

## Workforce progress report 2022

23 November 2023

### Foreword

Welcome to our 2022 SRA staff diversity report. It sets out information about our workforce and the progress we are making as we work towards being an organisation that fully reflects the diversity of the public whose interest we serve.

We know that diversity, and diversity of thinking, matters, with research consistently showing that diverse organisations are better organisations. We are committed to being an organisation that reflects our new values - inclusive, proactive, accountable and customer focused.

We have much to be proud of – our rise to 25 in the Stonewall Workplace Equality Index, for example. I am also proud of the strength and dynamism of our eleven staff networks, with hundreds of my colleagues - and myself - actively involved in them. They offer support to staff and enable discussion around topics ranging from gender to ethnicity; parenting to mental health.

There is, however, still a long way to go. For instance, although our gender pay gap is below the UK average, we want to reduce it further.

Progress on the ethnic diversity of our staff is also another core focus. We have for the second year published our ethnicity pay gap, and, as we expected, it shows we need to take action. Although we have an ethnically diverse workforce, that diversity is not reflected in our senior management. We are committed to improving. Our plan includes initiatives in recruitment, reverse mentoring and interorganisational mentoring, which are already up and running. We have set ourselves targets for senior level diversity and our Board and colleagues have a shared commitment to driving change.

Part of our role is to lead by example, helping to show the way for the law firms we regulate. Our report sets out some of our thinking. Importantly, our commitment to equality, diversity and inclusion will continue to be at the heart of all our work.

**Paul Philip, Chief Executive**

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### Executive summary

Some of the key findings about our workforce in 2022 include:

- Around two-thirds (64%) are female. Our gender median pay gap was 11.2%. Although this is below the UK median (15.4%), our gap increased in 2022. This was a result of the proportion of males and females at the more senior level.
- The ethnic diversity of our staff, where 21% are Black, Asian or minority ethnic, broadly mirrors the diversity of the West Midlands workforce (19%) where the majority of our staff are based. However, there are proportionately fewer senior staff from a Black, Asian and minority ethnic background with 10% representation at senior grades.
- Our ethnicity pay gap decreased from 15% in 2021 to 12.7% in 2022.
- Nine per cent have declared they had a disability, the same as in 2021.
- The age profile is similar to last year, with around a third of staff (32%) falling within the 35 – 44 age brackets.

There is a range of ongoing work and new work we have started in 2022 to further improve the equality, inclusivity and diversity of our organisation. This includes:

- An inter-organisational mentoring scheme with a focus on our Black, Asian and minority ethnics staff.
- A reverse mentoring scheme with a focus on Black, Asian and minority ethnic staff.
- We are working to ensure our recruitment panels continue to drive diversity.
- We continue to grow and promote our 11 staff networks.
- We plan to understand if there are any barriers to career development within the organisation.

However, we recognise there is still more to do to improve. This includes:

- Reducing our pay gaps. We are doing this through the actions set out above and our [ethnicity action plan \(/sra/research-publications/ethnicity-inclusion/\)](#). Our target is to increase the representation of our underrepresented groups in our leadership population.
- Further improving our data around the diversity of our staff. The introduction of a new HR system meant 20% of staff did not respond to exercise versus 5% the previous year. We are committed to improving this, while also recognising that the reduction means that these should be treated with greater caution when identifying trends or significant changes.

### [Our commitment to equality, diversity, and inclusion](#)

The Equality Act 2010 sets out public sector equality duties. We must comply with the duties and have due regard for the need to:

1. Eliminate unlawful discrimination, harassment, victimisation, and other conduct prohibited by the Act.
2. Advance equality of opportunity between people of different groups or protected characteristics.

Protected characteristics are defined as follows:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation.

3. Foster good relations between people from different groups.

The equality duty is about integrating consideration of equality and good relations into day-to-day business. It means organisations need to look at how they can positively contribute to the advancement of equality and good relations. It requires these considerations to be reflected into policies and the delivery of services, including internal policies, and for these to be kept under review. Within this report we reflect on the progress we are making.

