

A photograph of a man with a beard and glasses, wearing a dark shirt, sitting in a modern chair and smiling while looking at his smartphone. The background is a dark, industrial-style interior with a grid pattern.

Diversity
data collection
toolkit

Contents

Introduction	03
Step one: The context for data collection	07
Step two: How to collect data	12
Step three: Communicating	21
Step four: Reporting, analysis and action	28
Appendix	34
Global People Dashboard examples	35

Lloyd's aim is to build a market with an inclusive and high performance culture.

We aspire to reflect the global markets in which we operate and ensure that everyone is treated with dignity and respect. The last few years have seen us make steady progress in building a more diverse and inclusive culture – but we've got more to do, and we've got to move faster.

As the saying goes, what gets measured, gets done.

If you are a firm, you should have a robust set of diversity data, for a variety of reasons; to understand the employee experience, for oversight purposes, for investors, to attract future talent, to satisfy regulatory requirements – and most importantly – to help improve the working experience for everyone across the Lloyd's market. Diversity data allows us to give prospective talent the transparency they want about what it's like to work at Lloyd's. Regulators are also increasingly focused on ensuring we improve diversity and can demonstrate an inclusive culture. In 2021 Lloyd's mandated the collection of ethnicity data.

If you are a colleague in the market, take a minute or two to make sure you have provided your diversity data to your organisation. It really does make a big difference.

In this toolkit we will look at the why, what and how of collecting diversity data and how to interpret patterns of aggregated data and how the resulting insights can help shape and evolve the wider culture.

The toolkit primarily focuses on the situation in the UK, but ever mindful of the global context and market for talent in the insurance industry, we recommend that if you are outside of the UK, you consult with a local legal expert about which data you can collect. We hope that you will find this guide simple and practical in setting out the facts and key considerations around diversity data collection.

Monica Stancu
Diversity & Inclusion Manager, Lloyd's



Myth Busting: “Collecting diversity data is a legal and regulatory risk”

Myth:

We are not legally allowed to collect diversity data.

Fact:

The Data Protection Act 2018 (the UK’s implementation of the General Data Protection Regulation) allows the collection and processing of diversity data with the aim of monitoring equal treatment and the provision of equality of opportunities.

Myth:

To comply with GDPR regulations, we cannot collect diversity data.

Fact:

GDPR expressly allows the collection of ‘special category data’. You can do a Data Protection Impact Assessment to help you consider how any data will be kept secure, how long it will be kept for and who it will be shared with.

Myth:

Without an HR system, we cannot get diversity data.

Fact:

If your current HR system does not enable you to collect diversity data, you can collect and analyse diversity data through the employee engagement survey. Employee Engagement Surveys can also give you a real insight to how people perceive the organisational culture, especially in countries where you cannot collect certain demographic data, or when disclosure rates are low.

Top tips for diversity data collection

1. Be clear why you are collecting diversity data and how it will be used. Link it to building an inclusive culture and workplace to benefit everyone. Stories can bring this to life.
2. Comply with your local laws. Remember ethnicity is different depending on where you are in the world and LGBT+ is viewed differently by certain cultures.
3. Obtain consent, clarify who will have access to the data, how privacy is protected and how it will be used.
4. Analyse the data and use it to inform your strategic action plan. Share the insights from the data you collect with colleagues to build trust and get input to your plans.
5. Set targets and develop actions against which you can monitor progress.

Step one: The context for data collection

Why collect data?

Diversity data creates a detailed window into the make-up of a business. It can signal where initiatives are succeeding (retention of women in senior positions for example) or where efforts might need to be focused for better future outcomes.

Monitoring the diversity of your workforce over time is crucial to understand not only who is in the organisation now, but also what groups of people and diverse perspectives you might be missing out on. Collecting data also provides a benchmark against which D&I programme effectiveness can be measured to chart the cultural development of your organisation.

While there is the statutory requirement for organisations with over 250 employees to monitor their gender pay gap, there is no other specific legislative requirement to collect diversity information at this stage. However, Lloyd's has mandated the collection of ethnicity data and recommends collecting a broader set of diversity data, which contributes to annual diversity monitoring across the Lloyd's market.

The trend is definitely towards greater transparency with companies getting 'data ready' with the expectation of increased mandatory reporting (like the Gender Pay Gap in the UK) extending into areas such as ethnicity pay gap reporting.

When is it best to ask for data?

Collecting data at different stages in the employee 'lifecycle' can provide insight into who you are attracting into the organisation, how you are doing when it comes to developing and retaining them, and whether certain demographic groups may be leaving.

Starting with recruitment, it is possible to look at who is applying for roles, to analyse whether there is a representative spread of applicants at this initial stage.

Many organisations now include diversity monitoring questions throughout the recruitment process at all levels, from long list and short list, through to interview stage and final appointment.

One way to approach collecting diversity data is to integrate it with your onboarding processes. Diversity information can be requested alongside other personal data such as next of kin.

Once people are in the door, consider monitoring their career progression from a diversity perspective. Capturing data at annual appraisal stage for example can highlight if there are certain groups that face barriers to progression. It can also be used to assess whether all groups have equal access to development opportunities.

Gathering data at the exit interview stage is an established part of career lifecycle monitoring. It highlights retention issues if people from specific groups are leaving the firm more frequently than others.

Examples of how the collection of diversity data can add value at different stages

1.	Attraction Who is interested in joining your organisation
2.	Selection Who is going through this process?
3.	On-boarding The first 90 days
4.	Development Who is participating in training programmes
5.	Development Who is moving through the pipeline?
6.	Exit Who is leaving and why?

The diagram above shows a few examples of the processes that you can measure through a diversity data lens.

What data could you collect?

Data pertaining to the 9 protected characteristics outlined in the Equality Act 2010 cannot be used in a way that discriminates (directly or indirectly), harasses or victimises employees. It is recommended that you gather diversity data, as it can not only aid in identifying trends in the workforce, but through its analysis can support the creation of a fair, equitable workplace that allows everyone to bring their best selves at work.

Below are some examples of the types of personal information that map to the legally 'protected' characteristics' in the UK Equality Act 2010. While public sector organisations have generally tended to focus on collecting data on this basis, more progress has been made in the private sector with questions on background and education to give insight on social mobility and caring responsibilities.

