

# ANNEX B: Equality and diversity objectives for the Office for Students – Action plan 2019 to 2022

# Annual review of 2019-20 (undertaken June 2020)

1. The inaugural version of this plan was agreed by the OfS Board in July 2018, and is reviewed on an annual basis. The version agreed for 2019-20 is available on the OfS website at: <u>https://www.officeforstudents.org.uk/media/eed00cc0-ea32-4cca-9838-9b668cfe5e47/ofs-edi-action-plan-2019-22.pdf</u>.

2. This is an update on **2019-20**, and reports by exception for objectives **1-5**. This means that actions are included where progress has been slower than expected, activity has changed or where other circumstances warrant further detail to provide assurance that we remain committed to achieving our objectives in full.

3. Where progress against an action has been as expected with key milestones met, no further details are provided although are available on request. This includes where actions are completed or, where actions are ongoing but progress is broadly as expected (e.g. where evaluations are ongoing or reports are due for publication). Key achievements are covered in the main paper and Annex B.

- 4. Our equality and diversity and inclusion (EDI) objectives, priorities and actions are listed below:
  - **Objectives one to five** describe our priorities in facilitating the elimination of discrimination, equality of opportunity, and the fostering of good relations between different people in respect of universities, colleges and students.
  - **Objectives six to eight** report in full and describe our internally focussed priorities and how we plan to achieve equality for our employees.

We expect the board to hold us to account on the delivery of these priorities, both through our reporting on the business plan, and through our annual report to the OfS board specifically on equality and diversity.

**Objective one:** The OfS will develop, implement and consult on our EDI objectives, evidence base, impact assessments and action plan to ensure successful implementation of our Public Sector Equality Duty (PSED). **Priorities:** 

- Annually reviewing our progress and reporting this to the Board, and being held to account for our performance
- Linking EDI success factors to the OfS's performance measures and outcomes
- Seeking regular engagement, evidence and feedback from our stakeholders on our PSED performance
- Undertaking impact assessments of our policies and programmes using our making inclusive decisions guidance
- Having a clear linkage between our EDI strategy and OfS strategy and business plan

How we'll know if we have succeeded	Actions	Target date for completion or next key review date	Lead responsibility	Update
Stakeholders including the OfS board, our staff and sector agencies are clear on our requirements and	1.2 Develop an engagement, evidence and feedback process for stakeholders. Evaluate inclusive student engagement methods to ensure effectiveness, continue to review impact.	Ongoing	Head of Equality, Diversity and Inclusion	Equality impact has been fully embedded within the development of the stakeholder and student engagement strategy development and implementation.
commitments and equality and our strategic direction intersect with and complement wider sectoral work.	1.3 Implement the engagement, evidence and feedback process for stakeholders.	Ongoing	Head of Equality, Diversity and Inclusion	
The OfS equality impact assessment process is publicised	1.6 Update the equality impact assessment for the OfS regulatory framework.	March 2020 – delayed due to coronavirus and pausing of many regulatory	Head of Equality, Diversity and Inclusion	Postponed until after the coronavirus pandemic and will be considered along with the reintroduction of full regulatory requirements.

How we'll know if we have succeeded	Actions	Target date for completion or next key review date	Lead responsibility	Update
on the staff intranet and is undertaken as a primary step of the planning process and an ongoing integral part of all OfS policies and procedures.		requirements. Priority area for 2020-21.		

**Objective two:** The OfS will conduct and publish rigorous and influential analysis, research and insight into EDI (including the protected characteristics and socio-economic disadvantage) issues across the student lifecycle.