While publication of the gender pay gap report is a legal requirement, there is no current obligation to publish an ethnicity pay gap report. We have now started to publish our own ethnicity pay gap report, supporting our commitment to making a difference and encouraging regulated law firms to do the same.

Our 2022 gender median pay gap was 11.2%, which falls below the 15.4% for the UK (Office of National Statistics (ONS), 2021). The gap increased from 2021, which was a result of the proportion of males and females at the more senior level. We have work in hand to narrow the gender pay gap, and part of that will be reviewing our reward strategy, policies, processes and practices. Hand in hand with addressing the ethnicity pay gap, we continue to analyse diversity data to make sure there is fairness within the employee lifecycle.

We published both 2021 and 2022 ethnicity pay gap data for the first time in 2022, our median ethnicity pay gap decreased from 15% in 2021 to 12.7% in 2022, which compares with the national median of 2.3% (ONS, 2019).

We have also published an action plan addressing our aspiration to significantly improve ethnic diversity at senior levels.

In 2022 we also changed our organisational values, which link to our wider Equality, Diversity and Inclusion work:

- Proactive – We think ahead and take action to help us to help others
- Inclusive – We treat people fairly, valuing differences and respecting everyone as individuals
- Accountable – We take ownership for delivering our work
- Customer focused – We put our customers at the heart of everything we do, working to understand and respond to their needs

To help to describe our work to develop a fully inclusive culture and a diverse workforce, this report is structured in three sections. It builds on our report from 2021.

## **Organisation**

As an organisation, we expect the law firms we regulate to create and champion an equal and diverse culture, so we need to make sure we do the same. We expect our staff to consider EDI throughout their work, whatever their role.

## **Labour market**

Our offices are based in Birmingham, London and Cardiff. According to the ONS, 2021, England and Wales, Black, Asian and minority ethnic workers made up 19% of the West Midlands workforce, 5% of the Wales workforce and 37% in London. Although it should be noted that with more opportunities for hybrid working, and the fact that some of our staff are carrying out work and visits across the country, that a proportion of our staff are based beyond the Birmingham, London or Cardiff areas.

The workforce data for ethnicity can be seen to be reflective of the ONS data for the West Midlands, where the majority of our staff are based, with 20% of our workforce (151 staff) being Black, Asian and minority ethnic. We continue to work on areas where data suggests we have more to do to make sure there is diversity at every level in the organisation.

## **Roles at the SRA**

Our staff grading is structured in the following way:



- A-D: non-management roles
- E-I: specialist and management roles
- J-L: heads of business units and directors. Leadership and senior management roles are included at this level.

All data is taken as of 31 December 2022. Please note, larger percentages have been rounded to the nearest whole number, while smaller percentages may show more detail. Where data reflects small numbers, we have not reported them in case individuals are identifiable. In some cases, the data in this report will be presented in line with the staffing structure to express key points.

At the end of 2022 we implemented a new pay banding structure replacing the job grades with a new broad banded structure. This approach saw the introduction of job families and the following job bands:

- Administration
- Supervisor/Professional
- Manager/Technical
- Head of/Senior Manager/Technical Specialist
- Director

As a result, reporting will look different next year.

## **Building a diverse workplace**

We believe it is important that we share our commitment to EDI from the beginning of a person's interaction and engagement with us. We want to encourage applicants to be individuals who are proud of their diversity, promoting equality of opportunity.

The disclosure diversity data is voluntary. During 2022 we introduced our new HR system, myHR. As we were unable to migrate this data from the old system to the new one, we have had to collect data on the new system, which had a resource impact and reduced the amount of data we have. That meant we had to ask all staff to volunteer the information which has led to a different and lower percentage of staff giving us the data. This means that year on year changes and comparisons should be treated with caution, with more unknowns in the data. We will work to increase our data capture for future years.

## **Recruitment process**

During 2022, we incorporated a question relating to diversity and inclusion as part of our interview process to demonstrate our commitment to diversity and inclusion to prospective candidates, and to give candidates an opportunity to talk about this topic.

