

Meeting	OLC Board Meeting	Agenda Item No.	6
		Paper No.	144.5
Date of meeting	28 January 2026	Time required	35 Minutes

Title	EDI Update
Sponsor	Zoe Grainger, Head of People and Culture
Status	OFFICIAL
To be communicated to:	Members and those in attendance

Executive summary

Significant progress has been made across our 2025–26 EDI programme, with 79% of action plan milestones completed to date and all activities aligned to the strategic enablers in the OLC Business Plan. Engagement with colleagues remains strong, supported through Operations briefings, EDI Steering Group meetings, and regular internal communications.

A major achievement this quarter is the successful completion of the project to increase complainant EDI data submission rates. Following system and process changes to the online complaint form, “no response” rates have fallen from 96% to just 4%, resulting in a submission rate of 95%. This provides LeO with a far more accurate and reliable customer EDI dataset, strengthening our ability to identify trends, assess fairness, and ensure compliance with the Public Sector Equality Duty.

Other notable updates include completion of the draft Transitioning at Work Policy (pending updated Equality and Human Rights Commission guidance), a full review of our Race at Work Charter progress showing meaningful improvement across all seven commitments, and continued growth and positive impact from our staff networks with colleague satisfaction for EDI events at 92%.

Our Multi-Disciplinary Team (MDT) support for complex cases continues to show operational impact, reducing average case age for MDT referrals from 294 to 202 days which means we are helping customers with complex needs earlier.

Our external engagement work continues to enhance our understanding of best practice for supporting vulnerable customers, with 25 networking events attended so far this year, including key insights gained from national EDI events and regulator forums.

Finally, our gender pay gap performance remains strong, with a median of 4% and mean of 9%, both significantly better than sector benchmarks.

Recommendation / action required	
Board is asked to comment on this EDI update.	
Equality Diversity and Inclusion	
EDI implications	Yes
The EDI strategy is a key part of LeO's work to ensure we are compliant with relevant EDI legislation and best practice. It underpins our People and Culture plan. It also supports our people and our customers, having impacts on candidate attraction, staff engagement, staff retention, and customer accessibility and satisfaction.	
Freedom of Information Act 2000 (Fol)	
Paragraph reference	Fol exemption and summary
N/A	N/A
Value for Money (VfM)	
<p>The EDI programme continues to demonstrate strong value for money by delivering measurable improvements in service delivery, workforce engagement, and operational efficiency through targeted, proportionate activity.</p> <p>Improved intelligence enables earlier identification of customer needs, more effective use of reasonable adjustments, and better-targeted interventions through Multi-Disciplinary Team support, contributing to reduced case age for complex cases and helping to prevent avoidable complaints and rework.</p> <p>Internally, EDI activity supports retention, engagement, and capability by strengthening inclusive leadership, supporting staff networks, and maintaining strong workforce diversity outcomes relative to sector benchmarks. Collectively, this work helps LeO deliver a fairer, more accessible service at lower downstream cost, supports compliance with statutory duties, and ensures that limited resources are focused on interventions with demonstrable impact.</p>	

EDI strategy update

1. Background

All the key deliverables from our 2025-26 action plan are on track. 79% of the plan has been completed so far (82/104 activity milestones). All EDI action plan activities are aligned to the strategic enablers in the OLC business plan. Engagement within LeO on our commitment to EDI and progress against our commitments remains an important part of this, and we continue to engage with staff via a variety of different methods (such as Operations briefings, EDI Steering Group meetings, and updates in News in Brief).

A key part of our EDI strategy is to seek out best practices from organisations that support vulnerable customers and silent sufferers. We share those insights with colleagues around the business to contribute to our culture of service improvement. During this financial year we have attended 25 events so far (totalling 96 hours). Key events we attended in Q3 were the Race at Work Summit, Disability at Work Summit, and we also attended a legal regulator EDI forum session to explore the findings of LawCare's Life in the Law 2025 report into mental health and wellbeing in the legal profession.

2. Key project updates

The full EDI action plan for 2025/26 is detailed in the appendix. Some notable updates include:

2.1 Customer EDI information – measuring the success and impact of changes we made to the online complaint form

Over the past six months we have successfully completed the project to increase complainant EDI data submission rates, following feedback from the Legal Services Board and our own commitment to strengthening our understanding of who uses our service. As part of this work, the EDI questions were moved from the online eligibility checker to the end of the online complaint form. The wording was reviewed collaboratively by colleagues across Operations, EDI, Project Management Office (PMO) and Legal, and system changes were implemented so that Robotic Process Automation (RPA) can automatically pull EDI information into the complainant file. These improvements were designed to streamline the customer journey, reduce resource pressures on the General Enquiries Team, and remove barriers that previously discouraged customers from sharing their information. The results have exceeded expectations: “no response” rates have dropped from 95% in Q4 2024–25 to just **5%** by Q3 2025–26, and our average EDI data submission rate now stands at **95%**.

