Meeting	OLC Board Meeting	Agenda Item No.	8
		Paper No.	134.7
Date of meeting	25 July 2024	Time required	20 minutes

Title	EDI update
Sponsor	Paul McFadden, Chief Ombudsman
Status	**OFFICIAL**

Executive summary

All key deliverables were successfully achieved in the 2023-24 EDI action plan. Building on this momentum, our 2024-25 EDI action plan aligns with the strategic enablers in the OLC business plan and the key themes from the HR People Strategy. While ambitious and stretching, the plan is realistic given our available resources. Importantly, we are mindful not to overpromise what we can deliver. We are confident in our ability to deliver all key objectives. Ongoing engagement within LeO remains crucial, facilitated by regular updates through various channels such as our quarterly EDI Steering group, manager and leader updates, Executive Team briefings, and network meetings.

Some of the key EDI projects for delivery in 2024/25 include an accessibility review of the LeO website. The unacceptable behaviour policy for customers will be reviewed and strengthened. We will aim to improve our customer EDI information capture rates by integrating EDI questions into the online complaint form. Finally, we will provide disability training for managers building on our previous work with the employee's reasonable adjustments policy.

Our recent social mobility analysis revealed that most of our leaders come from lower/working-class backgrounds. This annual tracking demonstrates LeO's commitment to social mobility and inclusivity, and our results affirm that career progression here is not limited by socio-economic status.

Our annual workforce data analysis, benchmarked against civil service and census data, shows stability in diversity groups year-on-year. Key findings include:

- There is high female representation in all levels of leadership roles.
- A higher proportion of LGBO colleagues than the Civil Service which is positive.
- There is ethnic minority representation in all levels of leadership roles.
- A 14% higher proportion of ethnic minority colleagues compared to the Civil Service.
- Strong ethnic minority representation in the GET team (43%).
- Opportunities exist to increase ethnic minority diversity among Senior Ombudsmen.
- Improved disclosure rates from our 2023 rates.

The equality priority objectives are presented for Board approval. These have not changed since they were reviewed in 2023 as they align with the new OLC business plan aims (2024-27) and the updated HR People strategy themes.

To measure and report on the impact and success of EDI activities, we propose having six measures which are detailed in the paper.

Views are sought from the Board on:

- approval of the EPOs
- the measures of EDI success and impact
- whether we should track social mobility for all LeO colleagues in our next survey

Recommendation / action required
The Board are asked to **comment** on this EDI update.

EDI implications	Yes

The EDI strategy is a key part of LeO's work to ensure we are compliant with relevant EDI legislation and best practice. It is also key in terms of supporting our people and our customers, having impacts on candidate attraction, staff engagement, staff retention, and customer accessibility and satisfaction.

Freedom of Information Act 2000 (FoI)	
Paragraph reference	**FoI exemption and summary**
N/A	N/A

EDI strategy update

Background

All the key deliverables from our 2023-24 action plan were achieved. Our 2024-25 action plan aims to build on that positive work. All key deliverables have been aligned to the strategic enablers in the OLC business plan. They also align to the key themes from the HR People Strategy. Our 2024-25 action plan is ambitious and stretching. The plan is realistic given our available resources and we are mindful not to overpromise what we can deliver for the business. We are confident in our ability to deliver all key objectives. Engagement within LeO on our commitment to EDI and progress against our commitments remains an important part of this. We have continued to keep colleagues across the organisation informed and involved on progress through our quarterly EDI Steering group; updates to managers and leaders; Executive Team updates; bi-monthly meetings with Network Leads; quarterly meetings between the network and Executive Team Sponsors and wider News in Brief updates.

Key projects for delivery in 2024/25

The full EDI action plan for 2024/25 is detailed in the appendix. Some notable activities include:

One the key themes in our OLC business plan is accessibility. We will review the accessibility of our LeO website. This project will include procuring the services of an external organisation to complete some user testing by people with disabilities. We will then work with our IT team and our external communications team to address any areas of improvement to ensure compliance with a national standard called the Web Content Accessibility Guidelines 2.2 (WCAG). This is the gold standard for inclusive design to make websites and digital content more accessible for people with disabilities (we will aim to complete this project in Q4).

