

Meeting	OLC Board Meeting	Agenda Item No.	15
		Paper No.	123.10
Date of meeting	20 October 2022	Time required	60 minutes

Title	Annual ED&I update
Sponsor	Nikki Sinclair EDI Manager Exec Sponsor Paul McFadden, Chief Ombudsman
Status	OFFICIAL
To be communicated to:	Members and those in attendance

Executive summary
<p>This is an bi annual Equality, Diversity & Inclusion (ED&I) provide a summary update of activities and progress on work delivered in line with the EDI strategy and Action Plan.</p> <p>We have developed our three year EDI Strategy and adopted three equality priority objectives (Representation; Inclusivity; Accessibility) which underpin this and provide focus and help us in delivering our EDI strategy objectives.</p> <p>The EDI steering group have met twice over the last 6 months to provide guidance and support to the executive team on EDI strategy and to provide assurance of progress on implementation of the EDI 1 year EDI action plan</p> <p>EDI data set</p> <p>Workforce Data</p> <p>There has been challenges in obtaining our workforce EDI data however some top level data on our civil service people survey 2021 by demographics has been shared with the intention of full benchmarking for all workforce data to be shared in Jan 2023</p> <p>Complainant Data</p> <p>we have started high level analysis of our customer demographic data by outcomes to understand if there are any differences in the outcomes for complainants with protected characteristics</p> <p>We have also looked at customers with a reasonable adjustments and it has highlighted, although there are no key themes identified from the quantitative data</p> <p>For both data sets we are working closely with operations and the BI team to improve data collection and extend data capture so we can have better understanding of how to improve service for our customers</p>

Action Plan delivery

- During quarter 1 & 2 we focused on delivering activities under the inclusion EPO with particular attention on developing and supporting our leadership team around inclusive leadership and neurodiversity training. We focused on developing the maturity of our employee networks & benchmarking for our networks
- As part of the Health & Safety Wellbeing month we have focused on how to build a positive employee experience for remote and hub workers and invited them to attend the Birmingham office on 18 October
- Under the accessibility EPO the ED&I Manager has successfully launched a [new site](#) on LINK to help our staff identify and support Vulnerable and/or customers who may require a reasonable adjustment.

Key objectives to be delivered

- The EDI manager has been working closely with the Head of People on the theme of attract, retain and recruit in particular around full review of the recruitment process
- We have also responded to feedback from the Civil Service People Survey and EDI focus group on career progressing and improved learning and development. EDI & HR teams have collaborated on developing a mentoring programme

Building an Inclusive culture

Over the last 6 months the EDI team, Internal comms and the Staff networks have delivered a number of events to promote awareness of important cultural, religious, international and health related events including Pride Day, Alzheimers Walk & Black History Month

Recommendation/action required

Board are asked to **note** this update.

Background

ED&I update

Over the last year we have focused on the following 4 key themes; strategy and policy; building our community; diversity and inclusion training; and EDI reporting to assist LeO in embedding the EDI agenda and building a culture of inclusivity.

We have developed our three year EDI Strategy and adopted three equality priority objectives (Representation; Inclusivity; Accessibility) which underpin this and provide focus and help us in delivering our EDI strategy objectives. The aim of the strategy is to implement a framework that builds diversity in the workforce, helps create respectful and inclusive work environments and finds ways to weave diversity and inclusion practices and principles into policies, business plans, practices, performance expectations, leadership and our service.

Strategy & Governance

The EDI steering group met in May & September, where the EDI manager shared strategy updates. Some of the key items discussed and delivered are:

- A quarterly plan to help monitor the progress of the EDI strategy was suggested by the Chair of the EDI Steering Committee Group, the need to phase actions was also important to ensure that targets were achievable.
- Supporting and approving the network to develop their own 3 year action plans linking directly to the EPOs and supporting the people plan. This approach will clearly demonstrate the networks contribution to becoming a more inclusive organisation. The REACH network shared their strategy/action plan in detail using the Race Equality Code as a governance framework to identify activities, accountability.
- Development of an internal communications plan so that we can educate our people and help them understand how to participate in the inclusive culture at LeO, allow them to be a part of the EDI dialogue and ensure our management and leadership are committed initiatives and events and also leading the conversation.
- Group encouraged focus on a full review of recruitment, retention and attraction as part of the People Strategy with a specific emphasis on EDI woven throughout. They noted that this is a large scale project with multiple workstreams and suggested the most efficient way for successful delivery is to work with programme management for support.
- The EDI manager presented the Mentoring programme project in response to feedback from civil Service people survey, EDI focus groups and general feedback from staff. The group provided feedback and supported the project..

EDI dataset

We agreed the EDI data set would provide the Board with assurance that we are compliant with legislative requirements and consistently working towards becoming a diverse and inclusive ombudsman.

We have faced challenges outside of our control in accessing all of our workforce data from the HR system, however we aim to provide you with benchmarking data around our workforce demographics Jan 2023.

This data is also used to inform our gender pay gap, we preparing to submit for 22/23 and initial analysis shows improvement on gender bonus pay gap this year with a 14% decrease compared to last year (21/22) submission and the median reduced from 50% to 0%. Full report will be submitted to RemCo in November 2022.

We analysed the civil service people survey 2021 to direct us on where improvements need to be focused in relation to demographics. This data helped inform some of the themes and activities within the EDI strategy and People Plan, for example marginalized groups had poorer experience around inclusion and fair treatment. In response LeO committed to become Disability Confident L3 by 2024, became a member of the Business Disability Forum to help us embed the disability smart framework, plan to launch a Women's network and have already delivered inclusive leadership training across the wider leadership team.

Complainant data

In relation to our complainant data we have started high level analysis of our customer demographic data by outcomes to understand if there are any differences in the outcomes for complainants with protected characteristics. The data analysis focuses on stage of resolution for example agreed outcome or ombudsman decision and highlights areas where the data suggests that a group or groups of complainants are experiencing differential patterns of outcome and satisfaction. This analysis is a manual process and we are working closely with BI team to build data reports into the data warehouse and look at methods to automate data extraction and analysis.

We have also looked at customers with a reasonable adjustments and it has highlighted, although there are no key themes identified from the quantitative data, we do know indicatively that there is more work to be done to improve how we apply RA throughout the customer journey.

For both data sets we are working closely with operations and the BI team to improve data collection and extend data capture so we can have better understanding of how to improve service for our customers.

We are also exploring opportunities to benchmark with other schemes and incorporate additional data sources so that we use the findings to inform further EDI targets and metrics working steps (Appendix 1).

Key actions delivered

The 3 year and 1 year EDI action plans(appendix 2) was approved in March and there has been marked progress in implementing and embedding initiatives throughout LeO.

During quarter 1 & 2 we focused on delivering activities under the inclusion EPO with particular attention on developing and supporting our leadership team around inclusive leadership and neurodiversity training. The inclusive leadership training provided us with key themes to consider when reviewing the competency and performance framework in the

future and also where the gaps are in terms of a shared understanding of inclusivity throughout the leadership team.

We focused on developing the maturity of our employee networks benchmarking for our networks;

- LGBTQ have developed and 1 year action plan using the Stonewall Workplace equality Index,
- Disability and Carers are using the Disability Smart Framework
- REACH network have aligned the race at work charter, race action plan and race equality code to give a cohesive approach to tackling race inequity (refer to appendix 3)

As part of the Health & Safety Wellbeing month we have focused on how to build a positive employee experience for remote and hub workers and invited them to attend the Birmingham office on 18 October. It was an opportunity for them to help us create and build a positive hub and remote worker experience, meet colleagues and leadership team and talk about how we can improve their connection to LeOs culture. Our aim is to have a remote/hub work culture that is intentionally inclusive and creates equal opportunities for everyone where they can bring their knowledge, life experiences, self expression and talent to work. This work will inform our future strategies for recruitment, onboarding and employee lifecycle for this section of our workforce.

Under the accessibility EPO the ED&I Manager has successfully launched a [new site](#) on LINK to help our staff identify and support Vulnerable and/or customers who may require a reasonable adjustment. Following feedback from staff and our customers the site is dedicated to providing all staff with the information they need in one place, ranging from identifying disability/vulnerability to information on the support we can offer and how to make sure it's all properly documented. We have also increased the number of Vulnerable customer champions across the business, developed a news process within the CRM system and established a multi disciplinary team to provide cross functional support for complex reasonable adjustment cases. We have already seen the positive impact this approach has had as a supportive resource for colleagues in terms of competence and confidence in delivering an improved customer experience.

Key objectives to be delivered

The EDI manager has been working closely with the Head of People on the theme of attract, retain and recruit in particular around full review of the recruitment process. Following re prioritisation of the People Plan we expect to deliver:

- recruitment training to line managers as part of the Leadership & development and Management development programme to include training on unconscious bias
- Review of our recruitment policy with a focus on ED&I
- Development of attraction and retention strategy with a particular focus on improving attraction for marginalized groups in the workforce.

