

**EQUALITY, DIVERSITY
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03 March 2015



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Equality, Diversity and Inclusion Strategy - Progress Update

Purpose

- 1 The purpose of this paper is to update the Committee on the progress made against the Equality, Diversity and Inclusion (EDI) strategic action plan.

Recommendations

- 2 The Equality, Diversity and Inclusion Committee is asked to:
 - a) Note the progress made in meeting Objective One, in particular the diversity monitoring of SRA Board and Committee applicants, staff training, and staff EDI events;
 - b) Note the progress made in meeting Objective Two, in particular the regulation of smaller firms and review of Chapter 2; and
 - c) Note the progress made in meeting Objective Three, in particular our work with the Law Society, plans for diversity data collection from firms in 2015 and webinar delivered around the benefits of diversity monitoring and using the diversity toolkit.

If you have any questions about this paper please contact:

Leah Lee, Senior Business Partner at leah.lee@sra.org.uk on 0121 329 6008, in relation to the actions identified under EDI Objective One.

Richard Collins, Executive Director at richard.collins@sra.org.uk on 0121 329 6344, in relation to EDI objectives Two and Three.

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Equality, Diversity and Inclusion Strategy - Progress Update

Background

1. We published the SRA Equality, Diversity and Inclusion (EDI) Strategy 2014/17 on 20 November 2014. The EDI Strategy is supported by an action plan for 2014/15 which is set out at **Annex 1**.
2. The action plan is set out under our three EDI objectives. The first EDI objective covers our staff and the actions are led by our group HRD function supported by the SRA EDI Team. The second and third EDI objectives concern the delivery of our regulatory functions and how we support those we regulate to achieve a more diverse and inclusive profession and these actions are led by the SRA EDI Team.

Progress in meeting Objective One

3. This section sets out the most recent updates from the HRD team against the actions under Objective One in the EDI Action plan:

Develop a more diverse workforce and promote an inclusive culture, equality of opportunity for all staff and the behaviours and capabilities required to regulate proportionately, fairly and free from bias.

Diversity of applicants to the SRA Board and Committees - Action 1.3

4. The recruitment agency Davidson and Partners have now provided the diversity data for the recent recruitment campaign for new Board and EDI Committee members.
5. The gender and ethnicity breakdown of the SRA Board which has in recent years been published on the SRA website, is as follows:
 - Gender breakdown: 6 women and 9 men;
 - Ethnicity breakdown: 13 white members and 2 BAME members.
6. We will be recruiting for members of the SRA Board again later this year and will be carrying out additional work to consider if we need to take any further steps in the recruitment process to promote diversity at Board level in accordance with Action 1.3.
7. There were 98 applicants for the Board vacancies and 66 of these returned diversity monitoring forms. At **Annex 1** we have set out a breakdown of the diversity profile of the 'known' applicant group in a series of charts for gender, ethnicity, age, disability, religion or belief and sexual orientation.
8. The data for the Board applicants showed the following

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- 33% (22) of the applicants are female;
 - 89% (59) are white and 11% (7) are from a BAME background;
 - 80% (53) were aged between 45 and 64;
 - 11% (7) have a disability;
 - In the religion or belief category, the two largest groups are 29 Christians (44%) and 27 who have no religion (41%). There were 2 Muslims (3%) and 8 preferred not to say (12%).
 - 61 individuals provided information about their sexual orientation and of those 7% (4) are LGB.
9. Compared to the solicitor practising population and national population statistics, women and BAME individuals were under represented in the applicants applying for the Board.
10. There were 64 applicants for the EDI Committee vacancies and 41 of these returned diversity monitoring forms. At **Annex 2** we have set out a breakdown of the diversity profile of the 'known' applicant group in a series of charts for gender, ethnicity, age, disability, religion or belief and sexual orientation.
11. The data for the EDI Committee applicants showed the following
- 63% (26) of the applicants are female;
 - 76% (31) are white and 22% (9) are from a BAME background and 1 did not respond;
 - 61% (25) were aged between 45 and 64;
 - 10% (4) have a disability;
 - In the religion or belief category, the three largest groups are 20 Christians (49%), 12 who have no religion (29%), and 5 Muslims (12%);
 - 39 individuals provided information about their sexual orientation and of those 15% (6) are LGB.
12. Compared to the solicitor practising population and national population statistics, women and BAME individuals were overrepresented in the applicants applying for the EDI Committee.

SRA equality and diversity training needs - Action 2.4

13. The SRA EDI team is working with the HRD Learning and Development team to compile a comprehensive schedule of training for the SRA and one immediate training priority has been

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identified following this exercise. This involves supporting SRA staff in working with vulnerable stakeholders, including both regulated individuals and complainants who have reported concerns about the conduct of a regulated individual to the SRA. A project team has been formed to take this forward and is being sponsored by Executive Director, Robert Loughlin with the support of the SRA Culture Specialist, Alison Macfadyen.