We continued to use a broad range of advertising channels to advertise our vacancies, including job boards that focus on helping employers attract candidates from traditionally under-represented backgrounds.

Building on from our work in 2021, we worked with wider business areas to make sure we had balanced gender panels for reviewing selection outcomes, to create greater diversity of thought.

We continued to provide job application resources. This is so all interviewees have access to a range of learning materials designed to help candidates to develop skills, insight and confidence before they are assessed at interview. This helps level the playing field for every person invited to interview and we continue to get good feedback on the learning resources.

## **Supporting progression and fulfilling aspirations through learning and development**

In January 2022, we launched a new 'Conscious Inclusion: equality, diversity and inclusion in action' foundation module for all staff. This course shares what we do to make our work place an inclusive one and encourages our staff to play an active role in our approach. We followed this up later in the year with a new spotlight module for all staff on trans and non-binary inclusion, providing a deeper dive into this topic area.

Personal and professional development remains a key part of our learning and development offering. In September we launched our Aspiring Managers programme which attracted representation from across our underrepresented groups.

We also launched two mentoring schemes targeted at staff from Black, Asian and minority ethnic backgrounds with the aim of addressing the underrepresentation of these groups in our leadership and management populations. The first scheme is run with our external partner, Mission Include and connects mentees with mentors from around the world. Our second scheme is a reverse mentoring programme where our Chief Executive and Executive Directors are mentored by more junior members of staff. Both schemes will be evaluated in 2023 and we hope to extend them out to staff from all underrepresented groups.

To bring policies to life and empower managers to embrace our inclusive culture, we continue to make EDI a key part of our leadership development activities. In 2022 this included a sharp focus on making reasonable adjustments for staff.

## **Stonewall Equality Workplace Index**

The Stonewall WEI is a benchmarking scheme where employers can assess their achievements and progress on Lesbian, Gay, Bisexual and Trans (LGBT) equality in the workplace. In 2022 we were delighted to come 25th in their list of the Top 100 LGBT-inclusive employers and our work was recognised with a Gold Award. We will strive to improve the work we do in 2023.

### **Our networks and staff activity**

Our networks, established and run by staff, continued to share ideas and collaborate on events and initiatives throughout 2022. We have eleven such network, which are available for all staff to join and take part in. They each have an internal intranet page to share messages and raise awareness. We will build on our work to emphasise intersectionality and encourage allyship, through our cross network group.

A quarterly cross-network meeting also provides a good opportunity to support working together, helping to share ideas and best practice.

### **Highlights from 2022**

Our senior management team sponsor individual networks, taking a keen interest in and supporting the work of the network. We also have Board members who sponsor specific networks.

#### **REACH (Race, ethnicity and cultural heritage) - promotes racial equality and celebrates a diverse staff community**

During 2022 the network held regular monthly meetings and collaborated with other networks to talk about and provide feedback on our working from home policy, hybrid working guidance, ethnicity pay gap reporting, and gender pay gap reporting.

The network supported our faith events by sharing information and blogs, and also invited external guests from Diabetes UK and a Sikh Reserve Officer from the British Army to speak at their meetings.

#### **NOW - Network of Women - promotes gender equality and supports women in our workplace**

NoW continued their work to make menopause a mainstream conversation by marking World Menopause Day, raising awareness and holding a series of catch ups for colleagues directly affected by the menopause. These regular sessions aim to create time and space for colleagues directly affected by the menopause to share their views and experiences in a safe and respectful environment. Recognising that everyone's experience is different we held a range of open and closed sessions to be as inclusive as possible.

As well as various events to celebrate International Women's Day, NoW also marked 16 days of activism against gender-based violence - a UN led campaign - by inviting a local parliamentarian to talk about her work on women's safety and welfare, as well as her experiences as an Asian woman in a senior public facing role. On the same theme the network also hosted a self-defence session based on the martial art of Krav Maga, led by Gulshen Bano of [Strike Back \(https://www.strikebackselfdefence.com/\)](https://www.strikebackselfdefence.com/).