- We will collect the data necessary to allow us to conduct robust analysis examining the critical gaps in outcomes across the student lifecycle, taking an intersectional approach wherever possible, and extend our knowledge of groups that are currently under-reported such as postgraduate and international students. We will work through our regulatory framework to improve the quality and coverage of EDI related data, including through our implementation of the Transparency Duty. This includes a commitment to update the equality impact assessment of the regulatory framework at key points in its implementation
- Developing deeper insight into EDI issues by including data analysis and insight from alternative sources such as 3rd party data, international data and data from other industries and sectors
- Enabling continuous improvement by engaging and collaborating with stakeholders and using evidence and feedback to gather and triangulate insight and intelligence
- Taking an ethical and proportionate approach to gathering and presenting data that does not unnecessarily overburden stakeholders, including innovative and mixed methods approaches to collection and presentation that upholds our legal duties and ensures compliance with the General Data Protection Regulation requirements
- Supporting the sector to translate evidence into effective practice within providers through the Centre for Transforming Access and Student Outcomes (TASO)

How we'll know if we have succeeded	Actions	Target date for completion or next key review date	Lead responsibility	Update
The sector improves the quality of the equality data it provides, with more providers collecting data on all protected characteristics and socioeconomic disadvantage.	2.3 Work with HESA and other relevant bodies to achieve improved data capture and reporting through the student record.	Annually, June/July 2020	Director of Data, Foresight and Analysis	<ul> <li>The following changes will be made to the HESA 2020-21 return:</li> <li>Making Gender identity compulsory for all students and clarifying requirements to update annually</li> <li>Making Sexual orientation compulsory for all students and clarifying requirements to update annually</li> <li>Adding parental education to the AP return</li> <li>Adding socio-economic classification to the AP return</li> <li>Adding care leaver to the AP return.</li> <li>We remain in discussions with the ESFA to try and determine the future of HE records on the ILR and to find a way of obtaining the information we need from colleges going forward. No changes are expected to the ILR in the short term.</li> </ul>
Transparency duty data is used as part of our reported analysis and data.	<ul> <li>2.8 Review the transparency duty data to assess its potential to enhance the understanding of EDI.</li> <li>Depending on feedback the ABCS measure may be developed further to also include attainment and employment outcomes.</li> </ul>	Winter 2019 – then potentially include in spring 2020 EDI release – ongoing	Director for Data, Foresight and Analysis	Transparency duty work is ongoing. The way that outcomes vary by combinations of student characteristics may vary for different stages of the student life cycle. In September 2019 we published a new approach to measuring this called Associations Between Characteristics of Students (ABCS). This included a methodology that can be applied to different stages of the student lifecycle and using characteristics that are most important at each stage. The publication included ABCS for access to higher education for young people in England and ABCS for continuation in higher education for all entrants.

**Objective three:** The OfS will challenge the sector to significantly reduce gaps in access, success and progression for students from all backgrounds and identities<sup>1</sup> and across all disciplines.

- · Removing the degree attainment gap for black and Asian students
- Reversing the decline in mature student participation in higher education
- · Improving access to higher education for white males from low socio-economic groups
- Reducing the challenges for students with a disability in accessing, succeeding and progressing in higher education
- Delivering our access and participation strategy, challenge providers through the access and participation plans and supporting them through sector-wide championing of issues, the identification and sharing evidence on effective practice, and underpinning support on data and evaluation
- Distributing and reforming our funding in a targeted way to support social mobility and equity through the access and participation strategy
- · Implementing the Teaching Excellence and Student Outcomes Framework to promote positive learning outcomes for all students
- Implementing the Transparency Duty and working to develop the Duty further with the aim of capturing a greater number of protected characteristics (e.g. disability and age)
- Using our analytical capability and convening power to champion issues and understand where progress is being made and gaps remain
- Implementing and Monitoring TASO with the aim of identifying and disseminating 'what works' in access, success and participation and driving effective practice
- Implementing OfS policies to remove barriers to choice for students from all backgrounds and identities e.g. encouraging new providers into the market and driving new and existing forms of flexible provision

<sup>&</sup>lt;sup>1</sup> This will include students who we determine to be under-represented in relation to access and participation, in line with the Higher Education and Research Act (2017), and students with protected characteristics under the Equality Act (2010) who are identified by data and insight as underrepresented in relation to access, success and progression.