Staff events - Action 3.4

14. The calendar of internal EDI events for staff was put forward for input and agreement by different groups of stakeholders during February, including SMT, the Business Champions and the Employee Forum.
15. During February, a series of events were held to mark LGBT History Month. These involved a programme of external speakers which included:
 - Interlaw Diversity Forum – an inter-organisational forum for the LGBT networks in law firms. The forum has over 1000 members and aims to encourage LGBT diversity and inclusion within the legal sector.
 - Top Stonewall rated firms – ten of Stonewall’s top 100 employers to work for in 2014 were law firms. Representatives from Irwin Mitchell and Pinsent Mason, two of the firms that made this exclusive list, discussed what made them stand out and the difference it has made to their workplace.
 - GIRES – representatives from the Gender Identity Research and Education Society and the trans community spoke openly about the transsexual experience and the importance of effective communication, data recording and fairness when working with trans stakeholders.
16. 27 members of staff attended the Interlaw talk, 35 people attended the top Stonewall rated firms sessions and 35 people attended the GIRES session. Feedback from all three talks was excellent, with 98.7% of delegates rating the sessions as clear and useful. Individual comments included:
 - “Excellent and thought-provoking.”
 - “Excellent speaker – very engaging.”
17. In support of these events, a rainbow-themed bake sale helped raise over £50 toward our charity of the year and a quiz helped raise awareness of LGBT issues amongst staff.
18. Further events for quarter 1 will mark International Women’s Day in March. A programme of external speakers and internal events are scheduled which include:
 - The National Alliance of Women’s Organisations (NAWO) - an alliance of over 100 organisations and individuals concerned with making equality between women and men a

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reality. NAWO Chair Annette Lawson will discuss women's rights, progress within the workplace, gender inequality and discrimination against women.

- The 30% Club - Chair of the SRA's Equality, Diversity and Inclusion (EDI) Committee Jane Furniss and EDI Committee Member Jemima Coleman discuss the 30% club - a group of business leaders committed to achieving better gender balance at all levels of organisations.
- Birmingham and Solihull Women's Aid - the SRA's charity for 2015/16 supports women and children affected by domestic violence, rape and sexual assault. During this session, representatives from the charity will talk about their work.
- West Mercia Rape and Crisis Centre - WMRACC is a free, confidential and non-judgemental support service for survivors who have experienced rape, assault, incest, sexual abuse, sexual harassment or any form of sexual attack.
- Career development and progression - speed dating event - female directors and managers from the SRA and Corporate Solutions will be available to speak to colleagues about career development and progression.

Progress in meeting Objective Two

19. This section sets out the most recent updates from the EDI team against the actions under Objective Two in the EDI Action plan:

Ensure that the way we operate, our rules and the decisions we make are proportionate, fair and free from bias and help firms and individuals understand and comply with our requirements

Awareness of complaints handling policy – Action 11.2

20. The complaints procedure is signposted in the first letter a member of the public receives from Supervision following new letters that were developed in November 2014. We have started reviewing the position in all units to identify and plug gaps in relation to information to members of the public and regulated individuals. Through the complaints handling training we have delivered, we have reminded staff of the importance of identifying complaints at an early stage and ensuring stakeholders are aware of our comprehensive procedure to address concerns.

Diversity monitoring of complaints – Action 11.3

21. We have considered the diversity monitoring of complaints carefully. We will track the diversity data for regulated individuals who complain from January 2015 and report at the end of the year. This data can be obtained from existing records. We are amending the way we record complaints data to allow the link to and retrieval of existing data for reporting. With regard to diversity data for members of the public who complain, we have decided not to collect data at

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this time. Previous exercises showed limited responses rates and triggered some complaints but we will review our position next year.

Progress in meeting Objective Three

22. This section sets out the most recent updates from the EDI team against the actions under Objective Three in the EDI Action plan:

To work with those we regulate to support them in achieving a more diverse and inclusive profession

Working with the Law Society and other representative bodies – Action 12.1

23. Jane Furniss and Sian Hughes attended the Law Society's EDI Committee on 4 February 2015 at the Committee's invitation, to share information about our respective work areas. It was a useful exchange of views, and focused on a discussion of the recruitment practices of some firms, which were using various techniques to filter applications for training contracts which were impacting negatively on diversity and could potentially be indirectly discriminatory. One example was the use of online application forms which required a candidate to input A level results, impacting on those who had followed non traditional educational pathways or had been schooled overseas.
24. We agree there was scope for both organisations to work together to achieve common goals. The Law Society and the SRA EDI teams have worked together on a number of areas (the SRA EDI team and Supervision supported the TLS workshops on Principle 9 with the profession, we have collaborated on the diversity data collection exercise and inputted on the revisions being made to the D&I Charter). The teams will identify further areas where we can usefully work together and we will report back to the EDI Committee.
25. Jane Furniss and Chair of the Law Society EDI Committee, Lucy Scott-Moncrieff agreed to bring both Committees together to discuss common work areas, most likely in November 2015 where both Committees will be invited for a working lunch at Chancery Lane before retiring for their respective committee meetings.

Promoting diversity in the profession - Action 12.2

(a) Publication of the law firm diversity data toolkit

26. Following publication of the law firm diversity data toolkit in December 2014, a webinar was delivered to the profession on 28 January 2015. It was co-presented by the EDI team and the Risk team and included a live demonstration of the diversity toolkit, information about how it can best be used, and details of how diversity monitoring can bring about real business benefits for firms. 59 people attended the webinar and an overall rating of 3.7 out of 5 was given for usefulness.

