

Meeting	OLC Board Meeting	Agenda Item No.	10
		Paper No.	148.8
Date of meeting	29 July 2026	Time required	20 Minutes

Title	Public Sector Equality Duty Bi-Annual Compliance Report
Sponsor	Zoe Grainger, Head of People and Culture
Status	OFFICIAL
To be communicated to:	Members and those in attendance

Executive summary

LeO continues to make positive progress in embedding equality, diversity and inclusion across service delivery, workforce practices and governance arrangements.

During 2025–26, all EDI action plan activities were completed, resulting in 100% delivery against agreed milestones. Key achievements included increasing customer EDI data capture rates from 5% to 95%, improving inclusion and fair treatment scores to 82%, supporting 39 complex cases through the Multi-Disciplinary Team (MDT) and prioritising 166 cases to proactively support vulnerable customers.

This update places greater emphasis on how EDI activity supports compliance with the Public Sector Equality Duty by strengthening LeO's ability to identify and remove barriers, improve accessibility and use data to inform decision-making.

The 2025–26 EDI performance framework demonstrates increasing maturity in measuring both representation and inclusion, alongside the impact of EDI activity on customer outcomes and colleague experience.

During 2026–27, the EDI team will focus on strengthening governance, embedding accountability and enhancing the evidence base used to demonstrate equality outcomes for customers and colleagues.

Priority areas include:

- Enhancing customer vulnerability and accessibility insights;
- Developing role-based EDI objectives within the Performance and Development Review framework;
- Strengthening Equality Impact Assessment processes and wellbeing support;
- Consulting with internal stakeholders on ideas for areas of focus for our new EDI strategy.

Recommendation / action required

Board is asked to **comment** on this EDI update.

Equality Diversity and Inclusion

EDI implications Yes

The EDI Strategy supports LeO's statutory responsibilities under section 149 of the Equality Act 2010 by ensuring the organisation has due regard to the need to:

- Eliminate discrimination, harassment and victimisation;
- Advance equality of opportunity;
- Foster good relations between people who share a protected characteristic and those who do not.

The work outlined in this paper supports delivery of all three elements of the Public Sector Equality Duty.

Freedom of Information Act 2000 (Fol)

Paragraph reference	Fol exemption and summary
N/A	N/A

Value for Money (VfM)

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.

Improved intelligence enables earlier identification of customer needs, more effective use of reasonable adjustments, and better-targeted interventions.

Internally, EDI activity supports retention, engagement and operational performance by strengthening inclusive leadership, supporting staff networks, improving inclusion and fair treatment outcomes, and reducing barriers experienced by colleagues and customers.

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.

1. Public Sector Equality Duty assurance

The Public Sector Equality Duty (PSED) requires LeO to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations. LeO fulfils these duties through a combination of governance arrangements, workforce initiatives, customer accessibility measures and data-driven insight.

PSED duty	LeO activity
Eliminate discrimination	Equality Impact Assessments, Transitioning at Work policy, Disability Confident accreditation, development of vulnerability insights reporting, inclusive recruitment and workforce policies.
Advance equality of opportunity	Reasonable adjustments, customer prioritisation process, MDT support, Vulnerable Customer Champion training and improved customer EDI data collection.
Foster good relations	Staff networks, awareness events, EDI Steering Group, Race at Work Charter commitments, Disability Confident, and the MoJ LGBTQ+ Inclusion Framework.

The organisation's approach continues to evolve from measuring activity and representation towards understanding inclusion, accessibility and customer outcomes.

2. Performance and impact update

The EDI performance framework consists of six measures designed to assess the impact and success of EDI activity across colleagues, customers and organisational performance.

2.1 Delivery of the EDI action plan

All 99 action plan milestones were completed during 2025–26, representing 100% delivery against the annual action plan. External engagement activity included attendance at 29 networking events, totalling 130 hours, ensuring LeO continues to learn from sector best practice.

Key achievements included:

- Increasing customer EDI data capture rates from 5% to 95%;
- Introducing new reporting on customer vulnerabilities, reasonable adjustments and special requirements;
- Supporting 39 complex cases through the MDT, with reduced average referral case age from 294 days to 189 days;
- Training 18 additional Vulnerable Customer Champions, bringing the total trained to 43 colleagues over three years, strengthening organisational capability to identify and support vulnerable customers at an earlier stage of the customer journey;

- Establishing the Men's Health and Wellbeing Network;
- Developing an EDI glossary.

2.2 Inclusion and fair treatment

LeO's overall inclusion and fair treatment score increased to 82%, a three-percentage point improvement compared with 2024–25. All demographic groups remained within the organisation's highest tolerance range.

Key highlights included:

- Ethnic Minority colleague scores increased by 12 percentage points to 92%;
- Male colleague inclusion and fair treatment scores increased by 10 percentage points following targeted wellbeing interventions;
- Corporate Services scores increased by 12 percentage points to 87%;
- Disability inclusion scores remained high at 81%.

These results indicate continued progress towards LeO's Equality Priority Objective of creating an inclusive place to work and provide evidence that EDI interventions are contributing to improved colleague experience across several demographic groups.

2.3 Customer impact and accessibility measures

A key area of development during 2025–26 has been the introduction of new measures to better understand customer experience and accessibility. LeO now tracks the following areas as part of our annual EDI impact and success reporting framework:

- Customer reasonable adjustments;
- Case prioritisation requests;
- Translation service requests;
- Customer EDI disclosure rates;
- MDT referral themes;
- Customer demographic outcomes.

These measures provide greater insight into customer need and strengthen LeO's ability to identify barriers to access, tailor support and monitor equality outcomes. During 2025–26:

- Customer EDI data capture increased to 95%;
- 166 cases were prioritised to proactively support vulnerable customers;
- 189 translation requests were actioned;
- Enhanced reporting on reasonable adjustments and vulnerabilities was developed.

This improved evidence base strengthens LeO's ability to demonstrate compliance with the Public Sector Equality Duty, identify barriers experienced by different customer groups, and target service improvements where they will have the greatest impact.

Collectively, these measures provide the Board with greater assurance that LeO is identifying and responding appropriately to the needs of customers with protected characteristics and those experiencing vulnerability.

2.4 Staff wellbeing measures

During 2025–26, wellbeing measures were incorporated into the EDI performance framework, including the use of recognised wellbeing indices and Employee Assistance Programme utilisation data. This helps to support understanding of colleague experience and identify opportunities for targeted intervention.

LeO has also expanded its network of Mental Health First Aiders, with two cohorts of colleagues receiving training during Q1 (31 MHFAs now in place compared to 2 in January 2026). The aim of this investment is to establish MHFA representation across staff networks, hubs, operational teams, corporate teams and the People and Culture function and remove barriers for colleagues to access this important support. This work supports LeO's commitment to creating a psychologically safe and inclusive workplace and increases access to early wellbeing support for colleagues across the organisation.

3 Priority areas for 2026–27

3.1 Customer prioritisation and accessibility

LeO's prioritisation process plays a critical role in ensuring customers experiencing vulnerability or disadvantage receive timely support.