#### **PridePlus - promotes equal opportunities for LGBTQ+ colleagues and provides confidential support**

PridePlus is the SRA's sexual orientation and gender identity employee network, promoting inclusion for people who are LGBTQ+ (lesbian, gay, bi, transgender, queer or questioning and people who identify in other ways). The network has an active community page and provided varied activities over the year for its members and wider staff.

Members of the network held a webinar for the profession to promote trans and non-binary inclusion in 2022, inviting Mx Oscar Davies to share their experience as a non-binary barrister. They also invited a support worker from MindOut Mental Health Service to talk to staff about the challenges people from the LGBTQ+ community can face. Staff have enjoyed the new PridePlus podcasts, marking the main LGBTQ+ calendar days as well as a deeper level of discussion in its series of 'Queer Debates' discussing key issues of interest.

The network celebrated the return to Pride parades this year, turning out to support our presence in the Pride parades in London, Cardiff and Birmingham. It also formed new collaborative partnerships with other networks, including from the financial regulators.

#### **Mental Health First Aiders - trained colleagues who provide support and signposting on mental health and wellbeing**

During 2022, our Mental Health First Aiders (MHFA) received further training to help equip them to support staff and new mental health first aiders were recruited to further enhance the support available. The network held a panel show with their Executive and Board sponsor discussing mental health and our approach to wellbeing.

At the end of the year, the MHFA merged with the Accessibility Network to create the Everybody in Mind Network. The aim is to promote positive awareness regarding mental health, wellbeing, and disability access across the organisation, with activity including a virtual question box for anonymous queries.

### **Working Parents - for working parents to share ideas, information and support**

The Working Parents Network aims to support parents in the organisation by organising networking events and raising awareness of parenting related topics. It also provides one to one support to parents via its buddy scheme.

In 2022, the network organised a range of in person and online events on topics such as hybrid working, returning to work from maternity leave and work/life balance. The network plans to deliver a similar programme of events and activities in 2023 on topics such as careers, well-being and supporting parents who have children with physical or mental health conditions. It is also organising an event on LGBTQ+ families in collaboration with the PridePlus Network.

### **iCare - offers support, practical advice and information for carers of adults or children**

The network continued to empower the care givers within our organisation through support and practical advice for colleagues who care for loved ones. The Community Page shared invaluable tips on embracing a healthier lifestyle to ward off illnesses and real-life stories of carers, serving as a means for colleagues to tap into the experience of others.

During 2022 they arranged a talk from the manager of a local care home during Dementia Awareness Week, providing helpful advice about stimulating individuals with memory issues or dementia.

Looking ahead, the network will be doing more to support those caring for people with dementia.

### **Green Living Network**

During 2022 we received a Gold SKA rating from RICS for our office refurbishment. This network held various events, including sunflower growing competition, community litter picking and talks with external speakers such as the Wildlife Trust and environment consultancy Carbon Footprint.

### **Charity Working Group**

For the last two years (2021/22), our Charity Working Group have been fundraising for Mind, and during that time raised more than £7,000. Fundraising included our second organisation-wide challenge - walking the seven wonders of the world, bake sales, dress down weeks and individuals running marathons.

At the end of the two-year period staff voted on a new charity to support for 2023/24 and chose the Midland Langar Seva Society (MLSS).

### **Staff faith events**

We continued to organise staff faith events during 2022. These encourage staff from all religions and backgrounds to come together and celebrate as one.

Our Christian network also hosted a weekly virtual network prayer meeting for anyone that wished to join or to submit a prayer request for themselves, family, or friends.

### **Well-man Network**

The Well-man network was set up in October 2022 to engage colleagues and to make sure that men in the organisation, and in colleagues' lives, are supported. The network offers a platform for discussing wellbeing issues important to men, their families, friends and colleagues.

### **SRA Allies**

Our SRA Allies provides staff the opportunity to show support for all colleagues whatever their background. This helps create an inclusive culture where everyone feels safe and comfortable to be themselves. Allies are essential to providing a work environment where staff can fulfil their potential regardless of their characteristics.

In 2022, we refreshed our Allies programme, with a series of initiatives to educate and engage staff.