How we'll know if we have succeeded	Actions	Target date for completion or next key review date	Lead responsibility	Update
The decline in the participation rate of mature students is halted in areas that are a priority, to ensure student choice and equality of opportunity in relation to access and participation, and to address local and national skills.	<ul> <li>3.2 Analyse 2020-21 access and participation plans, in order to gain insights into how providers are planning to support mature students and will reflect this in updated advice and support for the sector.</li> <li>In autumn 2019, we will analyse 2020-21 access and participation plans, in order to gain insights into how providers are planning to support mature students and will reflect this in updated advice and support for the sector.</li> </ul>	Autumn 2019 – work rescoped for 2020-21 implementation (currently paused)	Head of Access and Participation (Regulation and Funding)	Since this action plan was developed, we have had the chance to rescope the likely shape of our mature students strategy. We are developing three strands of work as set out in the main report including: a data analysis and alignment project, a communications strategy, and a potential challenge competition. Mature students have not been prioritised by many providers in access and participation plans, despite low and decreasing proportions of such students in their own populations and the sector more broadly. We will develop further regulatory and funding incentives for mature student participation in 2020-21.
	<ul> <li>3.3 Support innovative approaches to mature student participation through an OfS Challenge Competition and a mature learner evaluation framework.</li> <li>A year two evaluation report and OfS programme report are scheduled for publication in October 2019. End of phase one monitoring will be returned in October 2019.</li> </ul>	Spring 2020 (as above)	Head of Access and Participation (Regulation and Funding)	We have also developed <u>effective practice</u> information on supporting a diverse mature student population.

How we'll know if we have succeeded	Actions	Target date for completion or next key review date	Lead responsibility	Update
OfS funding effectively targeted and used to address core access and participation priorities.	3.5 Review and reform access and participation funding for 2020- 21 onwards.	Autumn 2019 and ongoing	Access and Participation Funding Manager	The OfS board considered papers relating to the funding review in July and September 2019 and received further updates in March and May 2020. In the light of the pandemic there is now greater uncertainty over the timescales for the different elements of the review. The timescale for any public consultation or to bring proposals to the board is still to be determined.
Long-term, Teaching Excellence and Student Outcomes Framework (TEF) metrics evidence a closing of gaps in outcomes (DLHE <sup>2</sup> /GOS <sup>3</sup> , NSS <sup>4</sup> and LEO <sup>5</sup> ) between groups of students (by ethnicity, socioeconomic status or disability status). Medium-term, where gaps exist, providers publicly explain how they are addressing them in their	<ul> <li>3.15 From 2019-20 onwards:</li> <li>Subject-level TEF implementation rolls out a sector-wide mechanism that has proactive promotion of equality and the closing of success and progression gaps built into it.</li> <li>The TEF is strategically linked into the OfS regulatory functions to further promote equality of positive outcomes for all students.</li> </ul>	Review pilot subject TEF and Year 4 actions June 2019. Review subject- level TEF actions summer 2020. Delayed- we are awaiting publication of the independent review and the government's response.	TEF Subject Pilot Manager	All of the actions previously identified in relation to the implementation of TEF Year 4 and the second subject-level pilot have been achieved. We are awaiting publication of the independent review of TEF and the government's response prior to taking forward any proposed developments on enhancing EDI within TEF. We anticipate the next TEF exercise will require a full-scale refresh of TEF panellists and therefore the opportunity to enhance panel diversity.