During 2026–27, further work will focus on enhancing analysis of prioritisation requests, reasonable adjustment data and vulnerability themes to identify trends, improve consistency and strengthen service accessibility.

This work supports LeO's anticipatory duties under the Equality Act 2010 by helping ensure barriers are identified and addressed proactively.

3.2 Developing role-based EDI PDR objectives

The development of role-based EDI objectives will strengthen accountability for inclusive behaviours and support colleagues to understand how equality, diversity and inclusion relates to their individual roles and responsibilities.

The project aims to improve capability, embed inclusive practice and ensure colleagues are equipped to identify and respond to diverse customer needs, vulnerabilities and barriers to access.

By embedding EDI expectations within existing performance and development processes, LeO will strengthen its ability to meet the requirements of the Public Sector Equality Duty by ensuring colleagues are better equipped to:

- Identify and mitigate potential bias in decision-making;
- Recognise and respond appropriately to customer vulnerability;
- Consider accessibility and reasonable adjustments proactively;
- Promote fair and consistent outcomes for colleagues and customers.

This initiative supports all three elements of the Public Sector Equality Duty by helping LeO to eliminate discrimination, advance equality of opportunity and foster good relations between different groups.

Success measures will be integrated into existing EDI reporting arrangements and will contribute to a stronger evidence base demonstrating how workforce capability supports improved customer outcomes. The objectives will be launched in the 2027-28 PDR cycle (April 2027).

3.3 Strengthening Equality Impact Assessments

LeO will review and enhance its Equality Impact Assessment (EQIA) process to ensure equality considerations are embedded consistently across organisational change, policy development and transformation activity.

The revised approach will include greater focus on workforce impacts, accessibility considerations, skills requirements and psychological safety, ensuring potential barriers and unintended consequences are identified and addressed at an early stage.

Strengthening the EQIA process will enhance governance arrangements and provide greater assurance that LeO is meeting its Public Sector Equality Duty obligations by systematically considering the potential impact of decisions on people who share protected characteristics. Enhancing the framework will support LeO to demonstrate that equality considerations are integrated into decision-making processes, rather than considered retrospectively, and that due regard is given to the need to our Public Sector Equality Duty obligations.

The revised process will strengthen the organisation's ability to evidence compliance with the Equality Act 2010, support more inclusive decision-making and ensure equality considerations are embedded by design across future transformation activity.

3.4 Next steps

The EDI team will continue to deliver the 2026–27 Action Plan and develop the next EDI Strategy for 2027–30. Future activity this year will focus on:

- Strengthening evidence of PSED compliance;
- Enhancing customer accessibility and insight;
- Embedding inclusive capability across the workforce;
- Improving wellbeing support;
- Developing more sophisticated measures of inclusion and impact.

The EDI team are consulting with internal stakeholders to listen to views on areas of focus for the new EDI strategy which will cover the period 2027-30. A further update will be provided to the Board later in the financial year (January 2027).

Appendix – EDI Strategy 2023-27

Equality priority objectives (EPO)

- 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 insights 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.
Encourage 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 best practices.
Ensure our recruitment processes and workplaces are accessible and inclusive (through the achievement of Disability Confident 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 - 2026/27 Action Plan (key deliverables)

1. Strategic leadership and governance

Strengthening accountability, assurance and long-term planning for equality, diversity and inclusion.

Key activities:

- Develop the 2027–30 EDI Strategy
- Develop role-specific EDI PDR objectives (which will start from 2027-28)
- Review the Equality Impact Assessment framework
- External EDI networking and benchmarking

Business strategy alignment

- People and culture/ Resources and governance/ Relationships and collaboration.

3. Inclusive workforce and culture

Supporting an inclusive workplace where colleagues can thrive, perform and contribute.

Key activities:

- Mental Health First Aider expansion
- Disability Confident Level 3 accreditation
- LGBTQ+ inclusion assessment
- Transitioning at Work policy rollout
- Annual workforce diversity reporting
- Gender Pay Gap reporting
- Social mobility reporting

Business strategy alignment

- People and culture/ Resources and governance.

3. Fair and accessible customer service

Ensuring LeO services remain accessible, responsive and fair for diverse customers.

Key activities:

- Analysis of customer vulnerability and reasonable adjustments
- Vulnerable Customer Champion training
- MDT service for complex reasonable adjustment cases
- MDT thematic insights reporting

Business strategy alignment

- LeO resolves complaints fairly and effectively/ We will be accessible to everyone who needs us/ Systems and intelligence.

Equality, Diversity and Inclusion

Measuring impact and success

2025-26 annual performance pack



Executive summary

This summary highlights our key achievements and the impact of our EDI activity across our people, workplace and customers.



**Priority Objective 1: Representative workforce**



Social mobility outcomes exceed national and legal sector benchmarks.



Workforce ethnicity diversity to 27.4% (up from 24.9%).



Gender pay gap remains below public sector and national benchmarks (median 4%, mean 9%).



Male engagement increased by 5% following targeted health and wellbeing interventions.



100% EDI action plan delivery – 99/99 activities completed.

**Priority Objective 2: Inclusive place to work**



Inclusion and Fair Treatment score increased to **82%** (+3% vs 2024–25).



Ethnic minority Inclusion and Fair Treatment scores increased by **12 percentage points**.



Employee Engagement index score increased 1% to **60%**.



PERMA wellbeing score improved by +1% to **74%**.



Proxy Stress Index decreased 3% from 29% to **26%**.

**Priority Objective 3: Customer service and accessibility**



Customer EDI data capture rate increased to **95%** (from 5% pre-June 2025).



MDT referrals supported **39 complex cases**, reducing average referral age from 294 days to **189 days**.



166 cases prioritised to proactively support vulnerable customers.



New reasonable adjustment reporting provides greater insight into customer needs.



189 translation requests actioned, removing language barriers and improving access to services.

**Delivering impact and meeting our responsibilities**

Our EDI activity continues to create meaningful impact for our people and customers, supporting a fair, inclusive and accessible service for all and meeting our Public Sector Equality Duty.

- ✓ Reduce inequality and disadvantage
- ✓ Advance equality of opportunity
- ✓ Foster good relations
- ✓ Comply with our legal and ethical responsibilities

EDI measures of impact and success

We have the following six measures that we are using to track the impact and success of our EDI initiatives:

Measure 1:

Delivery of the activities on the annual EDI action plan

- The action plan contains activities to support our customers and staff.

Measure 2:

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

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

EDI measures of impact and success

Measure 3:

Track staff satisfaction from participants in EDI led training and development activities (via post-completion surveys)

Measure 4:

Achievement of relevant accreditations set out in the EDI strategy

Race at Work Charter (2023-24), Disability Confident Level 2 (2023-24), Disability Confident Level 3 (2026-27).