We invited all staff to sign the SRA Allies pledge every quarter. The pledge is a series of commitments to being an ally, including challenging inappropriate behaviour and celebrating difference.

We introduced Allies events led by our staff networks to raise awareness of intersectionality and the experiences of different marginalised groups. The first of these events was a talk arranged by the Network of Women and Reach Networks to highlight the ongoing importance of ensuring women's welfare and safety.

A new Allies Champion was nominated in recognition of their work on shining a light on all the different aspects of the LGBTQ+ spectrum and giving others the confidence to talk about their protected characteristics.

## **Rewarding and recognising our staff**

We continue to provide a range of staff benefits which reflect our inclusive approach. Our digital platform, the Recognition Hub supports timely recognition and reward for staff for embodying our behaviours and values.

We regularly remind staff through our internal communication of the importance of celebrating good news and success.

### **Some highlights from 2022**

In 2022, 82% of staff were recognised via the Recognition Hub.

In addition, during 2022 we have had 2,381 Thank You award nominations. A total of 471 ecards (such as welcome, congratulation, behaviours and the SRA values) have been sent. Our Recognition Hub includes a Wellbeing centre, where staff can access useful information and resources relating to diet and exercise, financial wellbeing and mental health.

Our weekly news round-up highlights offers of the week and links to where staff can access further discounts and up to date information. During 2022, staff saved more than £24,500 through the discount scheme in the Recognition Hub.

## **Our 2022 staff profile**

Our data is collected as at 31 December 2022.

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### **Gender**

#### **Key highlights and trends**

Our workforce is 64% female (466 staff) and 36% male (260 staff). This is compared to 63% female (444 staff) and 37% male (261 staff) in 2021. The government employment figures for 2022 show that women made up 51% of the workforce in England, Scotland and Wales.

Of those promoted in 2022, 65% (67 people) were female and 35% (36 people) were male. This compares to 56% (31 staff) and 44% (24 staff) respectively of those promoted in 2021.

For grades J-L, there was an increase in the number of external female applicants. In 2021, 28% of applicants were female, this increased to 37% in 2022, although this is still lower than previous years (51% in 2020).

The percentage of successful female applicants at grade J-L has increased from 37% (seven people) in 2021 to 53% (eight people) in 2022.

#### **Gender Pay Gap**

We published our Gender Pay Gap figures, which compare positively with the national one of 15.4% (ONS 2021).

	<b>Mean</b>	<b>Median</b>
SRA Pay	13.4% (2021: 9.7%)	11.2% (2021: 9.3%)
SRA Bonus	25.6% (2021: 24.2%)	12.5% (2021: -14.3%)

The mean pay gap is the difference between hourly earnings for men and women, taking the sum of all hourly rates divided by the total number of men or women in the sample.

The median pay gap is the difference between the midpoints in the ranges of hourly earnings between men and women. It takes all salaries in the sample, lines them up in order from lowest to highest, and picks the middle-most salary.

The pay gap increase is predominately due to the change in males and females in the upper quartiles. The pay gap has been adversely affected by the percentage of males employed at the lower two quartiles, which has decreased and the percentage of males in the upper two quartiles has increased.

We are concerned that our gender pay gap has widened, and we remain committed to reducing the gender pay gap. Measures in place to address the gap include:

- an ongoing review of our reward strategy and how we recognise staff
- an ongoing review of our policies, processes and practices to ensure an environment where everyone can flourish
- continuing to analyse diversity data in support of ensuring fairness throughout the employment lifecycle.

## Age

### Key highlights and trends

The largest proportion of our workforce continues to fall within the 35-44 age brackets (32% - 231 staff). Just under a quarter of our workforce (24% - 174 staff) are aged 25-34, 14% (102 staff) are aged 55-64, 4% (29 staff) of our workforce fell in the 16-24 age bracket and 2% of staff were aged 65 and over. This remains similar to 2021.

All age brackets were represented across all pay grades with the exception of 16-24 year-olds. Within grades J-L there was no representation from this age bracket. This has not changed since 2016.