(b) Collecting law firm diversity data in 2015

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27. Following consideration of a number of options for this year's diversity data collection, we have decided to commission an external provider to collect the data on our behalf. We are currently working internally with our Business Change team and consulting our Contact Centre and IT experts to draw up formal requirements for the work.

28. The most recent communication provided to the profession in January 2015 is set out below:

"We have listened to the feedback received from firms about using the organisation diversity data reporting pages on mySRA in early 2014. We recognise that a number of firms had difficulty accessing and using the reporting pages and we have been looking at ways to make it easier for firms to report the data to us. We are in the process of making significant improvements to our IT systems and until this work has been completed, we have decided to use an external provider to collect the data on our behalf. We will be discussing arrangements for this with a number of providers to ensure that the arrangements for reporting are easy for firms to use and secure.

We anticipate the period for reporting firm diversity data to the SRA will be three months from the beginning of April until the end of June 2015 but we will be contacting each firm to advise when and how the firm diversity data will need to be reported.

There is no change to the requirement for firms to collect and publish their firm diversity data annually. Firms may decide when to collect the diversity data from their staff each year and there is no change to the diversity questionnaire used in 2013/14, which can be downloaded from our website at [SRA | Ethics guidance - Diversity data collection | Solicitors Regulation Authority](#)."

29. Further in-depth guidance for firms around publishing their diversity data was due to be released in March 2015. However, the delay in collecting the diversity data from the profession is likely to now delay the publication guidance being released.

EDI Publications due in 2015/16

30. The EDI Committee requested a schedule of proposed EDI publications for 2015/6. We have set out a list of the publications that we are planning to meet annual reporting requirements and other actions set out in the action plan.

31. We are not yet able to confirm the time frame for these publications as our Executive Director Jane Malcolm is reviewing our wider approach to publications.

Report	Proposed Publication date
Annual Regulatory Monitoring Report	A diversity breakdown of key regulatory outcomes, including conduct matters, SDT referrals, PC conditions and interventions. The reports have been published in May or June annually since 2008 and are located here on our website. They are based on data for the previous calendar year. We hope to publish the 2014 data by the end of May 2015 and a draft report will come to the EDI

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	Committee on 20 May 2015.
Regulatory Monitoring - Supplementary Reports	These more detailed reports look at different aspects of the disproportionality that is evident in our regulatory work. We have prepared two reports to date both of which are brought to the EDI Committee under a separate item under the agenda. We are proposing to publish these reports in April 2015, in advance of the Disproportionality Seminar.
EDI Annual Progress Report	A report of our progress in meeting our equality objectives. The reports have been published in May or June annually since 2010 and are located here on our website. They have been based on the work we have done in the previous calendar year. As our current action plan covers our financial year we are intending to report progress in early 2015, and this will be linked to the SRA annual report.
Workforce Diversity Data Report	A report of the diversity profile of firms which is based on the data submitted to us from firms. The 2013/4 report was published in June, based on a snapshot of the data on 14 March 2014, but will be delayed this year as we are still not clear on our arrangements for collecting that data from firms. The reports are published here on our website.
Staff Diversity Data	Data is usually published annually on our website here covering the calendar year.

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Supporting information

Links to the SRA Business Plan/ EDI Action Plan

32. Links to the specific actions in the EDI Action Plan are provided in the body of the paper.

How the action will be evaluated

33. The EDI strategy sets out more detail about how we will evaluate our performance against the EDI Action plan and an annual progress report will be published.

