

<b>Meeting</b>	OLC Board Meeting	<b>Agenda Item</b>	5
		<b>Paper No.</b>	131.4
<b>Date of meeting</b>	30 January 2024	<b>Time required</b>	35 minutes
<b>Title</b>	EDI Update		
<b>Sponsor</b>	Paul McFadden		
<b>Status</b>	<b>OFFICIAL</b>		
<b>Executive summary</b>			
<p>We are currently at <b>87%</b> completion of our year 1 action plan for 2023/24 and on course to complete all deliverables and activities by the financial year-end. Notable accomplishments include the creation of detailed staff and customer EDI dashboards, menopause awareness training, and successful mentoring pilots.</p> <p>External benchmarking with Ombuds/Regulators reveals LeO's workforce gender split is comparable, though slight variations exist in disability, ethnicity, and sexuality representation. We are working on improving our customer EDI information capture rates based on observed best practices.</p> <p>We have made positive progress in external engagement by building links with Ombudsman, Regulators, and EDI-focused organisations. We have participated in events and conferences and our work at LeO aligns with best practices. We will be collaborating with SRA in consumer vulnerability research and working with external comms for consumer awareness research to further enhance LeO's external activities.</p> <p>Race Equality Week will take place (w/c 5 February). The "Listen Act Change" theme includes a 5-day challenge for colleagues, addressing microaggressions, culture, and belonging.</p> <p>Our Social Mobility annual reporting exercise is scheduled for the w/c February 12. The Social Mobility survey expands this time to include people managers. Results will be shared in March to provide insights into socio-economic diversity and inclusion in the organisation.</p> <p>This update underscores LeO's commitment to achieving our EDI strategy goals, highlighting progress, challenges, and future initiatives. The team remains dedicated to fostering an inclusive environment for staff and accessible justice for customers.</p>			
<b>Recommendation / action required</b>			
The Board are asked to <b>comment</b> on this EDI update.			
<b>EDI implications</b>	<b>Yes</b>		
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.			
<b>Freedom of Information Act 2000 (Fol)</b>			
<b>Paragraph reference</b>	<b>Fol exemption and summary</b>		
N/A	N/A		

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# EDI strategy update

## Background

Our EDI strategy is ambitious and stretching, but also realistic in terms of what we have set out to deliver with the resources available.

The EDI manager has been in post since mid-March 23 and a key initial objective was to review and refine the existing EDI strategy to come up with a credible 3-year strategy and 1-year action plan that can be delivered (the 3-year strategy aims, and year 1 action plan update are detailed in the appendix).

The year 1 action plan is progressing well with many impactful projects delivered. We have currently completed 87% of the year 1 activities for 2023/24 and all deliverables and activities will be completed by the end of the financial year.

Engagement within LeO on our commitment to EDI and progress against our commitments remains an important part of this. We have kept colleagues across the organisation informed and involved on progress through our quarterly EDI forum; 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 achievements 2023/24

*Some key achievements from 2023/24 include:*

- Utilising HR and CRM data to create detailed dashboards of our staff and customer EDI information. We plan to build on this in our next review of this data in April, and we will provide more detailed staff information broken down by role type to aid in the identification of any underrepresentation in certain roles.
- Raising awareness of menopause in the workplace, with significant focus placed on this through close working with our Women's network and commissioning an external provider to deliver training for all LeO's leaders and managers. This was very well received and an important first step in raising awareness and educating leaders on this topic and supporting reflection on how we can support people who are impacted directly or indirectly by menopause.
- Successfully launching two mentoring pilots. Our traditional mentoring pilot has been completed. The reverse mentoring pilot started in January. We will review both pilots with a view to seeing how we can embed them into an annual people development activity.

## External EDI benchmarking

### *Workforce data benchmarking*

Following Board in July 2023, we took an action to complete some external benchmarking of LeO's workforce data with other Ombuds/Regulators. We were particularly interested in understanding if our high proportion of female colleagues at LeO was representative of gender proportions in similar organisations.

All of the organisations we looked at had a high proportion of female colleagues. So, we can conclude that our workforce gender split is comparable to the Ombuds industry profile.