We have also started a piece of work to review the unacceptable behaviour policy for customers. Feedback received from our Reach network highlighted that some staff have experienced micro-aggressions from customers. This made them feel uncomfortable relating to comments about their race or gender and there is no current reference to how we should deal with this in our managing unacceptable behaviour policy (customers). Taking on board additional feedback from our service complaints team, we will review our policy to see if this can be strengthened to protect the wellbeing of our staff and provide more clarification for our customers about the behaviour that is expected when interacting with the LeO scheme. We are aiming to complete that work by the end of Q3.

We have scoped out a project to improve our LeO customer EDI information capture rates. We will aim to move our EDI questions from our Eligibility Checker into the online complaint form, so the customer only needs to complete this information once. Currently our EDI information capture rates at the online eligibility checker stage are 37%. This drops to 3% when we ask for the EDI information again once the case have been accepted for investigation (the eligibility checker data is not

pulled through and linked to the complainant's file as we cannot carry this through for GDPR reasons around the purpose to hold information). For our LeO benchmark we will refer to the 3% figure as our baseline for improvement. Work is estimated by the PMO team to be completed by the end of Q4.

We have an aim in our EDI strategy to support managers to increase their knowledge of disability. We are working in partnership with the Business Disability Forum to organise three line manager training sessions (Autism/ADHD/Dyslexia). We are confident that these sessions will build on the work we completed last year to launch our RA policy for employees, and it will also build on our recent achievement of obtaining the Disability Confident level 2 accreditation. This training will help managers to support their staff and customers with these disabilities. The investment in this training also speaks to our HR people strategy theme to develop and support.

Equality priority objectives

Our EPOs were reviewed in March 23 when the EDI manager began their role. They were reviewed again following the creation of the new OLC business plan (2024-27) and new HR People Strategy (2024-27). No changes were made to the EPOs following this latest review.

The EDI action plans have been updated to highlight the alignment of each activity to the OLC business plan strategic enablers and the themes from the HR People Strategy (see appendix). We recommend that the Board approves the EPOs.

Social mobility reporting

In Q4 we completed our annual social mobility analysis of our leaders at LeO. This year in addition to OLC Board and Executive Team colleagues, we went further and included our line managers. The purpose of this extended analysis was to add greater transparency to our understanding of the social economic backgrounds of our leaders.

The key takeaways from the results were that they demonstrated a very positive view of our senior leaders and management team from a social mobility perspective. Most of our senior leaders and management team at LeO come from a lower/working class socio-economic background. To become a senior leader or part of the management team at LeO does not require you to have come from an affluent background. This is very powerful message of inclusion for our staff and external stakeholders. This data also illustrates that LeO is an inclusive and diverse employer, and that employees from disadvantaged socio-economic backgrounds are not disproportionately impacted in terms of career progression towards higher salaried positions. Based on the positive results from the data, no specific interventions are required to address any inequalities from a social mobility perspective.

Workforce profile reporting

In Q1 we completed our annual workforce data analysis. We used datasets from the Civil Service equality data and census data for benchmarking reference points. This year, we have gone further and enhanced our analysis by providing an organisation view and a new job type view (GET Advisors, Investigators inc. GET Investigators, Ombudsman, Senior Ombudsman, Operational managers including TLs, Corporate managers, Executive Team). This deeper analysis of the diversity profile of our colleagues is aimed at helping us to understand whether specific initiatives are required to address any gaps/inequalities. This also builds on the work we completed last year to establish our workforce diversity baseline.

Organisation high level summary

- The diversity groups of our workforce appear to be stable year-on-year, particularly for gender, sexual orientation, and disability, with slight fluctuations in our ethnicity and age profile proportions.

- Overall, when comparing our 2024 workforce diversity profile against our benchmarking data (2021 Census E&W, 2023 national Ombuds, 2024 Civil Service equality data) we have:

    - 14% higher proportion of ethnic minority colleagues at LeO compared to the Civil Service which is positive from a race inclusion perspective.

    - Higher proportion of females (in line with national Ombuds).

    - Higher proportion of LGBO colleagues than the Civil Service which is positive.

- There has been an improvement in our disclosure rates since 2023. Many organisations experience challenges with regards to completion rates so there is no immediate issue there. Many organisations exclude the 'prefer not to say' and 'not given' data from their workforce reporting we have not taken that approach as we want to track disclosure trends year on year.

Job type summary

- GET team has strong ethnic minority representation (43%) and we can continue to develop that talent to progress into other roles at LeO.

- There is high female representation in all levels of leadership roles.

- There is ethnic minority representation in all levels of management roles.

- Opportunity to develop our talent pool to increase ethnic minority diversity in the Senior Ombudsman cohort, although positively we do have representation within the Ombudsman cohort.

