

Equality at the OfS

Purpose

1. To update the board on progress against the internally focused equality objectives, as well as a broader update on OfS employees. This paper will be supplemented by a presentation on OfS people.

Decisions required by the board

2. No decisions are required.

Issue

3. As a public body, the Public Sector Equality Duty (PSED) lays general duties on the OfS and requires certain specific actions from us, including the publication of information and one or more equality objectives. Under section 149 of the Equality Act 2010, a public authority must, in the exercise of its functions, have due regard to the need to:
 - a. eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
 - b. advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - c. foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
4. The PSED is not an obligation to achieve a particular result or outcome. Nevertheless, the duty to have due regard to the PSED forms a key part of OfS decision-making and the courts have summarised the practical effect of this duty as follows: "In short, the decision maker must be clear precisely what the equality implications are when he puts them in the balance, and he must recognise the desirability of achieving them, but ultimately it is for him to decide what weight they should be given in the light of all relevant factors".
5. The following specific duties apply to the OfS:
 - a. To publish annual information demonstrating compliance with the PSED. This should include information on employees and people affected by the OfS's functions who share a relevant protected characteristic.
 - b. To publish one or more objectives we think the OfS should achieve to do any of the things in the PSED, such objectives to be published at least every four years.
 - c. To ensure that such published information is accessible to the public.

6. The OfS meets these specific duties by ensuring that our equality statement and annual reports are published on our website. This includes three internally focused objectives:

Objective six: Fostering inclusive leadership and an inclusive and open culture.

Objective seven: Supporting staff to build diversity and inclusion into their work.

Objective eight: Behaving as an inclusive employer which attracts and retains the widest pool of talent where all staff have the opportunity to unlock their potential.

7. Our activities and progress against those objectives are reported in Annex B.

Further information

8. For further information, please contact Nolan Smith, Director for Resources and Finance, nolan.smith@officeforstudents.org.uk.

Publication

9. This paper will be published along with other July board papers.

Discussion

10. Equality is core to our mission and our values, underpinning all the work we do and how we do it. We are reporting progress against our equality objectives and targets during another challenging year. Like many employers, the state of the labour market continues to affect our ability to attract, recruit and retain quality diverse candidates. When introducing our equality targets in February 2020, we acknowledged that they were ambitious and therefore challenging to achieve. The continued change and uncertainty in recent years have brought further challenge to these ambitions. The annual data report is presented in Annex A.
11. We remain committed to being an inclusive employer and building a culture that will enhance the way we work and ultimately will lead to better outcomes. Stemming from our organisational values, we work to ensure equality is appropriately embedded in core business activity, organisational policies, and procedures. This is evident in our competency framework, individual objectives, mandatory training programme, and periodically reviewed through management reporting, and making inclusive decisions assessments. These measures provide assurance that the OfS remains compliant with our duties under the PSED.
12. In 2020, the OfS committed to an internal workforce strategy which went beyond legal compliance to add value, and contribute to employee wellbeing and engagement. This included a set of actions and key performance measures (KPMs) to support our aspirations to be an inclusive employer of choice, and help us to meet our three internal objectives and EDI targets. Annex B reports our activities against those KPMs and summarises the outcomes achieved. The report notes several added value projects which have been delayed as we prioritised other work. For example, a project to define the OfS employer value proposition for attracting quality diverse candidates, is delayed while our recruitment team focus on delivering a peak of staff recruitment.
13. Annex B also highlights the contribution towards our equality ambitions achieved through the collective efforts of our staff. This reflects our expectations for all staff, as set out in our competency framework:
 - a. **Inclusive leadership:** Everyone can champion and be open to 'different ways of doing things' by exploring alternative styles or diverse approaches. When we seek to understand similarities and talk openly about differences, we support the value of openness and demonstrate inclusive behaviour.
14. We value the commitment of staff in different areas of the organisation working individually and collectively to achieve a more inclusive workplace. This includes six staff networks; an EDI forum; a values and behaviours group; senior leadership and senior sponsors of each staff networks; and an EDI steering group of subject matter experts from across the business. We value this collective effort which works towards embedding EDI across all our work areas and teams.
15. Our internal governance structures have supported this collective approach, working collaboratively to ensure all activity has aligned with the objectives in our internal communications strategy. The activity has been co-ordinated with a particular focus on achieving a greater level of staff engagement, feedback and dialogue on a range of current and emerging EDI issues, using a variety of channels. This has included frequent engagement with

key internal stakeholder groups such as directors, the Senior Management Group, and the EDI Forum which is open to all staff to attend.

16. Listed in Annex B are a small number of examples of the activities and blogs that highlight the breadth and variety of topics covered, and the opportunities for staff engagement with EDI issues. Whilst there continues to be an appetite amongst staff to produce content and to profile particular issues and topics, there's a wider question about whether continuing with this level and type of activity will help us achieve our current EDI targets and whether it can be sustained and properly resourced in the longer term.

Forward plan

17. Equality objectives need to be published this year, including our internally focused objectives. Although the current three internal objectives remain sound and compliant under the PSED, we want to ensure they are appropriately aligned with the new OfS strategy. In particular, we have the opportunity to review and refine the priorities and activities which sit beneath these broad objectives to ensure they are sufficiently focused towards the outcomes we want to achieve, and are appropriately resourced within the wider OfS business plan. In view of the breadth of activity highlighted from the past year, we anticipate narrowing our efforts and concentrating our resources towards key priority areas. A more focused approach enables us to target those priorities, which helps build our inclusive working environment and the OfS is an employer of choice. This refreshed approach will be publishing alongside the wider review of our equality statement and objectives, in spring 2023.

EDI within corporate and project governance

18. In the summer of 2021, we recruited to six roles across three board committees: the Risk and Audit Committee, Provider Risk Committee and Quality Assessment Committee. We were particularly keen to attract applicants from minority ethnic backgrounds (particularly Black British communities) and people with disabilities who are underrepresented on our committees. We used the Cabinet Office Diversity Action Plan for Public Appointments as our reference point. Our advertisements, candidate packs and social media included text that was encouraging to applicants from underrepresented groups to apply to these roles.
19. We extended the application window for all three committees into July, having reviewed the diversity of applicant pools at the end of June 2021. In our second period of recruitment, we tried targeted advertising, placing advertisements on a specialist site, Diversity Dashboard Job Search. While we made excellent appointments, and in relation to the Cabinet Office guidelines our performance is comparatively good, we were not as successful in diversifying the applicant pool in all the ways we had hoped.
20. A key lesson from this recruitment was the importance of the OfS's social media as an important source of applicants' knowledge of the vacancies. Our challenge in the future is to use social media more effectively to draw this to the attention of potential applicants who are currently not represented on our committees.
21. In November 2021, our Remuneration and Nominations committee considered the outcome of our committee recruitment and how we might improve the diversity of the board committees in future, while maintaining high standards and observing all legal obligations. The aim is to

improve the equality of opportunity and trying to remove any barriers to applications in order to achieve a wider and more diverse recruitment pool. We will take forward the committees' advice into our next committee recruitment campaign.

22. During the 2021-22 academic year we also recruited to a number of other external roles, such as the student panel, and a joint Research England/OfS expert panel to make recommendations for the joint OfS and RE funding competition to improve Access and Participation for black, Asian and minority ethnic students in PGR study. The expert panel became a steering group to guide and support the programme in the long term. In these panels we achieved diverse representation. We also recruited to the Specialist Provider Panel through a nominations process where it proved more challenging to achieve the diverse membership we seek.
23. We are currently recruiting for members for the TEF panel. We have sought to draw on experience from other OfS recruitment exercises in planning the recruitment and selection process, and in the development of recruitment materials, including text in recruitment materials about particularly welcoming applications from those from backgrounds that have previously been underrepresented in our applicant pools and appointments (minority ethnic groups and disabled individuals). We have identified relevant networks and other channels through which we can reach these specific audiences, as well as using national advertising and social media. We intend to review applicant pools following the deadline and undertake additional, targeted recruitment activities if we do not at that point have a diverse range of applicants.