What equality and diversity considerations relate to this issue

34. The update report relates to the progress being made against the EDI strategy.

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Date 3 March 2015

Annex 1 - Diversity Breakdown of Board Member Applicants

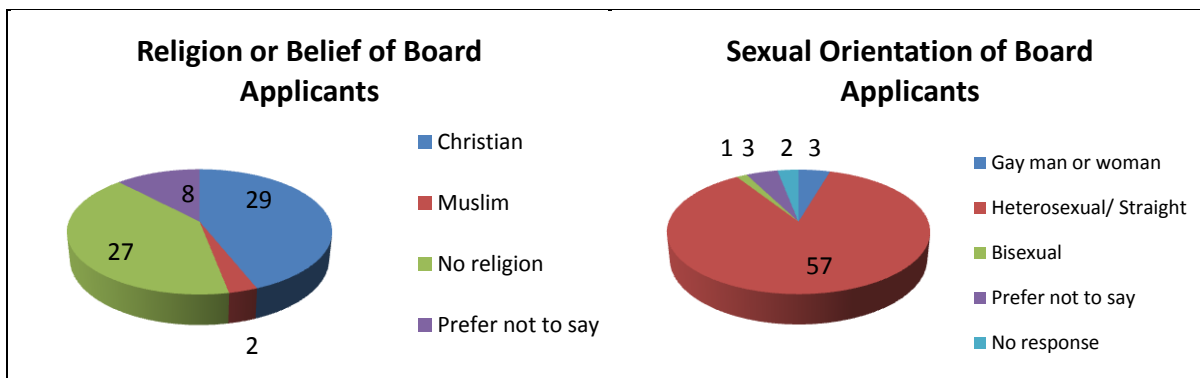
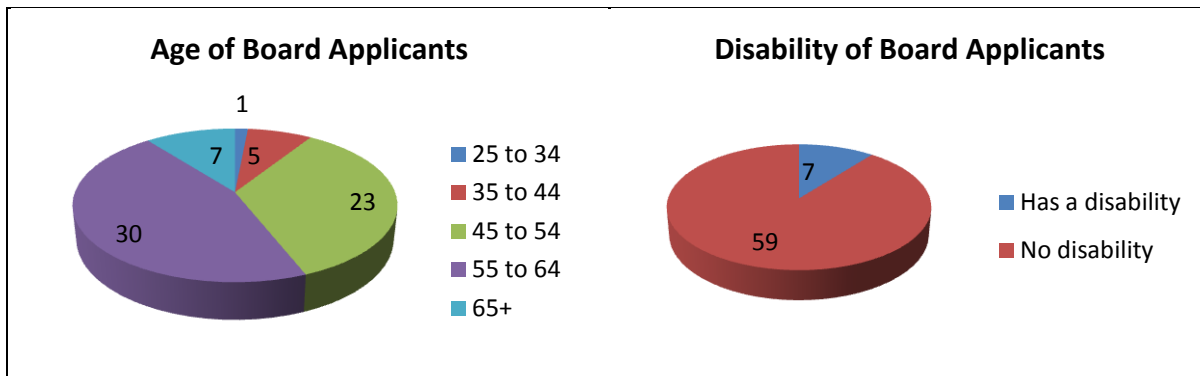
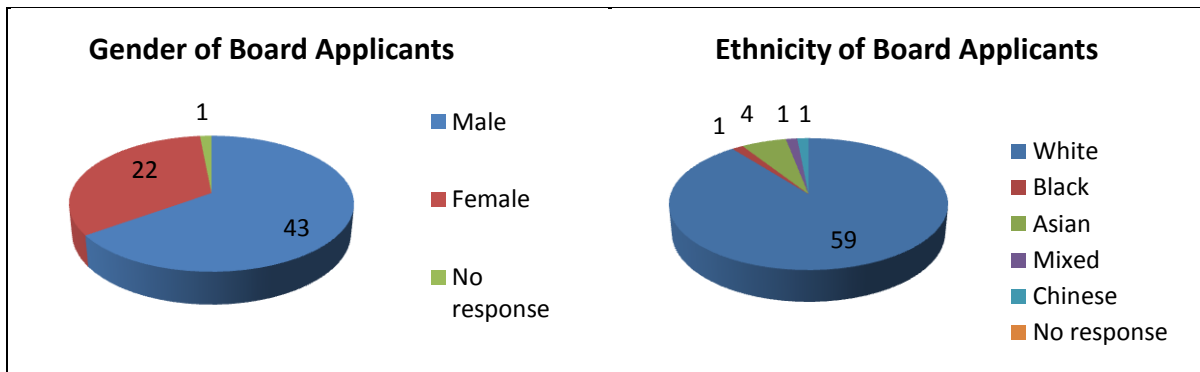
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Annex 1 - Diversity Breakdown of Board Member Applicants

The charts below set out the diversity breakdown of the 66 applicants for Board member roles (out of a total of 98) who returned the diversity monitoring form.