We have also responded to feedback from the Civil Service People Survey and EDI focus group on career progressing and improved learning and development. EDI & HR teams have collaborated on developing a mentoring programme and was supported by the EDI steering group. This is still very much in its infancy stages and will be taken to Executive team for approval to provide clarity on resource, costs, impact and alignment to business and people plan. An offshoot of the mentoring programme is reverse mentoring scheme which will focus on opening up participants of senior leadership team to different perspectives and to help cultivate a culture of understanding among employees at all levels who come from a diverse background. (Appendix 4).

Building an inclusive culture

Over the last 6 months the EDI team, Internal comms and the Staff networks have delivered a number of events to promote awareness of important cultural, religious, international and health related events;

- Challenge TmO – a non-Muslim colleague was challenged to cook dishes to celebrate EID but was a great opportunity for all staff to understand the meaning of Ramadan and share in celebrations
- Multiple collaborations with LGBTQ+ networks from PHSO & LGO including a presentation from a transgender colleague about challenges faces and how to make the workplace more inclusive in June and an inter ombudsman quiz in September
- Alzheimer’s Walk and McMillan Coffee Morning where we raised on £1500
- Celebrations of Black History month
- Health & safety & Wellbeing Month during October
- Upcoming celebration of Diwali & Launch of Women’s network

Nikki Sinclair

ED&I Manager

EDI Outcomes analysis

Research questions

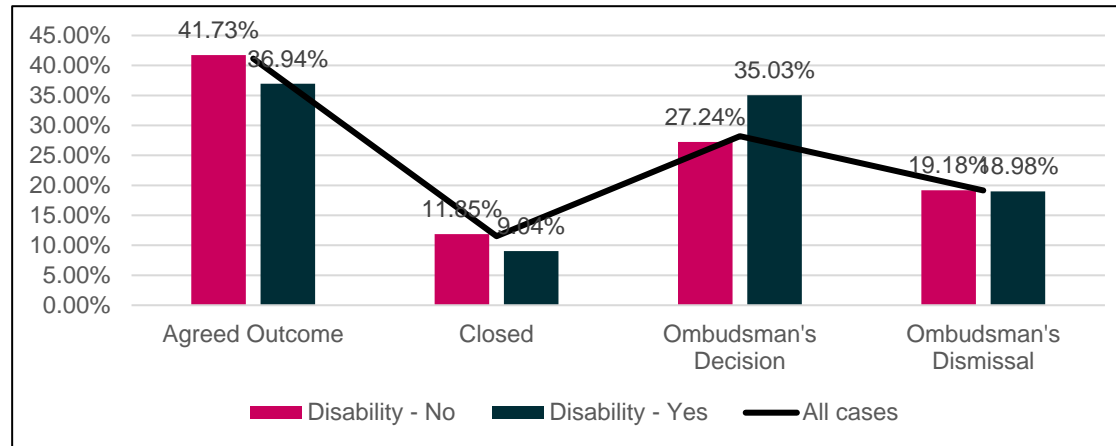
- To ascertain if there are any differences in the outcomes (resolution stage and satisfaction levels) for complainants for groups with protected characteristics.
- To understand factors which may contribute to any differences in outcomes.

Approach

- The data analysis focuses on the stage of resolution of complaints and highlights areas where the data suggest that a group or groups of complainants are experiencing differential patterns of outcome and satisfaction.
- Sample sizes between 2186 – 5982. All data is provided voluntarily, and no data fields are compulsory.
- Statistical significance is tested at the 95% confidence level.
- Protected characteristics prioritised for stage 1 analysis: Sex, Gender, Disability, Age, Ethnicity and Sexual Orientation,.
- Customer satisfaction based on our independent end of process survey 21-22.

Interesting observations – disability

- 12% of complainants identified themselves as having a disability
- Complainants with a disability are significantly less likely to have their case resolved through an agreed outcome. They are also significantly more likely to have their case resolved through an Ombudsman’s Decision.



- Disabled complainants are also significantly more likely to have ‘high’ complexity cases

Case Complexity	Disability No %	Disability Yes %
High	1.77%	4.37%
Low	72%	63%
Medium	26%	32%
Grand Total		

Interesting observations – disability

- Disabled complainants are significantly less likely to complain about Residential Conveyancing, which is more likely to be resolved through an Agreed Outcome.
- The majority of complaints are made about Personal Injury, accounting for 20% of complaints. They are also more likely to complain about Criminal Law (8%) and Employment Law (6%).
- While criminal law and employment law are both more likely to be resolved through an Ombudsman's Decision, this is not the case with Personal Injury which is significantly more likely to be resolved through an agreed outcome. This trend should therefore be explored in more detail.
- Respondents who had health problems responding to the end of process customer satisfaction survey gave significantly different scores in 35 areas, including:
 - Overall satisfaction with the service provided (31% vs 47%)
 - Customer effort score (32% vs 43%)
 - 'The investigation was fair and impartial' (31% vs 49%)
 - 'You were given the opportunity to have your say' (54% vs 74%)
 - 'Agree communication requirements were met' (36% vs 63%)

What next?

- Working with MI Team to build data reports within BI and looking at methods to automate data extraction and analysis
- Extend data capture to cover initial contact, supporting EQIA and wider SR evaluation and impact assessments
- Improved data collection, to include the entire life cycle of the customer journey (initial contact)
- Exploring opportunities to benchmark with other schemes
- Incorporate additional data sources such as use of legal services, wider trends in consumer market.

- Annual outcomes analysis. Findings used to inform further, targeted research and EDI targets?

EPOs	Theme	Action	Dependencies	Owner	Timescale	Comments/progress
1. Representation	1.1 Understanding our workforce	1.1.1 Collect regular data to understand the demographic of our workforce at all levels to drive change	HR	EDI Manager	Bi annually	Issue with getting data out of CipHR generally but have sent a versio to BI team to start looking at putting into data warehouse - expcet some sort of feedback in September
1. Representation	1.2 Attract, Recruit, Retain	1.2.1 <ul style="list-style-type: none"> • Complete full recruitment bench marking exercise to understand if there is any bias in our recruitment process • Promote diversity in recruitment by targeting and monitoring recruitment activity though improved EDI recruitment data 	HR, IT, BI team	EDI Manager	Complete Q4	Head of HR has started project planning for this in Q2. Will liaise with me throughout process in terms of benchmarking and gaps
1. Representation	1.2 Attract, Recruit, Retain	1.2.1.1 <ul style="list-style-type: none"> • Review the Recruitment Policy to ensure it reflects excellent recruitment practice, promotes excellent EDI practice and is fully compliant with employment law 		Head of People Strategy & Services	Complete Q3	Head of People is starting full recruitment process review as part of peole strategy in Q3, EDI team will support project to ensure EDI lens throughout - aim for end of Nov
1. Representation	1.2 Attract, Recruit, Retain	1.2.2.1 Identify a variety of media sources and advertisement platforms to provide access to the most diverse pool of talent possible and our vacancies will use inclusive language, diverse imagery and will be accessible	HR, Comms	Senior HR Services, EDI Manager	Complete Q4	EDI team i to look at opportunity to use Stonewall and if there are any cst s of race equality matters board. If sign up for business disability forum - option to advertise on their platform
1. Representation	1.2 Attract, Recruit, Retain	1.2.2.2 <ul style="list-style-type: none"> • Expect all recruitment agencies to promote diversity and present diverse applicant pools 	HR - Martin Pink procurment	EDI Manager	Complete Q3	Commitment to equality from recruitment agencies - will look to add paragraph in SLA/contract in future - work ing with Head of People to implemenent this
1. Representation	1.2 Attract, Recruit, Retain	1.2.3.1 <ul style="list-style-type: none"> • Deliver recruitment training to line managers as part of the Leadership and Management Development programme - to include EDI considerations within the recruitment process (e.g., awareness of unconscious bias) 	Knowledge & Learning & Development Business Partner	Head of People Strategy & Services	Complete Q4	delivery through training programme external consultant - leadership development programme
1. Representation	1.2 Attract, Recruit, Retain	1.2.5 <ul style="list-style-type: none"> • Develop an Attraction & Retention Strategy for the whole organisation including considerations of diversity characteristics 		Head of People Strategy & Services	Complete Q3	Head of People leading on this, will ensure they - will consult with networks and staff council. Work will start in November- deliver in Q4

Appendix 2 EDI strategy 22_23 Action Plan Yr 1 (22-23 Plan)