Annex A: Data report on staff profile and equality characteristics

Highlights

We employ a workforce of approximately 400 people. This report describes the makeup of our staff split by six protected characteristics and caring responsibilities:

- **Age.** The staff employed by the OfS are relatively young, with a median age of 39.
- **Disability.** Fourteen per cent of OfS staff have reported they have a disability.
- **Ethnicity.** Seven per cent of OfS staff have declared they are from a minority ethnic background.
- **Religion or belief.** A little under half of OfS staff (45 per cent) have declared that they do not have a religion or belief.
- **Sex.** Two-thirds of OfS staff are female and one-third are male.
- **Sexual orientation.** Eight per cent of OfS staff have declared they are lesbian, gay, bisexual or other.
- **Caring responsibilities.** Over a quarter of OfS staff (30 per cent) have reported they have caring responsibilities.

We compare our staff with Civil Service staff as a whole and with other public sector organisations responsible for regulation. This report also includes discussion of our appointments and leavers and our progress against our equality, diversity and inclusion (EDI) targets.

Notes on data report

24. This report is an update to the version published in June 2021 (OfS 2021.17).¹

25. The OfS employs around 400 staff and so is considerably smaller than the majority of Civil Service departments and many other public sector regulators.²

26. The OfS staff profile data in this report covers all those employed by the OfS including permanent staff, fixed term staff and sandwich year placement students. It does not include members of our board, our committees, our student panel or contractors/agency staff.

¹ See www.officeforstudents.org.uk/publications/staff-at-the-ofs-equality-diversity-and-inclusion-statistics/.

² Civil Service statistics: 2021, available at www.gov.uk/government/statistics/civil-service-statistics-2021.

27. As part of our Public Sector Equality Duty, OfS staff profile data is presented by reference to the following six protected characteristics. We also include data on the caring responsibilities of OfS staff.

- age
- disability
- ethnicity
- religion or belief
- sex
- sexual orientation.

28. The OfS collects data on the gender identity of staff. However, because fewer than six staff have reported that their gender identity is different from their sex registered at birth, we have decided not to publish this data.

29. OfS staff profile data is presented based on the following five annual census points to show the current composition of the OfS and how this has changed in the last four years. The total count of OfS staff at these census points can be found in brackets, rounded to the nearest 10.

- 1 April 2018 (380 staff)
- 31 March 2019 (350 staff)
- 31 March 2020 (420 staff)
- 31 March 2021 (400 staff)
- 31 March 2022 (400 staff).

30. Around three-quarters of OfS staff work full-time and a quarter work part-time.

31. To help put our staff profile data in context, throughout this report we provide comparisons between our staff and Civil Service employees. We use the Civil Service National Statistics 2021, which represent the makeup of the Civil Service as of 31 March 2021.³ We make these comparisons because the OfS is a public sector organisation, and they allow us to see how we compare with other public sector organisations.

32. In addition to the Civil Service as a whole, we compare OfS staff with other public sector organisations responsible for regulation. The organisations we make comparisons with are:

- Office for Standards in Education, Children's Services and Skills (Ofsted)
- Office of Qualifications and Examinations Regulation (Ofqual)
- Competition and Markets Authority (CMA)
- Charity Commission
- Office of Gas and Electricity Markets (Ofgem)

³ Civil Service statistics: 2021, available at www.gov.uk/government/statistics/civil-service-statistics-2021.

- Water Services Regulation Authority (Ofwat)

33. Where comparisons are made, we include proportions for all characteristic categories, including prefer not to say and non-completion. It is important to consider the size of prefer not to say and non-completion when making comparisons between other categories.
34. This publication also includes data on the number of the appointments made to the OfS, including progress against our six EDI targets.⁴ We also include some high-level data related to the number of staff that have left the OfS in recent years.
35. To allow a consistent approach to visualisation, the staff profile charts present the categories for which the characteristic is known in alphabetical order. Where relevant, these are then followed by 'prefer not to say' and 'not completed'. The only exception to this is age group, which is presented in ascending order.
36. To protect individuals' data we have rounded counts to the nearest ten and proportions to the nearest one percentage point. Furthermore, counts and proportions for categories that apply to five or fewer staff are suppressed. For the data on appointments and leavers, counts are rounded to the nearest five. This is because the data is not split by personal characteristics so the disclosure risk is much lower.
37. In April 2021 we have changed our collection of staff profile data so that it is more in line with the Government Statistical Service harmonisation standards. This updated recording and categorisation of staff characteristics has helped us to have a better understanding of our staff and will allow direct comparisons to census data when available. However, this change has led to a reduction in disclosure rates for several characteristics when comparing March 2022 with disclosure in March 2021. As a result, interpreting timeseries trends by comparing data for March 2021 and March 2022 should be avoided.

⁴ See 'Annual Equality, Diversity and Inclusion Report 2019-20' at www.officeforstudents.org.uk/about/board-papers/ofs-board-meeting-2-july-2020/.

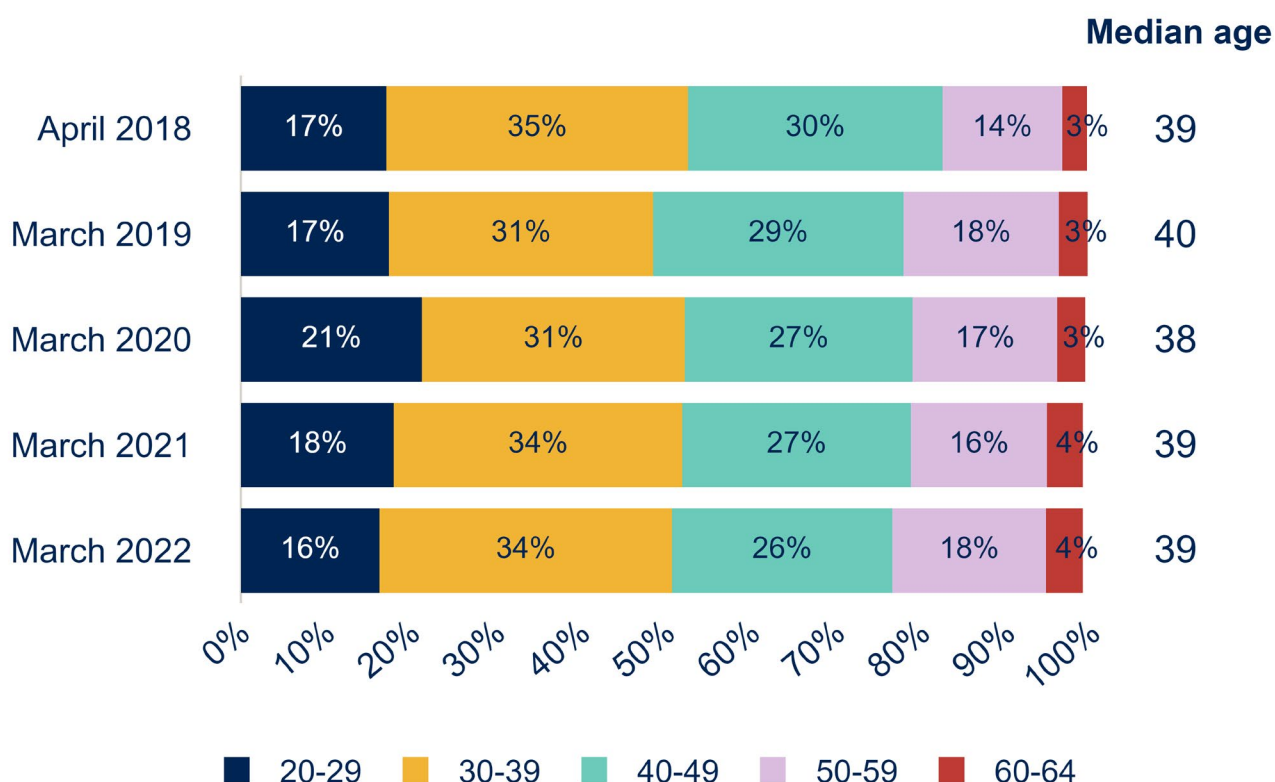
Staff characteristics

Age

The staff employed by the OfS are relatively young, with a median age of 39.

38. Figure 1 shows the current age profile of OfS staff and how it compares with earlier years. Age is known for all members of staff given that birth date must be provided as part of the application process to our pension scheme.