Annex 2 - Diversity Breakdown of EDI Committee Applicants

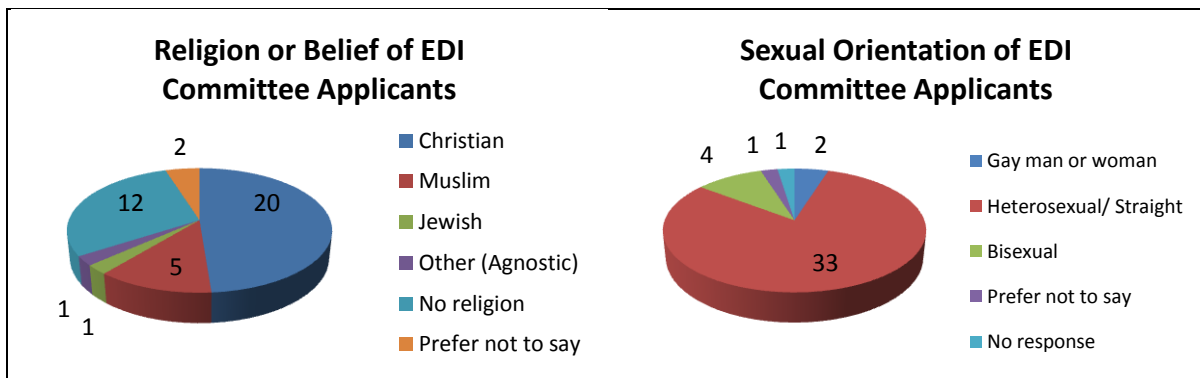
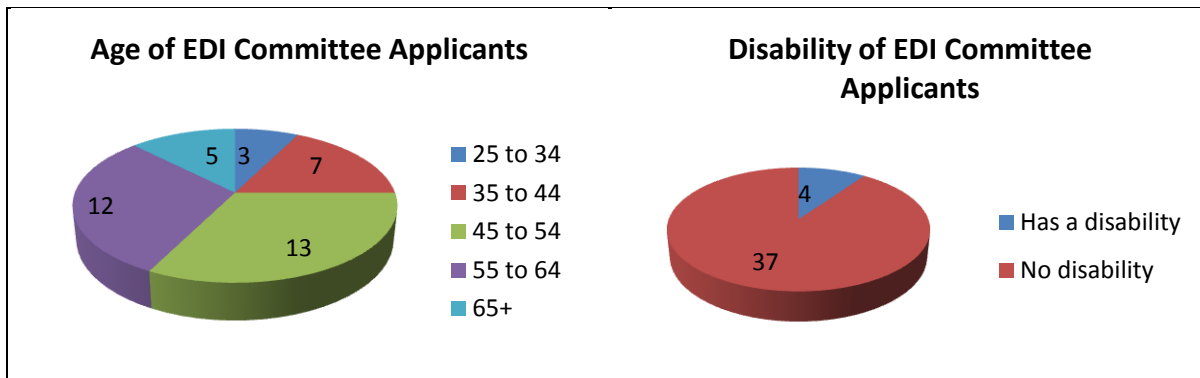
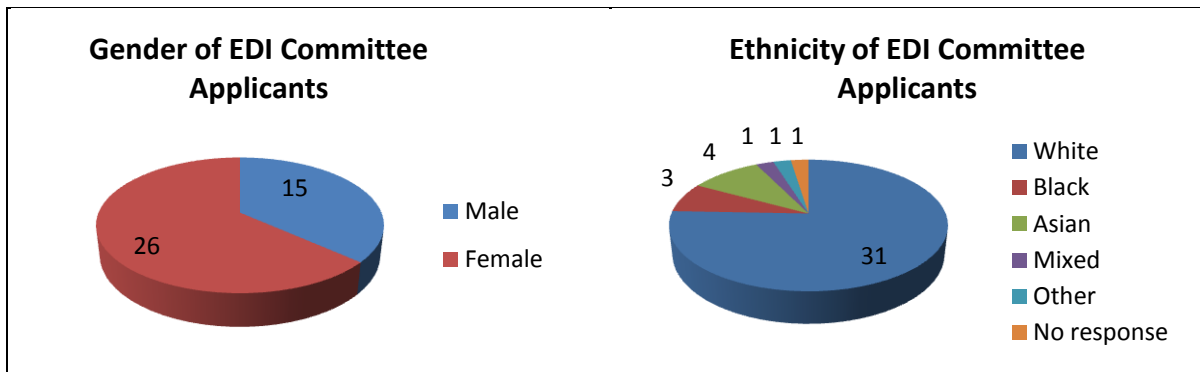
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Annex 2 - Diversity Breakdown of EDI Committee Applicants

The charts below set out the diversity breakdown of the 41 applicants (out of a total of 64) who returned the diversity monitoring form.



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Objective 1 - develop a more diverse workforce and promote an inclusive culture, equality of opportunity for all staff and the behaviours and capabilities required to regulate proportionately, fairly and free from bias.

No.	Activity	Responsibility	Delivery Date	RAG	Progress Update
1.	SRA BOARD AND GOVERNANCE				
1.1.	Recruit additional members to join the SRA Equality, Diversity & Inclusion (EDI) Committee. This will help us deliver the SRA's vision and strategy for diversity and inclusion and compliance with our equality duties and provide external insight and challenge to our approach.	CEO Office HRD EDI Committee Chair	January 2015	Completed	We have now successfully recruited 6 new Committee members: Caroline Armitage, Mike Franklin, Ruth Grant, Uday Dholakia, Sophie Khan, and Jemima Coleman. They attended their first Committee meeting on the 13 January 2015 and are due to attend an Induction day at the SRA on the 3 March.
1.2.	Review the work of the SRA Board and the other SRA committees, to ensure that equality, diversity and inclusion is fully integrated into their business and decisions.	CEO SRA Board Chair	December 2014	On track	The template for papers for SRA Board and all Committees require an assessment of equality impact. We are discussing how best to quality assure the information provided.

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1.3.	Take steps to attract a wide and diverse range of candidates when vacancies arise on the SRA Board, committees and the adjudication panel to continue to make the SRA a more diverse organisation at all levels.	CEO HRD SRA Board Chair	January 2015	On track	We have compiled the diversity breakdown of the applicants for the recent Board and EDI Committee recruitment and it will be reported to the EDI Committee on 3 March 2015. We will use the data and feedback from the recent exercise to inform the next Board recruitment exercise.
1.4.	Develop and deliver a mandatory bespoke Inclusive Leadership module for all members of the SRA Board and committees in addition to the required training on equality, diversity and inclusion to support our strategy and ensure understanding of our equality duties.	HRD CEO	April 2015	On track	The tender process for the training provider is at its final stages. The supplier appointment will be confirmed in the week commencing 16 February 2015. The supplier will then meet with key stakeholders in the SRA for familiarisation sessions to inform the training, starting in the week commencing 23 February 2015. The training will be scheduled in quarter two and but is likely to extend beyond April 2015.
2.	STAFF TRAINING & DEVELOPMENT				
2.1.	Develop and deliver a mandatory bespoke Inclusive Leadership & Unconscious Bias programme for the CEO, Executive Directors and Leadership team to support them in providing visible leadership in this area.	CEO HRD	July 2015	On track	As above