EPOs	Theme	Action	Dependencies	Owner	Timescale	Comments/progress
1. Representation	1.3 Benchmarking	1.3.1 • Ensure that external presentation of organisation represent diversity		External affairs	Complete Q4	work with Internal comms manager about improving social media presence and website presentation - networks on external website
1. Representation	1.3 Benchmarking	1.3.2 • Achieve Disability Confident L2 by March 2023 and achieve L3 by March 2024 to understand the needs of our employees with a disability and ensure our recruitment processes and workplaces are accessible and inclusive	HR	EDI Manager	Complete Q4	EDI team send to HR team our plan so far to collect evidence and identify gaps
2.Inclusion	2.1 Leadership	2.1.1 •Deliver Inclusive Leadership Training for all leaders •Including inclusive behaviours as part of performance management	Knowledge & learning Business Partner, HR	EDI Manager	Complete Q2 Complete Q4	Complete EDI to summarise key themes and feedback to HR to start work on integrating inclusive behaviour into performance management and PDR
2.Inclusion	2.1 Leadership	2.1.2.1 •Develop framework for reverse mentoring programme for senior leaders to increase awareness and competency in becoming a more inclusive leader	HR, Knowledge & learning B	Head of People Strategy & Services		Concept has been presented and supported by EDI steering group, next steps to consider impact on resource, capacity, costs for Executive team
2.Inclusion	2.1 Leadership	2.1.3 •Develop and implement a new leadership and management development programmes for current and aspiring managers (to include people management skills and EDI)	HR	Head of People Strategy & Services	Complete Q4	In progress -
2.Inclusion	2.2 Develop, Support & Value our people	2.2.1 • Review and evaluate the 2021/22 interim Celebrating Success scheme taking into account demographics		Head of People Strategy & Services	Complete Q2	HR shared data in Q3, initial analysis has started, will go to EDI steering group in Nov and exec bring to Board in Dec/Jan?
2.Inclusion	2.2 Develop, Support & Value our people	2.2.2 • Develop and implement a Competency Framework, setting out expectations of employees in different roles and at different levels including inclusive behaviour	HR	Head of People Strategy & Services	Complete Q4	EDI manager to summarise key themes and feedback to HR to start work on integrating inclusive behaviour into performance management and PDR. Moved to Q1 23/24 dues to competing priorities
2.Inclusion	2.2 Develop, Support & Value our people	2.2.3 • Develop a talent management and succession planning strategy ensuring we work closely with Staff networks	HR	Head of People Strategy & Services	Complete Q4	Moved to next year in line with revised People Plan
2.Inclusion	2.2 Develop, Support & Value our people	2.2.4 • Development of reverse mentoring programme for senior leaders (2.1.2.1)	HR, Knowledge & learning Business Partner	EDI Manager	Complete Q4	As above row 12
2.Inclusion	2.2 Develop, Support & Value our people	2.2.5 • Develop an annual programme of EDI awareness activities for our people which includes learning opportunities	Knowledge & Learning Business Partner	EDI Manager	Complete Q4	In progress

EPOs	Theme	Action	Dependencies	Owner	Timescale	Comments/progress
2.Inclusion	2.2 Develop, Support & Value our people	2.2.6 <ul style="list-style-type: none"> •Develop maturity of our staff networks by working closely with executive sponsors by reviewing and developing clear action plan/vision for each network (Race equality Code, Stonewall, Disability Confident/Reasonable Adjustments) • Development of network chairs 		EDI Manager	Complete Q2 Complete Q3	Complete - Each network has developed a clear framework /action plan to enageg with exec sponsor <ul style="list-style-type: none"> • disability smart framework • Stonewall workplace Indexdisabilty smart • Race Equality Code EDI team to look at what training for network chairs is available from each organisation we have signed up to - race equality maters, stonewall etc
2.Inclusion	2.2 Develop, Support & Value our people	2.2.7 <ul style="list-style-type: none"> •Development of Workforce Reasonable adjustment Policy & supporting guidance for managers •Workplace coaching for managers to support neurodiverse staff •Development of guidance to support managers 		Head of People Strategy & services	Complete Q3	In progress - Head of People developeing Neurodiversity Training delivered in June Guidance will be within RA guidance when RA policy is developed
2.Inclusion	2.3 Promote Engagement, Equality, Inclusion & Well being	2.3.1 •Development of full 360 feedback model following actions from civil service people survey and consultation around inclusion, bullying, harassment & monitor track report employee grievance in relation to same issues by employee demographics <ul style="list-style-type: none"> •identify top 2 issues identified for each specific demographic from civil service survey & consultation & work closely with Staff networks on solutions 	HR	EDI Manager	Complete Q4	start planning programme for next year about what we can do and when second survey.
2.Inclusion	2.3 Promote Engagement, Equality, Inclusion & Well being	2.3.2 <ul style="list-style-type: none"> •Provide opportunities for staff to have their voices heard •Implement safe space workshops to give our people opportunity to respectfully ask questions and share their experience 	Executive Team Internal Comms	EDI Manager	Complete Q3	Working with comms to develop safe space workshops - start Q3
2.Inclusion	2.3 Promote Engagement, Equality, Inclusion & Well being	2.3.3 •Create & Launch Women’s Network		EDI Manager	Complete Q2	Exec sponsors established - first meeting in November
2.Inclusion	2.3 Promote Engagement, Equality, Inclusion & Well being	2.3.4 • Exploring Working group for fully remote & hub workers to promote inclusion		EDI Manager	Complete Q3	In progress -remote workers day on 18th Oct as part of H& S & well being month. Focus group to look at opporunities to improve remote and hib workers experience

EPOs	Theme	Action	Dependencies	Owner	Timescale	Comments/progress
2.Inclusion	2.3 Promote Engagement, Equality, Inclusion & Well being	2.3.5 • Continue to actively promote health and wellbeing through a range of wellbeing initiatives and engagement activities, including support from the Wellbeing Champions, Employee Assistance Programme, workshops, 'Buddy Circles' and the development of an ongoing wellbeing programme	Wellbeing Champions Internal Comms HR	EDI Manager	Complete Q4	In progress - health & safety well being day, well being and inclusion month
2.Inclusion	2.4 Benchmarking	2.4.1 • Commit to begin delivery of 12 must do's in Race Equality Code	REACH Network HR OLC Board Executive Team	EDI Manager	Complete Q4	
2.Inclusion	2.4 Benchmarking	2.4.2 •Develop an LGBTQ Action plan using Stonewall feedback to rank in the Stonewall Workplace Equality Index •Review of key HR policies and procedures to ensure gender neutral language	LGBTQ Steering Group Stonewall HR	EDI Manager	Complete Q3	3 year action plan complete, - network focusing on priorities for this year and next financial year. Feedback on policies from stonewall received and shared with HR
2.Inclusion	2.4 Benchmarking	2.4.3 Embed disability smart framework and commit to completing disability self assessment tool (Benchmark of Disability Business Forum)	BDF D&C Network	EDI Manager		
3. Access to our services to our service	3.1 Understanding our customers	3.1.1 • Analyse demographic data of current complaints to understand barriers to engagement through different aspects of our service using customer satisfaction survey and service complaints	Research & Impact Lead	EDI Manager	Complete Q3	
3. Access to our services to our service	3.1 Understanding our customers	3.1.2 • Thematic review of outcomes by demographics to have a better understanding of barriers that impact	Research & Impact lead	EDI Manager	Complete Q4	TBC
3. Access to our services to our service	3.1 Understanding our customers	3.1.3 Development of service complaint reporting to follow any inequality discrimination	BI Team Service Complaints Team	EDI Manager	Complete Q4	TBC
3. Access to our services to our service	3.1 Understanding our customers	3.1.4 • Review data on all declared disabilities and Reasonable adjustments of our customers, to help us understand the barriers complainants experience and inform any changes we make. • Report to Equality, Diversity & Inclusion Steering group on a biannual basis	BI Team	EDI Manager	Complete Q2	Working with BI team to get this into data warehouse and then build power BI dashboard

EPOs	Theme	Action	Dependencies	Owner	Timescale	Comments/progress
3. Access to our services to our service	3.2 Reasonable Adjustments	3.2.1 <ul style="list-style-type: none"> •Full review of reasonable Adjustments process and guidance •Create and Launch resources and tips for supporting customers with a disability and vulnerable customers •Review of supporting documents including vulnerable customer guidance and suicide and self harm 	Ops	EDI Manager	Complete Q4	Completed
3. Access to our services to our service	3.2 Reasonable Adjustments	3.2.1.1 <ul style="list-style-type: none"> •Increase number of vulnerable customer champions (VCC) across the business •Train VCC in implementing new RA framework •Establish multi disciplinary team for support on complex RA cases 	Ops	EDI Manager	Complete Q2	All TIs trained as VCCs Attended Ops leadership meeting and ran through ew process with all TIs MDT established and piloted - embedding process
3. Access to our services to our service	3.2 Reasonable Adjustments	3.2.1.2 <ul style="list-style-type: none"> •Full audit and review of prioritisation process at front end of process to ensure Reasonable adjustments have been met •Development of clear criteria for implementing prioritisation process •Development of customer journey process for prioritisation process 		Service Complaints Ombudsman	Complete Q3	Liasing with senior ombudsman to deliver this work stream, priority to complete along side RA review
3. Access to our services to our service	3.3. Accessibility	3.3.1.1 <ul style="list-style-type: none"> •Review of our website accessibility •Review of complaints form accessibility 	External Affairs Transformation manager	EDI Manager	Complete Q4	