Figure 1: OfS staff by age group



Note: Ages have been grouped in the same way as the Civil Service National Statistics to allow comparison.

39. Table 1 shows the proportions of OfS staff in the different age groups are markedly different from the Civil Service.

40. The OfS staff had a median age of 39 as of 31 March 2022. The median age of the Civil Service on 31 March 2021 was six years older, at 45 years. The median age is the ‘middle’ number when the ages of all staff are listed in ascending order.

41. Table 1 also shows how the age profile of the OfS compares with Ofsted, Ofqual, the CMA, the Charity Commission, Ofgem and Ofwat.

Table 1: OfS staff, Civil Service staff and staff at other public sector organisations responsible for regulation by age group

Age group	OfS	Civil Service	Ofsted	Ofqual	CMA	Charity Commission	Ofgem	Ofwat
16-19	-	0%	-	0%	0%	0%	0%	0%
20-29	16%	16%	9%	12%	18%	11%	29%	12%
30-39	34%	21%	22%	35%	35%	25%	34%	27%
40-49	26%	23%	29%	31%	26%	30%	21%	38%
50-59	18%	29%	31%	19%	18%	27%	12%	19%
60-64	4%	8%	7%	4%	2%	7%	3%	4%
65 and over	-	2%	2%	-	1%	-	1%	0%
Total staff	400	484,880	1,780	260	840	440	1,180	250

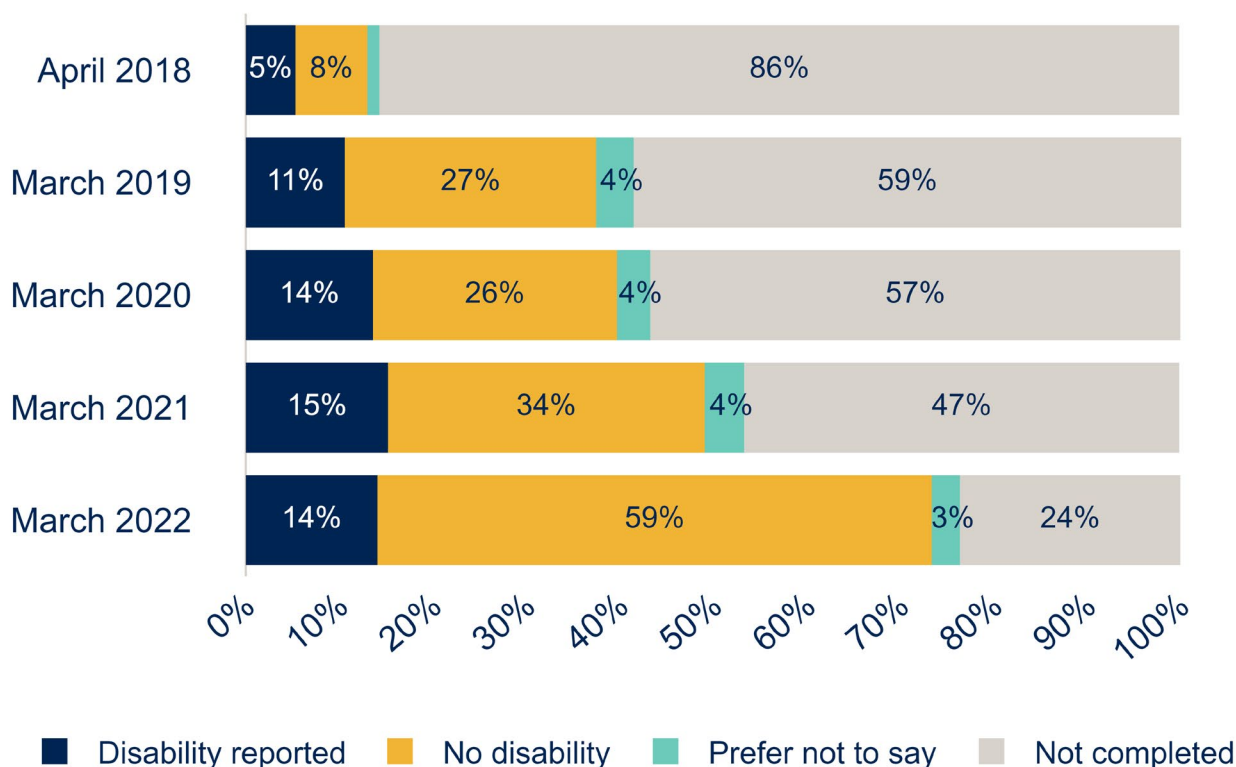
Notes: A dash indicates the proportion has been suppressed due to small numbers. Proportions for organisations other than the OfS are provided to give an indicative benchmark to allow comparison with the OfS. However, they were calculated using the rounded counts in the Civil Service National Statistics and may be slightly different had they been calculated using unrounded counts. Prior to external publication of this data we will explore providing ranges of proportions that will contain the accurate value, as opposed to a single value. The OfS proportions relate to March 2022 while the other organisations relate to March 2021.

Disability

Fourteen per cent of OfS staff have reported they have a disability.

42. Fourteen per cent of OfS staff have reported they have a disability.

Figure 2: OfS staff by disability



43. As noted above, in April 2021 we changed our EDI data collection processes, leading to an increase in completion in March 2022 when compared with March 2021. Differences between the disability groups when comparing these two years will likely in part reflect this change in data collection. For example, the large increase in the proportion of staff declaring 'No disability' between March 2021 and March 2022 will primarily have been driven by this change in collection.

44. Table 2 shows a smaller proportion of Civil Service staff have declared a disability when compared with OfS staff: 10 per cent. A larger proportion of Civil Service staff have declared they have no disability (66 per cent). Six per cent of Civil Service staff chose not to provide an answer and 17% have not reported their disability status.

45. Table 2 also shows how the disability profile of OfS staff compares with Ofsted, Ofqual, the CMA, the Charity Commission, Ofgem and Ofwat.

Table 2: OfS staff, Civil Service staff and staff at other public sector organisations responsible for regulation by disability

Disability status	OfS	Civil Service	Ofsted	Ofqual	CMA	Charity Commission	Ofgem	Ofwat
Disability reported	14%	10%	8%	8%	5%	7%	4%	4%
No disability	59%	66%	83%	62%	84%	49%	86%	68%
Prefer not to say	3%	6%	0%	4%	2%	0%	0%	-
Not completed	24%	17%	9%	27%	9%	44%	9%	28%
Total staff	400	484,880	1,780	260	840	440	1,180	250

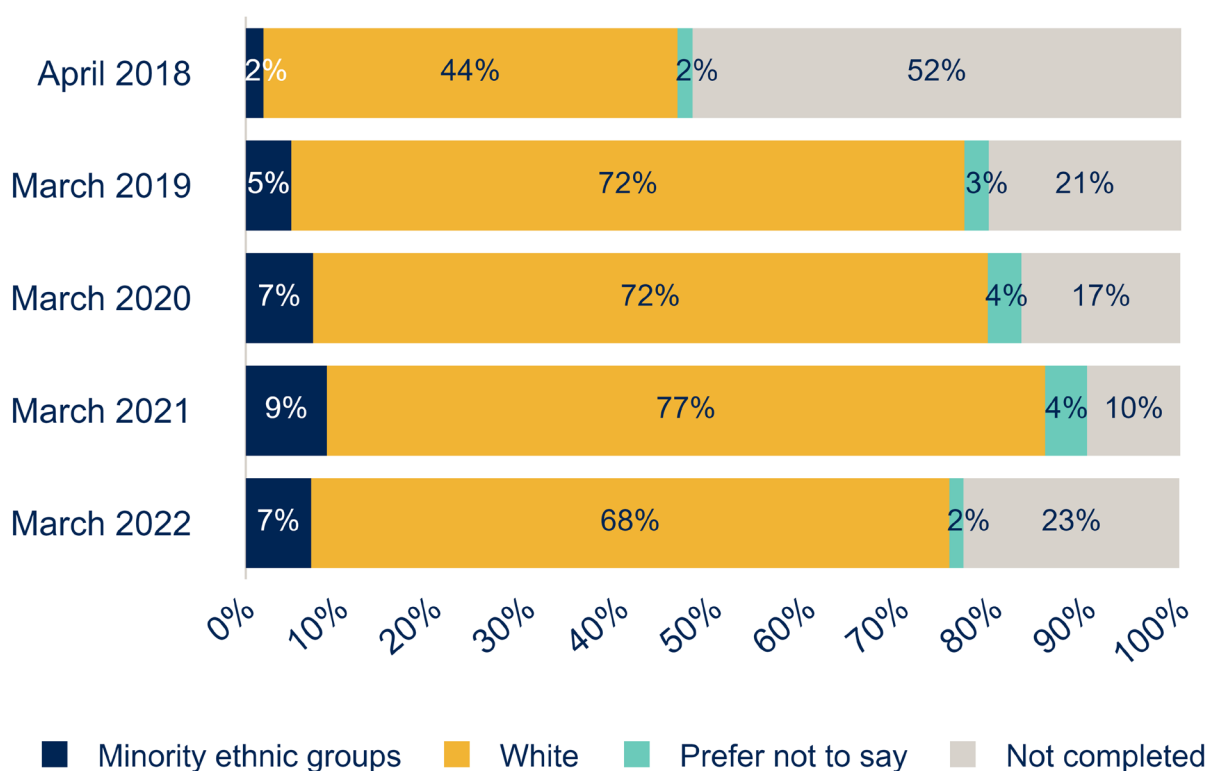
Notes: A dash indicates the proportion has been suppressed due to small numbers. Proportions for organisations other than the OfS are provided to give an indicative benchmark to allow comparison with the OfS. However, they were calculated using the rounded counts in the Civil Service National Statistics and may be slightly different had they been calculated using unrounded counts. Prior to external publication of this data we will explore providing ranges of proportions that will contain the accurate value, as opposed to a single value. The OfS proportions relate to March 2022 while the other organisations relate to March 2021.