<sup>&</sup>lt;sup>2</sup> Destinations of Leavers from Higher Education (DLHE) Survey

<sup>&</sup>lt;sup>3</sup> Graduate Outcomes Survey

 <sup>&</sup>lt;sup>4</sup> National Student Survey
 <sup>5</sup> Graduate outcomes: longitudinal education outcomes (LEO) data

How we'll know if we have succeeded	Actions	Target date for completion or next key review date	Lead responsibility	Update
TEF submissions, linked strategically to their Access and Participation Plans or Statements (APPs/APSs). Short-term, equality and diversity considerations are built into TEF training for providers and panellists, and into the developing subject- level TEF.	<ul> <li>EDI best practice is used to recruit a diversity of panellists.</li> <li>Ensure all TEF team, including contractors, are trained in EDI.</li> <li>TEF and the EDI dataset use the same underlying data. Articulate the relationship between the two for providers and panellists.</li> </ul>			

### Objective four: The OfS will work to address the risk of some students not receiving a high quality higher education experience

- Challenging and supporting the sector to address the significant increase in students reporting mental ill-health;
- Challenging and supporting the sector to tackle all forms of harassment and hate crime affecting students in higher education and supporting the sector's understanding of 'what works' and effective practice
- Implementing the initial and ongoing conditions of registration for quality to drive a high-quality academic experience for all students, giving explicit attention to the outcomes for students from under-represented groups
- Strategically reviewing our discretionary funding to lever innovation and effective practice
- Actively promoting whole institutional, inclusive approaches to both the academic and non-academic student experience (e.g. with regard to learning and teaching, access, participation, student welfare and safeguarding
- Supporting sector-wide activity e.g. by funding and communicating effective practice to tackle and reduce all forms of violence and harassment on campus, including sexual misconduct, online harassment and hate crime; also to enhance student support, including mental health and disability services
- Respond to the UK Government's LGBT Action Plan to "ensure that support is available for LGBT students who are victims of hate crime and online harassment"
- Promoting a more diverse higher education workforce (including senior managers and governors) to better reflect the diversity of the student population
- Using data, analysis, research and evidence to support continuous improvement and understanding of equality and diversity
- Ensure any provider that implements its student protection plan in the event of course, campus or provider closure mitigates against differential impacts of the closure on students with protected characteristics

How we'll know if we have succeeded	Actions	Target date for completion or next key review date	Lead responsibility	Update
We will: Implement our role operating at sector level by drawing on	4.1 Establish an expert advisory panel to provide advice and contribute to development of future priorities in areas of student welfare and safeguarding	Ongoing	Head of Equality, Diversity and Inclusion	No areas are delayed but there has been increased activity in this area and internal structural changes in how it is managed and overseen in OfS.

How we'll know if we have succeeded	Actions	Target date for completion or next key review date	Lead responsibility	Update
our regulatory tools to champion and promote positive approaches to student mental health and wellbeing so that they can achieve positive outcomes Work in partnership to facilitate and promote the sharing of effective practice and 'what works' to support the development of evidence informed policy and practice, and to catalyse change and drive improvement across all parts of the sector	Contribute our expertise to sector-wide inquiries, government initiatives/calls for evidence in the areas of student welfare and safeguarding Develop our horizon scanning capability and evidence base to understand gaps and emerging risks Use our regulatory information and work in partnership with other regulators to identify and monitor any evidence of systemic issues to develop evidence base Develop a communications strategy that uses key communications channels to promote effective practice, evidence-based policy and challenge providers to drive improvement in this area. Continue to work closely with key partners, such as DfE, UUK, Student Minds to develop cross-sector complementary approaches in relation to wellbeing and mental health.			<ul> <li>We continue to engage with a range of stakeholders and are actively involved in a number of groups, including being a member of</li> <li>the University Mental Health Charter steering group</li> <li>DfE's Ensemble group focused on mental health in higher education</li> <li>the advisory group for the Mentally Healthy Universities Pilot Programme, developed by the charity Mind.</li> <li>the government's Education Transitions Network</li> </ul>