EPOs	Theme	Action	Dependencies	Owner	Timescale	Comments/progress
Inclusion	Leadership	<ul style="list-style-type: none"> •Deliver Inclusive Leadership Training for all leaders •Including inclusive behaviours as part of performance management 	Knowledge & learning Business Partner, HR	EDI Manager	Complete Q2 Complete Q4	Complete Nikki to summarise key themes and feedback to Deb to start work on integrating inclusive behaviour into performance pamanagement and PDR
Inclusion	Develop, Support & Value our people	<ul style="list-style-type: none"> • Review and evaluate the 2021/22 interim Celebrating Success scheme taking into account demographics 		Head of People Strategy & Services	Complete Q2	Data received in August 22,
Inclusion	Develop, Support & Value our people	<ul style="list-style-type: none"> •Develop maturity of our staff networks by working closely with executive sponsors by reviewing and developing clear action plan/vision for each network (Race equality Code, Stonewall, Disability Confident/Reasonable Adjustments) • Development of network chairs 		EDI Manager	Complete Q2 Complete Q3	Complete - Each network has developed a clear framework /action plan to enageg with exec sponsor <ul style="list-style-type: none"> • Disabilty smart framework • Stonewall workplace Index • Race Equality Code Kirna to look at what training for network chairs is available from each organisation we have signed up to - race equality maters, stonewall etc <ul style="list-style-type: none"> • BDF - all employees have access to "knowledge hub" offers resources/e-learning (need to register) • Awaiting response from Stonewall and REM
Inclusion	Promote Engagement, Equality, Inclusion & Well being	<ul style="list-style-type: none"> •Create & Launch Women's Network 		EDI Manager	Complete Q2	Exec sponsors established - first meeting in October
Access to our services to our service	Understanding our customers	<ul style="list-style-type: none"> • Review data on all declared disabilities and Reasonable adjustments of our customers, to help us understand the barriers complainants experience and inform any changes we make. • Report to Equality, Diversity & 	BI Team	EDI Manager	Complete Q2	<ul style="list-style-type: none"> • Working with BI team to get this into data warehouse and then build power BI dashboard. • Sept 22- Raw data extracted and high level analysis completed • Visuals complete for end of Q3
Access to our services to our service	Reasonable Adjustments	<ul style="list-style-type: none"> •Increase number of vulnerable customer champions (VCC) across the business •Train VCC in implementing new RA framework •Establish multi disciplinary team for support on complex RA cases 	Ops	EDI Manager	Complete Q2	<ul style="list-style-type: none"> • All TIs trained as VCCs • Attened Ops leadership meeting in July 2022 and ran through new process with all TIs • MDT established and piloted June 2022, working towards embedding process when laucnh of RA framework in September

EPOs	Theme	Action	Dependencies	Owner	Timescale	Comments/progress
Representation	Attract, Recruit, Retain	<ul style="list-style-type: none"> Review the Recruitment Policy to ensure it reflects excellent recruitment practice, promotes excellent EDI practice and is fully compliant with employment law 		Head of People Strategy & Services	Complete Q3	<ul style="list-style-type: none"> Head of People has started full recruitment process review as part of people strategy in Q3, EDI team will support project to ensure EDI lens throughout
Representation	Attract, Recruit, Retain	<ul style="list-style-type: none"> Expect all recruitment agencies to promote diversity and present diverse applicant pools 	HR	EDI Manager	Complete Q3	Commitment to equality from recruitment agencies - will look to add paragraph in SLA/contract in future - working with Head of People & procurement manager to implement this
Representation	Attract, Recruit, Retain	<ul style="list-style-type: none"> Develop an Attraction & Retention Strategy for the whole organisation including considerations of diversity characteristics 		Head of People Strategy & Services	Complete Q3	<ul style="list-style-type: none"> Head of People leading on this, will ensure they will consult with networks and staff council
Inclusion	Develop, Support & Value our people	<ul style="list-style-type: none"> Develop maturity of our staff networks by working closely with executive sponsors by reviewing and developing clear action plan/vision for each network (Race equality Code, Stonewall, Disability Confident/Reasonable Adjustments) Development of network chairs 		EDI Manager	Complete Q2 Complete Q3	<p>Complete -</p> <p>Each network has developed a clear framework /action plan to engage with exec sponsor</p> <ul style="list-style-type: none"> disabilty smart framework - joined as of 1st September Stonewall workplace Index Race Equality Code EDI Specialist to look at what training available for network chairs from each organisation we have signed up to - race equality maters, stonewall etc

EPOs	Theme	Action	Dependencies	Owner	Timescale	Comments/progress
Inclusion	Develop, Support & Value our people	<ul style="list-style-type: none"> •Development of Workforce Reasonable adjustment Policy & supporting guidance for managers •Workplace coaching for managers to support neurodiverse staff •Development of guidance to support managers 		Head of People Strategy & services	Complete Q3	<ul style="list-style-type: none"> • In progress - Head of People will be using BDF to develop RA policy. • Neurodiversity Training delivered in June • Guidance will be within RA guidance when RA policy is developed
Inclusion	Promote Engagement, Equality, Inclusion & Well being	<ul style="list-style-type: none"> •Provide opportunities for staff to have their voices heard •Implement safe space workshops to give our people opportunity to respectfully ask questions and share their experience 	Executive Team Internal Comms	EDI Manager	Complete Q3	<ul style="list-style-type: none"> • Working with internal comms to develop safe space workshops - • Email to exec sponsors, Executive team & Board to obtain commitment - Sept 22 • Email to networks to ask for their topics for safe space discussion - Sept 22 • Deliver first safe space in Q4
Inclusion	Promote Engagement, Equality, Inclusion & Well being	<ul style="list-style-type: none"> • Exploring Working group for fully remote & hub workers to promote inclusion 		EDI Manager	Complete Q3	<ul style="list-style-type: none"> • Focus group to understand barriers & challenges for remote workers in terms on inclusion, well being and belonging • Considering a Remote workers day in October as part of health & Safety & Well being •

EPOs	Theme	Action	Dependencies	Owner	Timescale	Comments/progress
Inclusion	Benchmarking	<ul style="list-style-type: none"> •Develop an LGBTQ Action plan using Stonewall feedback to rank in the Stonewall Workplace Equality Index •Review of key HR policies and procedures to ensure gender neutral language 	LGBTQ Steering Group Stonewall HR	EDI Manager	Complete Q3	<p>3 year action plan complete, - network focusing on priorities for this year and next financial year.</p> <ul style="list-style-type: none"> •Policy & benefits •Employee lifecycle • recruitment data gathering/monitoring <p>HR policies are with Stonewall - awaiting feedback</p>
Access to our services to our service	Understanding our customers	<ul style="list-style-type: none"> • Analyse demographic data of current complaints to understand barriers to engagement through different aspects of our service using customer satisfaction survey and service complaints 	Research & Impact Lead	EDI Manager	Complete Q3	<ul style="list-style-type: none"> • Review of customer satisfaction survey - during investigation and end of process
Access to our services to our service	Reasonable Adjustments	<ul style="list-style-type: none"> •Full audit and review of prioritisation process at front end of process to ensure Reasonable adjustments have been met •Development of clear criteria for implementing prioritisation process •Development of customer journey process for prioritisation process 		Service Complaints Ombudsman	Complete Q3	<p>Joie Handle is delivering the prioritisation review, currently on hold due to capacity issues. A paper to exec to approve new process and embedding into business to be scheduled in due course</p>

EPOs	Theme	Action	Dependencies	Owner	Timescale	Comments/progress
Representation	Understanding our workforce	<ul style="list-style-type: none"> Collect regular data to understand the demographic of our workforce at all levels to drive change 	HR	EDI Manager	Bi annually	Issue with getting data out of CipHR generally but have sent a versio to BI team to start looking at putting into data warehouse - exncet some sort of
Representation	Attract, Recruit, Retain	<ul style="list-style-type: none"> Complete full recruitment bench marking exercise to understand if there is any bias in our recruitment process Promote diversity in recruitment by 	HR, IT, BI team	EDI Manager	Complete Q4	Deb W has started project planning for this in Q2. Will liaise with me throughout process in terms of benchmarking and gaps
Representation	Attract, Recruit, Retain	<ul style="list-style-type: none"> Identify a variety of media sources and advertisement platforms to provide access to the most diverse pool of talent possible and our vacancies will use inclusive language, diverse imagery and will be accessible 	HR, Comms	Senior HR Services, EDI Manager	Complete Q4	Nikki to look at opportunity to use Stonewall and if there are any cst s of race equality matters board. If sign up for business disability forum - option to advertise on their platform
Representation	Attract, Recruit, Retain	<ul style="list-style-type: none"> Deliver recruitment training to line managers as part of the Leadership and Management Development programme - to include EDI considerations within the recruitment process (e.g., awareness of unconscious bias) 	Knowledge & Learning & Development Business Partner	Head of People Strategy & Services	Complete Q4	delivery through training programme external consultant - leadership development programme (confirmed) madatory module on reruitment and unconscious bias
Representation	Benchmarking	<ul style="list-style-type: none"> Ensure that external presentation of organisation represent diversity 		External affairs	Complete Q4	work with Ashley abut improving social media presence and website presentation - networks on external website
Representation	Benchmarking	<ul style="list-style-type: none"> Achieve Disability Confident L2 by March 2023 and achieve L3 by March 2024 to understand the needs of our employees with a disability and ensure our recruitment processes and workplaces are accessible and inclusive 	HR	EDI Manager	Complete Q4	Kirna send to Deb & Dan our plan so far to collect evidece and identify gaps