Ethnicity

Seven per cent of OfS staff have declared they are from a minority ethnic background.

46. Figure 3 shows the ethnicities of OfS staff. Seven per cent of staff have said they are from a minority ethnic background. In this report, any member of staff who has identified as any ethnicity other than white is considered to be from a minority ethnic background. Staff who have selected any white ethnicity, including white minority groups, are part of the white group.
47. The proportion of staff declaring they are from a minority ethnicity background has increased from 2 per cent in April 2018. However, given the proportion of staff answering the question has increased considerably since 2018, much of this increase is likely related to the increase in reporting. As noted above, in April 2021 we changed our EDI data collection processes, leading to an increase in non-completion in March 2022 when compared with March 2021. Differences between the ethnicity groups when comparing these two years will likely in part reflect this change in data collection.

Figure 3: OfS staff by ethnicity



48. As of 31 March 2021, 12 per cent of Civil Service staff were from a minority ethnic group, 70 per cent were white, 4 per cent chose not to disclose their ethnicity and 14 per cent had not completed the question (Table 3).
49. Table 3 also shows how the ethnicity profile of OfS staff compares with Ofsted, Ofqual, the CMA, the Charity Commission, Ofgem and Ofwat.

50. However, there are regional differences in ethnicity. The vast majority of OfS staff (over 90 per cent) are based at our office in Bristol. Of our Bristol based staff, 6 per cent have declared they are from a minority ethnic background, 70 per cent that they are white, 2 per cent prefer not to say and 23 per cent have not completed the question. For Civil Service staff employed in the South West of England, 5 per cent have declared they are from a minority ethnic background, 81 per cent that they are white, 5 per cent prefer not to say and 9 per cent have not completed the question.

Table 3: OfS staff, Civil Service staff and staff at other public sector organisations responsible for regulation by ethnicity

Ethnicity	OfS	Civil Service	Ofsted	Ofqual	CMA	Charity Commission	Ofgem	Ofwat
Minority ethnic groups	7%	12%	11%	16%	24%	7%	19%	15%
White	68%	70%	85%	80%	67%	73%	72%	65%
Prefer not to say	2%	4%	1%	4%	2%	0%	7%	4%
Not completed	23%	14%	3%	-	7%	20%	3%	15%
Total staff	400	484,880	1,780	260	840	440	1,180	250

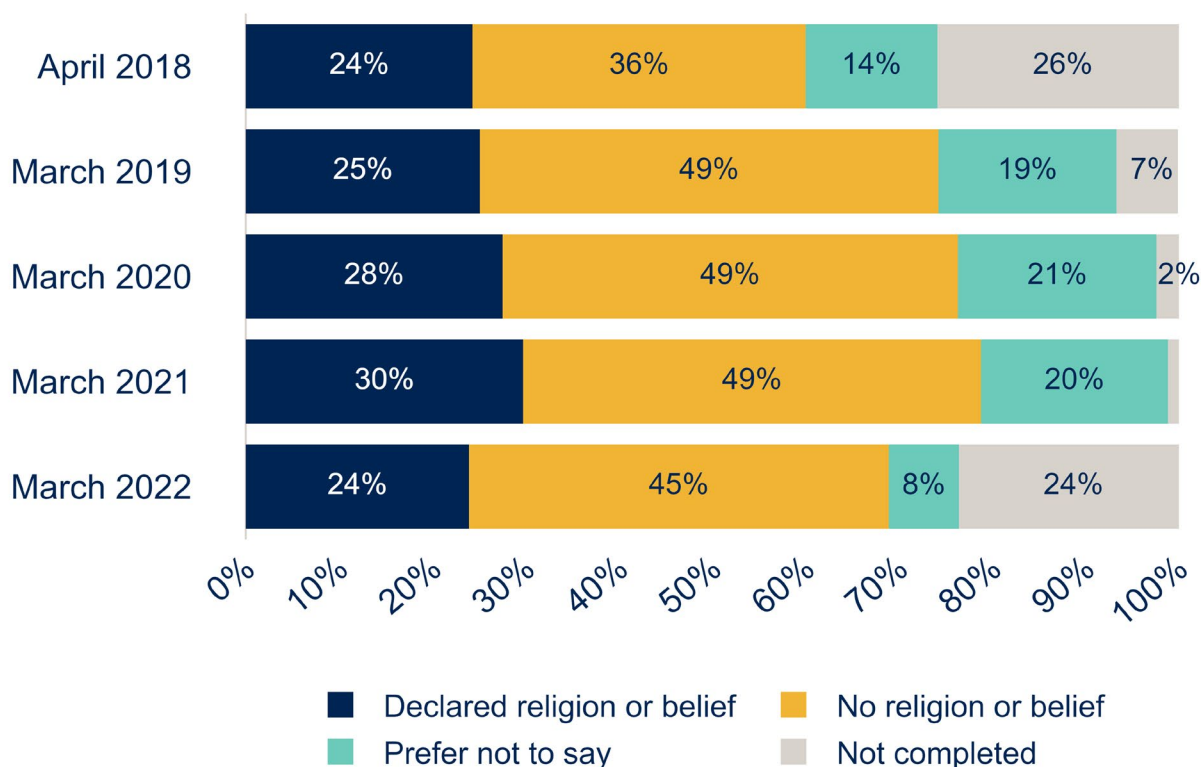
Notes: A dash indicates the proportion has been suppressed due to small numbers. Proportions for organisations other than the OfS are provided to give an indicative benchmark to allow comparison with the OfS. However, they were calculated using the rounded counts in the Civil Service National Statistics and may be slightly different had they been calculated using unrounded counts. Prior to external publication of this data we will explore providing ranges of proportions that will contain the accurate value, as opposed to a single value. The OfS proportions relate to March 2022 while the other organisations relate to March 2021.

Religion or belief

A little under half of OfS staff (45 per cent) have declared that they do not have a religion or belief.

51. Figure 4 shows the religion or beliefs of OfS staff. A little under half of OfS staff have declared that they do not have a religion or belief (45 per cent).

Figure 4: OfS staff by religion or belief



52. As noted above, in April 2021 we changed our EDI data collection processes, leading to an increase in non-completion in March 2022 when compared with March 2021. Differences between the groups when comparing these two years will likely in part reflect this change in data collection.

53. Table 4 shows that as of 31 March 2021, 27 per cent of Civil Service staff declared they do not have a religion or belief and 41 per cent declared that they do. Nine per cent chose to not disclose their religion or belief and 23 per cent had not completed the question.