In 2022, the largest percentage of external candidates (38%) continued to be in the 25-34 age bracket, suggesting that we continue to be attractive to external candidates within this age group.

A combined total of 46% (53 staff) of successful internal applications were from those within the 16-24 and 25-34 age brackets. 34% (39 staff) of successful internal applications were from those in the 35-44 age bracket.

## Ethnicity

### Key highlights and trends

The term Black, Asian and minority ethnic includes any member of staff who self-identifies their ethnicity as anything other than White.

Our largest ethnic minority group making up 16% of the workforce is Asian. However, the proportion of Black, Asian and minority ethnic staff continues to be lower in the middle and senior management grades than in the less senior grades. This is the case with many organisations and is an area where we want to see improvement.

At grade J-L the percentage of Black, Asian and Minority Ethnic staff in 2022 remained at 10%. The data indicates that Black, Asian and Minority Ethnic staff continue to be under-represented at this more senior level. The number of Black, Asian and Minority Ethnic external applicants at this level has increased from 24% in 2021 to 33%, although none of those applicants were successful. It is, however, worth noting that the number of roles that become available at this level is significantly lower than the number of roles available at the lower grades thus reducing the opportunity for candidates to secure a role.

Of those promoted in 2022, 20% were Black, Asian and minority ethnic (compared to 40% in 2021). When analysing this data further, the number of promotions in 2022 had almost doubled since 2021 at 103 promotions versus 55.

Furthermore, in 2022 there were 20 staff promotions whose ethnicity was not specified which amounts to 19%. By comparison, the number of individuals promoted in 2021 for whom we did not have a specified ethnicity was 5% which amounts to three people. This makes it very difficult to draw meaningful comparisons between 2022 and the previous year due to the differences in sample sizes across these two factors which may have skewed the outcome.

The number of people who expressly declined to state their ethnicity data reduced from 5% (three people) in 2021 to 4% (or four people) in 2022 so it is more likely that the change of HR systems is the reason behind the fact we do not have data for almost a fifth of the promotion population in 2022 as opposed to a reticence to share the data which is reassuring. We will continue to build out the data, across all characteristics as the system embeds.

We have outlined a series of career development measures in our published senior workforce ethnicity action plan which we would hope will lead to sustained changes in terms of representation of Black, Asian and minority ethnic staff in the profile of staff who are promoted over time.

The percentage of successful (internal and external) Black, Asian and minority ethnic candidates has increased slightly in 2022, from 30% (66 people) to 31% (93 people).

Government employment figures for 2022 showed that 13% of the workforce in England, Scotland and Wales were from a Black, Asian or minority ethnic background and 87% were White. Of the groups making up the Black, Asian and minority ethnic category in relation to the UK workforce:

- 7% are Asian
- 4% are Black
- 1% Mixed/Multiple background
- 2% other minority group.

We welcome the progress but know we have more to do. We will build on our work to date to make sure our people have every opportunity to develop their careers with us.



## Ethnicity Pay Gap

We published our ethnicity pay gap for the first time in 2022, which compares with the national one of 2.3% (ONS, 2019).

	Mean	Median
SRA Pay	17.6% (2021: 21.5%)	12.7% (2021: 15%)
SRA Bonus	49.5% (2021: 46.9%)	30% (2021: 16.7%)

Our 2022 median pay gap is 12.7%, compared to 15% in 2021.

Although we are pleased with the progress made in our ethnicity pay gap, our ethnicity bonus gap has widened. This is because the proportion of staff from a Black, Asian and minority ethnic background who are eligible for a bonus has decreased. A new action plan to address the lack of diversity within leadership has been implemented.

## Disability

### Key highlights and trends

In 2022, 9% of our workforce (64 staff) have declared that they have a disability, the same as 2021. 7% of those at grade J-L declared a disability in 2022.

Although the numbers are small, the proportion of external applicants applying who declare a disability is steadily increasing. In 2022 it was 8% of external applicants, compared to 7% in 2021, 5% in 2020, 4% in 2019 and 4% in both 2018 and 2017.