EPOs	Theme	Action	Dependencies	Owner	Timescale	Comments/progress
Inclusion	Leadership	<ul style="list-style-type: none"> •Deliver Inclusive Leadership Training for all leaders •Including inclusive behaviours as part of performance management 	Knowledge & learning Business Partner, HR	EDI Manager	Complete Q2 Complete Q4	Complete Nikki to summarise key themes and feedback to Deb to start work on integrating inclusive behaviour into performance pamanagement and PDR
Inclusion	Leadership	•Develop and implement a new leadership and management development programmes for current and aspiring managers (to include people management skills and EDI)	HR	Head of People Strategy & Services	Complete Q4	In progress -
Inclusion	Develop, Support & Value our people	• Develop and implement a Competency Framework, setting out expectations of employees in different roles and at different levels including inclusive behaviour	HR	Head of People Strategy & Services	Complete Q4	Nikki to summarise key themes and feedback to Deb to start work on integrating inclusive behaviour into performance pamanagement and PDR
Inclusion	Develop, Support & Value our people	• Develop a talent management and succession planning strategy ensuring we work closely with Staff networks	HR	Head of People Strategy & Services	Complete Q4	
Inclusion	Develop, Support & Value our people	• Development of reverse mentoring programme for senior leaders	HR, Knowledge & learning Business Partner	EDI Manager	Complete Q4	As above row 12
Inclusion	Develop, Support & Value our people	• Develop an annual programme of EDI awareness activities for our people which includes learning opportunities	Knowledge & Learning Business Partner	EDI Manager	Complete Q4	In progress

EPOs	Theme	Action	Dependencies	Owner	Timescale	Comments/progress
Inclusion	Promote Engagement, Equality, Inclusion & Well being	<ul style="list-style-type: none"> •Development of full 360 feedback model following actions from civil service people survey and consultation around inclusion, bullying, harassment & monitor track report employee grievance in relation to same issues by employee demographics •identify top 2 issues identified for each specific demographic from civil service survey & consultation & work closely with Staff networks on solutions 	HR	EDI Manager	Complete Q4	start planning programme for next year about what we can do and when second survey.
Inclusion	Promote Engagement, Equality, Inclusion & Well being	<ul style="list-style-type: none"> • Continue to actively promote health and wellbeing through a range of wellbeing initiatives and engagement activities, including support from the Wellbeing Champions, Employee Assistance Programme, workshops, 'Buddy Circles' and the development of an ongoing wellbeing programme 	Wellbeing Champions Internal Comms HR	EDI Manager	Complete Q4	In progress - health & safety well being day, well being and inclusion month
Inclusion	Benchmarking	<ul style="list-style-type: none"> • Commit to begin delivery of 12 must do's in Race Equality Code 	REACH Network HR OLC Board Executive Team	EDI Manager	Complete Q4	
Access to our services to our service	Understanding our customers	<ul style="list-style-type: none"> • Thematic review of outcomes by demographics to have a better understanding of barriers that impact resolution 	Research & Impact lead	EDI Manager	Complete Q4	Working with research and impact lead as part of data benchmarking
Access to our services to our service	Understanding our customers	<ul style="list-style-type: none"> • Development of service complaint reporting to follow any inequality discrimination 	BI Team Service Complaints Team	EDI Manager	Complete Q4	ON HOLD - service complaints still not in CMS

EPOs	Theme	Action	Dependencies	Owner	Timescale	Comments/progress
Access to our services to our service	Reasonable Adjustments	<ul style="list-style-type: none"> •Full review of reasonable Adjustments process and guidance •Create and Launch resources and tips for supporting customers with a disability and vulnerable customers •Review of supporting documents 	Ops	EDI Manager	Complete Q4	Launching start of September
Access to our services to our service	Accessibility	<ul style="list-style-type: none"> •Review of our website accessibility •Review of complaints form accessibility 	External Affairs Transformation manager	EDI Manager	Complete Q4	ON HOLD

Appendix 2 EDI strategy 3 year Action Plan

3 YEAR EDI ACTION PLAN

EPOs	Theme	Action	High Level activities (Y/N)	Dependencies	Owner	Year	FY	Corporate Plans	Comments/progress
1. REPRESENTATIVE WORKFORCE	1.1 Understanding our workforce	1.1.1 Collect regular data to understand the demographic of our workforce at all levels to drive change	Y	HR	EDI Manager	Y1, Y2, Y3	2022-2025	People Strategy	Issue with getting data out of CipHR generally but have sent a version to BI team to start looking at putting into data warehouse - expect some sort of feedback in September
1. REPRESENTATIVE WORKFORCE	1.2 Attract, Recruit, Retain	1.2.1 <ul style="list-style-type: none"> Complete full recruitment benchmarking exercise to understand if there is any bias in our recruitment process (Annual collection of data, Snapshot on high volume roles - following national recruitment, Snapshot on senior roles) Promote diversity in recruitment by targeting and monitoring recruitment activity though improved EDI recruitment data 	Y	HR, IT, BI team	EDI Manager	Y1	2022-2023	People Strategy	Head of HR has started project planning for this in Q2. Will liaise with me throughout process in terms of benchmarking and gaps
1. REPRESENTATIVE WORKFORCE	1.2 Attract, Recruit, Retain	1.2.1.1 <ul style="list-style-type: none"> Review the Recruitment Policy to ensure it reflects excellent recruitment practice, promotes excellent EDI practice and is fully compliant with employment law 	N		Head of People Strategy & Services	Y1			Head of People is starting full recruitment process review as part of people strategy in Q3, EDI team will support project to ensure EDI lens throughout
1. REPRESENTATIVE WORKFORCE	1.2 Attract, Recruit, Retain	1.2.2 Ensuring recruitment & attraction Strategy allows us to present a diverse workforce, strategy in place Y1	Y			Y1	2022-2025	People Strategy	
1. REPRESENTATIVE WORKFORCE	1.2 Attract, Recruit, Retain	1.2.2.1 <ul style="list-style-type: none"> Identify a variety of media sources and advertisement platforms to provide access to the most diverse pool of talent possible and our vacancies will use inclusive language, diverse imagery and will be accessible 	N	HR, Comms	Senior HR Services, EDI Manager	Y1, Y2	2022-2024	People Strategy	EDI team to look at opportunity to use Stonewall and if there are any issues of race equality matters board. If sign up for business disability forum - option to advertise on their platform
1. REPRESENTATIVE WORKFORCE	1.2 Attract, Recruit, Retain	1.2.2.2 <ul style="list-style-type: none"> Expect all recruitment agencies to promote diversity and present diverse applicant pools 	N	HR	EDI Manager	Y1			Commitment to equality from recruitment agencies - will look to add paragraph in SLA/contract in future - working with Head of People to implement this
1. REPRESENTATIVE WORKFORCE	1.2 Attract, Recruit, Retain	1.2.3 Recruitment training across the organization to ensure they have tools and skills to deliver recruitment and selection processes so free from bias and encourage best practice	Y			Y1, Y2, Y3	2022-2025	People Strategy	
1. REPRESENTATIVE WORKFORCE	1.2 Attract, Recruit, Retain	1.2.3.1 <ul style="list-style-type: none"> Deliver recruitment training to line managers as part of the Leadership and Management Development programme - to include EDI considerations within the recruitment process (e.g., awareness of unconscious bias) 	N	Knowledge & Learning & Development Business Partner	Head of People Strategy & Services	Y1			delivery through training programme external consultant - leadership development programme
1. REPRESENTATIVE WORKFORCE	1.2 Attract, Recruit, Retain	1.2.4 Support for staff to pursue leadership roles, especially where there is under representation as part of aspiring leadership programme (focus on people management skills). Proactive use of networks to encourage under represented staff members to join aspiring leadership programme (refer to 2.1.3)	Y			Y1	2022-23		
1. REPRESENTATIVE WORKFORCE	1.2 Attract, Recruit, Retain	1.2.5 <ul style="list-style-type: none"> Develop an Attraction & Retention Strategy for the whole organisation including considerations of diversity characteristics 	Y		Head of People Strategy & Services	Y1			Head of People leading on this, will ensure they - will consult with networks and staff council