54. Table 4 also shows how the religion or belief profile of OfS staff compares with Ofsted, Ofqual, the CMA, the Charity Commission, Ofgem and Ofwat.

Table 4: OfS staff, Civil Service staff and staff at other public sector organisations responsible for regulation by religion or belief

Religion or belief	OfS	Civil Service	Ofsted	Ofqual	CMA	Charity Commission	Ofgem	Ofwat
Declared religion or belief	24%	41%	53%	34%*	44%*	33%*	22%*	24%*
No religion or belief	45%	27%	37%	35%	38%	23%	22%	16%
Prefer not to say	8%	9%	4%	8%	9%	5%	5%	4%
Not completed	24%	23%	6%	23%	9%	39%	51%	56%
Total staff	400	484,880	1,780	260	840	440	1,180	250

Notes: Proportions for organisations other than the OfS are provided to give an indicative benchmark to allow comparison with the OfS. However, they were calculated using the rounded counts in the Civil Service National Statistics and may be slightly different had they been calculated using unrounded counts. Prior to external publication of this data we will explore providing ranges of proportions that will contain the accurate value, as opposed to a single value. An asterisk indicates that at least one of the values required to calculate the proportion has been suppressed, as such the proportion provided is the remaining proportion after summing no religion or belief, prefer not to say and not completed. The OfS proportions relate to March 2022 while the other organisations relate to March 2021.

Sex

Two-thirds of OfS staff are female and one-third are male.

55. Figure 5 shows the sex of OfS staff. Two-thirds are female (66 per cent) and one third are male (34 per cent). We have sex data for all members of staff as it must be provided as part of the application process to our pension scheme.

56. The proportion of female staff at the OfS is over ten percentage points higher than the proportion of female staff working at the Civil Service (54 per cent on 31 March 2021).

57. Table 5 also shows how the sex of OfS staff compares with Ofsted, Ofqual, the CMA, the Charity Commission, Ofgem and Ofwat.

Figure 5: OfS staff by sex

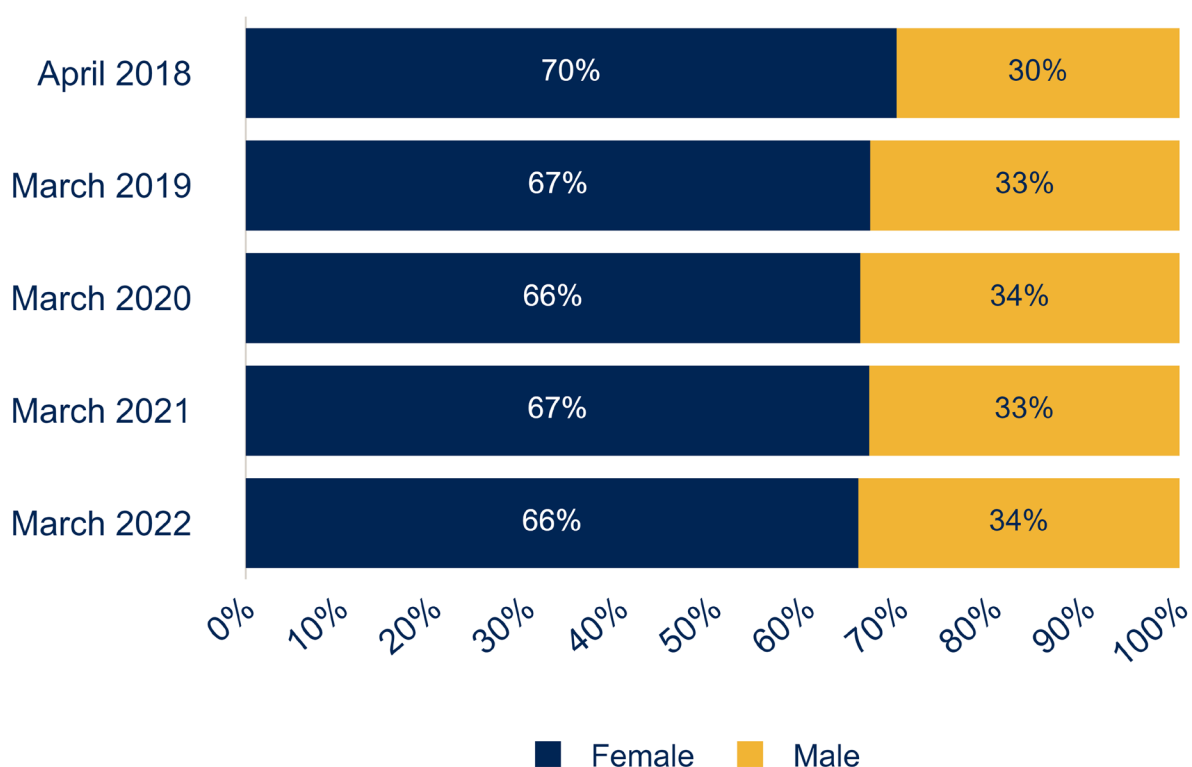


Table 5: OfS staff, Civil Service staff and staff at other public sector organisations responsible for regulation by sex

Sex	OfS	Civil Service	Ofsted	Ofqual	CMA	Charity Commission	Ofgem	Ofwat
Female	66%	54%	67%	60%	51%	58%	46%	52%
Male	34%	46%	33%	41%	49%	42%	54%	48%
Total staff	400	484,880	1,780	260	840	440	1,180	250

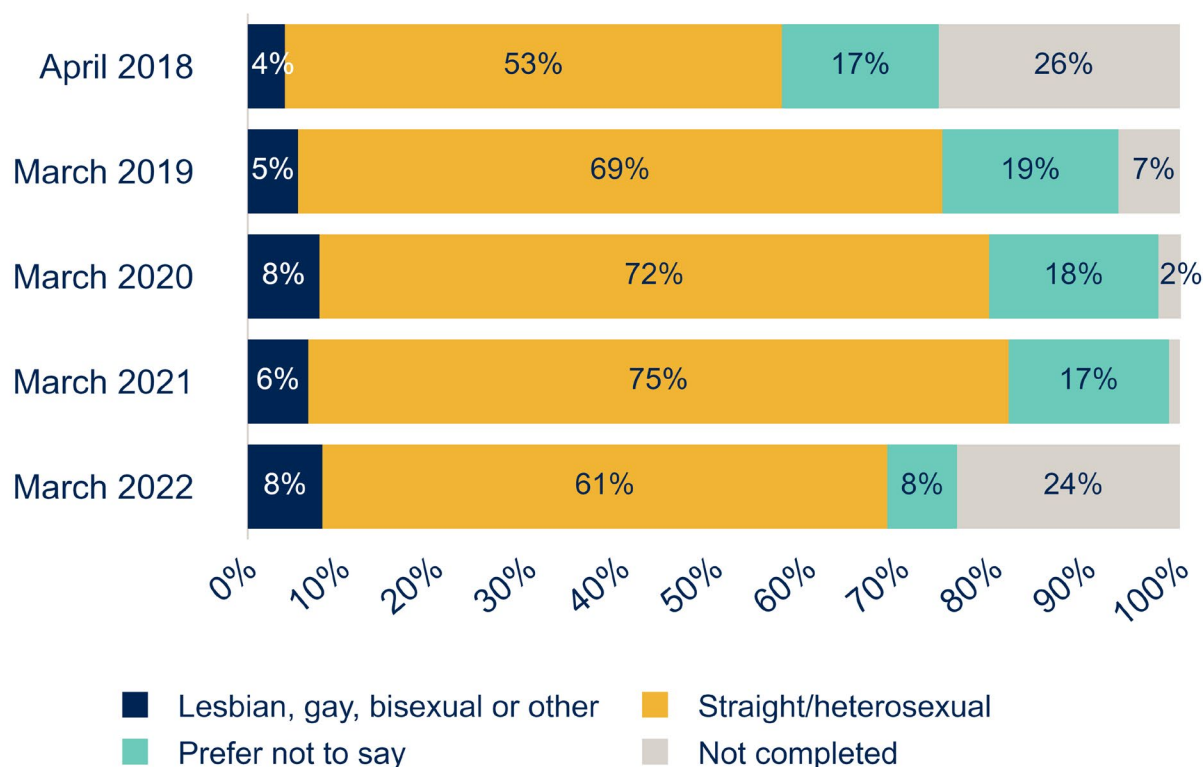
Notes: The OfS proportions relate to March 2022 while the other organisations relate to March 2021.