This improved data quality provides LeO with a far more accurate and representative picture of who is using our service. This will strengthen our ability to identify trends, assess fairness, and ensure complainants with protected characteristics are not disproportionately impacted by our processes or service design. Higher-quality insight also positions us to make more evidence-based decisions, including tailoring training, monitoring learning from MDT cases, and informing

future accessibility improvements. The success of this project directly supports LeO's Equality Priority Objective on Customer Service and Accessibility, reinforces our compliance with the Public Sector Equality Duty, and demonstrates clear progress against the LSB's expectations. Importantly, it gives us the foundation for future service improvements as we expand our customer EDI dataset and continue to enhance our understanding of the diverse individuals we support.

Now that we have greater assurance on the integrity of our complainant EDI information dataset, we will complete some thematic analysis of their reasonable adjustment requirements. We will report on that in our July Board update.

2.2 Transitioning at work policy

We have completed our project to create a Transitioning at Work Policy. This has been developed in line with the initial guidance from the Equality and Human Rights Commission (EHRC). In developing this draft, we worked with organisations such as the Ministry of Justice (MoJ), Solicitors Regulation Authority (SRA), the General Optical Council and Ofcom, who have similar policies, to ensure that our approach is as inclusive and person-centred as possible. The EHRC has submitted updated guidance to the Government, which is currently under review by the Minister for Women and Equalities. There is no confirmed timeline for when this updated guidance will be published.

Our draft policy reflects a compliant and approved approach based and following discussions with our legal team. We do not plan to launch the policy until the updated EHRC guidance is released so that we can ensure full alignment. Once the updated guidance is available, we will review our draft, make any required amendments, and then progress to launch. Although we have completed the project to create the policy, this means the launch may extend into the new financial year, as we are dependent on the timing of the updated guidance from EHRC being released.

2.3 Race at Work Charter progress review

In Q3 we completed a full review of our progress with the Race at Work Charter. This is a framework to promote race inclusion in the workplace. LeO are signatories of this charter. The findings show that LeO demonstrates meaningful progress against all seven Race at Work Charter commitments. The organisation has established strong governance structures, improved race-related data maturity, expanded leadership capability, and nurtured a culture of inclusion through networks, communication, and safe spaces for colleagues. Future opportunities include increasing Board and Executive visibility in network activity, enhancing ethnicity data completeness, sharing positive social mobility outcomes more widely, and embedding an EDI-specific objective for all colleagues to support continued progress.

The full report has been shared with the Executive Team, Board and REACH network in January. It will be shared with the wider business in February as part of our Race Equality week activities.

2.4 Staff network progress

In Q3 we appointed new Executive Sponsors for our Men's Health and Wellbeing network, REACH network, LGBTQ+ network and our Disability and Carer's network. We are continuing to work in partnership with our staff networks to deliver awareness events throughout the year to raise awareness of important topics and to celebrate aspects of staff diversity.

We request survey feedback from attendees as part of our work to track the impact and success of these events. The overall colleague satisfaction with the EDI led events so far this year is **91%** (South Asian heritage month event – 81%/ Domestic violence awareness event – 97%/ Men's Health and Wellbeing network event 92%/ Disability History month - 97%). We have two more staff network events to deliver in Q4 (LGBTQ+ history month event – Wednesday 11 February/ International Women's Day event – Thursday 5 March).

2.5 Multi-disciplinary team referrals (MDT)

Our work in MDT to support customers with complex reasonable adjustments and vulnerabilities directly supports operational performance. So far this year we have provided support on 33 complex cases. We measure impact and success by tracking the case age of the MDT referrals. Positively we can report that this has reduced from 294 days in 2024-25 to **209 days** in 2025-26. We have been promoting this support to colleagues to encourage them to utilise the support of MDT. We also track staff satisfaction with the service and this assessment will be carried out at the end of the financial year. We will report on that in our July update to Board.

2.6 Gender pay gap

Our median gender pay gap remained at 4%, and the mean increased by 1% to 9%, both measures were significantly better than public sector, private sector and national averages. We continue to implement initiatives to reduce the gap further but do not anticipate much fluctuation in the numbers year on year due to our gender split of colleagues and part-time gender ratio which remains consistent.

3. Upcoming activities

3.1 Race Equality Week (w/c 2 February 2026)

For Race Equality Week 2026, we'll be taking LeO colleagues on a journey through race equality which will allow us all to reflect on the past and consider what we can all do to contribute to a more inclusive workplace culture in the present. To set the scene for the week we will begin by exploring some of the legal milestones in race equality. We will then hear from REACH network colleagues to understand what race equality means to them. The week will also provide an opportunity for colleagues to learn what LeO is doing to advance race equality through our Race at Work Charter. We will finish the week by demonstrating the stereotypes and microaggressions that people from an ethnic minority background may experience and ask colleagues to reflect on what they can do to demonstrate true allyship.