Appendix 2 EDI strategy 3 year Action Plan

3 YEAR EDI ACTION PLAN

EPOs	Theme	Action	High Level activities (Y/N)	Dependencies	Owner	Year	FY	Corporate Plans	Comments/progress
1. REPRESENTATIVE WORKFORCE	1.2 Attract, Recruit, Retain	1.2.6 Continue our progress to achieve gender balance and address under representation of women in senior roles	Y			Y2, Y3	2023-2025	EDI Strategy/People Strategy	
1. REPRESENTATIVE WORKFORCE	1.3 Benchmarking	1.3.1 Ensure that external presentation of organization represent diversity	Y		External affairs	Y1	2022-2023	EDI Strategy/ network groups/ external affairs	work with internal comms about improving social media presence and website presentation - networks on external website
1. REPRESENTATIVE WORKFORCE	1.3 Benchmarking	1.3.2 Achieve Disability Confident L2 by March 2023 and achieve L3 by March 2024 to understand the needs of our employees with a disability and ensure our recruitment processes and workplaces are accessible and inclusive	Y			Y1	2022-2023	People Strategy/ Disability & Carers Network	EDI team send to HR our plan so far to collect evidence and identify gaps
1. REPRESENTATIVE WORKFORCE	1.3 Benchmarking	1.3.3 Ensure our ethnicity data is robust and publish our first ethnicity pay gap report To be compliant with 10 'must' actions in race equality code	Y			Y4	2025-2026	People Strategy/BAME Network	
2. EMBEDDING INCLUSION	2.1 Leadership	2.1.1 Deliver Inclusive Leadership Training for all leaders •Including inclusive behaviours as part of performance management	Y	Knowledge & learning Business Partner, HR	EDI Manager	Y1	2022-2023	People Strategy/EDI Strategy	Complete EDI Manager to summarise key themes and feedback to Head of People to start work on integrating inclusive behaviour into performance management and PDR
2. EMBEDDING INCLUSION	2.1 Leadership	2.1.2 Y1 is to develop framework for mentoring	Y	HR, Knowledge & learning Business Partner	Head of People Strategy & Services	Y1	2022-2025	EDI Strategy/People Strategy/Business Plan	Concept has been presented and supported by EDI steering group, next steps to consider impact on resource, capacity, costs for Executive team
2. EMBEDDING INCLUSION	2.2 Develop, Support & Value our people	2.2.1.1 •Develop framework for reverse mentoring programme for senior leaders to increase awareness and competency in becoming a more inclusive leader	N	HR, Knowledge & learning Business Partner	EDI Manager	Y1, Y2, Y3			
2. EMBEDDING INCLUSION	2.1 Leadership	2.1.3 Develop and implement a new leadership and management development programmes for current and aspiring managers (to include people management skills and EDI)"	Y	HR	Head of People Strategy & Services	Y1	2022-2023		In progress -
2. EMBEDDING INCLUSION	2.2 Develop, Support & Value our people	2.2.1 Review and evaluate the 2021/22 interim Celebrating Success scheme taking into account demographics	N	Head of People Strategy & Services		Y1			Waiting for data from HR
2. EMBEDDING INCLUSION	2.2 Develop, Support & Value our people	2.2.2 Develop and implement a Competency Framework, setting out expectations of employees in different roles and at different levels including inclusive behaviour	N	HR	Head of People Strategy & Services	Y1			EDI Manager to summarise key themes and feedback to Head of People to start work on integrating inclusive behaviour into performance management and PDR
2. EMBEDDING INCLUSION	2.2 Develop, Support & Value our people	2.2.3 Develop a talent management and succession planning strategy ensuring we work closely with Staff networks	Y	HR	Head of People Strategy & Services	Y1			
2. EMBEDDING INCLUSION	2.2 Develop, Support & Value our people	2.2.4 Development of reverse mentoring programme for senior leaders (2.1.2.1)	N	HR, Knowledge & learning Business Partner	EDI Manager	Y1			
2. EMBEDDING INCLUSION	2.2 Develop, Support & Value our people	2.2.5 Develop an annual programme of EDI awareness activities for our people which includes learning opportunities	Y	Knowledge & Learning Business Partner	EDI Manager	Y1	2022	EDI Strategy/People Strategy	In progress -

Appendix 2 EDI strategy 3 year Action Plan

3 YEAR EDI ACTION PLAN

EPOs	Theme	Action	High Level activities (Y/N)	Dependencies	Owner	Year	FY	Corporate Plans	Comments/progress
2. EMBEDDING INCLUSION	2.2 Develop, Support & Value our people	2.2.6 Develop maturity of our staff networks by working closely with executive sponsors by reviewing and developing clear action plan/vision for each network (RAP, Stonewall, Disability Confident) Development of network chairs	N		EDI Manager	Y1, Y2, Y3	2022-2025	EDI Strategy/ network groups	Complete - Each network has developed a clear framework /action plan to engage with exec sponsor <ul style="list-style-type: none"> • disability smart framework • Stonewall workplace • Indexdisability smart • Race Equality Code EDI team to look at what training for network chairs is available from each organisation we have signed up to - race equality matters, stonewall etc
2. EMBEDDING INCLUSION	2.2 Develop, Support & Value our people	2.2.7 <ul style="list-style-type: none"> •Development of Workforce Reasonable adjustment Policy & supporting guidance for managers •Workplace coaching for managers to support neurodiverse staff •Development of guidance to support managers 	N		Head of People Strategy & services	Y1			In progress - Head of People developing Neurodiversity Training delivered in June Guidance will be within RA guidance when RA policy is developed
2. EMBEDDING INCLUSION	2.3 Promote Engagement, Equality, Inclusion & Well being	2.3.1 <ul style="list-style-type: none"> •Development of full 360 feedback model following actions from civil service people survey and consultation around inclusion, bullying, harassment & monitor track report employee grievance in relation to same issues by employee demographics •Identify top 2 issues identified for each specific demographic from civil service survey & consultation & work closely with Staff networks on solutions 	Y	HR	EDI Manager	Y1, Y2, Y3	2022-2025	People Strategy	Start planning programme for next year about what we can do and when second survey.
2. EMBEDDING INCLUSION	2.3 Promote Engagement, Equality, Inclusion & Well being	2.3.2 <ul style="list-style-type: none"> •Provide opportunities for staff to have their voices heard Implement safe space workshops to give our people opportunity to respectfully ask questions and share their experience	N	Executive Team Internal Comms	EDI Manager	Y1	2022-2023	People Strategy/EDI Strategy	Working with comms to develop safe space workshops - start Q3
2. EMBEDDING INCLUSION	2.3 Promote Engagement, Equality, Inclusion & Well being	2.3.3 Create and launch a Women's network	N		EDI Manager	Y1	2022-2023	EDI Strategy/ network groups	Exec sponsors established - first meeting in November
2. EMBEDDING INCLUSION	2.3 Promote Engagement, Equality, Inclusion & Well being	2.3.4 Exploring Working group for fully remote & hub workers to promote inclusion	Y		EDI Manager	Y1	2022-2023	EDI Strategy/People Strategy	In progress -remote workers day on 18th Oct as part of H& S & well being month. Focus group to look at opportunities to improve remote and hub
2. EMBEDDING INCLUSION	2.3 Promote Engagement, Equality, Inclusion & Well being	2.3.5 Continue to actively promote health and wellbeing through a range of wellbeing initiatives and engagement activities, including support from the Wellbeing Champions, Employee Assistance Programme, workshops, 'Buddy Circles' and the development of an ongoing wellbeing programme	Y	Wellbeing Champions Internal Comms HR	EDI Manager	Y1			In progress - health & safety well being and inclusion mont October. Delivered Amnesty week, H&S quiz, Remote workers day, including Wellbeing
2. EMBEDDING INCLUSION	2.3 Promote Engagement, Equality, Inclusion & Well being	2.3.6 Analyse staff on performance plans by demographics to understand if there are barriers around learning, development and skills	N			Y2	2023-2024	EDI Strategy/People Strategy	