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2.2.	Develop and deliver a mandatory Inclusive Leadership & Unconscious Bias programme for line managers and employees to support our vision for diversity and inclusion and improve the confidence and skills of our managers to lead a diverse workforce. This will also support employees to feel confident in raising any concerns and to understand their own responsibilities in the workplace.	HRD	October 2015	On track	As above
2.3.	Deliver an E-learning diversity and inclusion training course to be completed by all SRA staff to provide a baseline of knowledge in respect of diversity and inclusion, dignity at work and unconscious bias.	HRD SMT	November 2014	Completed	E- learning module delivered in 2014.
2.4.	Each SRA directorate will assess any additional equality, diversity and inclusion training needs of their staff in fulfilling their specific role within the SRA, particularly those involved in decision making in the light of the ICCR report. A training plan will be developed and training delivered to SRA staff to cover these additional training needs and the impact of the training will be evaluated.	All Directorates EDI Team HRD	November 2014 and ongoing Evaluate impact by December 2015	On track	We have collated a list of equality and diversity training needs for the SRA. This is now being taken forward with L&D and will be fed into the work ongoing about technical training needs of the SRA. Executive Director Robert Loughlin has agreed to sponsor a particular training project around working with vulnerable stakeholders.

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2.5.	Provide sessions to support for the Employee Forum and Business Champions regarding their role in supporting the SRA's diversity and inclusion vision and strategy.	HRD Employee Forum Business Champions	April 2015	On track	We are due to start a recruitment campaign for the Employee Forum in March due to a number of staff leaving, to ensure representation across the SRA. Sessions will these groups will commence in April 2015.
2.6.	Provide recruitment and selection training to all hiring managers so they are confident in their ability to manage recruitment and selection in an objective and evidenced based way, recognising unconscious bias and how to eliminate it from the process.	HRD	December 2014 and on-going	On track	HRD pilot training sessions took place in February. Planned launch of the training and scheduled dates for staff will be scheduled imminently.
3.	STAFF ENGAGEMENT & COMMUNICATION				
3.1.	The CEO will act as the Diversity and Inclusion Champion for the SRA to demonstrate and deliver senior level commitment in this area.	CEO	October 2014 and ongoing	On track	The CEO leads the work of the Business Champions across the SRA. EDI is embedded into the Business Champions work programme. The CEO actively promotes this work eg by endorsing the recent LGBT month and events scheduled to take part as part of International Women's day in March.

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3.2.	Diversity and inclusion to be a fixed monthly agenda item at the SMT, Leadership Team meetings, Employee Forum and Business Champion meetings to help us maintain momentum and focus in achieving our vision and strategy.	All	October 2014 and on-going	On track	Progress against the strategy is now being reported to SMT.
3.3.	A diversity and inclusion performance objective will be set for members of the SMT and Leadership team to demonstrate visible leadership in support of our vision and strategy for diversity and inclusion.	SMT HRD	January 2015	-----	Discussion with SMT and leadership team about the need to change this action as it does not provide a SMART way of measuring output or performance. In addition the SRA has a set of values and behavioural competencies which are core to the organisation and underpin all staff objectives.
3.4.	SRA internal events for staff will be held, with internal and external speakers across a broad range of areas to provide an environment of open discussion and build awareness and understanding of a range of diversity and inclusion issues.	HRD SMT Employee Forum EDI Team Business Champions Communications	Minimum of 1 talk per quarter, commencing December 2014	On track	HRD and the D&I team have been working collaboratively to develop an internal events calendar for the year. Popular and successful events delivered to mark LGBT history month in February and events planned for March will be celebrating International Woman's Day. We are in the process of confirming the rest of the year's agenda which will be put to SMT for approval.

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3.5.	Research the viability of establishing employee networks for the purpose of providing expertise and learning to inform key policy and service developments and to provide options / recommendations to SMT.	HRD	April 2015	On track	A number of employees have expressed an interest in both a women's network and also a religious network. Research to be completed and a draft report with options to be presented to SMT in March.
3.6.	Deliver Pulse (mini) organisation-wide Employee Engagement survey which demonstrate improvements in outcomes and review departmental action plans across the SRA.	HRD SMT	December 2014	Delivered	A full survey is anticipated to be delivered in September / October 2015
3.7.	Deliver a second Equality, Dignity & Respect at Work survey which demonstrate improvements in outcomes.	HRD	October 2015	-----	This action is to be reviewed in light of the work HRD is undertaking and whether a second survey is required.