**LeO 68% female colleagues** - 4% above the Ombuds average of 64%. 13% higher than the civil service rate of 55%.

**Disability - LeO 8%** - slightly below above the Ombuds average of 11%. 6% lower than the civil service rate of 14%.

**Ethnicity - LeO 25%** - above the Ombuds average of 19%. 10% higher than the civil service rate of 15%.

**Sexuality - LeO 4%** - slightly below the Ombuds average of 7%, 2% below the civil service rate of 6%.

### *Customer data benchmarking*

We also benchmarked customer EDI information capture rates with other Ombuds/ Regulators where this was available on enquiry.

In terms of capture rates, the Scottish Legal Complaints Commission (79%) and Scottish Public Services Ombudsman (53%) have the highest capture rates. Their EDI questions are built into their complaints form (meaning the customers are asked to complete it at the start of their process). The Northern Ireland Public Services Ombudsman (30%) EDI info is requested via an online form once the case has been accepted for investigation. They are moving to a new process where the EDI questions will be captured on their new online complaint form. The Property Ombudsman, LGO, FOS, SRA and Office of the Ombudsman Ireland do not currently capture customer EDI information.

We have scoped out a project to improve our LeO customer EDI information capture rates. The aim will be to move our EDI questions from our Eligibility Checker into the online complaint form, so the customer only needs to complete this information once. Our EDI information capture rates at the online eligibility checker stage are 37%. This drops to 3% when we ask for it again once the case have been accepted for investigation (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, as the Eligibility checker data is not pulled through and linked to the complainant's file. Work is estimated by the PMO team to be completed in Quarter 3 2024/25 (Sept-Dec 24) for this project.

## External activities

We have also made significant positive progress with external engagement activities, a key aspect of our updated EDI strategy. From an external perspective we have been pro-active in building links with Ombudsman, Regulators and organisations that promote best practice in the EDI space, in addition to organisations that support vulnerable customers.

The EDI team have attended events and virtual conferences and sharing insights from those sessions with the Executive Team, Operational Leads, HR, Network Leads and other relevant LeO colleagues. Our main takeaway from these sessions is that LeO are already completing a lot of the best practice that we have observed which is good for us to know. Some organisations are further ahead in their thinking/work due to the large resources they have to deploy in the area of EDI. Others are further behind us in areas such as reporting (e.g., many are not reporting on social mobility yet or not capturing customer EDI data).

We will be assisting SRA with some new research that they are commissioning around measuring and monitoring consumer vulnerability in the legal market. SRA have commissioned the University of South Wales (USW) to undertake a feasibility study to consider whether and how the SRA could measure and monitor consumer vulnerability among the client population in England and Wales. This study will involve an online survey in January 2024 and an in-person focus group at a one-day stakeholder event in Birmingham in March 2024. The EDI Manager will be representing LeO in this activity.

We are also working with external comms who are commissioning some external consumer awareness research about LeO with the public. The purpose of that is aimed at supporting our work around the theme of silent sufferers and their awareness of how to seek legal redress.

## Race Equality Week plans (w/c 5 February)

The ReW 2024 theme is '**Listen Act Change**'. We will be asking colleagues to take part in a 5-day challenge that has 5 different activities for all our colleagues to engage in. Each daily activity takes about 5 minutes, and this will include videos, articles, and activities to help colleagues reflect and, more importantly, take action to drive Race Equality.

Some topics covered in the activities will be microaggressions, culture and belonging. On the last day, everyone will be asked to make a [Big Promise](#) – where colleagues can make a public commitment that is measurable aimed at contributing to positive change.

We will also be asking those who have made a Big Promise previously, to provide an honest self-assessment against their Big Promises.

## Social Mobility annual reporting exercise

We will be re-sending the Social Mobility survey week commencing 12 February. Last year, this survey went out our Board and Executive Team, however this year we will be opening out the survey out to include our people managers to help us understand more about the socio-economic diversity of this cohort and inclusion in our organisation. Results will be shared with Board/Executive Team/line managers in March.