How we'll know if we have succeeded	Actions	Target date for completion or next key review date	Lead responsibility	Update
Students from protected characteristics groups or socioeconomic disadvantage are not disadvantaged disproportionately in the event of provider, campus or course closure.	<ul> <li>4.8 Challenge the sector to eliminate differential impacts on students with protected characteristics in the event of provider, campus or course closure.</li> <li>As part of the production of the new student protection plan (SPP) guidance in summer 2019 there will be explicit reference to equalities principles and OfS expectations in this area.</li> <li>We will consider whether it is feasible to request Equality Impact Assessments from providers as part of the assessment of evidence in a market exit case.</li> </ul>	Ongoing and summer 2019	Head of Student Protection and Market Exit (SPME)	Further development work was undertaken to ensure that in the event of market exit the OfS had immediate access to data that would enable consideration of a range of demographic factors in relation to the student profile of the provider that are relevant to equality, diversity, and inclusion. Student protection cases considered by the OfS prior to March 2019 all considered these matters as part of the normal process. The new student protection plan guidance previously proposed has been delayed; the OfS will continue to consider the characteristics of students when holding discussions with providers on student protection and market exit matters.

**Objective five:** The OfS will work to reduce the risk that some students are prevented from maximising their outcomes through their higher education experience and therefore not maximise their potential in terms of employment or further study.

- Implementing the Teaching Excellence and Student Outcomes Framework with due regard to promoting positive learning outcomes for all students
- Working with providers, employers and other stakeholders to better understand and address the causes of gaps in employment outcomes
- · Working with providers and professional associations to eradicate gaps in employment outcomes
- Promoting activity that enhances employability and employment outcomes for students from under-represented groups and / or with protected characteristics, such as work-placement, community engagement and student enterprise
- Working with UKRI to understand the patterns of progression to postgraduate study for different student groups and developing approaches through regulation, funding, and sharing of data and practice, to strengthen and diversify the post-graduate pipeline
- Undertaking analysis to improve understanding of the benefits of higher education to graduates (beyond income measures) and how these vary between different groups of graduates

How we'll know if we have succeeded	Actions	Target or Review date	Lead responsibility	Update
The implementation of TEF proactively supports the closing of student outcome gaps.	<ul> <li>5.1 Require, support and encourage providers to use TEF as mechanism for identifying, addressing differential outcomes, encouraging strategic interventions and measuring of their impact.</li> <li>Future TEF design to take into account the findings of second pilot and the Independent Review. Independent Review of TEF due to report July 2019.</li> <li><actions brevity.="" details="" for="" full="" online.="" reduced=""></actions></li> </ul>	Ongoing. Review points summer 2019 and 2021	Teaching Excellence Framework Subject Pilot Manager	<ul> <li>We have described and evaluated all of the additional EDI mechanisms that we trialled in the second subject-level pilot in a detailed findings report. We expect publication of this report to coincide with the publication of the independent review of TEF.</li> <li>Subject to consultation and subsequent development work, as part of our design of the next TEF scheme we will explore the following actions to promote EDI: <ul> <li>A metric on differential degree attainment to aid panel assessment of positive outcomes for all students, in addition to the split metrics which split student outcomes by age, disability, ethnicity, and gender groups.</li> <li>Participating providers will be expected to explain and address any gaps in performance between different groups via their submissions.</li> <li>Subject-level data will be provided to the sector that highlights any gaps in success and progression at discipline level.</li> <li>Ensuring all panel members have sufficient relevant experience given the importance of EDI considerations throughout the new framework, and so that equality and diversity issues are considered consistently throughout the assessment.</li> </ul> </li> </ul>