- Age
- Gender reassignment
- Being married or in a civil partnership
- Being pregnant or on maternity leave
- Disability
- Race including colour, nationality, ethnic or national origin
- Religion or belief
- Sex
- Sexual orientation

Organisations are increasingly collecting other type of data as well:

- Socio-economic background. To inquire about socio-economic background, a good reference for capturing accurate information would be the parents' job and type of employment. For more information, visit the Social Mobility Commission toolkit at socialmobilityworks.org/toolkit/measurement/
- In addition to the main householder's occupation at the age of 14, nationality, veteran and/or refugee status can add additional nuances and paint a clearer picture of socio-economic disadvantage.

Summary:

Diversity data makes it possible to know what groups of people are in your business today and at what levels. You can also see how attractive you are as a career option for emerging talent.

Collecting aggregated data regularly over time means you will be able to spot patterns and trends to help chart the progress of different groups and spot where you might have an issue.

The general direction of travel is towards greater transparency so get on the front foot for more mandatory reporting of who is in your business and how equally they are treated.

Knowing how your business is doing on diversity is a useful bellwether for your broader cultural progression.

Global Considerations — a country view

The global landscape for data reporting on ethnicity is complex as outlined in the heat map. It is important for all companies who are considering how they measure in other countries to review the legal and cultural landscape.

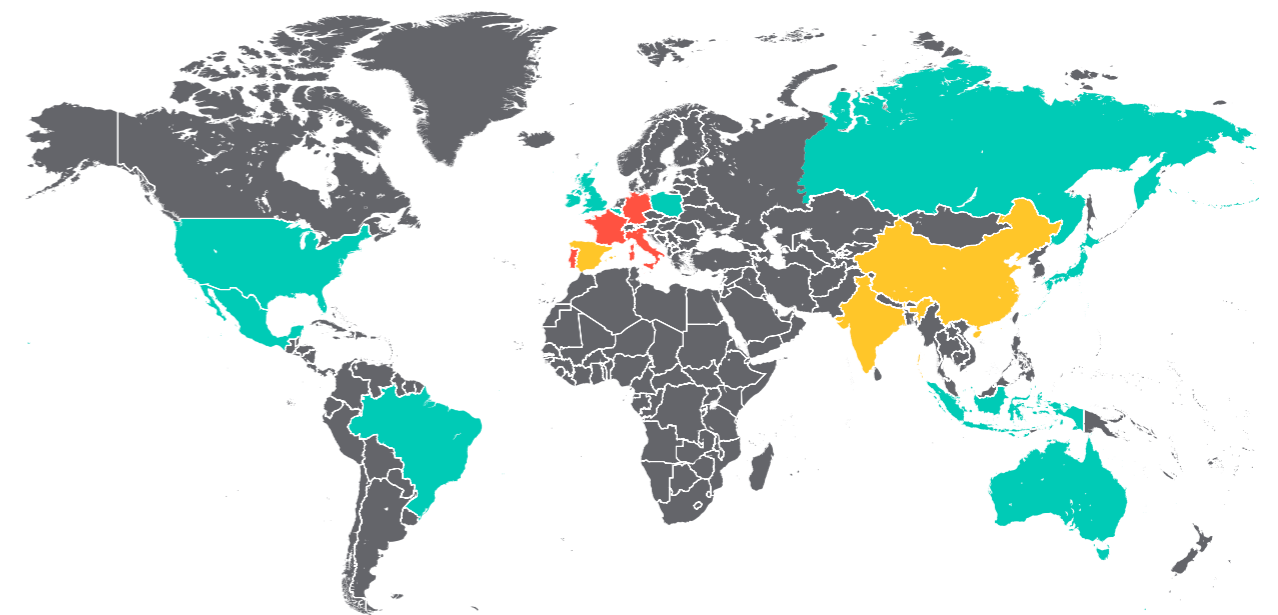
The countries in **turquoise** enable ethnicity data collection in their laws as well as the cultural appropriateness to discuss such matters.

Conversely, those countries where it is culturally or legally inappropriate to collect ethnicity data are indicated in **red**.

Those highlighted in **yellow** have further issues to take into consideration e.g. the local country census does not currently ask a detailed question about ethnicity and should be reviewed in more detail.

This map covers examples of data capture for ethnicity only. This is different for other D&I categories such as LGBTQ+ where the local laws and appropriateness may be different.

Able to Measure	Considerations Required	Unable to Measure
Australia, Belgium, Bermuda, Brazil, Indonesia, Ireland, Japan, Mexico, North America, Poland, Russia, Singapore, UK	China, India, Spain	France, Germany, Italy, Portugal



Step two: How to collect data

How do I start?

There are many opportunities to collect data at different times and for different reasons.

Here are some options:

- **Attaching data to confidential HR records**
Ask employees to update their HR records directly. This route would need to be accompanied by a carefully crafted communication setting out the rationale to build trust around visibility and who would be able to access the data. On the plus side, data captured in this way can be linked to training and development in the employee lifecycle.
- **Snapshot monitoring of employees**
A one-off data monitoring or snapshot survey is an option, but it would need to be carefully communicated to get good traction and the results could be affected by external factors. It's also important to consider its usefulness as it won't be helpful in charting progression.
- **Employee engagement surveys**
Another option is to collect diversity data as part of a wider employee engagement survey. This route creates an opportunity to look at the demographic trends to see if different groups are more or less engaged than others and to better understand the experience of demographic groups. Minimum thresholds for reporting of results by demographic can address concerns about anonymity.

Data captured through employee engagement surveys can be attached to confidential HR records or can be saved as snapshot monitoring.

We recommend attaching diversity data to confidential HR records as the most robust and sustainable approach as it enables you to analyse the diversity of your workforce but also key touchpoints in the employee lifecycle from a diversity lens, and monitor progress.

It is important to ask questions in the right way as if phrased incorrectly, some people may be put off participating.

Whichever option you decide to adopt, the first step is to think about the information you want in order to design a data monitoring form. It is important to ask questions in the right way as if phrased incorrectly, some people may be put off participating.

Remember, one-off exercises are not as effective as regularly collecting data as they do not allow for aggregating information over time to spot trends and patterns.