Measure 5:

Track People and Culture EDI related metrics

- a) Social mobility tracking (aiming for LeO to have a representative workforce and favourable profile against the Social Mobility Commission and legal sector benchmarks).
- b) Gender pay gap (aiming to be in line with the public sector average benchmark).
- c) Track measures of representation from our annual staff diversity data tracking (aiming for LeO to have a representative workforce in line with civil service data, census data, and legal profession benchmarks).
- d) Track wellbeing of staff using recognised indexes (including utilisation of EAP staff support services)

EDI measures of impact and success

Measure 6:

Customer EDI impact/success

- a) Track the themes of Multi Disciplinary Team referrals.
- b) Track the annual EDI profile information of customers that have had an outcome.
- c) Track annual customer submission rates of EDI information.
- d) Track the number and types of customer reasonable adjustments.
- e) Track the number and types of customer case prioritisations.
- f) Track the number and types of Translation services provided to customers.

Measure 1: Results

Delivery of the activities on the annual EDI action plan

Measure 1 - Key action plan deliverables achieved



• All 2025-26 activities were completed by financial year end.



• *Key insights from external networking activities were shared with colleagues.



Number of activities to complete in 2025-26

14



Completed activities

14



In progress activities

0



Not started activities

0



*External networking activities

29



*External networking activity total hours

130



Measure 1 - Key action plan deliverables achieved

- Completed a full progress review of our Race at Work Charter commitments.
- Improved online complaint form, increasing EDI data capture from 5% to **95%**.
- Worked with BI to develop new reporting that provides insight into customer vulnerabilities, reasonable adjustments and special requirements, strengthening our ability to identify needs and target support.
- Multi-Disciplinary Team supported **39** complex cases. Referral case ages reduced from 294 to **189 days**.
- Delivered Vulnerable Customer Champion training (**18 trained** - **43** colleagues trained over 3 years), strengthening support for vulnerable customers and removing barriers to access.
- Increased inclusion and fair treatment scores by **3%** (79% to **82%**).
- Established the Men's Health and Wellbeing Network, increasing male engagement by **5%**.
- Delivered five staff network events promoting inclusion and equity (**92%** satisfaction).
- Developed a Transitioning at Work policy and EDI glossary to support understanding and inclusion.
- Undertook extensive external engagement (**29** events / **130** hours) to inform best practice and continuous improvement.

Measure 2: Results

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

Measure 2 - 'Inclusion & fair treatment' scores from the annual Civil Service Staff survey.



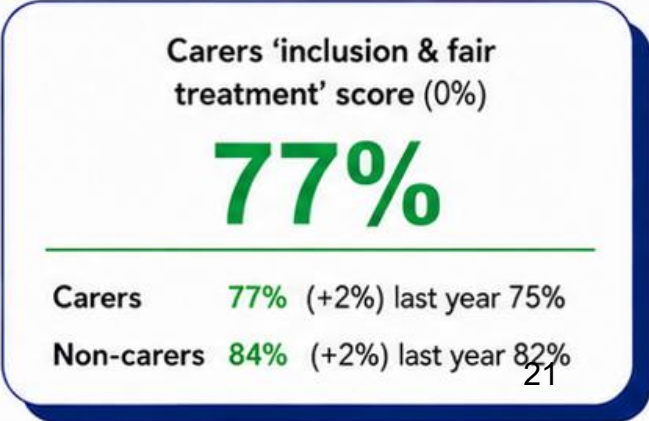
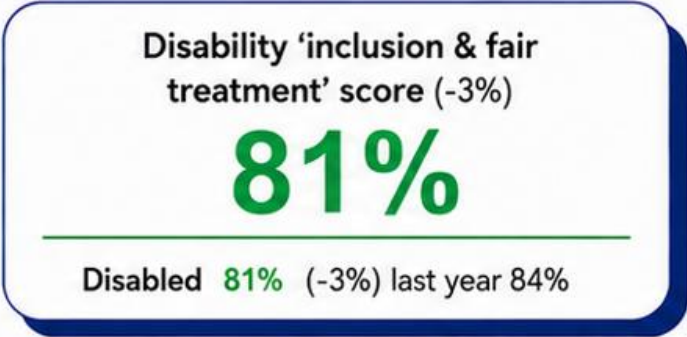
Tolerance	
70 - 100%	
50 - 69%	
0 - 49%	



Data for this measure is taken from the 2025-26 annual Civil Service survey scores compared with the 2024-25 results.



Percentage increases or decreases refers to percentage points increases, or percentage points decreases.



Measure 2 - 'Inclusion & fair treatment' scores from the annual Civil Service Staff survey.

- Overall 'Inclusion & fair treatment' score increased to **82%**, representing a **+3 percentage point improvement** compared to 2024–25.
- Strong overall performance was maintained across all demographic groups, with all scores remaining above **77%**.
- The highest score was recorded within the Ethnic Minority colleague group (**92%**), demonstrating a significant **+12 percentage point increase** year-on-year.
- The Gender inclusion & fair treatment score increased to **83% (+4%)**, with male colleague scores showing the largest improvement at **+10 percentage points** which is a direct correlation to our increased focus in that area with our Men's Health and Wellbeing network.
- Operational Delivery maintained a strong score of **81%**, while Corporate Services increased to **87% (+12%)**, indicating positive progress across business areas.
- Disability inclusion & fair treatment scores remained high at **81%**, although this represented a slight decrease compared to the previous year (-3%).
- Sexual orientation scores remained stable overall at **82%**, demonstrating continued positive inclusion experiences for LGBTQ+ colleagues.
- Carer inclusion & fair treatment scores remained positive at **77%**, with non-carer scores increasing to **84%**.
- All demographic group scores remain within the organisation's highest tolerance range (70–100%), indicating a consistently positive inclusion experience across the workforce. The results demonstrate continued progress against LeO's Equality Priority Objective of creating an inclusive place to work and reflect the impact of ongoing EDI and wellbeing initiatives across the organisation.

Measure 3: Results

Track staff satisfaction from participants in EDI led training and development activities

Measure 3 - Colleague satisfaction from participants in EDI led training and development



Tolerance	
70 - 100%	
50 - 69%	
0 - 49%	



- Data is taken from participants in 2025-26 EDI led training and development activities via post-completion surveys (Scores include: Agree and Strongly Agree).

- 18 x staff completed the VCC training in February 2026 including Investigators, Ombudsman, Team Leaders.

Measure 4: Results

Achievement of accreditations
set out in the EDI strategy

Measure 4 – Achievement of relevant accreditations set out in the EDI strategy

Achieve Disability Confident Level 2

Achieved

2023-24



Achieve compliance with the Race at Work Charter

Achieved

2023-24



Achieve Disability Confident Level 3

In progress

2026-27



The **Disability Confident Level 2 (Employer)** scheme recognises employers who have self-assessed to ensure they actively attract, recruit and retain disabled people within their workforce.

The **Race at Work Charter** is a public commitment by businesses to advance workplace equality for Black, Asian, Mixed Race, and other ethnically diverse employees. During 2025-26 we completed a full progress review against our RaWC commitments.

The **Disability Confident Level 3 (Leader)** scheme acknowledges employers who have their disability inclusion practices externally validated, and actively champion disability confidence within their networks. We will be working towards achieving DC Level 3 during the 2026-27 financial year.