How we'll know if we have succeeded	Actions	Target or Review date	Lead responsibility	Update
Established baseline data on patterns of progression to postgraduate study across protected characteristics and socioeconomic disadvantage. Having identified any gaps, committed to using our levers to diversify the postgraduate pipeline. Graduate and workforce pipelines will be strengthened and become more diverse.	<ul> <li>5.2 Build on the commitment by OfS and UK Research and Innovation (UKRI) to 'Promote equality, diversity and inclusion in higher education' as Area 13 in their collaboration agreement.</li> <li>This includes the commitment that the OfS will work towards a position where policies and priorities between OfS and UKRI mutually support improvements in equality at the points of transition from undergraduate to postgraduate study, to doctoral degrees and into the research and wider workforce for different student groups (protected characteristics and socioeconomic disadvantage).</li> <li>Develop approaches through regulation, funding, and sharing of data and practice, to strengthen and diversify of postgraduate researchers and the future academic workforce.</li> </ul>	Ongoing, review annually – delayed.	Access and Participation Manager (EDI)	<ul> <li>We are working together on EDI in higher education and its links through to academic and research careers. It also fits closely with Research England's (RE) Equality, Diversity and Inclusion principles and the forthcoming UKRI EDI Strategic Framework . The relevant EDI areas we have agreed to collaborate on are: <ul> <li>a. Progression of students from UG to PG</li> <li>b. Culture, environment and the PGR student experience</li> </ul> </li> <li>Following a stakeholder workshop in December 2019, RE and OfS intend to launch a joint call to improve access and participation for black, Asian and minority students in postgraduate research study. This will support projects for up to four years to develop exemplars of effective practice and/or transferable insights across the higher education sector. A <u>soft announcement in May</u> will be followed by a full launch in the Autumn.</li> <li>We have also been sharing regular updates with UKRI in our work to eliminate unlawful discrimination, harassment and victimisation. UKRI have recently published <u>new quidance for preventing harm in</u> <u>research and innovation</u>; we will continue to engage with UKRI to seek coherence between our work and share information about key sector issues where appropriate.</li> </ul>

### Objectives 6-8 have been subject to significant change and all actions are reported

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

- Senior leader role modelling for inclusive leadership and management to drive positive culture change
- Ensure accountability from managers and directors across the OfS
- Ensure our internal EDI strategy and practise is consistent with our external EDI ambitions
- Better understand our staff profile, views and experiences and harness the employee voice to build diversity of thought and perspective

How we'll know if we have succeeded	Actions	Target or Review date	Lead responsibility	Update April 2020
The OfS internal Equality, Diversity and Inclusion (EDI) strategy and priorities sets out the organisational intention and approach to achieving our EDI aspirations	<ul> <li>6.1</li> <li>Ongoing management and activity to deliver the strategy and priorities identified.</li> <li>Establish open and ambitious qualitative and quantitative success measures.</li> <li>Establish a communications strategy which promotes and advances EDI priorities and activities.</li> </ul>	Ongoing Review Autumn 2020	Chief Executive	Significant increased activity in this area including a revised internal EDI governance structure to oversee the internal management and oversight within OfS. No areas are delayed.
Senior leaders sponsor and lead the activity for delivering the internal EDI strategy	6.2 Demonstrate continued leadership to deliver the strategy and priorities identified by drawing up an action plan of quantitative and qualitative measure.	Ongoing Review Autumn 2020	Chief Executive	Increased activity in this area has led to a planned review of the existing EDI strategy to ensure it continues to be fit for purpose. Some activities have been re-prioritised in line with our new EDI targets (see 6.1) and outcomes of the people survey (see 7.3)
	6.3			We have increased communications of our
	Further embedding our Values and	Ongoing	Chief	EDI activities, including through the newly
	Behaviours, including into:	Review	Executive/	established staff networks.