We also saw that 11% (11 people) of new starters in 2022 had a disability, which is an increase from 7% in 2021, 5% in 2020 and 4% in 2019.

According to the Government, there has been strong growth in the rate of disabled [Employment of disabled people 2022 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/the-employment-of-disabled-people-2022/employment-of-disabled-people-2022#:~:text=The%20disability%20employment%20rate%20has%20increased%20by%209.2%20percentage%20points,before%20showing). [The%20disability%20employment%20rate%20has%20increased%20by%209.2%20percentage%20points,before%20showing](https://www.gov.uk/government/statistics/the-employment-of-disabled-people-2022/employment-of-disabled-people-2022#:~:text=The%20disability%20employment%20rate%20has%20increased%20by%209.2%20percentage%20points,before%20showing) people in employment, during 2022, the disability employment rate was 52.6%.

## Religion and belief

### Key highlights and trends

Within our workforce, the largest group of staff identified as those saying they have no religion, 31% (225 staff). The second largest group are Christian, 26% (188 staff). This compares to 35% and 33% respectively in 2021.

Of other groups, 7% (50 staff) identified as Sikh, 6.5% (47 staff) identified as Muslim, and 2% (15 staff) as Hindu. The representation of Hindus decreased by one percentage point, after increasing by one point in 2021. The representation of Muslims and Sikhs decreased from 8%.

For staff working in grade A-D roles, 21% (23 staff) said they had no religion, 20% (24 staff) identified as Christian, 9% (ten staff) identified as Muslim, 7% (eight staff) identified as Sikh and 2% (two staff) identified as Hindu.

Of staff working in grade E-I roles, 29% (158 staff) said they had no religion, 28% (152 staff) identified as Christian, 7% (38 staff) identified as Sikh, 7% (37 staff) identified as Muslim and 2.4% (13 staff) identified as Hindu.

The majority of staff working in grade J-L roles, 63% (43 staff) have no religion. There were also 19% (13 staff) who identified as Christian, 6% (4 staff) who identified as Sikh and 3% (two people) who identified as Buddhist.

16% (16 staff) of those who received a promotion identified as Muslim, Sikh or Hindu.

## Sexual orientation

### Key highlights and trends

4% (29 staff) disclosed their sexual orientation as gay/ lesbian or bisexual, this has increased slightly from 3% (21 staff) in 2021.





From external applicants, 7% declared that they were gay/ lesbian or bisexual, compared to 6% in 2021.

Gay and lesbian members of staff were represented across grades E-L. Bisexual members of staff were represented across all grades.

An estimated 3.1% of the [UK population](#)

[\[https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/sexuality/bulletins/sexualidentityuk/2020\]](https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/sexuality/bulletins/sexualidentityuk/2020) aged 16 years and over identified as lesbian, gay or bisexual (LGB) in 2020.

## **Social mobility**

There is a greater proportion of staff from a professional parental background compared to [the general population and the Financial and Professional Service sector \(FPS\)](#) [\[https://socialmobilityworks.org/toolkit/measurement/1\]](https://socialmobilityworks.org/toolkit/measurement/1).

In 2022, 40% of respondents are from a professional background, compared to 37% nationally and 69% in the FPS sector.

From an intermediate background, there were 21%, compared to 24% nationally and 22% in the FPS sector.

14% of staff are from a lower socio-economic background, compared to 39% nationally and 29% in the FPS sector.

We have a greater proportion of staff from a professional parental background compared to the national average, but lower than the FPS average. Although we have a lower proportion of staff from a lower socio-economic background when compared to the both the national average and FPS.

20% of staff had one or both of their parents attend university, whereas 51% did not have parents who attended university. The remainder preferred not to say. 80% of staff whose parents attended university work in grade E-I roles.

In 2022, 6.6% of staff attended an independent or fee-paying school, which compares to the [national average of 7.5% of the workforce](#) [\[https://socialmobilityworks.org/toolkit/measurement/1\]](https://socialmobilityworks.org/toolkit/measurement/1) attending an independent or fee-paying school.

