



Workforce progress report 2018



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Foreword

Welcome to our 2018 SRA staff diversity report. This provides information on our workforce and the initiatives we have taken as part of our commitment to a diverse and inclusive workforce and workplace, reflecting the core values our staff have developed.

Real inclusion is important for the legal sector as a whole, the users and the providers of legal services, as well as wider society. And for us, we know, and as our own ['The Business Case for Diversity'](#) report said, "a more diverse business is a successful business".

Last year saw us continue our work to support our workforce, for example through our growing number of staff networks and by listening to feedback from our staff. We keep our recruitment approach under review and have again done more this year to reach out to a wider range of people.

Good regulation means maintaining the confidence of the public and the profession. Our workforce and what we do every day is key to that. To me that means a truly inclusive approach for all our people and I welcome the progress we are making. I am looking forward to doing even more to develop an increasingly diverse culture and organisation.

Paul Philip
Chief Executive

Our commitment to equality, diversity and inclusion (EDI)

The Equality Act 2010 sets out the 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
 - Gender
 - Ethnicity
 - Disability
 - Religion or belief
 - Sexual orientation.
3. Foster good relations between people from different groups.

The broad purpose of the equality duty is to integrate consideration of equality and good relations into day-to-day business. The mainstreaming of EDI throughout our work is a priority for us. This report provides information on some of our work to do that.

The general equality duty requires organisations to consider how they could positively contribute to the advancement of equality and good relations. It requires equality considerations to be reflected into the design of 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.

In 2018 we focused on embedding mainstreaming EDI. This is overseen by our EDI Programme Board which:

- provides operational oversight of our work to make sure EDI is integrated into our core activities
- reviews performance against our annual EDI action plan, which sets out the activity that we are taking forward to support the Corporate strategy 2017/20.

Our EDI work is linked to our values:



Our values were developed by our staff and are threaded through everything that we do.

Our report

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 2017](#).

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 equality, diversity and inclusion throughout their work, whatever their role.

Labour market

Our offices are based in Birmingham and London and our staff are broadly representative of the labour markets in these locations. There has been little change in the diversity profile of our staff over the last few years and we continue to work on areas where data suggests we are behind market trends.

Workforce data

Our staff grading is structured in the following way:

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

All data is as taken at 31 December 2018. Please note larger percentages have been moved to the nearest whole number whilst smaller percentages may show more detail. In some cases, the data in this report will be presented in line with the staffing structure to express key points.

Solicitors
Regulation
Authority

Building a diverse workplace

Attracting and recruiting diverse talent

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

In 2018 we worked with a number of new partners to widen our attraction strategy and to reach a diverse pool of applicants. This included increasing our presence on diversity-related job boards. We introduced new advertising contracts with the following:

- Even Break - which focuses on supporting people with disabilities
- Timewise - which targets communities specifically looking for part time roles.

In addition, we delivered a training session for our administrative support staff (who often

support with the interview process) to make sure they are comfortable and capable of supporting interviewees who need reasonable adjustments.

In 2017 as part of increasing social mobility and our commitment to reaching the widest possible pool of people, we trialled a new way of working. Candidates who are invited to interview are given access to an e-learning platform, designed to help people show their full potential at interview.

The aim was to help to 'level the playing field' by providing support and guidance to applicants from all backgrounds at interview stage. The pilot concluded in 2018 and we received positive feedback from candidates. This initiative has now been implemented permanently.



Diversity matters

Our recruitment team initiated a tender process in late 2018 to refresh our recruitment agency preferred supply chain. Agencies commitment to EDI – both internally within their own organisations and in practice in terms of how they could support our key aims with recruitment and diversity – was a core part of the procurement process with significant weighting attached to it.

The recruitment team supported a careers fair aimed at black young professionals in London to engage and understand what companies can do to better engage with Black, Asian and minority ethnic (BAME) candidates.

Our BAME network hosted a recruitment and career development workshop in-conjunction with recruitment and learning and development for all staff to focus on reaching their potential through career progression.

In 2018 we launched a new recruitment and selection workshop for hiring managers that helps them identify the potential for unconscious bias and discusses methods and techniques to prevent this from influencing decisions.