Measure 5: Results

Track People and Culture EDI related metrics

- 5a) Social mobility
- 5b) Gender pay gap
- 5c) Workforce diversity
- 5d) Employee wellbeing

Measure 5a) Annual social mobility monitoring

Socio economic background SMC National Benchmark		LeO Average v SMC
What was the occupation of your main household earner when you were about aged 14?		
- Professional	37%	36%
- Intermediate	24%	18%
- Working Class	39%	46%
Attended a state run or state-funded school		
Attended an Independent or fee-paying school	7.50%	11%
Eligible for free school meals - Yes	15%	30%
*No parent attended university and gained a degree by the time you were 18?		*76%

Legal Professional Benchmark	LeO Average v Legal Benchmark
58%	36%
13%	18%
17%	46%
63%	86%
20%	11%
N/A	

- **2026 social mobility survey results** (February 2026). **Benchmark 1:** Social mobility commission national benchmarks. **Benchmark 2:** The legal industry's socio-economic benchmarking data was referenced from the SRA, covering solicitors and other employees in SRA-regulated law firms based on data collected from firms in 2025.
- ***Note on this question: No parent attended university and gained a degree by the time you were 18:**
 - LeO's score for this question has been benchmarked using UK population data as SMC do not provide a specific benchmark. As of 2022, 42% of adults in families with dependent children held a degree or higher qualification, indicating that approximately 58% did not have a university degree.
 - SRA data indicates that 57% of lawyers have parents from a professional background, suggesting that a significant portion of legal professionals come from families where higher education is prevalent. Given these figures, a benchmark where **50-60%** of employees' parents did not attend university would reflect a commitment to socio-economic diversity, aligning with the broader UK demographic and indicating inclusivity within the legal sector. LeO's score was **76%** which is very positive.

Measure 5a) Annual social mobility monitoring

Summary:

- The results of the 2026 Social Mobility Survey present a highly positive picture of the Legal Ombudsman (LeO) as an inclusive and socially diverse organisation.
- LeO has performed well against all national benchmarks set by the **Social Mobility Commission** (SMC). Additionally, it has performed well when compared to **legal sector data** from the Solicitors Regulation Authority.
- **46%** of our leadership team (Senior Leaders, Line Managers and Ombudsman groups) come from a working-class or lower socio-economic background, with our figures exceeding national benchmarks (39%) and legal sector benchmarks (17%).
- We have strong representation of individuals who attended state-funded schools across all of our leadership groups (**86%**).
- A significant proportion of our Senior Leaders, Line Managers, and Ombudsman team were eligible for free school meals (**30%** compared to the national benchmark of 15%). This demonstrates that individuals from economically disadvantaged backgrounds have been able to secure or progress into leadership roles at LeO.

Measure 5b) Annual gender pay gap reporting

Median gender pay gap

4%

*(No change) last year 4%

**UK national average comparison 7%

**Public sector comparison 10%

**Private sector comparison 12.5%

Mean gender pay gap

9%

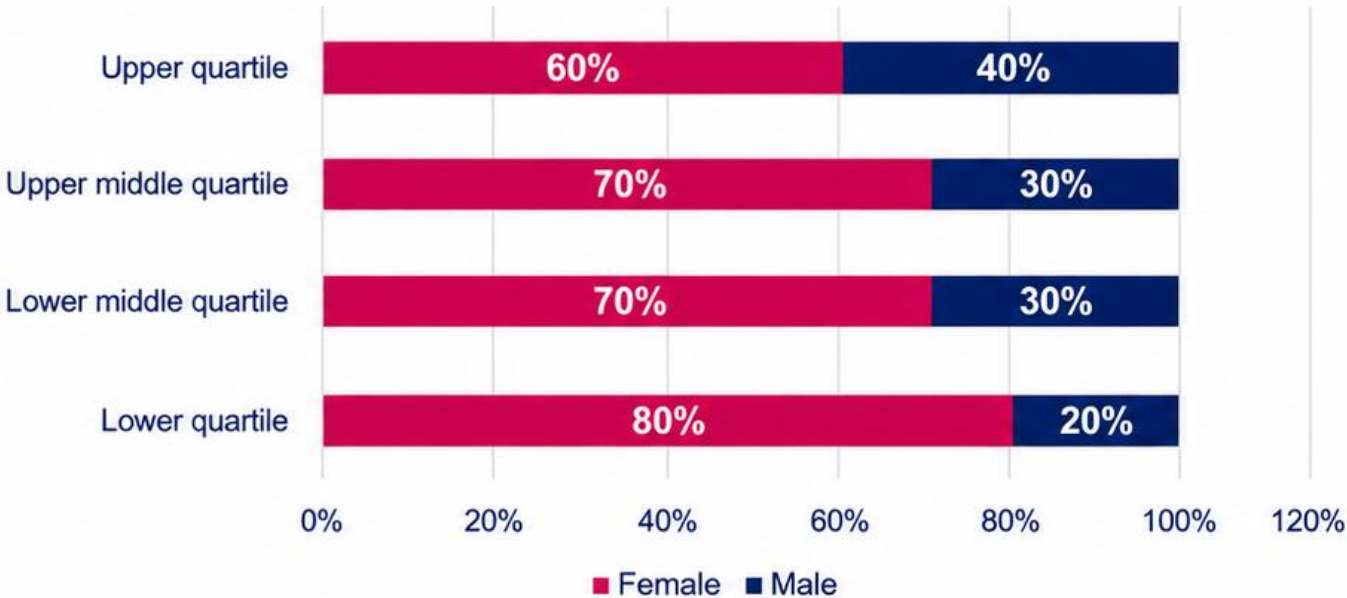
*(+1% point) last year 8%

**UK national average comparison 11.3%

**Public sector comparison 10.6%

**Private sector comparison 12.6%

2025 Pay Quartiles



Mean gender pay gap

The difference between the average of men's and women's hourly pay.

Median gender pay gap

The difference between the midpoints in the ranges of men's and women's pay. All salaries in the sample are lined up separately for men and women in order from lowest to highest, and the middle salary is used. The figure is the difference of these two middle points.

* A reduction in gender pay gap is viewed as positive for this measure. An increase is not viewed as positive.

** Benchmarking data referenced from the Office for National Statistics 2025 dataset.

Measure 5b) Annual gender pay gap reporting

Summary:

- **Median gender pay gap: 4%** (no change from last year; below UK national average of 7%, UK public sector average of 10% and UK national average of 12.5% which is positive).
- **Mean gender pay gap: 9%** (increase of 1% since last year; remains below UK national average of 11.3%, UK public sector average of 10.6% and UK national average of 12.6% which is positive).
- ***Bonus pay gap:** Mean bonus gap is **-4%**, median bonus gap is **17%** compared to 24% last year.
- **Workforce gender composition:** 68% female, 32% male.
- **Pay quartiles:** Males are overrepresented in the upper quartile (40% male vs 60% female); females are overrepresented in the lower quartile (80% female v 20% male).
- **Rewards:** **76%** of employees received recognition payments (11% higher than last year); higher proportion females (**80%**) received rewards than males (**69%**).
- **Key initiatives:** Strengthened family-friendly policies, ongoing leadership development, Women's Network support, and expanded EDI events.
- **Key takeaways:** Mean and median pay gaps stable. Workforce gender profile stable. Positive reduction in the mean bonus pay gap. Strong ongoing commitment to sustaining gender equality and inclusivity across all levels.