## Risks and dependencies

There are no key risks that would stop the remaining activities being delivered on time other than unplanned absence from the EDI team:

Since our last board update one key risk has been mitigated. The EDI Manager and EDI Specialist have now been confirmed in permanent roles providing resilience and certainty to our EDI programme. Delivery of the plan requires resource from the EDI Manager and EDI Specialist to lead and complete these activities.

In terms of a forward look into the 2024/25 (year 2) action plan, there are some dependencies around resourcing. These include decisions around the seconded resource into the HR Team around HR systems and the work to track EDI data for all of LeO's recruitment. In addition, the allocation of PMO resources is required to lead a year 2 project aimed at improving our customer EDI data capture rates by updating the online complaint form (we will be moving our EDI questions from our online complaint checker to the online complaint form).

# Appendix

## EDI Strategy 3-year plan

### Representative workforce aims

#### Activities in this EPO over the next three 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 three years are to:

- Ensure our policies 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 EDI analysis of reward and recognition data.
- 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 three 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 - 2023/24 (Year 1) Action Plan

EQUALITY PRIORITY OBJECTIVE	STRATEGIC THEME	ACTIVITY	START	COMPLETED	PROGRESS
- Customer service and accessibility/ - Representative workforce/ - Inclusive place to work	<b>Governance/Risk related</b>	Complete a review of the EDI strategy	Q1	Q1	Completed
- Customer service and accessibility/ - Representative workforce/ - Inclusive place to work	<b>Governance/Risk related</b>	Create an action plan for year 1	Q1	Q1	Completed
- Customer service and accessibility/ - Representative workforce/ - Inclusive place to work	<b>Governance/Risk related</b>	Obtain Exec sign off for the EDI strategy and 1 year action plan	Q1	Q2	Completed
- Customer service and accessibility/ - Representative workforce/ - Inclusive place to work	<b>Governance/Risk related</b>	Re-instate EDI Steering Group meetings	Q1	Q1	Completed

EQUALITY PRIORITY OBJECTIVE	STRATEGIC THEME	ACTIVITY	START	COMPLETED	PROGRESS
- Representative workforce - Inclusive place to work	<b>Improving and developing our policies</b>	Create a new reasonable adjustments policy for LeO staff	Q1	Q4	In progress
- Customer service and accessibility/ - Representative workforce/ - Inclusive place to work	<b>Improving and developing our policies</b>	Complete an inclusive language review of HR policies.	Q2	Q2	Completed

EQUALITY PRIORITY OBJECTIVE	STRATEGIC THEME	ACTIVITY	START	COMPLETED	PROGRESS
- Representative workforce - Inclusive place to work	<b>Promoting engagement, Equality, Inclusion &amp; Wellbeing</b>	Launch traditional mentoring pilot	Q1	Q3	Completed
- Representative workforce - Inclusive place to work	<b>Promoting engagement, Equality, Inclusion &amp; Wellbeing</b>	Launch reverse mentoring pilot	Q3	Q4	In progress
- Representative workforce - Inclusive place to work	<b>Promoting engagement, Equality, Inclusion &amp; Wellbeing</b>	Engagement with Staff Networks <i>(Develop action plans and support with progressing plans for each Network)</i>	Q1	Q4	Completed
- Representative workforce - Inclusive place to work	<b>Promoting engagement, Equality, Inclusion &amp; Wellbeing</b>	Complete a review of the staff networks and staff council. <i>(Support HR with completing this activity)</i>	Q1	Q2	Completed
- Representative workforce - Inclusive place to work	<b>Promoting engagement, Equality, Inclusion &amp; Wellbeing</b>	Deliver annual calendar of EDI awareness raising activities	Q1	Q4	In progress
- Inclusive place to work	<b>Promoting engagement, Equality, Inclusion &amp; Wellbeing</b>	Run safe space sessions with Networks to capture feedback from the Civil service people survey <i>(Use results to inform EDI/People strategies)</i>	Q1	Q1	Completed
- Customer service and accessibility/ - Representative workforce/ - Inclusive place to work	<b>Promoting engagement, Equality, Inclusion &amp; Wellbeing</b>	Improve systems to record customer pronouns/title (CRM)	Q1	Q4	Completed
- Customer service and accessibility/ - Representative workforce/ - Inclusive place to work	<b>Promoting engagement, Equality, Inclusion &amp; Wellbeing</b>	Work with HR/facilities to investigate creating an sensory zone area for colleagues to access at Edward House.	Q1	Q3	Completed
- Representative workforce - Inclusive place to work	<b>Promoting engagement, Equality, Inclusion &amp; Wellbeing</b>	Raise awareness of menopause in the workplace	Q1	Q3	Completed