Appendix 2 EDI strategy 3 year Action Plan

3 YEAR EDI ACTION PLAN

EPOs	Theme	Action	High Level activities (Y/N)	Dependencies	Owner	Year	FY	Corporate Plans	Comments/progress
2. EMBEDDING INCLUSION	2.4 Benchmarking	2.4.1 Continue to deliver Race Action Plan and commit to race equality code (y1) • Commit to begin delivery of 12 must do's in Race Equality Code	Y	REACH Network HR OLC Board Executive Team	EDI Manager	Y1, Y2, Y3	2022-2025	EDI Strategy/People Strategy	
2. EMBEDDING INCLUSION	2.4 Benchmarking	2.4.2 Develop an LGBTQ Action plan using Stonewall feedback to rank in the Stonewall Workplace Equality Index •Review of key HR policies and procedures to ensure gender neutral language	Y	LGBTQ Steering Group Stonewall HR	EDI Manager	Y1, Y2, Y3	2022-2025	EDI Strategy/People Strategy	
2. EMBEDDING INCLUSION	2.4 Benchmarking	2.4.3 Embed disability smart framework and commit to completing disability self assessment tool (Benchmark of Disability Business Forum)	Y	BDF D+C network	EDI Manager	Y1, Y2, Y3	2022-2025	EDI Strategy/people Strategy	
3. IMPROVE ACCESSIBILITY	3.1 Understanding our customers	3.1.1 Analyse demographic data of current complaints to understand barriers to engagement through different aspects of our service using customer satisfaction survey and service complaints	Y	Research & Impact Lead	EDI Manager	Y1, Y2	2022-2024	Business Plan Priority 1	
3. IMPROVE ACCESSIBILITY	3.1 Understanding our customers	3.1.2 Thematic reviews of outcomes by demographics to have a better understanding of barriers that impact resolution (annual review)	N	Research & Impact lead	EDI Manager	Y1, Y2, Y3	2022-2025	Business Plan priority 1/ EDI Strategy	TBC
3. IMPROVE ACCESSIBILITY	3.1 Understanding our customers	3.1.3 Development of service complaint reporting to follow any inequality discrimination	N	BI Team Service Complaints Team	EDI Manager	Y1, Y2, Y3	2022-2025	EDI Strategy	TBC
3. IMPROVE ACCESSIBILITY	3.1 Understanding our customers	3.1.4 • Review data on all declared disabilities and Reasonable adjustments of our customers, to help us understand the barriers complainants experience and inform any changes we make. • Report to Equality, Diversity & Inclusion Steering group on a biannual basis	Y	BI Team	EDI Manager	Y1			Working with BI team to get this into data warehouse and then build power BI dashboard
3. IMPROVE ACCESSIBILITY	3.1 Understanding our customers	3.1.5 Engage with customers using customer on impact assessments for changes to our service and processes Ensure that equalities implications inform policy formulation and decision making from the start of the process	N			Y2, Y3	2022-2025	Business Plan	
3. IMPROVE ACCESSIBILITY	3.2 Reasonable Adjustments	3.2.1 Full review of Reasonable Adjustments Process & Guidance (Y1) •Create and Launch resources and tips for supporting customers with a disability and vulnerable customers •Review of supporting documents including vulnerable customer guidance and suicide and self harm	Y	Ops	EDI Manager	Y1	2022-2023	Business Plan Priority 1	Launching start of September
3. IMPROVE ACCESSIBILITY	3.2 Reasonable Adjustments	3.2.1.1 •Increase number of vulnerable customer champions (VCC) across the business •Train VCC in implementing new RA framework •Establish multi disciplinary team for support on complex RA cases	N	Ops	EDI Manager	Y1			All TIs trained as VCCs Attended Ops leadership meeting and ran through ew process with all TIs MDT established and piloted - embedding process

Appendix 2 EDI strategy 3 year Action Plan

3 YEAR EDI ACTION PLAN

EPOs	Theme	Action	High Level activities (Y/N)	Dependencies	Owner	Year	FY	Corporate Plans	Comments/progress
3. IMPROVE ACCESSIBILITY	3.2 Reasonable Adjustments	3.2.1.2 <ul style="list-style-type: none"> •Full audit and review of prioritisation process at front end of process to ensure Reasonable adjustments have been met •Development of clear criteria for implementing prioritisation process •Development of customer journey process for prioritisation process 	N		Service Complaints Ombudsman	Y1			Liasing with senior ombudsman to deliver this work stream, priority to complete along side RA review
3. IMPROVE ACCESSIBILITY	3.3. Accessibility	3.3.1 Review of our website, guidance and comms channels (emails, letters, calls)	Y			Y2	2023-2024	Business Plan	
3. IMPROVE ACCESSIBILITY	3.3. Accessibility	3.3.1.1 <ul style="list-style-type: none"> •Review of our website accessibility •Review of complaints form accessibility 	N	External Affairs Transformation manager	EDI Manager	Y1			
3. IMPROVE ACCESSIBILITY	3.3. Accessibility	3.3.2 Regular external comms explaining how we are embedding EDI in everything we do	Y			Y2, Y3,Y4	2022-2026	EDI Strategy	
3. IMPROVE ACCESSIBILITY	3.3. Accessibility	3.3.3 Identify opportunities to link directly with regulators and our service providers to effectively improve our feedback to the profession, particularly service providers with protected characteristics	Y			Y2, Y3	2022-2025	Business plan priority 3	
3. IMPROVE ACCESSIBILITY	3.3. Accessibility	3.3.4 Provide our people with annual accessibility training (RA governance)	Y			Y2, Y3	2022-2025	EDI Strategy/ network groups	



REACH NETWORK: ACTION PLAN 22-26

Principles	Action	EDI strategy	Dependencies	Owner	Timescale	Comments/progress
Reporting	Obtain data on number of employees that fall in the REACH Network	1.1.1 Collect regular data to understand the demographic of our workforce at all levels to drive change	HR	EDI Team	Bi annually	Issue with getting data out of CipHR generally but have sent a versio to BI team to start looking at putting into data warehouse - expcet some sort of feedback in September
Reporting	REACH NETWORK Strategy and Roadmap visible to all		Network	EDI Team / Internal Comms		
Reporting	Establish a collaboration with EDI for quarterly reports			EDI Team	Quarterly / Bi annually	
Reporting	Engagement Sessions with sponsors and stakeholders	2.2.6 •Develop maturity of our staff networks by working closely with executive sponsors by reviewing and developing clear action plan/vision for each network (Race equality Code, Stonewall, Disability Confident/Reasonable Adjustments) • Development of network chairs	Network / Exec Sponsors	EDI Team	Bi monthly	Complete - Each network has developed a clear framework /action plan to engage with exec sponsor • disability smart framework • Stonewall WEI • disability smart framework • Race Equality Code EDI team to look at what training for network chairs is available from each organisation we have signed up to - race equality maters, stonewall etc
Reporting	Cultural and Religious Calendar	2.3 Promote Engagement, Equality, Inclusion & Well being	Network	EDI Team	Ongoing	EDI calendar live on Link since Jan 2022 and is regularly updated by EDI team. Network members are also reminded of upcoming awareness days every quarter to plan effectively forward
Reporting	Improved employee engagement	2.3 Promote Engagement, Equality, Inclusion & Well being	HR	EDI Team		
Reporting	Celebrating Success	2.2.1 Review and evaluate the 2021/22 interim Celebrating Success scheme taking into account demographics	HR	Head of People Strategy & Services	Complete Q2	Waiting for data from HR - share with Head of HR to be part of whole review to go to REMCO
Reporting	Network Idea Station			Network		
Reporting	More visibility on social media platforms	3.3.2 Regular external comms explaining how we are embedding EDI in everything we do		EDI Team / Internal Comms	Ongoing	
Reporting	Visible reports demonstrating network progress cross all channels			EDI Team / Internal Comms	Quarterly / Bi annually	See row 5
Actions	Celebrate success story through the organisation through employee that fall within the REACH Network		HR	EDI Team / Internal Comms		See row 9
Actions	Improved Senior Leadership engagement activities e.g. Cooking, dress, theme days, etc.	2.3 Promote Engagement, Equality, Inclusion & Wellbeing	Senior leadership team	EDI Team / Internal Comms / Network	Ongoing	Actively seeing more engagement from leadership team, involved with REACH activities (eg. BHM)
Actions	Quest speaker from all Cultures and Religions	2.3 Promote Engagement, Equality, Inclusion & Well being	Network	EDI Team / Network	Quarterly	