Of staff who responded, 31% declared that they are the primary care giver for a child under 18. This has increased from 20% in 2021. 11% of our staff look after or care for someone with long term physical or mental ill health caused by disability or age (up from 5% in 2021).

## **Our next steps**

To support our action planning following the reporting of our ethnicity pay gap we have set targets over the next five to ten years. We aim to double the number of Black, Asian and minority ethnic staff within our senior team from 8% (as at 31 December 2022) to 16% in the next five years, and to further increase to 20% by 2032.

Actions include expanding our reverse mentoring programme for Black, Asian and minority ethnic colleagues to include sexual orientation and disability to mentor our Director team. We also continue our inter-organisational mentoring scheme, targeted at colleagues from Black, Asian and minority ethnic backgrounds.

We continue to focus on recruitment and sourcing a diverse panel of people for our leadership recruitment process, reviewing the essential requirements for roles.

We have also refreshed our Allies programme to encourage more colleagues to support each other, our staff networks and our work on diversity. To support growing our diverse workforce each of these actions will be applied across all elements of diversity in due course.

## **Leadership**

We continue to use the employee lifecycle approach to support our leadership. We use the data we collate to give insight and inform our approach.

We continue to develop our leadership pathway taking the journey of leadership from being an aspiring manager to executive leader. In addition, we will introduce an advanced leadership programme. This series of events includes diversity as the main subject matter from time to time.

## **Resourcing**

We will be reviewing our executive search and selection firms supply chain and EDI will remain a heavily weighted selection criterion in terms of the organisation's commitment to this and the service they offer; pressing our preferred suppliers in recruitment to work much harder to provide a diverse range of candidates. We will also re-tender to test whether there are others who can do more in this area.

As we expand our presence in Wales and grow our Cardiff office, we will review the diversity profiles of the labour market and applicants.

We will source ethnically diverse interview panels for our leadership recruitment process.

We will review and challenge the criteria required to apply for our roles, to make sure that 'essential' requirements are really essential, for example having a degree qualification versus related experience.

### **Learning and development**

In 2023, we will launch a spotlight on reasonable adjustments eLearning module for all staff. This course will focus on how staff and managers can request and implement reasonable adjustments at work, as well as how we implement reasonable adjustments for the profession and members of the public.

We will evaluate our Aspiring Managers programme in 2023 and run further cohorts throughout the year.

### **Networks**

Through our cross network group, which supports our staff networks to collaborate, we will build on our work to emphasise intersectionality and encourage allyship.

We will also continue to endorse and promote our staff networks further, to provide useful information, events, and online intranet content to support all staff.

### **Other initiatives**

We will continue to review our progress against our 2023 staff survey and action plans, including those areas that address issues arising in relation to EDI.

Our ethnicity action plan will focus on increasing ethnicity within leadership but we will also review our career development practices by conducting a survey to understand the barriers to career development, exploring specific career development programmes for underrepresented groups and secondment and apprenticeship opportunities.

Through promotional work, internal communications, sharing of experience and promotion of EDI, we will continue to encourage a culture where staff feel comfortable to input their diversity data into the HR system. This will help maximise response rates and improve the accuracy of our diversity data.

We will submit an application to the Stonewall Workplace Equality Index (WEI) in November 2023 - the benchmarking scheme used by employers to assess their achievements and progress on Lesbian, Gay, Bisexual and Trans (LGBT) equality in the workplace. We came 25th in Stonewall's list of the Top 100 LGBT-inclusive employers and our work was recognised with a 'Gold Award'. We will work closely with Stonewall on developing our next application for the top 100 organisations in the annual Stonewall Workplace Equality Index.

We will monitor the implementation of the Reasonable Adjustments Policy and guidelines to make sure that staff understand how to request reasonable adjustments and line managers are equipped to implement them.

We will review the analysis of our diversity profile to identify areas of concern or positive changes within the staff demographic.

We will align a set of new behaviours to our values that further promote EDI in our day to day work.

We will continue to monitor and review our policies and practices and values to ensure that they are not discriminatory and are in line with best practice relating to EDI.