- Non-disclosures appear to be the highest amongst sexual orientation, disability, and ethnicity across most job types. This is in line with other organisations completing this type of analysis.

EDI impact/measures of success

Following our January 24 board meeting, the EDI Manager took an action to consider how best to measure and report the impact of EDI activities to the Board.

From a strategic perspective we would suggest that we use the six key measures detailed below. They are realistic, in terms of things we can impact, and importantly we can access the relevant data to track and measure them (noting that the process to obtain the information is all manual at present). We would report on these once a year as part of our annualised EDI monitoring.

Measure 1:

Use the overall 'inclusion & fair treatment' score from the annual Civil Service Staff survey.

i. Also track annual progression with this inclusion and fair treatment score with the following groups:
    - Gender
    - Ethnicity
    - Disability
    - Sexual orientation
    - Carers

In this measure we are tracking our annual Civil Service survey progress against our scores from the previous year (internal comparison as opposed to comparing against external benchmarks).

When the annual Civil Service results are analysed (top level), HR complete an additional deeper analysis to look at the data broken down by the protected characteristics (which this year also included carers). We are referring to this information for this measure and we will use this analysis to track progress/impact with our staff. This measures the impact of the initiatives we have put in place to improve inclusion and equality at LeO. We will use the 2023-24 scores as our baseline.

Measure 2:

Report on the delivery of the activities on the annual EDI action plan
The success measure is to ensure that the activities detailed on the annual action plan are delivered by the end of the financial year.

EDI Manager will provide the Executive Team with quarterly progress updates on our action plan completion. For further assurance, the EDI Manager meets fortnightly with the Chief Ombudsman to provide progress updates. EDI Manager also meets monthly with the Head of People, Strategy and Services to discuss EDI action plan progress and HR people strategy progress as our work crosses over a lot. Board updates will be provided in January and July.

Staff members will be kept informed through the following methods: EDI Steering group (quarterly), Operations briefings (quarterly), strategy in action updates via news in brief.

Measure 3:

Track customer satisfaction from participants in EDI led training and development activities via post-completion surveys.
In this measure we are tracking the high-level immediate customer satisfaction relating to specific EDI led training interventions. Surveys will be sent out to delegates after the sessions. Any recommendations can be taken on board for

future sessions. An overall satisfaction score will be aggregated for the sessions delivered in the financial year.

Measure 4:

Achievement of relevant accreditations set out in the EDI strategy
The achievement of the following accreditations was set out as an aim in the 2023-2027 EDI strategy:

- Achieve Disability Confident Level 2 (year 1 aim)
- Achieve compliance with the Race at Work Charter (year 1 aim)
- Achieve Disability Confident Level 3 (year 3 aim)

Measure 5:

Track relevant HR People metrics
- Track measures of representation from our staff diversity data tracking (annually)
- Gender pay gap progress (annually)
- Social mobility tracking (annually)

With regards to social mobility, we currently track this information for OLC Board/ Executive Team and this year we also included Line Managers.

We could expand this next year to include non-line managers so that all LeO staff are reported on. We can use the same survey that was sent to the existing participants and have another option for them to select.

Many organisations have not started to report on social mobility. Those that are doing this tend to focus on the higher levels of management. LeO is forward thinking in this area, and going further to track the whole organisation would speak to an inclusive approach to understanding the economic backgrounds of our staff and put us in a stronger position to identify any areas of development.

Measure 6:

Customer EDI impact/success

A) Track the annual EDI profile information of customers that have had an outcome.
- The data for this comes from an external affairs PowerBI report that is refreshed annually each April by the data team.

B) Track annual customer capture rates of EDI information
- We will deliver a project in 2024-25 to improve the capture rates of EDI information from customers.
- The completion rates are currently 3%.
- We will move our EDI questions from our online complaint checker to the online complaint form. This will provide a better customer experience for our customers as they only need to provide this information to us once as opposed

to the current process where we ask for it twice (once at the complaint checker stage, and again once the case has been accepted for investigation).

- Once the project has been completed, we will continue to track the completion rates.

C) We will work with the service and standards team to enhance the customer satisfaction reports so that we can report on customer satisfaction by EDI characteristics.

- Our service and standards team currently capture customer satisfaction and there is a wealth of information both qualitative and quantitative in their quarterly reports. So, we would not want to duplicate that effort.
- The current customer satisfaction quarterly reports have two slides that show who has participated in the survey. Those slides provide some EDI metrics (age/disability/ethnicity). The report does not currently break down customer satisfaction by EDI metric.
- We have asked our Quality Auditor to contact the survey provider to add a slide that presents the high-level satisfaction scores from the scorecard by the EDI metrics.