3.2 Annual social mobility survey (February)

We will be issuing our annual social mobility survey w/c 2 February. This will be issued to Board colleagues, Executive Team, Line Managers, Ombudsman, Senior Ombudsman. The results will be shared with the business in April.

Appendix – EDI Strategy 2023-27

Equality priority objectives

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

Representative workforce aims

Activities in this EPO over the next four years are to:

Build robust workforce EDI data to enable us to assess representation at all levels.

Use this insight to target and implement initiatives aimed at increasing representation and access to opportunity.

Develop and report on our understanding of the social mobility of our LeO workforce

Achieve compliance with the Race at Work Charter.

Ensure external presentation of LeO represents diversity.

Ensure our suppliers and partners align to LeO's commitment to diversity and inclusion.

Inclusive place to work aims

Activities in this EPO over the next four years are to:

Ensure our policies are developed to fulfil our legal obligations, 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 opportunities (e.g., mentoring programmes).

Develop and support initiatives to support staff development and progression.

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 learning opportunities for LeO staff.

Support managers to increase their knowledge of disability (utilising resources such as our membership of the Business disability forum and via Civil service-learning resources).

Customer service and accessibility aims

Activities in this EPO over the next four years are to:

Build a customer EDI dataset that will enable us to understand our diversity customer profile and how our service impacts on them.

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 for our customers.

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 - 2025/26 Action Plan (key deliverables)

OLC Business Plan strategic enablers alignment	HR People Strategy theme alignment	Equality Priority Objective	Activity	Start	Completion target	Progress
People and culture	Develop and support	- Representative workforce - Inclusive place to work	Run safe space sessions with Networks to capture feedback from the Civil service people survey (<i>Use results to inform EDI/ HR strategies – April 25</i>)	Q1	Q1	Completed
People and culture	Promote engagement, equality, inclusion & wellbeing	- Representative workforce - Inclusive place to work	Deliver annual calendar of EDI awareness raising activities.	Q1	Q4	In progress
People and culture	Develop and support	- Representative workforce - Inclusive place to work	Develop a transitioning at work policy. <i>(Note: The policy has been completed. We are waiting for full guidance to be issued from the Equalities and Human Rights Commission before we officially launch our policy. The launch may run into the new financial year as no date has been provided when the guidance will be issued).</i>	Q1	Q4	In progress
People and culture	Promote engagement, equality, inclusion & wellbeing	- Representative workforce - Inclusive place to work	Develop and launch a new Men's health and wellbeing network.	Q2	Q4	Completed
People and culture	Promote engagement, equality, inclusion & wellbeing	- Inclusive place to work	Develop a Glossary of Equality and diversity terms for LeO	Q3	Q4	Completed
People and culture	Attract, recruit, and retain	- Representative workforce - Inclusive place to work	Complete annual review of EDI policies and guidance. <i>(Sept 25)</i>	Q3	Q3	Completed
People and culture	Develop and support	- Customer service and accessibility	Deliver annual vulnerable customer champion (VCC) training for new managers and specialists. <i>(Feb 26 - for 18 colleagues)</i>	Q4	Q4	In progress

OLC Business Plan strategic enablers alignment	HR People Strategy theme alignment	Equality Priority Objective	Activity	Start	Completion target	Progress
Systems and intelligence	Attract, recruit, and retain	- Representative workforce - Inclusive place to work	Complete annual workforce diversity analysis.	Q1	Q1	Completed
Systems and intelligence	Promote engagement, equality, inclusion & wellbeing	- Customer service and accessibility/	Track the impact of changes to the online complaint form (EDI data capture rates).	Q1	Q4	In progress
Systems and intelligence	Promote engagement, equality, inclusion & wellbeing	- Representative workforce - Inclusive place to work - Customer service and accessibility/	Present EDI impact and success performance pack to the Board <i>(July 25)</i>	Q3	Q3	Completed
Systems and intelligence	Attract, recruit, and retain	- Representative workforce - Inclusive place to work	Produce annual Gender Pay Gap report.	Q3	Q3	Completed
Systems and intelligence	Promote engagement, equality, inclusion & wellbeing	- Representative workforce - Inclusive place to work	Complete annual Social Mobility reporting exercise (Board/Executive Team/Line Managers/Ombudsman). <i>(Feb 26)</i>	Q4	Q4	Not started
Relationships and collaboration	Promote engagement, equality, inclusion & wellbeing	- Customer service and accessibility	Seek out best practices to contribute to improving LeO's work through networking activities with Ombuds, Regulators, and EDI industry networks that support vulnerable customers. Share insights with LeO colleagues.	Q1	Q4	In progress
Relationships and collaboration	Attract, recruit, and retain	- Representative workforce - Inclusive place to work	Review compliance/progress with our Race at Work Charter.	Q2	Q3	Completed