The data monitoring form

- Developing a standard approach to your data monitoring is good practice to ensure you are collecting data in a consistent way.
- The UK Census is useful to refer to for questions on ethnicity and religion, but it is not as helpful for other areas such as sexual orientation or disability for example. In these cases, refer to organisations that focus on particular groups for guidance (such as Stonewall, for example).
- Using standardised questions means that you can benchmark your data against other organisations both within and across sectors.
- It is important that you include an option for people to indicate that they do not want to answer the questions – a 'prefer not to say' option; this option should be available for each individual characteristic.
- Response rates vary among the characteristics, as people may be more comfortable being asked questions on certain topics so do not be surprised if there are different response rates for different areas. As people build trust in how you store and use the data, you should find that the response rate increases.

HR Systems

- Some HR management systems enable people to update their own information directly into the system. This is potentially a quick way to encourage people to share their diversity data.
- Often a HR system will have a diversity monitoring form available as a default. Other times, you will need to request the facility from your provider and/or customise the questions that you want to ask.
- If you are planning a new HR system, don't assume that it will work for your needs. Get involved in the initial scoping conversations to let them know what you are going to need in terms of data storage and analysis.
- Another benefit of collecting data via your HR system is that it is easier to generate reports using the existing reporting functionality.

GDPR Consent for Data Collection

One of the most important things to remember when collecting personal data is that you need to clearly explain what the data will be used for and how it will be kept safe once you have it. You also need to obtain active consent regarding the personal data you are collecting, such as having a tick box on the form to confirm that the entrant is happy with the terms you have stated.

Collecting and storing diversity data is covered by the UK General Data Protection Regulation (UK GDPR), which regulates the way information can be collected, handled and used. It also gives people rights, such as access to the information, the right to amend information that is incorrect, and compensation if things go wrong.

Summary:

Your HR systems provider can be helpful in setting up the system to generate reports, but what you get out will only be as good as what you put in, so be clear about what you want.

What to Ask — Diversity Monitoring Form

Gender

1. What is your gender?

- Female
- Male
- Non-binary
- Prefer not to say

2. Would you describe yourself as trans?

- Yes
- No
- Prefer not to say

Sexual Orientation

3. Which of the following best describes your sexual orientation?

- Heterosexual or straight
- Gay / Lesbian
- Bisexual
- Prefer not to say

4. Please indicate where you are open about your sexual orientation:

- At home
- With your manager
- With colleagues
- I am not open with any
- Prefer not to say

Disability

5. Do you consider yourself to be disabled (considering these descriptions below)?

- A disability is a mental or physical condition that is long lasting (e.g. longer than 12 months or likely to last 12 months) although its impact may fluctuate
- And has a significant impact on day-to-day activities e.g. reading, walking, dexterity, breathing, speaking, writing, hearing, and interacting with people.

- Yes
- No
- Prefer not to say

6. If yes, which of the following best describes the impact of your disability?

- Dyslexia, Development Co-ordination Disorder/Dyspraxia, ADHD or DLD (Development Language Disorder)
- Memory (often short-term memory and memory processing speed when reading)
- Mental health (including Anxiety, Depression, Bi-polar disorder, and Schizophrenia)
- Autism spectrum disorder, which includes Asperger's
- Blindness or visual impairment
- Hearing (for example, D/deafness or hearing impairment)
- Vision (for example, blindness or visual impairment)
- Mobility (for example, walking short distances or climbing stairs)
- A long-standing illness or health condition such as cancer, HIV, diabetes, chronic heart disease, or epilepsy
- Stamina or breathing or fatigue (including chronic fatigue syndrome and Long Covid)
- Dexterity (for example, lifting and carrying objects, writing with a pen or using a keyboard)
- Self-description (free text)
- Prefer not to say

Nationality**7. What is your Nationality or Citizenship?**

- For this, provide a global list of all countries in alphabetical order and to allow for capturing dual citizenship tick both boxes that apply
- Prefer not to say

Religion**8. What is your religion?**

- Buddhist
- Christian (all denominations)
- Hindu
- Jewish
- Muslim
- No religion (including atheist and agnostic)
- Sikh
- Other religion and please self-describe
- Prefer not to say

Age**9. What is your age?**

- 16-19
- 20-24
- 25-29
- 30-34
- 35-39
- 40-44
- 45-49
- 50-54
- 55-59
- 60-64
- 65+
- Prefer not to say

Caring Responsibilities**10. Do you currently have caring responsibilities? (this can include childcare and adultcare)**

- Yes
- No
- Prefer not to say

11. If yes, who are your caring responsibilities for?

- A child under the age of 18
- A child aged 18 or over
- A spouse or partner
- A parent
- Disabled adult (18 years and over)
- Disabled child or children (under 18 years old)
- Prefer not to say

12. If yes, are you the primary carer in your household?

- Yes
- No
- Prefer not to say

Ethnicity

In the UK, we use the ONS ethnicity categories

In Lloyd's, we collect ethnicity data against these categories. In our culture survey and Market Policies and Practices return, we tend to report back workforce composition at the 'group' level, i.e. Asian, Black, Mixed / Multiple, Other, White and Prefer not to say, however we do look at the data at a more granular level.

We collect and analyse ethnicity data for **total workforce** and **leadership levels** (Board, Executive Committee, Direct Reports to Executive Committee and Executive Committee also serving on the Board).

What is your ethnic group?

Choose one option that best describes your ethnic group or background

White

- English/Welsh/Scottish/Northern Irish/British
- Irish
- Gypsy or Irish Traveller
- Any other White background, please describe

Mixed/Multiple ethnic groups

- White and Black Caribbean
- White and Black African
- White and Asian
- Any other Mixed/Multiple ethnic background, please describe

Asian/Asian British

- Indian
- Pakistani
- Bangladeshi
- Chinese
- Any other Asian background, please describe

Black/ African/Caribbean/Black British

- African
- Caribbean
- Any other Black/African/Caribbean background, please describe

Other ethnic group

- Arab
- Any other ethnic group, please describe

- Prefer not to say**

Socio-economic background

There are four social mobility related questions recommended by the Social Mobility Commission.