D) Track the number and themes of customer reasonable adjustments
- This aim will be delivered in the 2025-26 financial year (phase 2 of the reporting project).

Appendix – EDI Strategy 2023-27
Equality Priority objectives

Representative workforce	• we will work towards increasing the diversity of our workforce at all levels to reflect the communities and the customers we serve.
Inclusive place to work	• provide an accessible and inclusive working environment and culture where our people are treated fairly, are able to perform to the best of their abilities and get support in developing and growing their careers.
Customer service and accessibility	• the needs and rights of people who share protective characteristics are at the forefront of the design and delivery of our service.

Representative workforce aims

Activities in this EPO over the next four years are to:
Build robust workforce EDI data to enable us to assess representation at all levels.
Use this insight to target and implement initiatives aimed at increasing representation and access to opportunity.
Have systems in place to track EDI data for all of LeO's recruitment and development opportunities.
Achieve compliance with the Race at Work Charter.
Develop and deliver our first ethnicity pay gap report (building on our annual gender pay gap reporting).
Ensure external presentation of LeO represents diversity.
Ensure our suppliers and partners align to LeO's commitment to diversity and inclusion.

Inclusive place to work aims

Activities in this EPO over the next four years are to:
Ensure our polices are developed to fulfil our legal obligations and taking on board EDI industry best practice.
Ensure our recruitment processes and workplaces are accessible and inclusive (through the achievement of Disability Confident Level 2 and Level 3 accreditations).
Develop and implement initiatives to support access to opportunity (e.g., traditional mentoring, reverse mentoring programmes).
Develop and implement initiatives to support staff development and progression (e.g., leadership development programme).
Complete annual social mobility reporting of LeO's management.
Support and develop our staff networks to promote EDI activities and an inclusive culture at LeO.
Enhance our annual programmes of EDI awareness activities with includes learning opportunities for LeO staff.
Support managers to increase their knowledge of disability (utilising resources such as our membership of the Business disability forum and via Civil service-learning resources).

Customer service and accessibility aims

Activities in this EPO over the next four years are to:
Build a customer EDI dataset that will enable us to understand our diversity customer profile and how our service impacts on them (customers EDI info, impacts of scheme rule changes, outcomes, service complaints).
Identify organisations that support vulnerable customers and customer consumer panels. Pro-actively develop links with them to promote our services and take insights from their work that can support LeO's work.
Engage with other Ombudsmen organisations and Regulators to seek out best practice and use that to improve our service.
Provide annual accessibility training for all staff to enhance their knowledge to support their customers.
Contribute to the external engagement work of LeO by providing EDI insights data that can be shared with the profession aimed at reducing complaints, supporting customers with protected characteristics, and improving the quality of complaint resolution.

EDI Strategy - 2024/25 Action Plan

OLC Business Plan strategic enablers alignment	HR People Strategy theme alignment	Equality Priority Objective	Activity	Start	Completion target	Progress
People and culture	Develop and support	- Representative workforce - Inclusive place to work	Run safe space sessions with Networks to capture feedback from the Civil service people survey *(Use results to inform EDI/ HR strategies – April 24)*	Q1	Q1	Completed
People and culture	Develop and support	- Representative workforce - Inclusive place to work	Arrange for line managers to have some disability training on Autism. *(June 24)*	Q1	Q1	Completed
People and culture	Develop and support	- Representative workforce - Inclusive place to work	Produce some guidance to support staff/managers on the topic of dealing with micro-aggressions. Review the unacceptable behaviour policy (customers).	Q1	Q3	In progress
People and culture	Develop and support	- Representative workforce - Inclusive place to work	Support the running of the annual traditional mentoring programme (L&D leading on this).	Q1	Q3	In progress
People and culture	Promote engagement, equality, inclusion & wellbeing	- Representative workforce - Inclusive place to work	Deliver annual calendar of EDI awareness raising activities.	Q1	Q4	In progress
People and culture	Attract, recruit, and retain	- Representative workforce - Inclusive place to work	Complete annual review of EDI policies and guidance.	Q2	Q2	In progress
People and culture	Develop and support	- Customer service and accessibility	Arrange for line managers to have some disability training on (ADHD) attention deficit hyperactivity disorder *(Sept 24)*	Q2	Q2	In progress
People and culture	Develop and support	- Representative workforce - Inclusive place to work	Develop menopause support guidance for staff/managers.	Q2	Q4	In progress
People and culture	Promote engagement, equality, inclusion & wellbeing	- Representative workforce - Inclusive place to work	Start scoping out a 'transitioning at work' guidance (aiming to deliver this guidance in year 3 of the strategy - 2025/26 financial year).	Q2	Q4	In progress