Sexual orientation

Eight per cent of OfS staff have declared they are lesbian, gay, bisexual or other.

58. Figure 6 shows the sexual orientations of OfS staff. Eight per cent of staff have declared they are lesbian, gay, bisexual or other.

Figure 6: OfS staff by sexual orientation



59. As noted above, in April 2021 we changed our EDI data collection processes, leading to an increase in non-completion in March 2022 when compared with March 2021. Differences between the sexual orientation groups when comparing these two years will likely in part reflect this change in data collection.

60. As of 31 March 2021, 4 per cent of Civil Service staff declared they are lesbian, gay, bisexual or other and 65 per cent that they are straight/heterosexual (Table 6). Nine per cent chose not to disclose their sexual orientation and 22 per cent did not answer the question.

61. Table 6 also shows how the sexual orientation profile of OfS staff compares with Ofsted, Ofqual, the CMA, the Charity Commission, Ofgem and Ofwat.

Table 6: OfS staff, Civil Service staff and staff at other public sector organisations responsible for regulation by sexual orientation

Sexual orientation	OfS	Civil Service	Ofsted	Ofqual	CMA	Charity Commission	Ofgem	Ofwat
Lesbian, gay, bisexual or other	8%	4%	7%	4%*	6%	4%	6%*	0%*
Straight/heterosexual	61%	65%	80%	63%	82%	51%	39%	36%
Prefer not to say	8%	9%	6%	7%	7%	4%	5%	4%
Not completed	24%	22%	6%	26%	5%	40%	50%	60%
Total staff	400	484,880	1,780	260	840	440	1,180	250

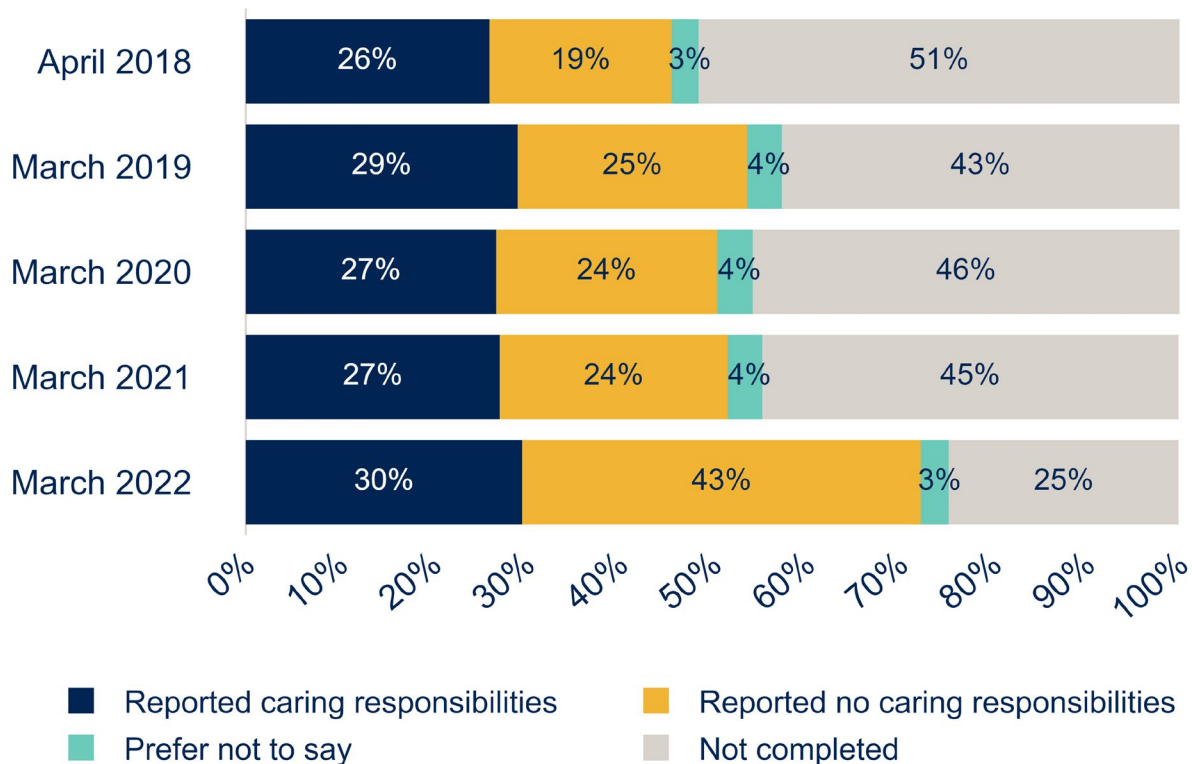
Notes: Proportions for organisations other than the OfS are provided to give an indicative benchmark to allow comparison with the OfS. However, they were calculated using the rounded counts in the Civil Service National Statistics and may be slightly different had they been calculated using unrounded counts. Prior to external publication of this data we will explore providing ranges of proportions that will contain the accurate value, as opposed to a single value. An asterisk indicates that at least one of the values required to calculate the proportion has been suppressed, as such the proportion provided is the remaining proportion after summing straight/heterosexual, prefer not to say and not completed. The OfS proportions relate to March 2022 while the other organisations relate to March 2021.

Caring responsibilities

Over a quarter of OfS staff (30 per cent) have reported they have caring responsibilities.

62. Caring responsibilities are not a protected characteristic under the Equality Act 2010. However, at the OfS it is important to us that our employment policies do not discriminate against people with caring responsibilities. Further, in the case of employees who are carers for disabled people, the Equality Act protects them from discrimination by association. Caring responsibilities include the following: primary carer of a child or children, primary carer or assistant for a disabled adult, primary carer or assistant for an older person or people and/or secondary carer.
63. Figure 7 shows that, over a quarter of staff (30 per cent) have reported they have caring responsibilities and 43 per cent have said they do not.
64. As noted above, in April 2021 we changed our EDI data collection processes. Previously, staff completed this data in a different section of our internal reporting system leading to lower disclosure. As anticipated, our change in collection led to an increase in disclosure, especially for staff with no caring responsibilities
65. There is no available Civil Service data related to caring responsibilities to allow comparison to OfS staff.

Figure 7: OfS staff by caring responsibilities



Appointments

66. The OfS made 105 staff appointments between 1 April 2021 and 31 March 2022 (see Table 7). Of these, 55 were new starters who have joined the OfS, while 50 were internal appointments of staff already working at the OfS, which will include promotions. This was slightly down on 130 appointments between 1 April 2019 and 31 March 2020 but over double the 50 appointments made between 1 April 2020 and 31 March 2021. Due to small numbers we do not include data on appointments split by staff characteristics.

Table 7: Appointments to the OfS

Type of appointment	01 April 2019 - 31 March 2020	01 April 2020 - 31 March 2021	01 April 2021 - 31 March 2022
External	110	35	55
Internal	20	15	50
Total	130	50	105

EDI targets

67. In 2020 the OfS put in place six EDI targets to help diversify the workforce at the OfS and lead to a step change in the way we work and ultimately lead to better outcomes.⁵ These targets are outlined in Table 8. Staff turnover at the OfS is relatively low, and as a result the number of appointments each year is likely to be low. Further, for some of these characteristics the proportions in the population are low. As a result, targets for these characteristics are lower and detecting a change in the staff population will take time. For these reasons, Targets 2 to 6 were set for rolling periods of various lengths (see Table 8) and were put in place to allow a gradual change in the OfS workforce. Success against these rolling targets is being recorded for appointments made after 31 March 2019. As of 31 March 2022, all targets except Target 6 have reached their minimum rolling periods. Target 6 is currently considered an interim measure.