For more information on social mobility data, visit the Social Mobility Commission toolkit at socialmobilityworks.org/toolkit/measurement/

1. What was the occupation of your main household earner when you were about aged 14?

- Modern professional & traditional professional occupations such as: teacher, nurse, physiotherapist, social worker, musician, police officer (sergeant or above), software designer, accountant, solicitor, medical practitioner, scientist, civil / mechanical engineer.
- Senior, middle or junior managers or administrators such as: finance manager, chief executive, large business owner, office manager, retail manager, bank manager, restaurant manager, warehouse manager.
- Clerical and intermediate occupations such as: secretary, personal assistant, call centre agent, clerical worker, nursery nurse.
- Technical and craft occupations such as: motor mechanic, plumber, printer, electrician, gardener, train driver.
- Routine, semi-routine manual and service occupations such as: postal worker, machine operative, security guard, caretaker, farm worker, catering assistant, sales assistant, HGV driver, cleaner, porter, packer, labourer, waiter/waitress, bar staff.
- Long-term unemployed (claimed Jobseeker's Allowance or earlier unemployment benefit for more than a year).
- Small business owners who employed less than 25 people such as: corner shop owners, small plumbing companies, retail shop owner, single restaurant or cafe owner, taxi owner, garage owner.
- Other such as: retired, this question does not apply to me, I don't know.
- I prefer not to say.

How to analyse

Report socio-economic background in three groups, following this guide:

- Professional backgrounds / modern professional & traditional occupations; senior or junior managers or administrators.
- Intermediate backgrounds / clerical and intermediate occupations; small business owners.
- Lower socio-economic backgrounds / technical and craft occupations; routine, semi-routine manual and service occupations; long-term unemployed.
- Exclude / other; I prefer not to say.

2. Which type of school did you attend for the most time between the ages of 11 and 16?

- State-run or state-funded school
- Independent or fee-paying school
- Independent or fee-paying school, where I received a means tested bursary covering 90% or more of the total cost of attending throughout my time there
- Attended school outside the UK
- I don't know
- I prefer not to say

How to analyse

Simply look at the percentage of respondents who went to an independent school (without a complete bursary) compared to all others, excluding those who say 'I don't know,' 'Prefer not to say' and 'Attended school outside the UK'.

3. If you finished school after 1980, were you eligible for free school meals at any point during your school years?

- Yes
- No
- Not applicable (finished school before 1980 or went to school overseas)
- I don't know
- I prefer not to say

How to analyse

Review the proportions of applicants and staff members who were eligible for free school meals – what is the size of the group compared to the national benchmark? It's important to note this question isn't a substitute for measuring social background and should always be reviewed alongside parental occupation (question 1).

4. Did either of your parents attend university and gain a degree (e.g. BA/BSc or equivalent) by the time you were 18?

- No, neither of my parents attended university
- Yes, one or both of my parents attended university
- Do not know / not sure
- I prefer not to say

How to analyse

Review the proportions of new graduate hires who said 'no' and are thus first in family to attend university and compare it to the national benchmark. Remember this is not a measure of social background and should always be interpreted alongside the parental occupation question (question 1).

Step three: Communicating

Preparing to communicate

Communication is perhaps the single most important thing to get right — the dialogue around data, why it's needed, how it will be used, who sees it and individuals' rights, should be straightforward and transparent.

Employers are allowed to gather and analyse information about employees for equality monitoring purposes as long as they obtain consent. In Europe, the new General Data Protection Regulations (GDPR) sets out individuals' rights to know what data is held and their right to see it.

Make it clear to everyone that providing the information is optional and that it will only ever be used at the aggregate level and for diversity and inclusion monitoring purposes. Guarantee anonymity as people are often sharing highly sensitive data.

If information is being collected as a one-off exercise, don't ask for names or personal identification numbers of any kind.

Individual data should be protected and securely stored in line with data protection rules. If the information is being stored centrally (on an HR system for example), ensure that everyone knows how their information is being stored and who will have access to it. If someone has undergone or is currently undergoing gender reassignment, you should be especially careful who can access this, information and what is done with it. (ref the Gender Recognition Act 2004)

- Ensure your senior leaders and line managers understand what you are trying to do as they play an important role in encouraging their teams to participate and can add credibility to the exercise.
- The more concrete examples you can include on how the information will be used, the more likely that more people will choose to disclose their diversity data.

Individual data should be protected and securely stored in line with data protection rules.

Disclosure rates

Capturing data is essential for every business; it informs its strategic priorities and the areas in need of attention. After all, 'what gets measured, gets managed'

Employees may be wary of providing data or participating in surveys, partly due to their suspicion or even fear of the way their data will be handled.

You want to aim for 100% disclosure from employees. The higher the disclosure rates the more reliable the inferences from the data will be. Embedding the questions into a process is a key way of encouraging people to complete it, such as during an induction process, at annual reviews, or alongside employee engagement surveys. You may also want to send reminders regarding completion deadlines as well as considering the following points.

Increasing Disclosure Rates

1. State the purpose

What is the purpose of collecting diversity data and how will both the business and the employees benefit from future actions informed by it?

2. List the actions which will be based on them

In addition to the purpose, state actions you already have planned. The intended participants will be aware of the ways their contribution will be an investment to a fairer workplace.

3. Provide information on your privacy policy

Explain who will be granted access to the data and the approach to anonymity and data traceability.

4. Highlight data storage policy

It is important to provide information to address employees concern; for instance, clarify how the information is going to be handled and who has access to it and note that the information is stored in line with regulations.

5. Psychological safety

Psychologically safe workplaces are characterised by employees' feeling others will not embarrass, reject or punish them for speaking up. They can be comfortable being themselves. The feeling of safety can raise confidence in the processes of data collection and processing and enable increased disclosure. Cultivating inclusion, understanding and belonging has the potential of bringing about such change.

Rolling out your comms campaign

There are different ways to communicate why you are collecting diversity data to encourage people to participate. It is important to communicate before campaigns begin so that line managers are aware and can field questions. Similarly, it is good to enrol key senior people as advocates. After the campaign is over, report back on the response rate and what the data is telling you. Think about what engagement methods work best for your organisation, for example:

- Put up marketing and communication materials across a range of media in key areas such as the intranet, common areas, toilets
- Include diversity monitoring when reminding people to update other areas of personal data, e.g. next of kin, change of address
- Arrange for the CEO or other senior leader/ D&I ally to send an email asking people to participate and outlining why gathering diversity data is an important strategic issue
- Incorporate into your onboarding process, so it is completed automatically as new people join the organisation
- Consider new media messaging eg. internal social media channels (like Yammer and Workplace) as well as video.