Throughout the year we have made changes to our recruitment practices to be more inclusive. For example, candidates are no longer asked for their title (ie Mr, Mrs, Ms and Miss) to remove barriers for applicants, including the trans community, who may not identify in this way.

Importantly, we continue to measure the recruitment process at each stage by grade and by characteristic. We have worked closely with industry experts, including signing up to the Good Recruitment Campaign in 2018 to share best practice and help with benchmarking data.

Black Young Professionals diversity recruitment fair



Supporting progression and fulfilling aspirations through learning and development

In 2018 there was an increase in the delivery of learning and development to staff. We delivered 3,215 training interventions in 2018 compared to 2613 the year before. This shows our continued commitment to build and retain a knowledgeable and motivated workforce.

We continue to support our staff to make our overarching commitment to EDI a reality. All our managers attend dedicated courses to equip them with the necessary skills to support their staff, and diversity and inclusion is at the heart of these initiatives. A dedicated diversity and inclusion e-learning module for managers, featuring videos and scenarios, helps to embed the skills that promote a healthy, inclusive workplace. This is refreshed every two years.

All new members of staff complete our welcome e-learning modules that help us identify specific needs and introduce reasonable adjustments, as required. Within our welcome e-learning package is a diversity and inclusion module for all staff to complete, establishing how important EDI is to us as an organisation.

Our two-day corporate induction programme introduces all new starters to the organisation and our ways of working.

Strengths Deployment Inventory (SDI) workshop follows the two-day induction. SDI continues to be our tool of choice, and helps individuals identify their motivational preferences. It provides an appreciation of difference, a better understanding of someone else's view of the world, and how this can impact on the way we work.

With the launch of our new Stress and Wellbeing Policy, all managers have attended a briefing to help them recognise those around them who may be overwhelmed and present ways in which they can help and support. Stress and wellbeing briefings have also been delivered throughout the year to all staff and reflect the commitments within our new policy.

Our Mental Health First Aid initiative is now established, offering guidance and help to those who need it and promoting good mental health across the organisation.

In 2018 we updated our Maternity, Shared Parental and Transitioning at Work Policies to remove gendered language and make our policies more inclusive.

Personal and professional development remains a key part of our training and development offering, with funding available for external courses or qualifications, subject to key criteria set out within our professional development policy.

We provided support to our trainers and delivered a series of Train the Trainer sessions. These workshops not only help staff create engaging, relevant and memorable training but also covers ways in which learning can appeal to different types of learners and how best to support individual's needs.

The Allies pledge



I will demonstrate my support by:

- Challenging any inappropriate language, behaviour and attitudes
- Acting as a role model for our fair and inclusive values
- Doing what I can to change the behaviours and attitudes of others to create an inclusive culture
- Being visible in my role as an ally and openly showing my support to our staff networks
- Keeping up with the work of networks and the issues that some of our colleagues may face by receiving news updates and attending at least two network events each year
- Acknowledging and celebrating that we are all individuals.

I will do this to ensure everyone feels safe and comfortable to be themselves at work.



SRA Allies

In 2017 we introduced SRA Allies as an opportunity for all our staff to show support to LGBTQ+ colleagues as part of their commitment to creating a diverse and inclusive workplace. As an SRA Ally, staff can demonstrate their support by getting involved in key events and initiatives. They do not need to be a member of a network, nor do they need to identify as LGBTQ+.

Through SRA Allies we wanted to:

- raise awareness of the issues that LGBTQ+ colleagues may face
- encourage people to be advocates and supporters of our LGBTQ+ colleagues.

Our Allies will challenge against homophobic, biphobic or transphobic jokes in the organisation.

They try to understand the issues and support LGBTQ+ colleagues by making the workplace a space where we can all be ourselves. We have also provided trans awareness sessions for our managers and Ally staff.

We invited everybody who would like to be an SRA Ally to make a pledge of support in line with the Allies aims.

In June 2018 as part of our ongoing commitment to building an inclusive and supportive culture we held drop in sessions and further promoted SRA Allies encouraging staff to pledge their support. Our Board members have signed a pledge to show support for our aims of inclusivity and fairness.