68. Roles in the OfS are assigned to pay bands, which relate to levels of responsibility and salary. EDI Target 2 concerns appointments at the level of pay bands 11 and above, while Targets 4 and 6 concern appointments to pay bands 10 and above. These pay bands were chosen to increase representation, in the most senior roles at the OfS, of female staff, staff from minority ethnic backgrounds, and lesbian, gay, bisexual or transgender staff or those of other minority sexualities and gender identities (LGBT+). Staff at pay band 10 and above have the most responsibility at the OfS and, as per our scheme of delegation, are the only staff who are authorised to make decisions regarding functions and to act as the Relevant Director where needed.⁶ OfS pay band 10 is roughly equivalent to Civil Service pay grade 6, while pay band 11 and above is roughly equivalent to the members of the Senior Civil Service (SCS). As of 31

⁵ See 'Annual Equality, Diversity and Inclusion Report 2019-20' at www.officeforstudents.org.uk/about/board-papers/ofs-board-meeting-2-july-2020/.

⁶ The Office for Students Scheme of delegation (22 September 2020) is available at www.officeforstudents.org.uk/about/who-we-are/our-board-and-committees/.

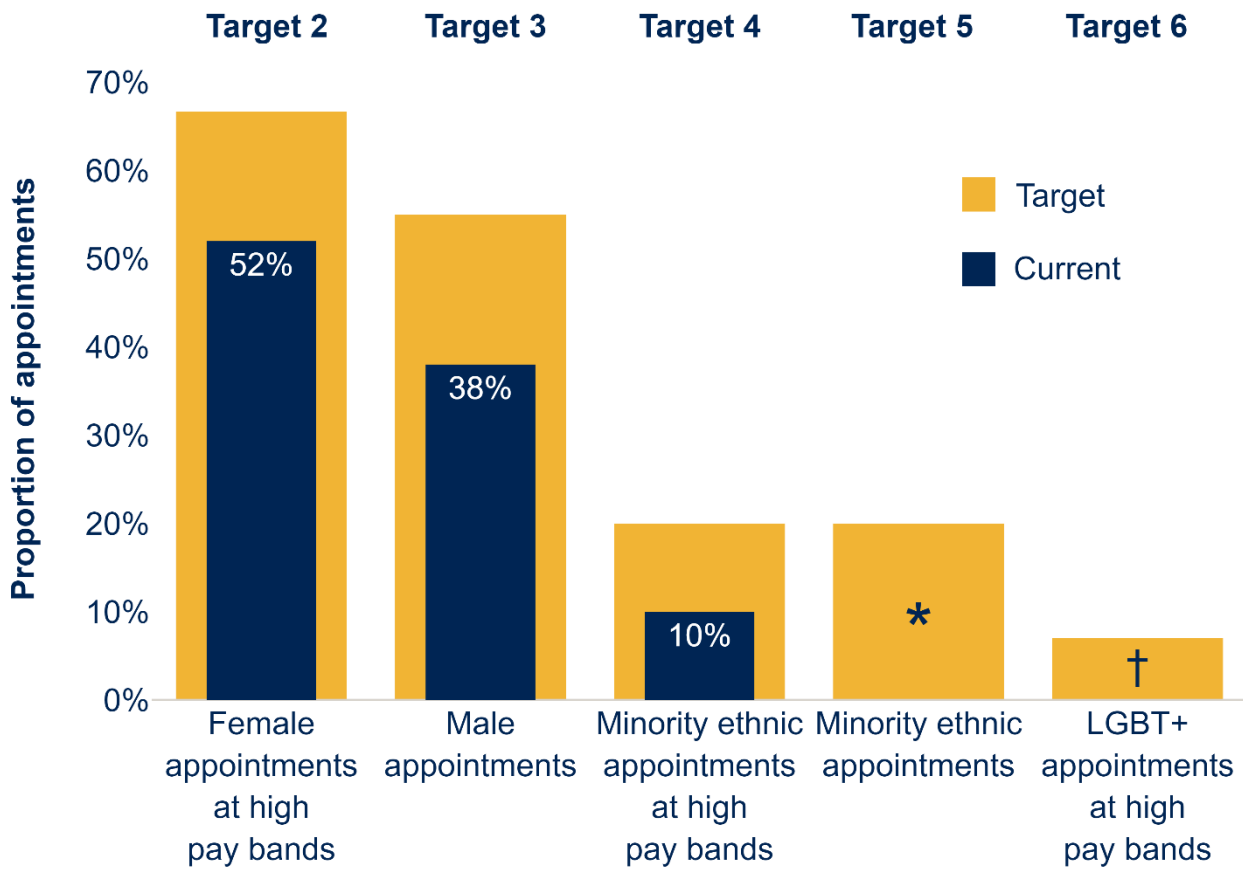
March 2022, 10 per cent of staff were in pay band 10, 7 per cent were in pay band 11 and 4 per cent were pay band 12 and above.

Table 8: OfS EDI recruitment targets

Target	Description	Rolling period	Minimum rolling period reached?
1	80 per cent disclosure rate for all protected characteristics by March 2022	N/A	N/A
2	Approximately two-thirds of appointments at pay band 11 and above should be women	Three-year	Yes
3	Approximately 55 per cent of appointments should be men	Three-year	Yes
4	Approximately 20 per cent of appointments at pay band 10 and above should be people from black, Asian and minority ethnic (BAME) backgrounds	Three-year	Yes
5	Approximately 20 per cent of appointments throughout the organisation should be people from BAME backgrounds	Yearly	Yes
6	Approximately 7 per cent of appointments at pay band 10 and above should be LGBT+	Four-year	No

69. As of March 2022, Target 1 was close to being achieved, standing at over 75 per cent for all the protected characteristics for which we collect data. Our change to the collection of OfS staff profile data, led to a drop in disclosure for some characteristics but increase for others and disclosure is now consistent across characteristics.
70. Our current progress against Targets 2 to 5 is visualised in Figure 8.
71. As discussed above, our change in staff EDI data collection led to a drop in disclosure for most characteristics. As a result we are not confident that the value we calculate for Target 5 accurately represents our appointments between 1 April 2021 and 31 March 2022, so the value for this target is not presented this year. Targets 2 and 3 use our pension data so are not impacted by this change. While the drop in disclosure impacts Target 4, the longer rolling period for this target than Target 5 (three years as opposed to one year) and disclosure tending to be better for higher pay bands allows us to be more confident that the value represents our appointments. However, there is potential that the true value is different to that in Figure 8.
72. When compared with the other EDI targets, Target 6 has a lower target percentage and a longer rolling period. This is because the proportion of the population who identify as LGBT+ is low, as is our recruitment of staff at high pay bands. To reduce the risk of identifying individuals, we will not be publishing our progress against Target 6 until it has reached at least its minimum four-year rolling period. When Target 6 has reached the minimum four-year rolling period (April 2023), we will assess whether we can safely publish this data.

Figure 8: Progress against EDI targets



* Progress against Target 5 is not published due to concerns with data quality. † Progress against Target 6 is currently not published due to disclosure risk.

Leavers

73. Between 1 April 2021 and 31 March 2022, 60 staff left the OfS (see Table 9). These leavers comprise both staff on permanent contracts and those who have reached the end of fixed term contracts (including our sandwich year placement students). Due to these small numbers we do not include data on staff that have left the OfS split by characteristic.

Table 9: Staff who have left the OfS

Type of contract	01 April 2019 - 31 March 2020	01 April 2020 - 31 March 2021	01 April 2021 - 31 March 2022
Permanent	40	35	45
Fixed term	10	15	15
Total	50	50	60

Annex B: EDI Workforce Strategy 2020 - 2022

1. In September 2020, an internal strategy set out our approach to EDI and our plans for delivering our three internal EDI objectives. It included priorities for achieving them, and key performance measures for assessing our progress. This paper summarises the outcomes achieved.