Measure 5c)

2026: Workforce Diversity Profile



347
colleagues
(31 Mar 2026)



5
diversity
characteristics
Sex, Sexual Orientation,
Ethnicity, Disability, Age



4
years of data
2023 – 2026
to identify trends
and progress



1
goal
A representative
workforce that
reflects the people
we serve



Background

As part of our annual EDI reporting, we have been measuring the diversity profile of our workforce since 2021.

We obtain the raw data set from our HR team (snapshot typically taken end of March). In 2023, this data set was not available for us to analyse.

This means we have analysed 2021, 2023, 2024 and 2025 workforce data by Sex, Sexual Orientation, Ethnicity, Disability and Age.



Why measuring diversity matters

- Helps us identify focus areas and develop initiatives that drive meaningful impact.
- Demonstrates our commitment to fairness, accountability and addressing inequalities.
- Being transparent is an important step towards meaningful change.
- We intend to publish our workforce diversity data internally and externally in Q2.

2026 at a glance: How do we compare

Category	LeO 2026 (347 colleagues)	vs 2025 (YoY variance)	Civil Service 2025 (549,450 employees)	vs Civil Service variance	Census 2021 (E&W)	vs Census variance	Legal Profession data 2023	vs Legal Profession variance
Female	67.7%	0.0%	54.6%	+13.1%	51.0%	+16.7%	65.0%	+2.7%
Male	32.3%	+1.0%	45.4%	-13.1%	49.0%	-16.7%	33.0%	-0.7%
Disabled	19.6%	+0.8%	17.9%	+1.7%	17.8%	+1.8%	8.0%	+11.6%
Ethnic minority	27.4%	+2.5%	14.8%	+12.6%	18.7%	+8.7%	19.0%	+6.0%
LGBTQ+	5.0%	0.0%	7.2%	-2.2%	3.2%	+2.2%	5.0%	0.0%
Median age	40	+1	44	-4	N/A	N/A	N/A	N/A



2026 LeO workforce data compared with the 2025 results taken April 2025. Civil Service data is for 2025. Census data is from 2021 (England & Wales). Legal profession data from SRA 2025 (solicitors and other employees in SRA-regulated law firms). Figures may not total 100% due to rounding.

Our diversity at LeO (2026)



Female
67.7%
234 colleagues



Disabled
19.6%
68 colleagues



Ethnic minority
27.4%
95 colleagues



LGBTQ+
5.0%
17 colleagues



A diverse workforce brings different perspectives, drives innovation and helps us better serve the public.



Approach

- In April 2026, we analysed the diversity profile of 347 colleagues (snapshot taken 31 Mar 2026).
- The 2026 data was compared with 2023 (301), 2024 (309) and 2025 (313).
- We also benchmarked our data against:



2025 Civil Service
549,450 employees



2021 Census
England and
Wales (E&W)



SRA 2025
Diversity in law
firm workforce
(solicitors and
other employees)



Key insights

- LeO continues to make strong progress against our 'Representative Workforce' priority.
- We lead the civil service, census and legal profession benchmarks for female representation, disability and ethnic minority representation.
- Our workforce is more diverse than the wider legal profession, particularly in relation to disability and ethnic background.
- LGBTQ+ representation is higher than within the general population.
- We will continue to focus on under-represented groups to better reflect the national population.

Measure 5c) Workforce Diversity Profile 2026

Summary:

- LeO continues to make strong progress against our 'Representative Workforce' priority, with diversity levels exceeding sector and national benchmarks across most categories.
- We remain significantly ahead of the civil service, census, and legal profession benchmarks for **female** representation, **disability**, and **ethnic minority** representation.
- Our workforce is **more diverse than the wider legal profession**, particularly in relation to disability and ethnic background.
- The median age of our staff is comparable to the civil service and the national average.
- Our gender profile aligns with sector norms for Ombudsman services, where female-majority workforces are common. The Solicitors Regulation Authority (SRA) reports a 64.5% female workforce.
- Overall, LeO is well positioned to meet and further embed its commitment to a workforce that better reflects the communities we serve.

Measure 5d) Employee wellbeing – PERMA Index results 2025-26

Measuring how colleagues flourish at LeO



The PERMA Index measures the extent to which employees are 'flourishing' at work. It is based on the work of psychologist Martin Seligman and looks at five dimensions of wellbeing and happiness.



- A score of 100% indicates that respondents gave the most positive response possible to all five questions, whereas a score of 0% indicates the opposite.
- LeO's PERMA index for 2025 at **74%** demonstrates a 1%-point improvement in the extent to which colleagues are flourishing at LeO when compared with 2024 (73%).

The five dimensions of PERMA

P Positive emotion
(feeling good)



Feeling positive, happy and optimistic at work.

E Engagement
(flow)



Being fully absorbed and energised by our work.

R Relationships
(connection)



Building positive relationships and feeling supported.

M Meaning
(purpose)



Finding purpose and feeling our work matters.

A Accomplishment
(goal attainment)



Achieving goals and feeling a sense of achievement and progress.

LeO PERMA Index score over time



74%
2025 PERMA Index
1%-point improvement
vs 2024 (73%)

Positive trend: +2 percentage points since 2023



Key takeaway

Our colleagues continue to flourish at LeO. The upward trend in our PERMA Index reflects our ongoing focus on wellbeing, connection and purpose.



A flourishing workforce drives better outcomes for our people, each other and the public we serve.

Measure 5d) Employee wellbeing – Proxy Stress Index results 2025-26

Measuring the conditions that can contribute to stressful environments



The Proxy Stress Index measures conditions that can contribute to stressful environments.

It is based on Health and Safety Executive (HSE) stress management standards.



- ✓ A score of 100% indicates that respondents gave the most negative response possible, operating in a highly stressful environment.
- ✓ A score of 0% indicates the opposite
(Key point: A lower score is positive with this measure).
- ✓ LeO's Proxy Stress Index score for 2025 was **26%**. This was a 3%-point improvement on 2024 and a 4%-point improvement on 2023.



26%

2025 Proxy Stress Index

- ↑ 3%-point improvement vs 2024 (29%)
- ↑ 4%-point improvement vs 2023 (30%)

Proxy Stress Index score over time



Positive trend: -4 percentage points since 2023
Lower scores are positive with this measure.



Key takeaway



A lower Proxy Stress Index score indicates healthier working conditions and better support for our people.