Continuous improvement based on our staff engagement survey

In November 2018 we ran an interim 'pulse' staff engagement survey. We had a good response rate of 74% suggesting that staff wanted to engage with the organisation and to speak up where they wanted to see improvements.

The two biggest increases were in response to having a clear understanding of the purpose and objectives of the organisation, and that the reasons behind change are clearly communicated.

The results showed us that the initiatives introduced in 2018 - such as the use of new technology to improve communications, the introduction of a portal to increase staff recognition and more opportunities to spend time with the Senior Management Team - have had a positive impact.

As with all our staff engagement surveys, we included bullying and discrimination questions. Discrimination and bullying have remained broadly the same as 2017 and were below the UK average.

We continue to have a zero-tolerance approach to any bullying and discrimination. We plan to do further work in 2019 to raise awareness, encourage reporting and provide support to staff and line managers to work towards a culture without any discrimination.

SRA staff, The Contact Centre



Stonewall Workplace Equality Index

In September 2018, we submitted our third application to the Stonewall Workplace Equality Index (WEI). This is a benchmarking tool used by employers to assess their achievements and progress on lesbian, gay, bisexual and trans (LGBT) equality in the workplace.

We are delighted that Stonewall has confirmed our position in the 2019 WEI as 123 out of 445 organisations. This is an improvement of 48 places and puts us in a good place to achieve a Stonewall Top 100 place in the near future. This continues our improvement from the previous year when we moved up 70 places.

Stonewall Workplace Equality Index award 2019



Our networks

Our staff networks, established and run by staff, continue to host a programme of events throughout the year. Networks share ideas and collaborate on events and initiatives. A quarterly cross network meeting is a great forum to help share ideas, best practice and to work together. The introduction of a new staff intranet this year allowed the networks to benefit from technology and to more easily share messages and raise awareness across networks.

The networks are:

- Black, Asian, and minority ethnic (BAME)
- Christian
- Disability (Access Ability)
- LGBTQ+ (SRA Nexus)
- Women (rebranded to NOW – Network of Women – in 2018)
- Carers (iCare).

They worked together to create a calendar that celebrates events and raises awareness of diversity throughout the year. For example, during Black History Month an exhibition was held to share information, raise awareness and different aspects of black history was celebrated with the involvement of Nexus, NoW and external stakeholders.

Some highlights from 2018:

- Our Nexus network held a number of events to promote the network and had a continued visible presence and participation at Pride in Birmingham and London - joined by colleagues from the SRA, other legal regulators, law firms and the Legal Ombudsman on our parade bus. In 2018 we also attended Cardiff Pride for the first time.
- Our Vaisakhi celebrations were particularly notable. These included an event that raised awareness and celebrated the Sikh faith, with staff given the opportunity to try food, wear turbans and hear musicians from a local Sikh temple. The event was attended by 50-60 staff. A visit to a Sikh temple in Birmingham which included a tour of the temple, followed by a vegetarian meal was also popular.
- The Christian network introduced regular opportunities for prayer in the reflection room and celebrated events such as All Souls Day throughout the year. The events culminated in a nativity play in December 2018. This involved members of the Senior Management Team and staff from a number of different networks coming together to take roles in the play and present the nativity to all staff.
- The Access Ability Network alongside the Resourcing Team started work towards Level 3 Disability Confident accreditation upgrade. The network has appointed a neurodiversity champion at the end of 2018 and planned to plan a programme of events for 2019 including a focus on Autism and hidden disabilities week in April.
- In support of the BAME network, we jointly hosted a panel discussion for all staff with some of our Adjudicators to discuss and celebrate their journeys so far as successful BAME women. The discussion provided an insight into some of the challenges, opportunities and experiences of BAME women in the workplace. To support internal progression, an interview and career workshop was held for all staff as part of a collaboration between the recruitment team, learning and development and hosted by the BAME network.
- Our NoW network was at the forefront of raising awareness about period poverty and the menopause and its impact at work. We held talks with external speakers, created and implemented line manager and staff information packs and ran line manager training.