- Representative workforce - Inclusive place to work	<b>Promoting engagement, Equality, Inclusion &amp; Wellbeing</b>	Improve the communication and support for colleagues going on/currently on/returning from maternity related leave.	Q1	Q3	Completed
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EQUALITY PRIORITY OBJECTIVE	STRATEGIC THEME	ACTIVITY	START	COMPLETED	PROGRESS
- Customer service and accessibility/	<b>Improving our service for our customers</b>	Work with PMO/BI team to develop Scheme rules impact assessment reporting to identify any areas where customers with protected characteristics are being disproportionately affected by our scheme rules changes.	Q1	Q3	Completed
- Customer service and accessibility/	<b>Improving our service for our customers</b>	Complete analysis of Q1 data from the website eligibility checker to identify any areas where customers with protected characteristics are being disproportionately affected by our scheme rules changes.	Q1	Q2	Completed
- Customer service and accessibility/	<b>Improving our service for our customers</b>	Build customer EDI profile dashboard to facilitate a better understanding of our customers. <i>(Note: Initially this will be built in Excel by the EDI team – our aim would be to get this built into a PowerBi report)</i>	Q1	Q2	Completed
- Customer service and accessibility/	<b>Improving our service for our customers</b>	Contribute to the external engagement work of the Operational Support team by providing EDI insights data that can be shared with the profession to support our aims of increasing their quality of complaint resolution.	Q2	Q4	Completed

EQUALITY PRIORITY OBJECTIVE	STRATEGIC THEME	ACTIVITY	START	COMPLETED	PROGRESS
- Representative workforce - Inclusive place to work	<b>Utilise workforce data to improve diversity and representation</b>	Use HR data to create a workforce EDI dashboard	Q1	Q3	Completed
- Representative workforce - Inclusive place to work	<b>Utilise workforce data to improve diversity and representation</b>	Produce Gender Pay Gap report (for 2022/23 financial year)	Q3	Q4	Completed
- Representative workforce - Inclusive place to work	<b>Utilise workforce data to improve diversity and representation</b>	Complete annual social mobility reporting exercise (Board/Exec) <i>Note: This survey was originally completed in Nov 22. This was re-run in May 23 as we have new board members. We will run this again in March 24 and include Board/Exec and LeO managers).</i>	Q4	Q4	Not started (February 24)

EQUALITY PRIORITY OBJECTIVE	STRATEGIC THEME	ACTIVITY	START	COMPLETED	PROGRESS
- Customer service and accessibility/ - Representative workforce/ - Inclusive place to work	<b>Benchmarking/ external engagement</b>	Achieve Disability Confident Level 2 to understand the needs of our employees with a disability and ensure our recruitment processes and workplaces are accessible and inclusive. <i>Note: We are currently a Disability Confident 'Committed Level 1' employer.</i>	Q1	Q4	In progress
- Customer service and accessibility/ - Representative workforce/ - Inclusive place to work	<b>Benchmarking/ external engagement</b>	Work towards compliance to the Race at work charter.	Q1	Q4	In progress
- Customer service and accessibility/ - Representative workforce/ - Inclusive place to work	<b>Benchmarking/ external engagement</b>	Seek out best practice to contribute to improving LeO's work through networking activities with Ombudsman orgs, Regulators, EDI industry networks.	Q2	Q4	In progress
- Customer service and accessibility/ - Representative workforce/ - Inclusive place to work	<b>Benchmarking/ external engagement</b>	Identify organisations that support vulnerable customers and pro-actively develop links with them to promote our services and to take insights from their work that can support LeO's work.	Q2	Q4	Completed