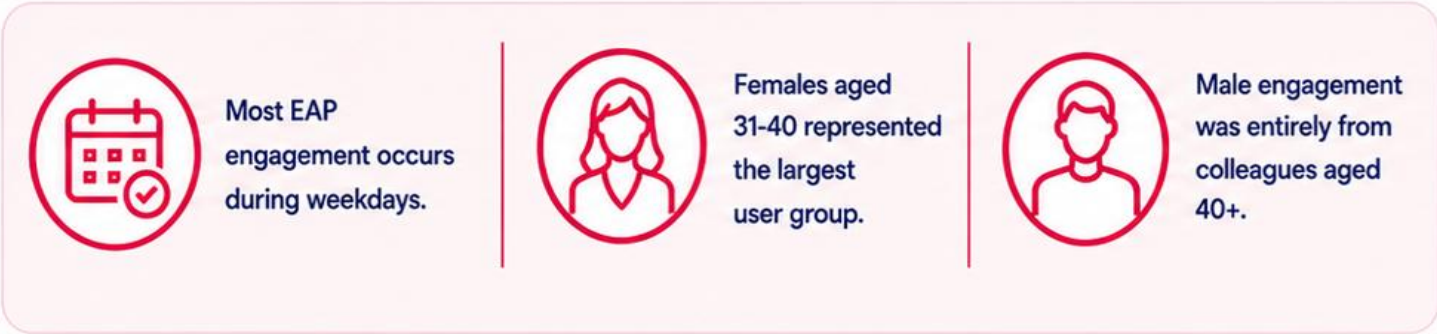
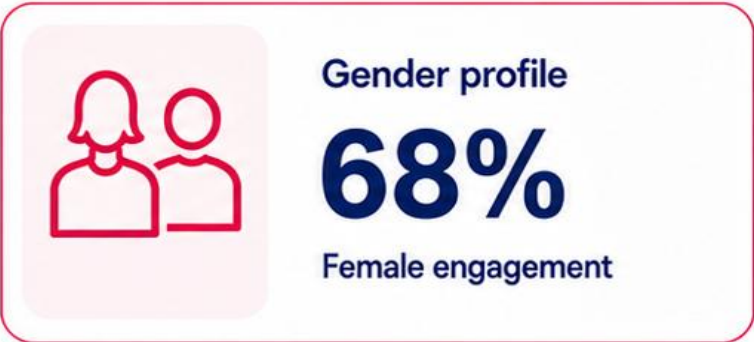
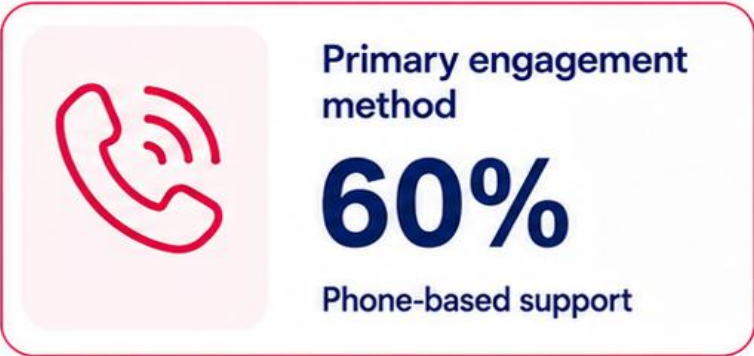
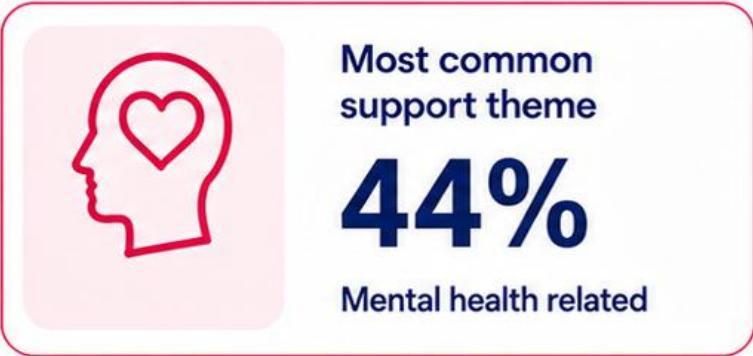
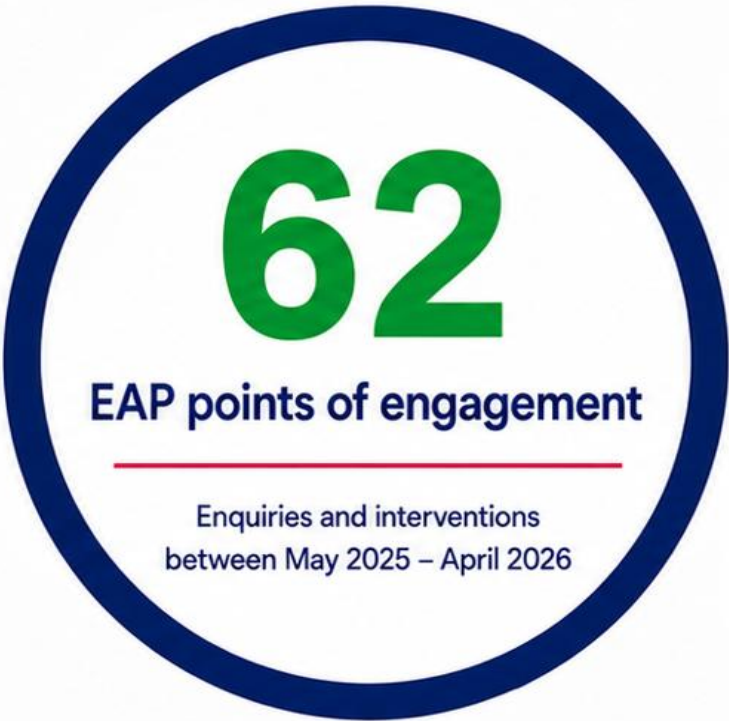


We remain committed to creating a supportive and sustainable workplace where colleagues can thrive.



The Proxy Stress Index aligns with Health and Safety Executive (HSE) stress management standards and forms part of our ongoing commitment to colleague wellbeing and workplace health.

Measure 5d) Employee wellbeing – Employee Assistance Programme (EAP) utilisation 2025-26



Key takeaway

The EAP continues to provide an important wellbeing support mechanism for colleagues, particularly in relation to mental health, emotional wellbeing and personal support needs.

Data source: EAP engagement data between 1 May 2025 and 30 April 2026.

Measure 5d) Employee wellbeing - Flexible working

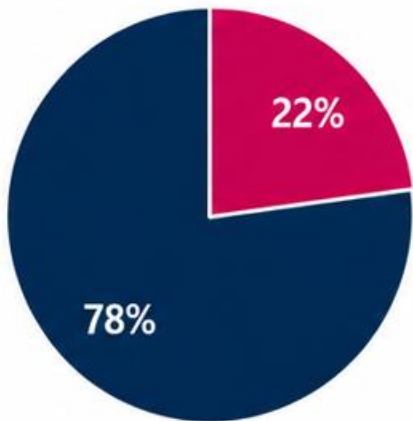
Understanding how our people work



- **110**, out of **347 (32%)**, employees do not have standard working hours – i.e. they work less than 1 FTE and/or have an amendment to the usual Mon – Fri, 7.5 hour-day, working pattern.
- Out of the 110 colleagues who do not have standard hours, **86 (78%)** are **female** and **24 (22%)** are **male**.
- Out of the 110, **43 (39%)** colleagues have compressed their hours. **28 (65%)** are **female** and **15 (35%)** are **male**.