End of Year Awards 2018

Thank you and well done to all



Our choir performs, End of Year Awards 2018

Rewarding and recognising our staff

We continue to provide a range of staff benefits which reflect our inclusive approach. Our EDI commitment extends to the partnerships that we have with others. Based on staff feedback, and as part of our staff engagement survey action plan 2018, we reviewed our performance bonus scheme, which only up to 20% of staff could receive. This was removed and replaced with a digital Recognition Hub to instantly recognise and reward all our staff for exemplifying our behaviours and values.

The new digital format encourages managers and staff to make nominations for a host of awards, financial and non-monetary and makes it easy to send e-cards to recognise and celebrate achievements on a day to day basis.

The Recognition Hub also allows staff to make significant savings at a variety of retailers and helps support the benefits package. To make sure the rewards are fair, we monitor and report on them. Whilst the Hub had only just been introduced when the Staff Engagement Survey 2018 was run, the results showed an increase in satisfaction from staff in this area.

Our staff profile

Gender

Key highlights and trends

The gender split was 59% female (359) and 41% male (249). There has been a slight increase (2%) in the number of male members of staff since 2017.

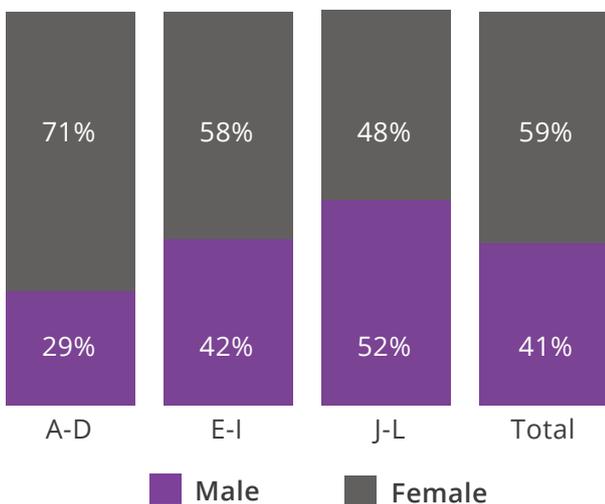
In line with the SRA gender split, 57% of new starters in 2018 were female.

For grade J-L, there has been an increase in the number of external female applicants. In 2018 40% of external applicants at grade J-L were female, an increase from 32% in 2017. Of those J-L roles offered to external applicants, 63% were offered to females.

70% (47) of flexible working applications were submitted by females. This is down 16% from 2017. However there has been an increase in the number of flexible working requests made by males, from 10 in 2017 to 20 in 2018. Requests from males accounted for 30% of requests in 2018.

Our Flexible Working policy is applicable to all staff. We took steps to promote the policy to the male population as part of Gender Pay Gap communications in 2017 to make sure both genders felt able to request to work flexibly.

Staff by gender



Gender Pay Gap

In February 2019 we published the Gender Pay Gap figures for Law Society Group 2018. The figures compare positively with the national gender pay gap, 17.9% (ONS 2018).

| | Mean | Median |
|-----------------------|------------------------|------------------------|
| Law Society Group Pay | 12.7% (2017: 12%) | 9.0% (2017: 8.7%) |
| Law Society Bonus | 34.4% (2017: 36.4%) | 13.9% (2017: 12.8%) |

The figures reflect the female/male profile across the organisation, and the presence of more men in the senior management teams. This also means that there is a bonus differential at a higher level. In addition, a higher proportion of females work part-time in lower level roles.

We are committed to reducing the gender pay gap and have an action plan, which includes:

- reviewing reward and recognition of staff
- continuing to review how we recruit into the SRA
- reviewing our policies
- promoting flexible working.

In 2018 we hosted an event specifically for the Women’s Network to preview early findings of the gender pay gap before publication. As part of this we held a discussion on the data and what it meant now and for the future in the SRA.