When you ask for personal information can be as influential as how you ask for it. One example is to piggyback on an awareness day e.g. Black History Month as an opportunity to update diversity data. Don't reinvent the wheel – there are plenty of great examples of wording to draw on from expert organisations when asking for personal details.

Working with employee resource and network groups

If your organisation has employee resource or network groups, they can help in a number of ways when it comes to designing and communicating data collection. They are also a valuable resource to support on subsequent strategy and action planning.

Some firms hold specific sessions with network groups to provide an opportunity for people to ask questions about the data gathering exercise. Others involve their network groups in road-testing the questionnaire and designing the communication plan. Network groups can also help you communicate the results of the data gathering exercise back to everyone and help the organisation shape relevant actions to address any issues.

Advice from Inclusion@Lloyd's Partner Network Groups

- Question phrasing and language is crucial; clunky attempts may be off-putting for certain people, so check your choice of words with the Networks if you are uncertain
- Reassuring people that their data will remain confidential is key (within the LGBT+ community for example, some people may not be out, or may be selectively out in the workplace)
- Enroll senior leaders and divisional heads as role models for data sharing and encouraging their teams to do the same
- Share the data you collect with your Networks as this will help them shape their strategies for the benefit of the organisation
- Use data to dispel myths and attract people from different groups into the organisation.

Summary:

Plan your communications carefully and consult the experts about how to frame certain questions to get the best engagement.

Enroll your leaders and D&I advocates to help make the case for providing data and reinforcing that it will be used with integrity to benefit everyone in the organisation.

Work with your network groups as internal consultants – they are a great source of advice and an effective feedback loop for the business.

Successful Communication

Case Study: The Land Registry's Declaration Campaign

Land Registry (LR) has successfully implemented internal diversity monitoring to ensure workforce profile, talent management, discipline, grievance and attendance processes can be audited across diversity strands. Over four years, LR undertook a programme to increase declaration of sexual orientation and religion, where the declaration rate had been lower than for others. The campaign has seen an increase across both areas, from 21% in 2012 to 75%.

Communication campaigns

LR has run three campaigns aimed at increasing declaration rates.

Phase 1: personal emails to all employees from the HR Director asking them to update their personal records; emails to union members; articles on the internal website; and FAQs on the Diversity Intranet. Local diversity champions highlighted the importance of updating personal information via poster campaigns. The Head of Diversity reported monthly on the percentage of employees who had updated; and quarterly to the LR Executive Board.

Phase 2: the Head of Diversity emailed employees who had not yet updated their personal information, alongside other communications, with an immediate increase of 15%.

Phase 3: a video provided a guide for employees on adding diversity information on the HR Portal and reassuring them about confidentiality. Crucially, it outlined the business benefits of obtaining workforce data.

Key tips**Senior buy-in**

The biggest driver of success was buy-in from the top. CEO support was essential: he led by example, disclosing his information and expecting his senior leaders to do the same. HR had 100% declaration, strengthening the message on confidentiality.

Communication

LR used a variety of ways to communicate the purpose for obtaining diversity data and gave examples of how it had been used in the past. A team of 'champions' was highly effective, reinforcing official comms with face-to-face contact.

Successful Communication Case Study: AXA UK — Campaign

- In March 2021, AXA UK launched their D&I Data Campaign – *Fairer in Five*. The name came from the notion that it takes less than five minutes to input your information and the use of aggregated data will make the organisation fairer for all. In reality, it takes less than a minute to complete via our MyHR dashboard.

AXA UK collect seven data points: Ethnicity, Sexuality, Gender Identity, Socio-economic background, Disability (physical and/or hidden), Family Care and Religion. For the purpose of this case-study, disclosure rates will be referring to employees who have completed a minimum of two data-points. Data is aggregated under a “rule of six” to counteract smaller teams being identifiable.

- Within the first year of launch, the firm managed to gain just over 50% of the workforce’s D&I data but saw that uptake was beginning to plateau and so used targeted communications to drive up completion rates. Initial insight from Fairer in Five, showed that just over half of respondents had some form of caring responsibility and so this resulted in the development of a new employee network, Carers at AXA which launched in April 2022. Through anecdotal data they found that a large proportion of the business were unaware of what their data was going to be used for and so refrained from disclosing. To address this, during their ‘Year on’ targeted comms campaign in March 2022, they spoke about the launch of the new Carers at AXA network which was born from the new data-led approach – this was in an all employee email which saw completion rates go from 53% to 57.3%, an extra 300 people disclosing.
- In July 2022, AXA UK launched another targeted comms campaign sent to all employees who had yet to disclose their Fairer in Five data. This email further stated the benefits of a data-led approach to inclusion and reiterated the anonymity of disclosure. This approach saw an increase from 59% to 62%.
- All employee comms are good, however you run the risk of annoying people as over half of the organisation have disclosed and so they’ll be receiving reminders to do something they’ve already done which could lead to disengagement. The Q3/Q4 approach from the Inclusion team is to now work with Business areas with a headcount of less than 100 to hit a minimum of 50% disclosure, with an aim of getting all business areas at AXA UK over 50% by the end of the year.

Successful Communication Case Study: Aon campaign

- In 2020, Aon launched its first self-identification campaign, to better understand the make-up of its UK workforce and to take more targeted and measurable action. Through the campaign, Aon explained that the data would allow it to understand whether its actions were helping to build an inclusive workplace, where diverse, talented individuals not only chose to join Aon, but to stay – because they would be afforded equitable opportunities to develop their careers.
- The campaign also shared messages from members of Aon’s Business Resource Groups, who themselves had self-identified and spoke about why they felt that self-identification data was key to taking the next step in Aon’s Inclusion & Diversity (I&D) journey.
- Within a year, 88 percent of Aon employees self-identified, with only five percent choosing not to disclose their information. Armed with the data, the firm sprang into action by setting targets and developing an I&D action plan, to develop new initiatives or strengthen existing ones; the impact of which continues to be measured through quarterly inclusion index reports.
- Aon is now replicating this approach in other regions, including US, Australia, Ireland, Brazil and Canada. To further cement its commitment, the global Aon Executive Committee, has aligned 20 percent of their executive discretionary incentive compensation to the firm’s I&D goals.