REACH NETWORK: ACTION PLAN 22-26						
Principles	Action	EDI strategy	Dependencies	Owner	Timescale	Comments/progress
Actions	Organisational Communication cascade plan	2.3 Promote Engagement, Equality, Inclusion & Well being		EDI Team / Internal Comms	Ongoing	Live EDI comms plan shared with network
Actions	LeO Network recognition programme	2.2.3 Develop a talent management and succession planning strategy ensuring we work closely with Staff networks	HR	Head of People Strategy & Services	Complete Q2	Waiting for data from HR - share with Head of HR to be part of whole review to go to REMCO
Actions	Visible imaging across all channels of employees that fall within the Network	2.3 Promote Engagement, Equality, Inclusion & Well being		EDI Team / Internal Comms	Ongoing	
Actions	Create Visual Aid (Handbook, leaflet of what the REACH Network can offer to employee)	2.3 Promote Engagement, Equality, Inclusion & Well being	Network	EDI Team / Internal Comms		
Actions	Road map for development within LeO "Step to" Learning and Development	1.2.5 Develop an Attraction & Retention Strategy for the whole organisation including considerations of diversity characteristics / aspiring leadership programme (2.1.3)	HR	Head of People Strategy & Services	Y1	Head of People leading on this, will ensure they - will consult with networks and staff council
Composition	Share monthly feedback and sentiment	2.3 Promote Engagement, Equality, Inclusion & Well being		Network		See row 6
Composition	Collaboration with EDI for awareness on Ethnic Pay Gap	1.3.3 Ensure our ethnicity data is robust and publish our first ethnicity pay gap report To be complaint with 10 'must' actions in race equality code	HR	EDI team / Sian	25/26	
Composition	Have a Network presence within the recruitment program	1.2.1 • Complete full recruitment bench marking exercise to understand if there is any bias in our recruitment process (Annual collection of data, Snapshot on high volume roles - following national recruitment, Snapshot on senior roles) • Promote diversity in recruitment by targeting and monitoring recruitment activity though improved EDI recruitment data	HR, IT, BI team	EDI Manager	Complete Q4	Head of People has started project planning for this in Q2. Will liaise with EDI manager throughout process in terms of benchmarking and gaps
Composition	Challenge and review current methodology on Race within the organisation	2.3 Promote Engagement, Equality, Inclusion & Well being		Network		
Composition	Introduce Race focus survey (to gather Pain Points)	2.3 Promote Engagement, Equality, Inclusion & Well being		Network		
Composition	Create organisation Race code	1.3.3 To be complaint with 10 'must' actions in race equality code HR EDI team / Research Impact lead	HR	EDI team / Research le	23/24	see row 22

REACH NETWORK: ACTION PLAN 22-26						
Principles	Action	EDI strategy	Dependencies	Owner	Timescale	Comments/progress
Composition	Actively identify improvement opportunities through civil service survey & Customer Insight	2.3.1 •Development of full 360 feedback model following actions from civil service people survey and consultation around inclusion, bullying, harassment & monitor track report employee grievance in relation to same issues by employee demographics •identify top 2 issues identified for each specific demographic from civil service survey & consultation & work closely with Staff networks on solutions	HR	EDI team	Complete Q4	start planning programme for next year about what we can do in terms of including questions and timing of a second survey.
Composition	Race and pay band sharing	1.3.3 Ensure our ethnicity data is robust and publish our first ethnicity pay gap report	HR	EDI team / Research le	23/24	see row 22
Education	Collab with EDI and Learning and Development to create an annual training module on Race and Religious beliefs	2.2.5 • Develop an annual programme of EDI awareness activities for our people which includes learning opportunities	Knowledge & Learning Business Partner	EDI Team	Complete Q4	In progress
Education	Attending stakeholder, sponsors, senior events	2.3 Promote Engagement, Equality, Inclusion & Well being		Network / EDI team	Ongoing	
Education	Active Office Present	2.3 Promote Engagement, Equality, Inclusion & Well being		EDI Team / Internal Comms	Ongoing	
Education	Awareness of Worship Rooms in the office	2.3 Promote Engagement, Equality, Inclusion & Well being	IT	EDI Team	Complete	Contemplation room available on matrix from 24th Oct 2022 to be used as worship/meditation room
Education	Identify clear consequences for those that do not adhere to Race Code	2.2 Develop, Support & Value our people	HR	EDI Team / Network		
Education	Open Days for people to have a scope on the Network to see what it is we are doing	2.3 Promote Engagement, Equality, Inclusion & Well being		EDI Team / Network		Will be included as part of remote/hub workers day
Education	Vlogs and blogs of "Race" related employee stories on SharePoint	2.3 Promote Engagement, Equality, Inclusion & Well being	Network / Staff from REACH community	EDI Team / Internal Comms	Ongoing	

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Reverse mentoring

Nikki Sinclair

Equality, Diversity & Inclusion Manager

Adam Thompson

Knowledge & Learning Business Partner



Background

- Feedback from civil service people survey showed that the experiences of some of our marginalized groups were poorer than the rest of general workforce particularly core themes like:
 - Employee engagement, Inclusion and fair treatment, learning and development
- As part of our work to become more inclusive leaders we want to challenge and develop our senior leadership team and OLC board by opening them up to different perspectives from colleagues with specific protected characteristics

What is reverse mentoring?

- Reverse mentoring is when a junior colleague mentors someone more senior
- It can match more senior and older colleagues with younger, junior colleagues
- Or match people new to an organisation with experienced colleagues
- Initially, we intend to match senior leaders with more junior colleagues who, from a diversity and inclusion perspective, are different from them in some way
- Focusing on pairing senior employees with colleagues from diverse backgrounds will encourage diversity and inclusion across the organisation overall.
- The focus is increasing the mentee's inclusivity awareness. However, unlike traditional mentoring, both the mentor and mentee have an opportunity to learn from each other

Organisational benefits

- Reverse mentoring improves leadership's understanding of minority issues, including those of LGBT and ethnic minorities
- It is an effective way to build genuine awareness of the barriers faced by minority colleagues
- Organisations and leaders can demonstrate their commitment to EDI by taking time to get to know colleagues they may otherwise have no interactions with, learn from each other, and work towards a more inclusive company culture
- Exposure to new and different perspectives: every conversation you have with someone who is from a different background and has a different lived experience, teaches you something
- Having the chance to learn and share with someone else in a safe space can be hugely impactful for inclusion
- Reverse mentoring improves engagement, overall experience and retention

Benefits for senior mentees

- Mentees become change agents who harness candid and honest feedback shared by their mentor to influence wider leadership and challenge unhelpful practices
- Reverse mentoring provides a tangible opportunity for leadership to walk the talk when it comes to inclusion, directing culture change through leading by example
- Ensuring those in senior positions have access to fresh perspectives
- Mentees develop their ability to lead diverse teams

Benefits for junior mentors

- By taking part in reverse mentoring, mentors gain visibility as role models to other ethnically diverse colleagues
- Mentors broaden their network by building mutually beneficial relationships with senior leaders
- Reverse mentoring is a unique knowledge-sharing opportunity, providing mentors with a unique insight into leadership roles
- Allows staff to get to know different parts of the organisation, helping them to grow their networks, and create professional relationships that may not have happened naturally.

Reverse mentoring pilot

- A reverse mentoring pilot started in November 2020 when the OLC Chair was matched with the Chair of LeO's BAME Network
- The pilot lasted 10 months
- Both parties found the match and ongoing relationship beneficial

Reflections

“Unlike the typical mentoring scheme, reverse mentoring in my view creates a balance where both of us were seeking to benefit from taking part in it. Whilst we had different objectives, we were honest at the outset about these so the meetings felt like we were both gaining and not at all one way”

“I have welcomed the opportunity to just listen and learn, to share reflections, gently ask questions and be honest about my past mistakes. We are two people from different backgrounds, and at different life stages, yet I truly believe we have found that we have a huge amount in common”

Reflection

“For me taking part in the programme has achieved more than I expected, reverse mentoring was not something I was too familiar with. But the programme has allowed me to share experiences that aren’t always heard, it has made me make time to reflect on myself and my achievements all whilst building a good relationship”

“Being able to talk so directly and openly about how messages have been landing, and to receive a more direct understanding of the staff perspective, has been really timely”

Our objectives

To design and implement a reverse mentoring programme at LeO in Q4 2023. The programme will emphasise the commitment of our senior leaders to EDI and inclusive leadership.

Method: The reverse mentoring programme will pair junior employees from minority backgrounds with more senior employees who are different from them in some way. The mentors will offer perspectives based on their experiences that the mentee may not be aware of.

Success: The mentees will have a greater awareness and understanding of the barriers faced by minority colleagues by the end of the programme. By pairing senior employees with colleagues from diverse backgrounds it will encourage diversity and inclusion across the organisation.

Measure: Civil Service People Survey WHAT ARE THE MEASURES?

How it will work

- **How many spaces are available?**
- We intend to pilot the programme by pairing volunteers from our staff networks with Board members
- **How long will the programme last?**
- We expect each relationship to last about six months.
- **What is the resource impact?**
- Three mentees will be matched with three mentors.
- **What is the commitment expected from participants?**
- A minimum of one meeting per month. We expect sessions to last approximately one hour.

Implementation

- **How will you match participants?**
 - All participants will complete a skills analysis to identify knowledge and experience. As part of the application process, mentees will be asked to identify their goals. We will use this data to match individuals.
- **How will you support mentors?**
 - All mentors will receive guidance and will be invited to a face-to-face briefing so they are clear about what is expected.
- **How will you monitor progress throughout the mentoring relationship?**
 - There will be regular check-ins with both parties.
- **Who will administer the programme?**
 - The programme will be run by L&D in partnership with EDI.

Next steps

- The following steps assume that roll-out of a reverse mentoring programme will be approved by Executive Team
- Write comms to attract volunteers
- Develop online template for volunteers to complete
- Match mentors with mentees based on experience and goals
- Provide both parties with guidance and face-to-face instructions
- Set up first introductory meeting – ‘chemistry check’
- Check in with participants
- Allow relationship to develop organically
- Check-in after six months

Next steps

- Evaluate the success of the programme
- Consider wider roll-out