OLC Business Plan strategic enablers alignment	HR People Strategy theme alignment	Equality Priority Objective	Activity	Start	Completion target	Progress
People and culture	Develop and support	- Representative workforce - Inclusive place to work	Lead on the annual reverse mentoring programme.	Q3	Q4	Not started
People and culture	Develop and support	- Customer service and accessibility	Arrange for line managers to have some disability training on dyslexia. *(Jan 25)*	Q4	Q4	Not started
People and culture	Develop and support	- Customer service and accessibility	Deliver annual vulnerable customer champion (VCC) training for new managers and specialists. *(Feb 25)*	Q4	Q4	Not started
OLC Business Plan strategic enablers alignment	**HR People Strategy theme alignment**	**Equality Priority Objective**	**Activity**	**Start**	**Completion target**	**Progress**
Relationships and collaboration	Promote engagement, equality, inclusion & wellbeing	- Customer service and accessibility	Take part in SRA commissioned research (related to measuring consumer vulnerability in the legal sector).	Q1	Q1	Completed
Relationships and collaboration	Attract, recruit, and retain	- Representative workforce - Inclusive place to work	Identify industry best practice to inform our LeO LGBTQ+ inclusion action plan.	Q1	Q2	In progress
Relationships and collaboration	Attract, recruit, and retain	- Representative workforce - Inclusive place to work	Identify industry best practice to inform our LeO Reach inclusion action plan.	Q1	Q2	In progress
Relationships and collaboration	Promote engagement, equality, inclusion & wellbeing	- Customer service and accessibility	Work with external communications to commission some market research to determine consumer awareness of LeO and support the identification of silent suffers.	Q1	Q3	Completed

OLC Business Plan strategic enablers alignment	HR People Strategy theme alignment	Equality Priority Objective	Activity	Start	Completion target	Progress
Relationships and collaboration	Promote engagement, equality, inclusion & wellbeing	- Customer service and accessibility	Arrange for LeO Staff network Leads to meet with other Ombi staff network leads to seek out and share best practice.	Q1	Q3	In progress
Relationships and collaboration	Promote engagement, equality, inclusion & wellbeing	- Customer service and accessibility	Seek out best practice to contribute to improving LeO's work through networking activities with Ombuds, Regulators, EDI industry networks that support vulnerable customers. Share insights with LeO colleagues.	Q1	Q4	In progress
Systems and intelligence	Attract, recruit, and retain	- Representative workforce - Inclusive place to work	Complete annual workforce diversity analysis.	Q1	Q1	Completed
Systems and intelligence	Promote engagement, equality, inclusion & wellbeing	- Customer service and accessibility/	Continue to use eligibility checker data to identify if customers with protected characteristics are being disproportionately affected by our scheme rules changes.	Q1	Q3	In progress
Systems and intelligence	Attract, recruit, and retain	- Representative workforce - Inclusive place to work	Continue to work with HR to make progress towards tracking EDI data for all LeO recruitment (aiming to have processes in place to track all LeO recruitment by the end of the 4-year strategy).	Q1	Q4	In progress
Systems and intelligence	Attract, recruit, and retain	- Customer service and accessibility/	Review the accessibility of our LeO website and address accessibility gaps (work with IT; external comms; developers to address any accessibility issues following this review).	Q1	Q4	In progress
Systems and intelligence	Promote engagement, equality, inclusion & wellbeing	- Customer service and accessibility/	Complete a project with the aim of increasing LeO customer EDI data capture rates (moving our customer EDI questions from the eligibility checker to the online complaint form).	Q1	Q4	In progress
Systems and intelligence	Attract, recruit, and retain	- Representative workforce - Inclusive place to work	Produce annual Gender Pay Gap report.	Q3	Q3	Not started

| Systems and intelligence | Promote engagement, equality, inclusion & wellbeing | - Representative workforce
- Inclusive place to work | Complete annual social mobility reporting exercise (Board/Executive Team/Line Managers).
(Feb 25) | Q4 | Q4 | Not started |

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