Successful Communication Case Study: Tokio Marine Kiln’s Campaign

- The CEO sent a message to all staff explaining how they use I&D data on Workday, how they use it and also with a reassurance that the information is kept securely. The % of employees sharing their data increased to over 80%. The organisation have set a goal to ask all staff to refresh data on workday annually.
- This helps them keep up with any changes and catches any new staff that may not have updated their data – but they do also ask people to complete their Workday profiles as part of induction.

Step four: Reporting, analysis and action

Reporting the data

- It is important to report internally on the results of the data gathering exercise. This might include reporting to senior leaders on the results so they can endorse any actions that have been planned.
- If the data can be cut by division, sharing the information with divisional heads encourages them to understand any issues in their specific area and to develop customised actions.
- Organisations report back to staff as part of a transparent culture to explain what the results have shown and also to say thank you for sharing their data. This approach will also encourage people to participate in future data gathering exercises as they will know how their data has been used.
- Data insights can help set organisational goals. For example, if you found people are sharing information about dyslexia, it might inform decisions regarding the purchasing of specific tech solutions. If you find that a high proportion of staff are carers, you might investigate family care options such as the provision of emergency childcare and/or elder care provision.
- You can use data to start further discussions, for example, if you found that your LGBT population were getting lower than average grades on certain development programmes, you could investigate why there was perhaps a lack of engagement or some other reason.
- Diversity data can only tell you who you've got in your organisation but if you survey through different channels and cross reference, you can start to look at the experiences for different groups and even debunk myths, for example that the organisation doesn't attract certain groups of people.
- You can use the people dashboards examples in the annex to report your diversity data.

Data analysis

You could use the data you collect in several ways, for example to:

- Compare it with national demographic statistics
- Compare it with industry standard data and see how representative you are of your sector
- Compare it with regional representational data to see how far your workforce reflects the local community
- See whether your organisation has met its diversity and inclusion objectives
- These comparisons will help you to plan and review your D&I strategy and action plan. For example, the data you collect could be used to help you plan ways to engage with more potential members from under-represented groups

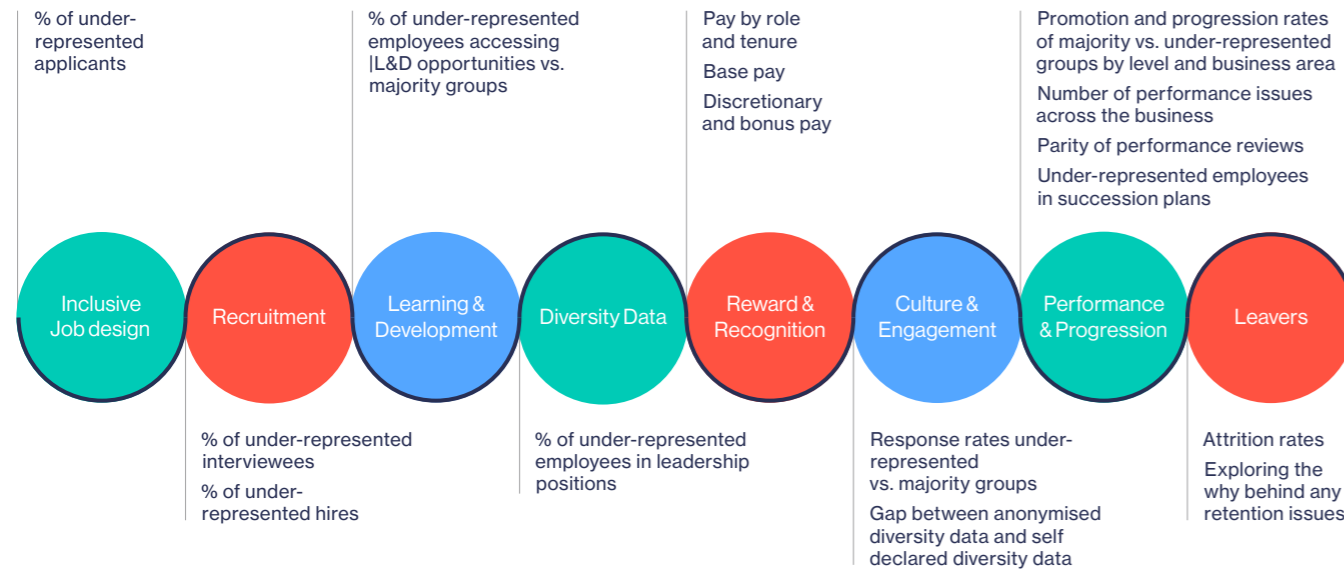
Workforce representation in the Lloyd's Market, 2022

	Financial Services	Lloyd's Market	UK	Corporation
Women	43%	42%	51%	51% global
Ethnic Minorities	17%	9%	14%	23% UK
Disabled	4%	10%	19%	2% UK
LGBT+	3%	2%	6%	2% UK

Data sources: MP&P 2022, Ranstad D&I Financial Services report, Census 2011, DWP Family Resources Survey 2019-2020, Stonewall, ONS 2019 Population Estimate

Quantitative measures

Use your diversity data to identify any bias and inequities in your policies, practices and culture across the employee's life cycle.



Source: The Clear Company

Setting targets

Targets are achievable, time-based goals that help to maintain focus and demonstrate the organisation's commitment. Basing targets on analysis and baseline data provides a solid foundation for achieving them. Not all organisations are supportive of targets, but they are useful when it comes to measuring progress and impact.

Once you have decided that targets are a useful tool for your organisation, the next step is to consider the business areas you want to measure and the identifiable groups you want to set targets against e.g. increasing the number of women in senior positions or attracting more people from underrepresented groups to apply for roles.

Another factor to consider is the data point you use to set your target. Some organisations consider the demographic composition of their client and user base. Others use the demographic composition of the workforce. A common data point is the demographic composition of the country or region in which a firm operates.