Age

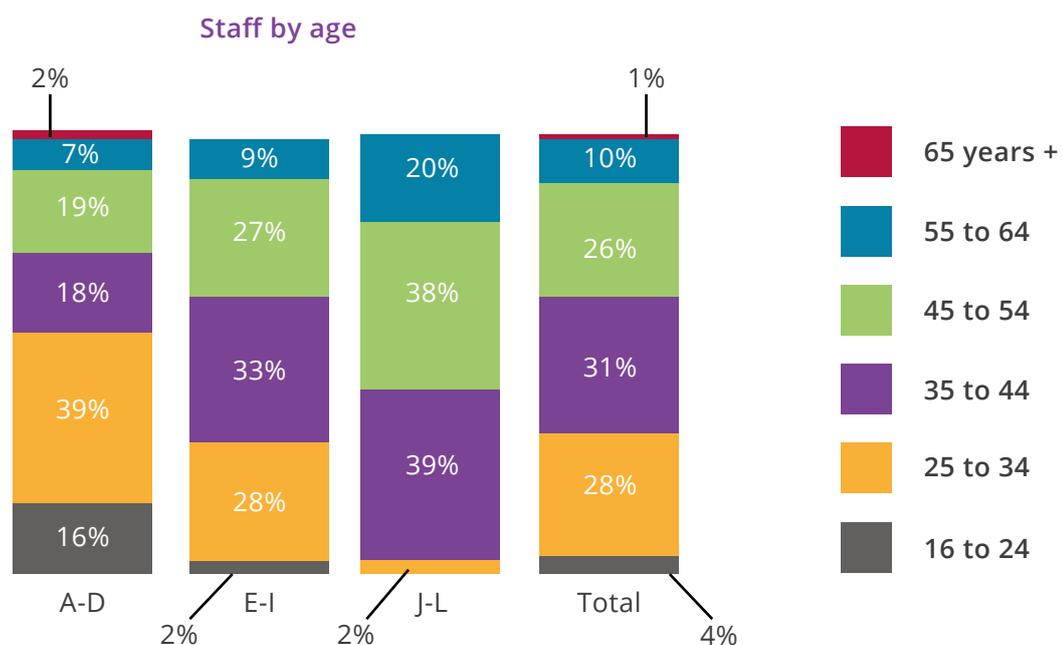
Key highlights and trends

The largest proportion, 31% (190), of our staff were within the 35-44 age bracket closely followed by those in the 25-34 age bracket (28%). In 2018 both age brackets saw a decrease in the percentage of staff when compared to 2017.

48% of all promotions were achieved by staff aged 25-34, down from 49% in 2017. Promotions for those in the 55-64 age group increased from 0% in 2017 to 2% in 2018.

A combined total of 57% (41 staff) of successful internal applications were received by those within the 16-24 and 25-34 age brackets.

The data suggests that the SRA continues to be attractive to external candidates within the youngest age group (16-24). In 2018, 21% of external candidates applying to the SRA were in the 16-24 age bracket. This compares to 17% in 2017.



Ethnicity

Key highlights and trends

In 2018, 66% of our workforce were white (401 staff) - a slight decrease from 70% in 2017 and 71% in 2016. 24% were BAME (141 people).

In 2018 11% of staff (69 staff) either declined to state or have not stated their ethnicity. This is an increase on 2017 where 7% declined to state or have not stated their ethnicity. In 2018, 24% of staff stated they were BAME, which is unchanged from 2017. This figure is comparable to, or higher than other regulators.

