### Barrier Analysis Checklist

- ☐ Have employees and the EE Committee been consulted during the process?
- ☐ Have all policies, procedures, and data been reviewed and analysed?
- ☐ Are barriers identified across all occupational levels and HR functions?
- ☐ Are barriers documented clearly with meaningful corrective actions proposed?
- ☐ Are barriers and actions properly integrated into the Employment Equity Plan?
- ☐ Are measures in place for ongoing review and tracking of progress?

✗ Risk: Treating this as a tick-box exercise without engagement or follow-through will lead to an ineffective EE Plan.

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### Why Barrier Analysis Matters

Barrier analysis is not optional, it not a legal requirement. But more than that, it allows companies to:

- Build more inclusive and effective teams.
  - Improve their **B-BBEE scorecards**.
  - Avoid fines and public scrutiny from the Department of Employment and Labour.
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### How RKCC Supports You

We work with you to:

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- Conduct your full **barrier analysis** (including drafting surveys and doing policy reviews).
  - Identify **hidden systemic issues** and recommend practical interventions.
  - Ensure your **Employment Equity Plan** includes measurable barrier removal steps.

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### Navigating with Confidence

Do not let outdated policies or unconscious bias derail your transformation goals. Barrier analysis helps you turn intent into action and compliance into culture.

 **Book your free 30-minute consultation today** to get help conducting your barrier analysis or reviewing your internal policies.

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**Navigating compliance with confidence, we handle the red tape so you can focus on growth.**