To set realistic, achievable targets you need to take a long-term approach and be pragmatic about possible growth, contraction, promotions, and restructuring. It can be difficult to achieve a shift in the numbers over a relatively short timeframe, especially if turnover of staff is low in your organisation.

Lloyd's has set a target for 35% women in leadership across the market.

Leadership = Boards + Executive Committee + Direct Reports of Executive Committee (and we deduct Executive Committee members who also serve on the Board, so that we don't double count).

Lloyd's has also set a 1 in 3 hiring ambition – we aim for one third of new hires to have an ethnic minority background.

We report our progress against these via our Culture Dashboard: www.lloyds.com/about-lloyds/culture/reports-insights-data/culture-dashboard/2022-culture-dashboard/

Developing Actions

Targets are just one barometer of how inclusive your organisation is – they are not an end in themselves. Be sure to communicate your overall aims rather than focus on one or two data points as this can miss the point.

Other ways of moving to action include:

- Equipping line managers to lead diverse teams
- Ensuring that organisational branding material features people from diverse backgrounds
- Providing opportunities for people to speak up about their experience of working at the organisation
- Introducing D&I-related objectives into performance appraisal processes
- Appointing a senior leader as the accountable executive for building a diverse and inclusive culture

Once internal targets have been set for action and progression, monitoring exercises should be conducted on a regular basis in order to track progress over time. You may also consider assigning responsibility for progress to relevant roles and include this when setting personal objectives for the year.

Summary:

Don't look at your data in a vacuum – compare it with other meaningful sources.

Be realistic about setting targets. Change doesn't happen overnight. Be prepared to take the long view and report against progress.

Consider both diversity and inclusion data when developing actions.

Frequently asked questions

Is there a legal basis for collecting diversity data?

The Data Protection Act 2018 (the UK's implementation of the General Data Protection Regulation) allows the collection and processing of diversity data with the aim of monitoring equal treatment and the provision of equality of opportunities. However, there is no legal obligation to gather such data.

Can I use the collected data for another purpose?

No, you cannot in most cases. The user(s) provided their consent for a certain purpose, and should the purpose be a long-term one, their consent must be refreshed. Should you wish to reuse the data for another reason, you will have to ask for their consent again.

What if I am unsure how to process the data or what to do with them after using them for the original purpose?

Mishandling data can have grave consequences and can incur hefty fines. Should you have questions on data handling or detect security breaches, please seek out Lloyd's Data Protection Officer for advice.

What if disclosing data would 'out' people, or the data sets are too small?

In these circumstances we would recommend acknowledging the imbalances within the organization that need addressing and providing information on what you are doing to address that. When sharing data (eg for representation), Tokio Marine Kiln usually use % rather than employee numbers unless there is a reason not to (eg with CEO/Exec) and if a pool of employees is 5 or less we might not share that data at all because it could be easy to identify those individuals.

How long can I retain the collected data?

As a rule of thumb, no longer than you need it. The reason for holding the data must be clear and justifiable. Periodic reviews of it can help you comply with regulations and erase/anonymise data which is no longer needed.

Is the data on our employee's disclosure of their protected characteristics to be treated differently than other data?

No, the same principles governing other types of data apply to diversity-related information: accountability, data minimisation, accuracy, purpose limitation, storage limitation, integrity & confidentiality, lawfulness, fairness & transparency. However, some of the characteristics enjoy stronger legal protection in the Data Protection Act 2018.

Do my partnering businesses have to comply with the United Kingdom's data protection regulation (GDPR)?

Entities providing their services in the EU and the United Kingdom must be compliant with the current data protection regulation. Failure to do so can have legal implications.

For more information and best practice, visit the Information Commissioner Office website: <https://ico.org.uk>

Appendix:

Resources and wider reading

Increasingly we are seeing more organisations choose to report their D&I data collection externally – an area in which the public sector traditionally led the way. Here are some examples of external reporting from both the public and private sectors:

Google	about.google/belonging/diversity-annual-report/2022/
GLA	www.london.gov.uk/about-us/jobs-and-working-city-hall/diversity-and-our-values
Ofcom	www.ofcom.org.uk/about-ofcom/what-is-ofcom/corporate-responsibility/diversity-and-equality
NHS England	www.england.nhs.uk/about/equality/
The FCA/PRA/BoE Diversity and Inclusion Discussion Paper	www.fca.org.uk/publication/discussion/dp21-2.pdf
The Solicitors Regulation Authority	www.sra.org.uk/solicitors/guidance/sra-approach-equality-diversity-inclusion/
The Financial Authority	www.fca.org.uk/publication/corporate/diversity-annual-report-2021-22.pdf
Lloyd's Diversity data video	www.youtube.com/watch?v=gbqFI4iDb5w&feature=emb_title
PwC – Taking the right approach to ethnicity pay gap reporting, March 2019	www.pwc.co.uk/human-resource-services/assets/pdfs/ethnicity-pay-report.pdf
UK Government, The Social Mobility Index	assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496103/Social_Mobility_Index.pdf
Bird & Bird, Global guide on HR Data Essentials: Equality, Diversity and Inclusivity Monitoring	www.twobirds.com/en/hr-data-essentials/international-perspectives/articles/equality-diversity-and-inclusivity-monitoring

Global People Dashboard examples

People Dashboard Gender and gender identity representation

As at date / month / year, Global workforce

			Q1 yy dd/mm/yy	Q2 yy dd/mm/yy
Global	All staff	Female	%	%
		Male	%	%
		Non Binary	%	%
		Trans	%	%

People Dashboard

Women's representation

As at date / month / year, Global workforce

			Q1 yy dd/mm/yy	Q2 yy dd/mm/yy	Headcount dd/mm/yy
Global	Female representation by level	Board	%	%	
		Executive Committee	%	%	
		Direct Reports	%	%	
		Leadership	%	%	
		Talent Pipeline	%	%	
		All staff	%	%	
	Disclosure	Gender	%	%	

	Dept. 1	Dept. 2	Dept. 3	Dept. 4	Dept. 5	Dept. 6	Dept. 7	Dept. 8
Senior leadership	%	%	%	%	%	%	%	%
Talent Pipeline	%	%	%	%	%	%	%	%
All staff	%	%	%	%	%	%	%	%