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4. STAFF DIVERSITY MANAGEMENT INFORMATION					
4.1.	Conduct an exercise to gather and cleanse diversity data for a minimum of 90% of our staff in order to produce an accurate set of workforce data.	HRD	October 2014	Completed	<p>Following the recent diversity data collection exercise we now have diversity data for:</p> <ul style="list-style-type: none"> • Gender - 100 per cent of staff before and 100% after the exercise; • Ethnicity - 94 per cent before and 98 per cent after; • Age - 100 per cent before and after; • Religion - 66 per cent before and 85 per cent after; • Sexual Orientation - 68 per cent before and 86 per cent after; • Disability - 73 per cent before and 92 per cent after. <p>Although we did not meet the target of 90% for sexual orientation and religion, there was an increase across the board and lessons have been learn about improving response rate for the next exercise.</p>

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4.2.	Provide SMT with six monthly reports outlining patterns and trends in respect of workforce diversity in relation to applications, short-listing, hires and internal promotions. This will inform the development of any positive action initiatives to address under representation.	HRD	April 2015 and every six months First paper to SMT in May 2015	On track	A report of staff diversity data is being taken to the EDI Committee at its meeting on 3 March 2015.
5.	BESPOKE HR ACTIVITIES				
5.1.	Recruitment pages of the SRA website to be reviewed to help ensure all diverse groups such as Black African - Caribbean, LGB and disabled people are attracted and apply for roles.	SMT HRD	TBC	On track	A first meeting to discuss website branding is taking place this March.
5.2.	HRD to provide interventions and expert support for management as and when required so any concerns are proactively addressed before they have a negative impact on individuals and teams.	HRD	On-going	On track	HRD staff are working with the SRA on actions following on from the Dignity at Work survey and Pulse survey and from actions arising from the Supervision Report.

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Objective 2 - ensure that the way we operate, our rules and the decisions we make are proportionate, fair and free from bias and help firms and individuals understand and comply with our requirements.					
No.	Activity	Responsibility	Delivery Date	RAG	Progress Update
6.	REGULATORY REFORM AGENDA				
6.1.	Publish a discussion paper of proposals for the more proportionate regulation of smaller firms to inform our regulatory reform agenda, both in relation to any changes required to our formal regulatory requirements and the way we supervise and engage with smaller firms.	Policy	December 2014	Completed	Deadline for responses to the discussion paper was 4 February 2015.
6.2.	Pursue our programme of regulatory reform (as set out in our Corporate Strategy) to ensure our regulation is more targeted and proportionate, including an assessment of the impact on equality for each of the proposals.	Policy	Ongoing	On track	We are taking account of the consultation responses received and formulating a plan for small firm engagement that delivers policy objectives and fits within our supervision strategy. SMT will be discussing this shortly with a view to engaging with the Board as part of our response to the consultation and finalising our position on small firms more widely.

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6.3.	Review and update our published Enforcement Strategy and make clear how we use our regulatory tools so the profession better understands our approach to supervision and enforcement.	Legal	May 2015	On track	Aiming to present the enforcement strategy at the Regulatory Risk Committee on the 8 th April 2015.
7.	SUPPORT IN MEETING PRINCIPLE 9				
7.1.	Review the outcomes in chapter 2 of the Code of Conduct so the profession has a better understanding of the outcomes expected for compliance with Principle 9.	EDI Team Policy	October 2015	On track	This review now forms part of the 'regulatory simplification' work stream and will go out to consultation in April 2015. A draft will go to EDI Committee on 3 rd March, Standards Committee on the 9 th April and the Board in July. We are looking at making relatively small changes with proposed further changes to be captured as part of the Handbook review for 2016.
7.2.	Monitor and publish information about the reports received in relation to Principle 9.	Management Information EDI Team Supervision	May 2015	Likely to be delayed	We will be capturing this information and including it as part of the annual report of progress against the EDI strategy for 104/15 which is likely now to be published early in 2016 to align it with the SRA annual reporting deadlines.

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8.	REGULATORY DECISION MAKING				
8.1.	Embed equality and diversity in our decision making framework and supporting processes.	All directorates	July 2015		The following action is under discussion by SMT to identify work programmes to take this work forward.
8.2.	Implement the decision making framework and train staff in its use.	HRD EDI Team	September 2015		The following action is under discussion by SMT to identify work programmes to take this work forward.
8.3.	Develop and establish a revised and improved quality assurance function and processes so as to demonstrate that our regulatory decisions are fair, consistent and free from bias.	Quality Assurance	August 2015		The following action is under discussion by SMT to identify work programmes to take this work forward.
8.4.	Review our decision making criteria and approach to writing regulatory decisions to ensure clarity and transparency in explaining how decisions are reached.	All Directorates	October 2015		The following action is under discussion by SMT to identify work programmes to take this work forward.

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9.	DIVERSITY MONITORING OUR REGULATORY WORK				
9.1.	Review our approach to diversity monitoring of our regulatory work to ensure we are monitoring all key areas of our decision making to identify any disproportionality. We will publish an annual report and at least 2 additional reports looking in more detail at an agreed area of disproportionality.	MI EDI Team	Annual report in May 2015	On track	The report will come for approval to EDI Committee on 20 May 2015 for publication thereafter.
			Additional reports in January and October 2015	On track	Two reports (one about instigators and firm profile by turnover and one comparing QLT and non QLT individuals involved in regulatory activity) will be brought to EDI Committee for approval on 3 March 2015.
10.	ENGAGEMENT WITH THE REGULATED POPULATION AND OTHER STAKEHOLDERS				
10.1.	Review how Supervision engages with the profession and the purpose of our engagement to assess the impact of our approach on the profession.	Supervision	April 2015	-----	Supervision is currently undergoing a review that enables consistent, fair and timely delivery of actions. This action is therefore under review and further discussions with Robert Loughlin are under way.