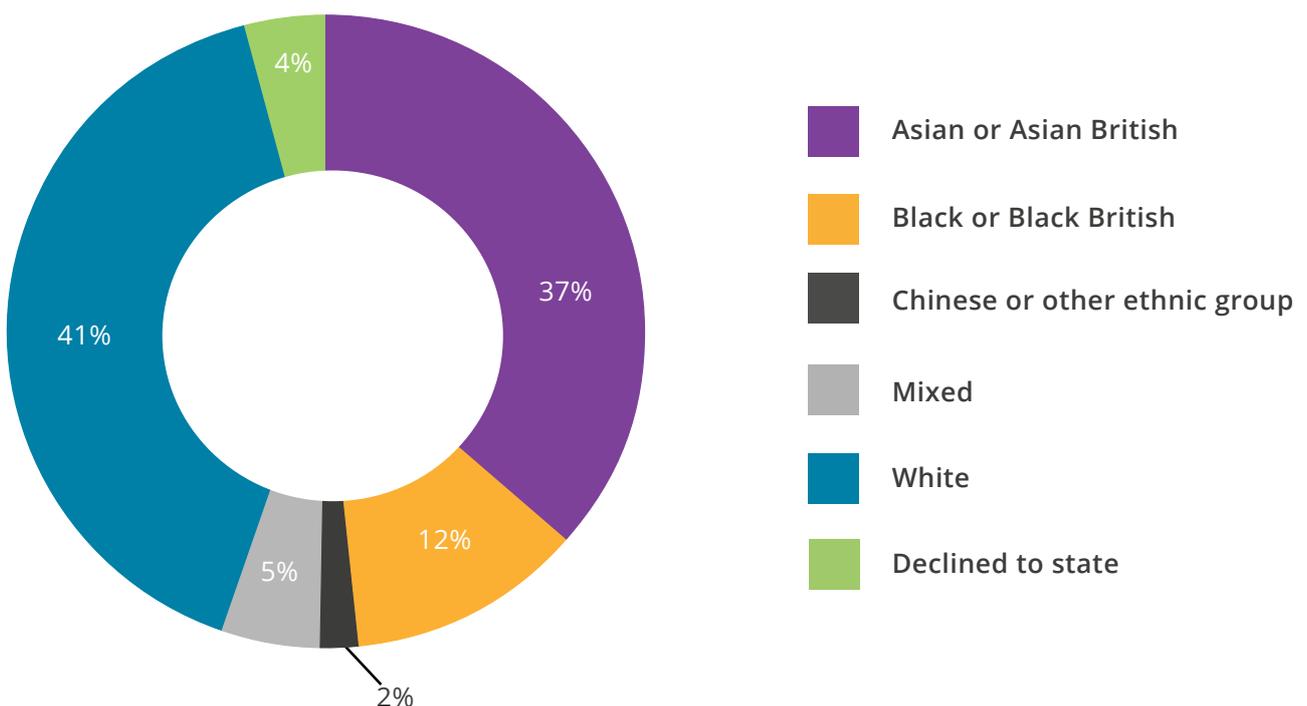
56% of external applicants who applied for a role at the SRA were BAME, this compares to 51% in 2017 and 43% in 2016. In 2018, 38% of our new starters were BAME, which remained the same as in 2017.

43% (45 people) of external successful candidates were BAME compared to 42% in 2017 (35 people).

42% (34 people) of external applications made for grade J-L roles were made by BAME candidates and one person was successful in securing a role at this level. It is, however, worth noting that the number of roles at this level is significantly lower than the number of roles available at other grades thus reducing the opportunity for candidates to secure a role.

46% of internal applications were made by BAME staff (139 people). This increases from 33% in 2017. In 2018, 28% of internal BAME applicants (20 staff) were successful in their application. Of those promoted in 2018, 27% were BAME, compared to 26% in 2017.

External applicants by ethnicity



Disability

Key highlights and trends

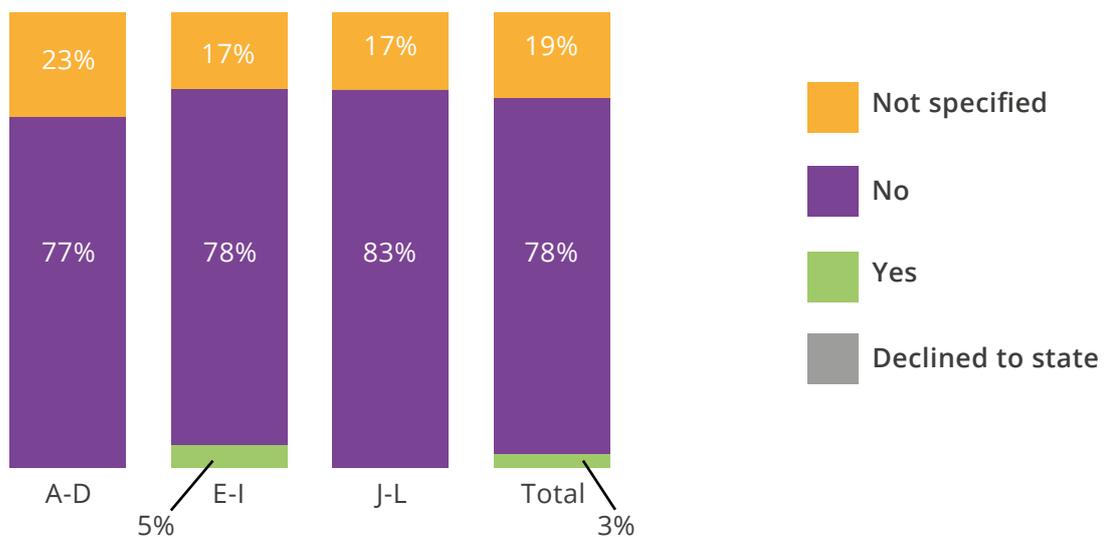
In 2018 6% of our workforce (35 staff) declared a disability. This remains unchanged from 2017.