			Q1 yy dd/mm/yy	Q2 yy dd/mm/yy
Global	Attrition Rolling attrition for the previous 12 month period	Leadership	%	%
		Female	%	%
		Male	%	%
		All staff	%	%

People Dashboard

Ethnicity

As at date / month / year, UK employees only

			Q1 yy dd/mm/yy	Q2 yy dd/mm/yy	Headcount dd/mm/yy
UK only	Overall Ethnic Minority representation by level	Board	N/A	N/A	
		Executive Committee	%	%	
		Direct Reports	%	%	
		Leadership	%	%	
		Talent Pipeline	%	%	
		All staff	%	%	
		Disclosure	Gender	%	%
	Breakdown of Ethnic minority representation	White	%	%	
		Black	%	%	
		Asian	%	%	
		Mixed	%	%	
		Other	%	%	
		Prefer not to say	%	%	
		No Data	%	%	
Disclosure	Ethnicity disclosed (incl. PNTS)	%	%		

	Dept. 1	Dept. 2	Dept. 3	Dept. 4	Dept. 5	Dept. 6	Dept. 7	Dept. 8
Senior leadership	%	%	%	%	%	%	%	%
Talent Pipeline	%	%	%	%	%	%	%	%
All staff	%	%	%	%	%	%	%	%

Attrition – UK employees only		Q1 yy	Q2 yy
Attrition Rolling attrition for the previous 12 month period	White	%	%
	Ethnic Minority Background	%	%
	Prefer not to say	%	%

People Dashboard Sexual Orientation, Disability, Religion

As at date /
month / year,
UK employees
only

		Q1 yy dd/mm/yy	Q2 yy dd/mm/yy	Headcount dd/mm/yy	
UK only	Breakdown of Sexual Orientation representaion	Heterosexual / straight	%	%	
		Gay / Lesbian	%	%	
		Bisexual	%	%	
		Other	%	%	
		Prefer not to say	%	%	
		No Data	%	%	
	Disclosure	Sexual Orientation disclosed (incl. PNTS)	%	%	

		Q1 yy dd/mm/yy	Q2 yy dd/mm/yy	Headcount dd/mm/yy	
UK only	Breakdown of Disability representaion	Dyslexia	%	%	
		Hearing	%	%	
		Long Term Health Condition	%	%	
		Mental Health	%	%	
		Mobility	%	%	
		Musculoskeletal incl. Back, Neck, Shoulder	%	%	
		Other	%	%	
		Other neurodiverse (dyscalculia, autism)	%	%	
		Speech	%	%	
		Vision	%	%	
		No Data	%	%	
	Disclosure	Disability disclosed	%	%	

People Dashboard Sexual Orientation, Disability, Religion

As at date /
month / year,
UK employees
only

		Q1 yy dd/mm/yy	Q2 YY dd/mm/yy	Headcount dd/mm/yy	
UK only	Breakdown of Religion representaion	Buddhist	%	%	
		Christian	%	%	
		Hindu	%	%	
		Jain	%	%	
		Jewish	%	%	
		Muslim	%	%	
		No Religion/Belief	%	%	
		Sikh	%	%	
		Other	%	%	
		Prefer not to say	%	%	
		No Data	%	%	
		Disclosure	Religion disclosed (incl. PNTS)	%	%

People Dashboard Social Mobility

As at date /
month / year,
UK employees
only

			Q1 yy dd/mm/yy	Q2 yy dd/mm/yy	Headcount dd/mm/yy
UK only	Breakdown of Social Mobility representation	Professional background	%	%	
		Intermediate background	%	%	
		Lower socio-economic background	%	%	
	Disclosure	Social Mobility disclosed (incl. PNTS)	%	%	

			Q1 yy dd/mm/yy	Q2 YY dd/mm/yy	Headcount dd/mm/yy
UK only	Breakdown of Social Mobility representation	Type of School attended ages 11 to 16			
		State-run or state-funded school	%	%	
		Independent or fee-paying school	%	%	
		Independent or fee-paying school where means tested bursary covering 90% of total cost of attendance	%	%	
		Attended school outside the UK	%	%	
		Don't know	%	%	
		Prefer not to say	%	%	
	No Data	%	%		
Disclosure	Disability disclosed	%	%		

People Dashboard Caring Responsibilities

As at date /
month / year,
UK employees
only

			Q1 yy dd/mm/yy	Q2 YY DD/MM/YY	Headcount dd/mm/yy
UK only	Breakdown of Caring Responsibilities representaion	A child under the age of 18	%	%	
		A child aged 18 or over	%	%	
		A spouse or partner	%	%	
		A parent	%	%	
		Disabled adult (18 years and over)	%	%	
		Disabled child or children (under 18 years old)	%	%	
		Prefer not to say	%	%	
	No Data	%	%		
Disclosure	Caring Responsibilities disclosed (incl. PNTS)	%	%		

Inclusion@Lloyd's

Inclusion@Lloyd's is a consultative body, comprised of a group of representatives of the companies and membership organisations within the Lloyd's and the wider insurance market.

A core pillar of the work that Inclusion@Lloyd's delivers is the development of tools and resources to support managers and individuals looking to create a more diverse and inclusive culture both in their organisations and in the broader insurance sector.

For more information and to access additional reports and resources, please visit the website:

www.lloyds.com/about-lloyds/culture

The Market Policies and Practices (MP&P) return

Each year Lloyd's collects data from market participants through the Market Policies and Practices (MP&P) return. All Managing Agents must complete the return and key Brokers are also invited to participate. The MP&P return helps us understand the workforce composition, policies and practices of firms who operate in the Lloyd's market and progress towards building an inclusive and high-performance culture.

The collection of this data enables us to:

- Monitor the diversity of the market overall and at firm level, on gender, ethnicity, disability, sexual orientation and a growing range of diversity characteristics
- Track progress against targets
- Provide benchmarks and market comparisons to firms in the market
- Learn about the good practice that is contributing towards those firms who are ahead
- And for managing agents, we consider diversity data as part of culture oversight

Data is reported as at 31 December, with the return open to complete until the end of January each year.