How we'll know if we have succeeded	Actions	Target or Review date	Lead responsibility	Update April 2020
Greater visibility and accountability for EDI across the organisation	<ul> <li>establishment of future OfS competencies.</li> <li>performance management process, system and culture</li> <li>establishing a communications plan</li> </ul>	January 2021?	Head of Strategic Resource Unit/ Head of HR	The introduction of OfS behavioural competency framework will now be launched in Autumn 2020. In response to COVID-19 we have introduced an interim performance management process, focussing on the first six months of 2020-21 performance year, with a review in September 2020.
Greater understand staff views and internal culture relating to EDI in the organisation.	6.4 Consider options for harnessing employee voice on ongoing basis detailed in action 7.3 below	Ongoing Review January 2021?	Chief Executive/ Head of Strategic Resource Unit/ Head of HR	Some activities have been re-prioritised in response to the outcomes of our first OfS People Survey. We have proactively engaging our new staff networks in several EDI activities including our response to COVID-19.
More comprehensive and insightful equality data on our staff profile, against all protected characteristics.	<ul> <li>6.5</li> <li>Continued campaign on the importance and impact of completing personal data; particularly new staff to OfS</li> <li>Annual analysis of diversity data including benchmarking against external organisations and the wider labour market.</li> </ul>	Ongoing	Director for Resources, Finance and Transformation	We have re-prioritised our activities based on the outcomes of extensive data analysis and subsequent EDI targets. Our planned disclosure campaign to improve the completion of personal data, was delayed due to COVID-19.

**Objective seven:** Supporting 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 EDI across all areas of work, and foster a culture which regularly and routinely considers and discusses issues of EDI
- Harness the employee voice, via the creation of staff networks to take into account staff views, experiences and build diversity of thought and perspective

How we'll know if we have succeeded	Actions	Target or Review date	Lead responsibility	Update April 2019
OfS staff capacity, capability and support to build EDI considerations into their work and roles across the organisation	<ul> <li>7.1</li> <li>Continue to map out the needs and priority areas for learning and development.</li> <li>Consider the options for more specific EDI training or alternative opportunities for building this knowledge and capacity.</li> </ul>	Ongoing. Review September 2020	Head of HR/ Head of Strategic Resource Unit	We identified EDI as a priority area for our evolving learning and development programme and have increased the learning modules available. Further enhancements are planned including more targeted provision to support staff working on specific policy areas.
OfS staff routinely consider the EDI implications of their work and wider activities	<ul> <li>7.2</li> <li>Aggregate our learning from impact assessments and use this to drive a continuous improvement approach to internal projects.</li> <li>Build impact assessments into our broader learning and development programme.</li> </ul>	Ongoing. Review	Director for Fair Access and Participation	MID training launched and now forms part of PMO processes (as set out under objective one). There have been a high number of internally focused MID forms completed.

How we'll know if we have succeeded	Actions	Target or Review date	Lead responsibility	Update April 2019
OfS staff are confident and take the opportunity to voice and share their knowledge, input and personal experience to the benefit of the organisation.	7.3 Consider options for harnessing employee voice on ongoing basis	Ongoing. Review February 2020	Director for Fair Access and Participation	New staff networks have been created (see 6.4 above) Based on the outcomes of our new OfS people survey from February 2020, we have identified 3 priority areas for response including bullying and harassment.

**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.

- Improve BAME representation across the OfS workforce and throughout the recruitment and selection process, including at senior level roles
- Improve gender balance across the OfS structure and reduce the gender pay gap

How we'll know if we have succeeded	Actions	Target or Review date	Lead responsibility	Update April 2019
Identified the needs of the organisation in relation to EDI and embed E&DI into all our L&D approaches and provision	8.1 We will review our L&D provision and procedures as we develop the Workday learning tool	September 2020	Head of Human Resources/ Head of Strategic Resource Unit	We identified EDI as a priority area with a significant increase in specific EDI provision.
Improved BAME representation across the OfS workforce and through recruitment and selection process	8.2 We will be review our recruitment procedures and potential implementation of the Workday recruitment tool.	September 2020	Director for Resources, Finance and Transformation	A new task and finish group has been established to review our recruitment process and practices to ensure these represent best practice in EDI terms which will report in July 2020.
Improved gender equality across the OfS workforce structure	8.3 Monitoring, analyse and model our available data to understand the impact of recruitment and staffing changes, which will feed into our forward gender action plan.	Ongoing	Director of Competition and Regulation	Two of our EDI targets specify gender profile (see Annex A) and we continue to regularly monitor our data to understand the outcomes and potential impact of our evolving staffing profile.