7% of promotions went to staff that declared a disability (four staff). This remains unchanged from 2017 and compares to no promotions for staff with a disability in 2016.

In 2018, we introduced an advertising contract with Even Break who focus on supporting people with disabilities. The proportion of individuals applying who declare a disability is 3% of all external applicants and this remains the same as 2017.

3% (three people) of new starters in 2018 had a disability. This increases from 2% in 2017.

Starters by disability



Religion and belief

Key highlights and trends

The majority, 39%, of our workforce are Christian (239 staff), which is a decline of 1% since 2017, when 40% (255 staff) of the workforce were Christian.

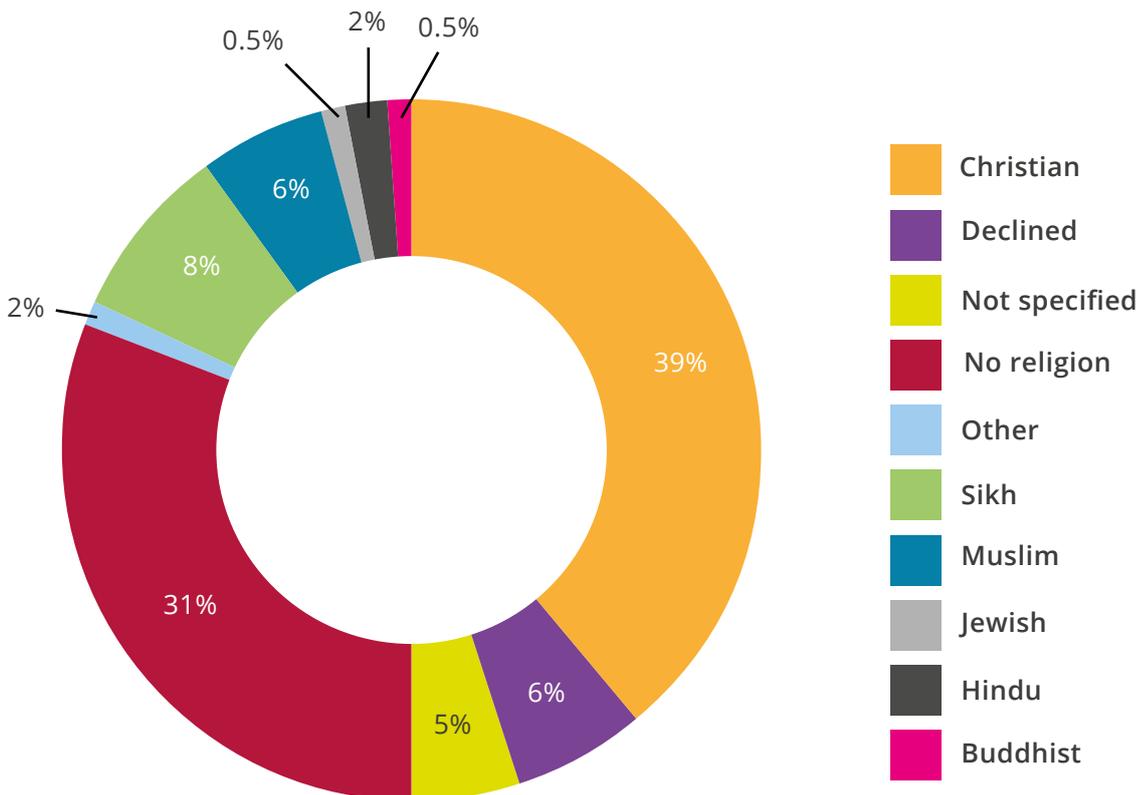
31% (191 staff) had no religion and 12% of staff (71) had not specified or declined to say.