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10.2.	Engage with all sectors of the regulated community, specifically with equality groups representing the profession, about our risk criteria (which define the relative seriousness of regulatory events that are referred to us) so as to ensure that they are robust and understood by the profession.	Policy and Risk	October 2015	On track	These are now core to how policy reform projects are working. We are, over the next three months, codifying our approach to policy development and that will include appropriate equality assessment and engagement. We will take a tailored approach depending upon the project and proposals. Some will require wide engagement and more detailed equality assessment, others will need a more short form approach. Our overriding reform programme is centred on making the legal market work more effectively for consumers of all sorts so the choice of projects is itself focused partly on issues of access, choice and growth.
10.3.	Develop a specialist approach to supervision and engagement with small firms in line with our policy on proportionate regulation.	Supervision Policy	April 2015	On track	As above.

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10.4.	Review our approach to stakeholder engagement, including with equality groups representing the profession about all areas of our work and implement our new engagement plans.	Communication EDI Team	January 2015	In progress but delayed	We are meeting with a number of equality groups in the profession to re-establish engagement. To date we have met with Junior Lawyers Division, British Nigeria Law Forum, Asian Solicitors GB. A coordinated approach will be developed in consultation with John Dickinson Lilley. Delayed to ensure the equality stakeholder work is coordinated and developed alongside the wider engagement work which is in progress.
10.5.	Hold more regular events/ workshops with the profession to promote understanding of how we work - each directorate to consider potential areas to cover, working where we can in partnership with other groups or organisations.	All Directorates	Ongoing to October 2015	On track	Joint event with the Law Society and the Legal Ombudsman being planned for October 2015 around meeting the needs of vulnerable consumers.
10.6.	Hold a seminar with other regulators and academics to discuss disproportionality in regulation.	Comms EDI Team	May 2015	On track	Invitation only seminar arranged for 27 April 2015, preparations underway, invitations sent to other regulators and stakeholder organisations, speaker organised, programme being finalised.

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11. COMPLAINTS ABOUT THE SRA					
11.1.	Ensure that all staff are provided with an appropriate level of training on handling complaints of discrimination.	Complaints Team EDI Team	October 2015	On track	Training is being rolled out to directorates provided jointly but the Complaints and EDI team. In the past few weeks 4 sessions have been rolled out to Authorisation with more on the way, covering an overview of complaints handling as well as specifically handling complaints of discrimination.
11.2.	Take steps to raise awareness of our complaints handling policy among our stakeholders at an early stage in our dealings with them.	Complaints Team All directorates	September 2015	On track	The complaints procedure is signposted in the first letter a member of the public receives from Supervision following new letters that were developed in November 2014. We have started reviewing the position in all units to identify and plug gaps in relation to information to both members of the public and our regulated community. Through our complaints handling training (see above 11.1) we remind staff of the importance of identifying complaints at an early stage and ensuring stakeholders are aware of our comprehensive procedure to address concerns.

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11.3.	We will consider if and how we can introduce diversity monitoring of those raising complaints against the SRA to provide a richer understanding of what our complaints data is telling us.	Complaints Team	January 2015	On track	We will track the diversity data for regulated individuals who complain from January 2015 and report at the end of the year. This data can be obtained from existing records and we are amending the way we record data to allow reporting. As for complaints from members of the public we are not collecting data at this time, previous exercises showed limited responses rates and some complaints.
Objective 3 - to work with those we regulate to support them in achieving a more diverse and representative profession.					
No.	Activity	Responsibility	Delivery Date	RAG	Progress Update
12.	DIVERSITY IN THE PROFESSION				
12.1.	Work with the Law Society, other representative bodies, firms and solicitors to identify ways to improve the co-ordination of efforts to improve diversity within law firms.	Strategy EDI Team	January 2015 onwards	On track	Working with the Law Society EDI team to support their review on the D&I Charter in January 2015. Jane Furniss and Sian Hughes attended TLS EDI Committee to discuss common issues, meeting of the two EDI Committees proposed for November 2015.

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12.2.	Provide the profession with a range of information and tools to help them promote diversity in the profession, including: a diversity data benchmarking tool for law firms; a paper and a webinar on diversity in the profession; and guidance for the profession on publishing diversity data.	Risk EDI Team Comms	December 2014 for the bench marking tool and paper	Completed	Published to the profession on 19 December - looking at further ways to promote the tool.
			January 2015 for the webinar	Completed	79 registered, 59 attended. Only 3 exit survey responses – but 3.7 out of 5 for usefulness, two ratings of 5/5 and one rating of 1/5). Feedback – one comment only: “It was all very clear and well presented, thanks.”
			March 2015 for the publishing guidance	Likely to be delayed	The delay in collecting the diversity data from the profession is likely to now delay the publication guidance being released.