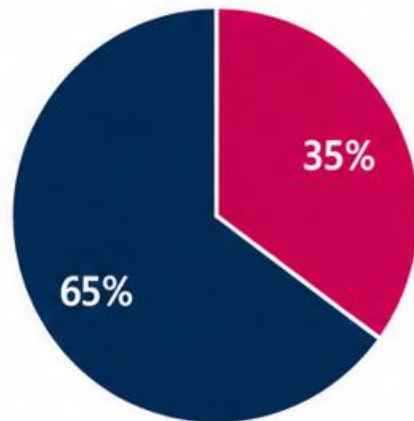
Flexible Working Gender Split



Male Female



Compressed Hours Gender Split



Male Female



Flexible working supports our people and our organisation.

It helps colleagues balance work and life commitments while enabling LeO to attract, retain and support a diverse and inclusive workforce.

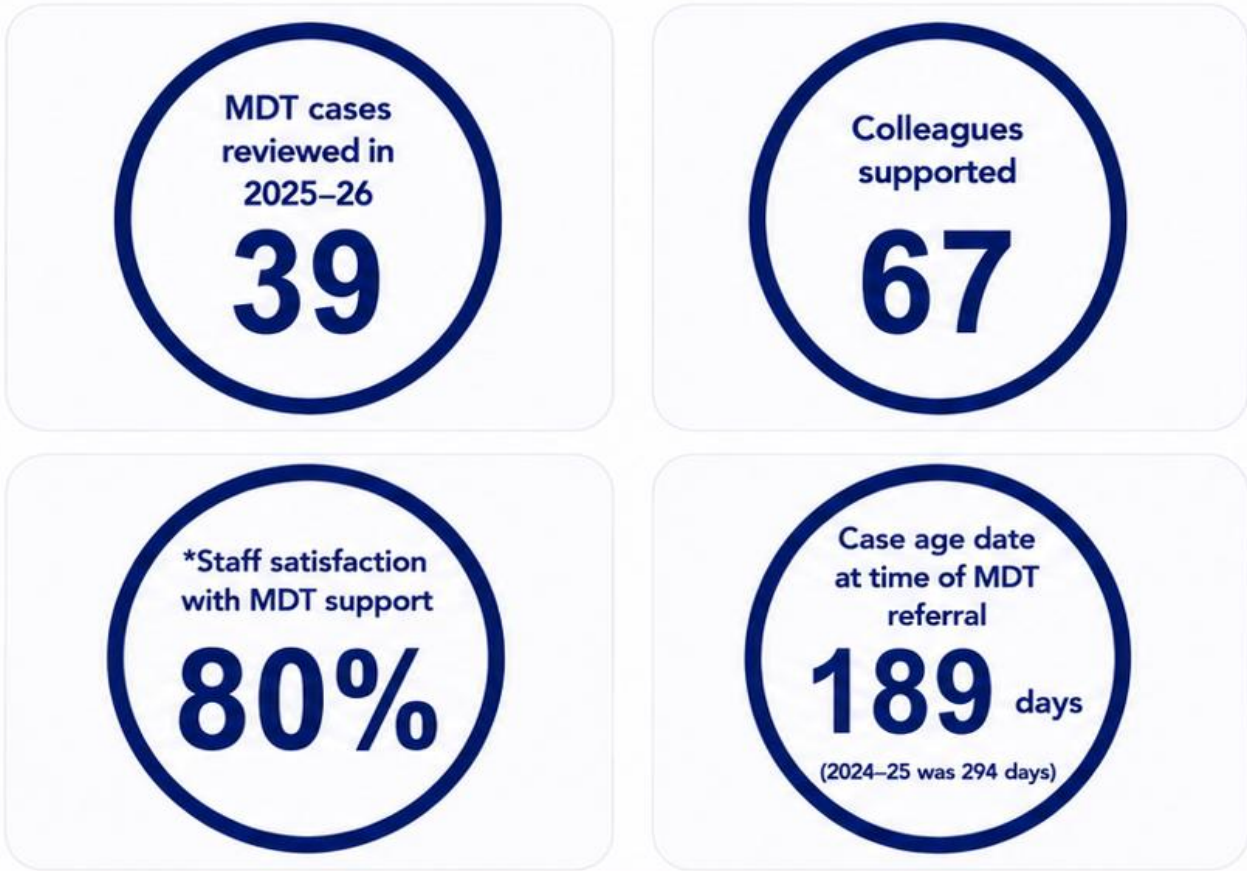
- ✓ Promotes wellbeing and work-life balance
- ✓ Supports inclusion and equality of opportunity
- ✓ Strengthens attraction, retention and engagement

Measure 6: Results

Customer EDI impact/success

Measure 6a) Track the number and themes of Multi Disciplinary Team referrals

Supporting fair, consistent and high-quality case handling



Top 5 MDT referral themes		
1	Case progression & delays	38%
2	Reasonable adjustments	36%
3	Mental health & capacity	31%
4	Communication challenges	26%
5	Representative/authority concerns	21%

Top 5 MDT advice themes		
1	Investigator actions	51%
2	Reasonable adjustments guidance	46%
3	Written communication strategy	41%
4	Case management strategy	38%
5	Case resolution strategy	33%



Meeting weekly, the MDT provides guidance, assurance, and clarity to Investigators, Team Leaders, and Ombudsmen handling complex or sensitive cases particularly where vulnerability, reasonable adjustments, or communication challenges are involved.



*Staff satisfaction data taken via an MDT survey to users of the service (80% were very satisfied/ 20% were satisfied/ 0% were dissatisfied).

Measure 6b) EDI profile of customers with an outcome

LeO complainants compared to previous year and Census (England & Wales)

Category		LeO complainants 2025–26	Variance to 2024–25	Census E&W data
	Female	48%	— 0%	51%
	Male	48%	↓ -2%	49%
	Disability	24%	↓ -9%	18%
	Ethnic minority	18%	↓ -1%	18%
	Sexual orientation	6%	↑ +2%	3%



This analysis compares the EDI profile of LeO complainants with an outcome in 2025–26 to the previous year (2024–25) and the 2021 Census for England & Wales.

- ↓ Decrease vs 2024–25
- No change vs 2024–25
- ↑ Increase vs 2024–25



Source: LeO case data (2025–26),
LeO case data (2024–25),
2021 Census (England & Wales)

Measure 6c) Track annual complainant EDI information submission rates

Q2–Q4 2025–26 performance

Summary



Prior to June 2025 the average ‘no response’ rates were **95%**. Full and partial responses were **5%**.



The new online complaint form went live on **25 June 2025**.



2025–26 complainant EDI submission rates have increased to **95%** (**90% increase**).