OfS EDI objective six: Fostering inclusive leadership and an inclusive and open culture		
Priorities:		
<ul style="list-style-type: none"> • Senior leader role modelling for inclusive leadership and management to drive positive culture change • Clarify specific senior accountability and governance of each agreed EDI priority. • Ensure accountability from managers and directors across the OfS • Ensure our external EDI ambitions are consistent with our internal EDI strategy and practice • Harness the employee voice, via the creation of staff networks to take into account staff views, experiences and build diversity of thought and perspective • Introduce accountability for diversity and inclusion for all staff • Promote the use of staff groups to support and drive continued commitment and action 		
Action	KPM	Outcome
Directors to be responsible for EDI strategy and for ensuring delivery of our aspirational EDI targets , through quarterly PMO reporting	Annual analysis of our staff profile data and progress against EDI targets, reported to the board and published to staff, with improved diversity of our staff profile and demonstrable progress towards achieving our aspirational targets.	Annual analysis and publication of staff profile data. Quarterly EDI data reporting to Directors. Annual people presentation to the Board. Planned review of our EDI strategy for 2023 publication.
Directors to embed leadership and implementation of EDI priorities within their directorates , through performance management, the competency framework recruitment, line management, the cultures they instil in their directorates	Significant improvement on annual staff survey results – particularly questions on inclusion and fair treatment, leadership and management and organisational culture All staff to have EDI objectives in their objectives. Competency framework to reflect EDI priorities	Annual analysis of our annual people survey results with subsequent action plan agreed and implemented. Annual performance management cycle actioned and ongoing. Competency framework includes an Inclusive leadership competency for all staff.

	Implement the response to the review of recruitment task and finish group report.	Completion of recruitment task and finish action plan and recommendations.
Roll out of the DG secondment programme (being piloted for one year from September 2020)	Success of DG secondment programme will be reviewed, measured by DG reporting that the secondment added greater diversity of perspectives into DG discussions, and the secondees reporting that they found the experience useful, fulfilling and supporting their career objectives Directors to explore reverse mentoring.	2 secondment cycles completed. Programme under review. Reverse mentoring actioned through senior sponsorship of staff networks.
Development of the five staff networks including agreement on priorities activities, outcomes and success factors: <ul style="list-style-type: none"> • Black, Asian & Minority Ethnic (BAME) network • Carers' and parents' network • Disability equality network • LGBTQ+ network • Women's network 	Working with the networks to development of a programme of work with clear outcomes and success factors for each network Delivery of the success factors developed by each network, within the timeframe proposed by each Significant improvement on annual staff survey results – particularly questions on inclusion and fair treatment, leadership and management and organisational culture	Staff networks established programme of work in line with internal communications strategy. Delayed review of staff networks projects. Project to be scoped in line with wider OfS business plan commitments. Annual analysis of our annual people survey results with subsequent action plan agreed and implemented
Support for OfS values and behaviours (particularly openness and diversity)	All staff: <ul style="list-style-type: none"> - Know the OfS's values - Experience the values in the workplace and the work of colleagues - Act in line with the values Outcomes are measured by observable behaviours, as set out in the V&B groups' maturity model	Actioned through the values and behaviour working group programme of activities.

OfS EDI objective Seven: Supporting staff to build diversity and inclusion into their work (embedding EDI)

Priorities:

- Support staff to build diversity and inclusion into their work
- Ensure that staff at all levels have the training, tools and personal agency to contribute to positive culture change at all levels of the organisation
- Embed the use of equality impact assessments
- Ensure regular planned discussions on EDI at Directors meetings

Action	KPM	Outcome
Development of EDI strand within learning and development programme , both mandatory and targeted for staff working on specific policy areas.	All staff completing mandatory and targeted L&D by April 21 Significant improvement on annual staff survey results – particularly questions on inclusion and fair treatment, leadership and management and organisational culture	Learning modules implemented as part of the OfS essentials programme. EDI specific content reviewed and enhanced by subject matter experts. Annual analysis of our annual people survey results with subsequent action plan agreed and implemented.
Development and implementation of a communications plan for EDI including: <ul style="list-style-type: none"> • a dedicated Hub pages for all relevant activities to enhance the visibility of our work • regular discussions with Directors on EDI, informed by data, and disseminated to staff • engagement with the managers • disclosure campaign to improve staff reporting within workday 	Creation of bespoke hub pages by September 2020, leading to increased visibility of the EDI programme of work with increased number of staff visiting the hub pages. Improve reporting in workday and meet our target of 80 per cent disclosure rate for all protected characteristics by March 2021.	Bespoke EDI hub pages in place. Several national campaigns signposted. Disclosure campaign actioned and ongoing. Annual analysis and publication of staff profile data. Quarterly EDI data reporting to Directors Quarterly EDI forum open to all staff, chaired by Nolan Smith.
Addressing staff survey results in relation to bullying and harassment including updating our policy, running focus groups etc	Publish updated B&H policy with engagement from SMG etc Improvement in people survey responses to B&H questions:	Bullying and harassment provision at OfS reviewed and updated with accompanying new policies and Hub pages. Annual reporting to Directors.

<p>Ensure OfS internal systems and practices embed EDI principles where appropriate, including use of MIDs</p>	<p>Increase the number of MIDs completed and review of MIDs undertaken. HR to identify annual programme of policy updates relevant to EDI.</p>	<p>MID assessments ongoing. Policies reviewed in line with HR priorities and wider business plan.</p>
<p>Recognising our EDI Adviser's contract ends in March 2021, develop a model for embedding, delivering and overseeing EDI programme of work on a sustainable basis as from April 2021.</p>	<p>Sustainable model of delivery and oversight of EDI work developed and agreed with DG by January 2021</p>	<p>Internal EDI governance and leadership reviewed and refreshed. Ongoing review of resource requirements in line with wider OfS business plan commitments.</p>

OfS EDI objective eight: Behaving as an inclusive employer which attracts and retains the widest pool of talent where all staff have the opportunity to unlock their potential

Priorities:

- Behaving as an inclusive employer across all protected characteristics, identify specific and targeted activity to address current issues
- Improve BAME representation across the OfS workforce and throughout the recruitment and selection process, including at senior level roles
- Improve staff profile by sex across the OfS structure and reduce the gender pay gap

Action	Success factor	Outcome
Deliver and implement findings of recruitment task and finish group to address good EDI practice,	Annual analysis of our staff profile data and progress against targets, reported to the board and staff. Improved diversity of our staff profile and movement towards delivering our aspirational targets. Annual analysis of people survey results against protected characteristics and comparison against benchmarks (civil service and other agencies where appropriate) and published internally.	Completion of recruitment task and finish action plan and recommendations. Annual analysis and publication of staff profile data. Quarterly EDI data reporting to Directors. Annual analysis of our annual people survey results with subsequent action plan agreed and implemented.
Address gender pay gap to include quarterly PMO reporting (as above)	Reduction in gender pay gap through annual pay settlement – through each annual pay award and by reducing the width of the pay bands	Monthly monitoring of data, including review against annual pay remit. Annual publication of gender pay gap.
Pilot reverse mentoring	Activity paused due to covid-19	Reverse mentoring actioned through senior sponsorship of staff networks
Supporting internal staff progression for under-represented groups	Activity paused due to covid-19	To be reviewed against wider business plan priorities and new OfS strategy.

Summary of internal equality activities

2. Listed below are a small number of examples of the activities and blogs that highlight the breadth and variety of topics covered, and the opportunities for staff engagement with EDI issues. Whilst there continues to be an appetite amongst staff to produce content and to profile particular issues and topics, there's a wider question about whether continuing with this level and type of activity will help us achieve our current EDI targets and whether it can be sustained and properly resourced in the longer term.

Activity	Summary
Celebrating national awareness day	Highlighting the activities of staff and our staff networks to mark various national campaigns, including International Women's Day, Pride, Carers' week, Disability History and Black History months.
Insights into OfS life	Recognising and sharing personal experiences of roles undertaken internally, such as secondments to the Directors' Group, and senior sponsorship of staff networks. As well as externally, including firefighters and school governors.
Corporate initiatives	Highlighting activities such as a renewed EDI statement for applicants, new policies, mandatory PSED training, and a Speak Up campaign raising awareness of routes for raising a concern and highlighting our work on tackling discrimination, bullying and harassment.
Social activities	Sports and Social Club organised events including invited speakers, such as The Women who built Bristol, and their supported charity Bristol refugee rights.
Harnessing the power of online learning	Signposting online learning options to enhance equality and diversity, including skills building, and resources for career development.
Wellbeing	A series of staff webinars to help staff reflect and build skills to manage the mental health impact of changing work environments
Spotlighting diversity	The values and behaviours working group organised a series of events spotlighting diversity, one of our four organisational values.
Hybrid working	A series of informal 'bite-sized' briefings for staff on relevant topics in preparation for the trial of hybrid working.