Each religious group is represented at the SRA, the largest groups (after Christian) were:

- Sikh (8% / 49 staff)
- Muslim (6% / 36 staff)
- Hindu (2% / 12 staff).

In 2018, the representation of Hindus decreased by 1%, the representation of Muslims remained unchanged at 6% and the representation of Sikhs increased by 1%. The percentage of Sikh new starters increased from 8% (seven staff) in 2017 to 11% (10 staff) in 2018.

Staff by religion



Sexual orientation

Key highlights and trends

The diversity data for the SRA shows that 2.5% of staff (13 staff) disclosed their sexual orientation as gay or bisexual. 11% (67) of staff chose not to specify their sexual orientation. This remains unchanged from 2017. It is positive that there has been a sustained ability for staff to be open and to state their sexual orientation given that in 2016 16% of staff chose not to specify.

During 2018, 2% of new starters were gay or bisexual. This is an increase on 2017 when 1% of new starters were gay or bisexual. 5% of leavers were gay or bisexual. When reviewing the reasons for leaving, there was no evidence of this being linked to protected characteristics.

4% of external applicants in 2018 were gay or bisexual. This remains as in 2017.

SRA staff at Birmingham Pride



Our next steps

Below are some of our initiatives for 2019.

- We will continue to review our attraction strategy by reviewing our outreach when advertising roles and promoting our brand at career fairs. We will commission new videos featuring diverse images to support campaigns, target flexible working job boards, test language in our job advertisements (masculine / feminine) and continue to train managers in unconscious bias for recruitment and selection.
- In October 2018, we started a tender process to refresh our recruitment agency preferred supply chain. Their commitment to EDI – both internally within their own organisations and in practice – in terms of how they could support our key aims with recruitment and diversity was a core part of the process with significant weighting attached to it. We will follow up with our refreshed recruitment agency supply chain and hold them to account for the promises they made.
- In 2018, we signed up to the Good Recruitment Campaign to benchmark ourselves against best practice and other organisations. We will utilise information received to make positive changes. We have increased our reporting from annually to quarterly to better be able to identify trends and their possible causes and respond to changes earlier.
- We will increase awareness of bullying and discrimination to promote a zero-tolerance approach. We will continue to do this by providing training and support to help line managers identify cases and highlight routes to report any bullying and discrimination at the earliest stage. Alongside this we will update and relaunch learning and development resources for managers and staff to help define bullying and discrimination, identify it, report it and manage situations sensitively and swiftly.
- We plan to create new web communities:
 - ◊ 'Working at the SRA' – this will provide staff with information of what is expected of us and how we fit into the organisation. It will include our local and corporate induction for new starters, our policies, our code of conduct and mandatory suite of e-learning modules eg our EDI e-learning modules 'Working with Respect and Managing with Respect'.
 - ◊ Training and Development – this community will be a one stop shop for staff and managers to access all information on all training and development across the SRA – eg a training catalogue which will be developed as a result of the training needs analysis and will make training more accessible for staff.
- Continue to monitor and review our progress against our 2018 staff survey and action plans, including those areas that address issues arising in relation to EDI.
- Work closely with Stonewall on developing our application for the top 100 organisations in the annual Stonewall WEI.
- Undertake promotional work internally to support a thorough staff diversity data collection exercise in 2019 to maximise response rates, thereby improving the accuracy of our diversity data.
- Continue with regular analysis of our diversity profile to identify areas of concern or positive changes within the staff demographic.
- Monitor and review our policies and practices to ensure that they are not discriminatory and are in line with best practice relating to EDI.

- Continue to endorse and promote our staff networks further to embed and strengthen their position within the SRA. And increase visibility of the Board, Senior Management Team and Leadership Group in actively endorsing and promoting each of the networks to embed and strengthen their position.
- Engage with staff to make progress on the gender pay gap eg promote our family friendly policies on our internet pages for prospective candidates and we will seek to make flexible working more accessible.
- Use the Recognition Hub more widely to celebrate and communicate success with others. This should promote a greater level of peer to peer nomination and recognition and encourage nominations that recognise achievement in line with our behaviours and values.

SRA staff