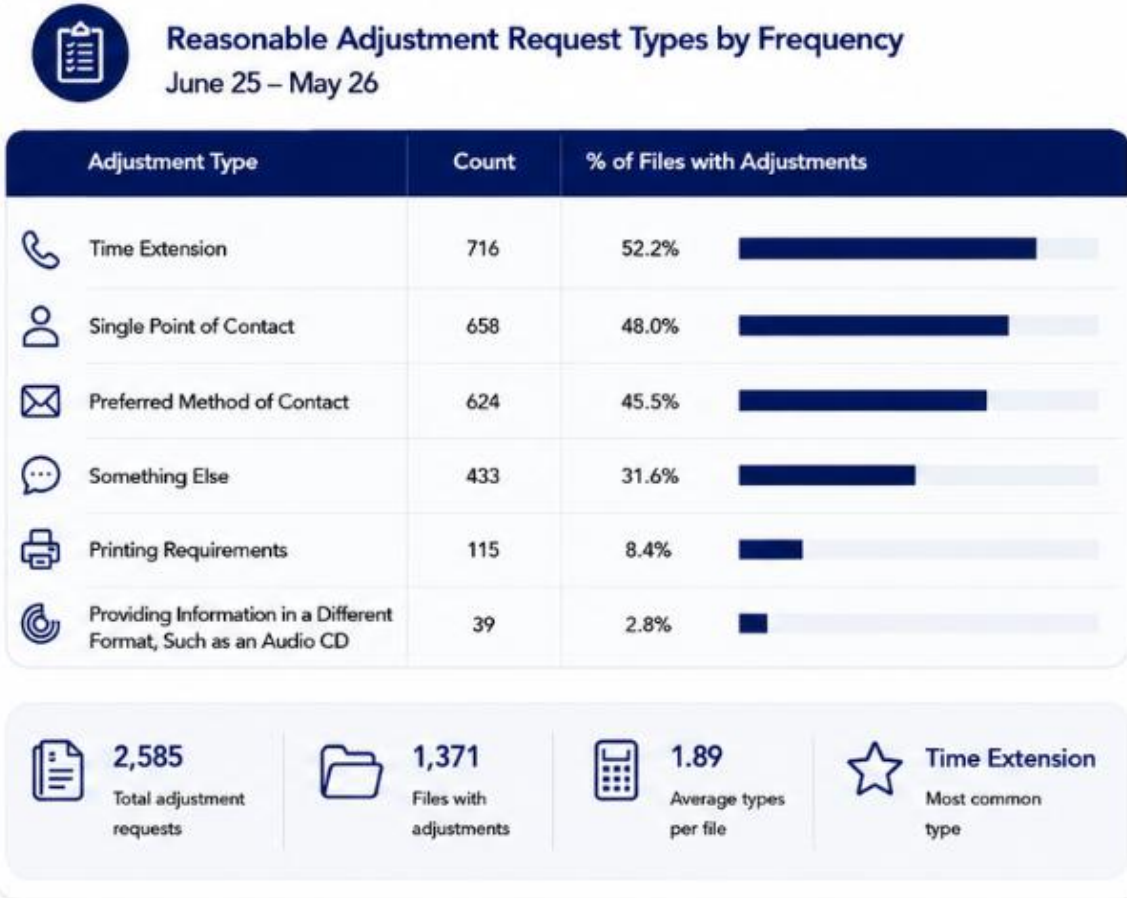
Period (Q2–Q4 2025–26)	Jul-25	Aug-25	Sep-25	Oct-25	Nov-25	Dec-25	Jan-26	Feb-26	Mar-26	Average
 Online complaint forms	1,016	944	969	1,114	1,075	1,006	1,405	1,320	1,337	1,132
 Full and partial EDI info responses	95%	93%	94%	95%	96%	95%	97%	96%	95%	95%
 No response	5%	7%	6%	5%	4%	5%	3%	4%	5%	5%

Full and partial responses tolerance key



Measure 6d) Reasonable adjustments overview (June 2025 – May 2026)

Requests by Area of Service and by Request Type





Notes

- Data for Area of Service is taken from Robot 2 (RPA – Robotic Processing Automation) introduced on 25 June 2025 to the online complaint form.
- The table shows categories where the number of RAs was > 50. This is why they do not add up to the total RA for all categories number of 1,371.
- Baseline Reasonable Adjustment measurement (all files): RA Yes / All Files = 1371 / 12078 = 11.35% of files had a RA request.



Key insights

- ✓ Employment Law and Criminal Law have the highest proportion of RA requests (25%).
- ✓ Time Extension is the most requested adjustment type (52.2%).
- ✓ Nearly half of RA requests relate to communication preferences or single point of contact.
- ✓ Over 1 in 10 files (11.35%) include a request for reasonable adjustments.

Measure 6e) Case prioritisation summary (2025-26)

Overview of cases prioritised during the year



What is case prioritisation?

Case prioritisation is the process of identifying and escalating cases that require urgent attention based on the potential impact on the individual.

This ensures our resources are focused on those who need it most and supports us in meeting our **Public Sector Equality Duty (PSED)** by addressing inequalities and protecting the rights of individuals.

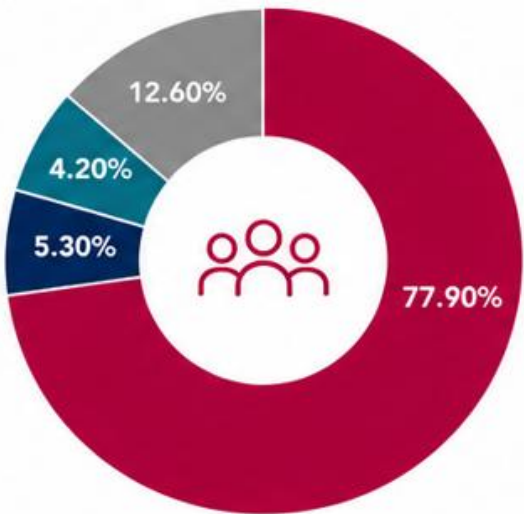


166

Total number of cases prioritised in 2025–26

Cases prioritised by reason

Percent of total cases



Health	77.90%
Risk of removal (homelessness)	5.30%
Financial	4.20%
Other	12.60%



Supporting our Public Sector Equality Duty

By prioritising cases based on factors that may create disadvantage or affect access to rights and services, we help to reduce inequality, advance fairness and promote good relations across the communities we serve.

- ✓ Focused support for those most at risk
- ✓ Helps reduce inequality and disadvantage
- ✓ Promotes fairness and good relations
- ✓ Aligned with our legal and ethical responsibilities



Measure 6f) Translation services overview (2025-26)

Translation requests by language pair



Translation requests

April 2025 – March 2026

Top requested language translations	Request count	% of all requests
 English > Urdu	39	20.6%
 English > Polish	25	13.2%
 English > Persian	21	11.1%
 English > Chinese	14	7.4%
 English > Arabic	12	6.3%



189

Total translation requests



26

Language pairs requested



20

Unique target languages



59%

Top 5 language pairs of all requests



Notes

- Translation request data is based on thebigword's translation service records for the period April 2025 – March 2026.
- A total of 26 different language pairs were requested, covering 20 unique target languages.
- The top 5 language pairs account for 59% of all translation requests.



Key insights

- ✓ English > Urdu is the most requested language pair, accounting for 20.6% of all requests.
- ✓ The top 5 language pairs represent 59% of all translation requests.
- ✓ A wide range of language needs are supported, with 20 unique target languages requested.
- ✓ Translation services continue to play a key role in supporting accessibility and inclusion.

