



LCS Equality and Diversity Strategy Annual Review

2009
LCS Diversity Working Group



ANNUAL REVIEW OF LCS EQUALITY AND DIVERSITY STRATEGY 2009



Introduction

The Legal Complaints Service (LCS) equality and diversity vision is: *“we aim to deliver a non-discriminatory service by being transparent, fair, accessible and inclusive taking into account diverse backgrounds and needs.”*

In October 2008 we published our first equality and diversity strategy and action plan designed to help us to achieve this aspiration. In this our first annual report, you will find evidence of a number of key lessons learnt as we have worked on embedding equality and diversity in the organisation.

This report marks progress since we published our 2008 strategy. A significant emphasis has been placed on putting the right building blocks in place through training, effective communication, refreshing our existing policies and equality impact assessing. Progress is reported against each action identified in the LCS E&D strategy and action plan.

Progress

Strategic Objective One: *Deliver an accessible customer service tailored to the diverse needs of our consumers and solicitors.*

Action point 1: *Improve the way in which we collect, retain and analyse our customer profiling data and then analyse our complainant database.*

Progress:

- Established a working group on data collection to review the way in which we currently collect, retain and analyse the data we collect on solicitors and customers.
- Incorporated a write up of the group’s findings into the ‘Understanding our Customers project’ delivered by our research unit.
- Final delivery of this work was initially scheduled for November 2008; however, due to the lack of suitable data, had to be rescheduled for March 2009 – now complete.
- The aim of this research project was to analyse consumers’ and solicitors’ demographic data, with particular emphasis on diversity profiling of information from complaints closed by the LCS from 2004 to 2008.
- This is our first data analysis exercise ; the ultimate goals of this research study were to identify differences in service use between diversity groups, monitor trends and to recommend ways in which we might improve our service, data collection processes and the monitoring of our diverse customer base.
- The research also looked at types of outcomes, solicitor profile and size of firm against all aspects of diversity and identified trends and patterns.

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Outcomes:

This research has provided valuable insights into the profile of consumers of legal services who, for whatever reason, are dissatisfied with the service that they have received and have complained to the LCS. It has also enabled us to have a better understanding of the other half of our customer base, namely the solicitors and the firms who are the respondents to our complaints. Despite shortfalls in the data, which have produced results that are unfortunately statistically inconclusive, we are particularly pleased that the analysis did not show any significant evidence of any inequalities in service delivery.

The report has produced twenty one helpful recommendations which, if implemented, would enable the LCS to build a fuller picture of both its customers and their views and perceptions of the service provided by the LCS. This would provide management data to inform our strategy in relation to our services and help us to develop further our policies on accessibility and how we treat our customers.

There is in reality relatively little that the LCS can achieve ahead of closure. Under the provisions of the Legal Services Act 2007, the Office for Legal Complaints (OLC) is due to take over complaint handling for legal services by the end of 2010. This leaves limited time for changes to be implemented and for data to be collected and analysed. It does not provide sufficient time for meaningful conclusions to be drawn from trends and developments over time.

We have considered each recommendation and how it might be addressed. We have identified a number of recommendations that we will be able to implement effectively within our time and resource constraints. Some recommendations can be taken forward by the wider Law Society (TLS) or by the Solicitors Regulation Authority (SRA). There are also some recommendations that cannot be addressed effectively or are unlikely to deliver significant benefits to our customers in the time remaining to us but that may be of interest to our successor complaint handler, the OLC. We will ensure that we share these recommendations and the learning from the project with the OLC.

Data from this work has been used to assist us with our equality impact assessments (EIAs). The findings have been presented to the Law Society E&D Committee and key findings have been shared with the wider profession through a comment piece in October's Law Society Gazette which has received positive feedback, in particular from sole practitioners.

Action points 2 & 3: *Roll out Solicitor Satisfaction forms with diversity profiling questions and to monitor and review feedback from these forms.*

Progress:

- Satisfaction forms have been sent out to solicitors on a sample basis: these forms include a diversity monitoring section at the end.
- The response rate for the forms has been positive to date.

Outcome

Analysis of the solicitor satisfaction forms has allowed us to begin to develop our own solicitor profile. Once we have sufficient data it can be used to identify in gaps in service satisfaction on any diversity grounds for solicitors.

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Action point 4: *Audit our internal and external website to determine accessibility for disabled customers and staff.*

Progress

- Advice sought from the LCS Disability Advisory Group (DAG) on conducting an audit of the websites.
- DAG advised that a full technical audit would be required; a quotation for such an audit has been obtained at a cost of approximately £3000.
- Additionally, a number of technical/systems-related issues were identified affecting the main website (managed by the Law Society).
- We learnt that the amount of changes we could make to the website was severely limited in certain areas due to these issues.

Outcome

Due to the cost and technical difficulties and the short time remaining before the LCS closes; we have not been able to conduct a full technical audit of our website. We have, however, shared our findings with the Law Society and encouraged a group-wide audit. This will be considered as part of a wider review of the group website(s).

Action point 5: *Carry out an assessment of where and how we advertise and communicate the LCS.*

Progress:

- Attendance at Citizens Advice Bureau (CAB) conferences.
- Specific literature (information leaflets) provided to regional CABs upon request.
- Attendance at the National Solicitors' Network conferences - our main point of contact with the profession.
- Some outreach work with Age Concern via articles in regional newsletters and distribution of leaflets to regional centres.
- Informal promotion of LCS through the DAG.

Outcomes:

From this assessment we learnt that although we have done some work on advertising and communication our services to those who use them, a lot more could be done. In particular, we have not taken significant steps in ensuring that we attempt to reach out to 'hard to reach communities' and other potentially vulnerable groups who may not be aware of the LCS.

Action point 6: *Effectively communicate information about the LCS to diversity groups who are not currently using our service and those who come from traditionally 'hard to reach' communities.*

Progress:

- Information on LCS disseminated through national organisations represented on our Disability Advisory Group.
- Information article placed in national and regional Age Concern newsletters.

Outcome:

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We have made some progress in communicating information about the LCS to organisations that work with disabled people through our DAG and through Age Concern. This has resulted in a higher awareness of the LCS and the service it provides amongst these organisations, which has been disseminated to their membership. This has been evidenced through a number of queries that have been brought forward by these organisations on behalf of their members as well as requests for LCS information leaflets for Age Concern regional centres, some of which were not previously aware of the LCS.

2. Strategic Objective Two: *Build staff and stakeholder engagement and effectively communicate our E&D Commitment*

Action point 7: *Effectively communicating progress on E&D to key stakeholders.*

Progress:

- Regular E&D progress updates provided to TLS/SRA through the Law Society Equality and Diversity Committee.
- Quarterly E&D progress reports submitted to TLS Management Board.
- Updates on E&D work provided to the Legal Services Complaints Commissioner via policy updates.
- Lessons learnt from EIA process have been shared at national conferences by the LCS CEO
- Experience of E&D work shared (upon request) with Financial Ombudsman Service (FOS)

Outcomes

We have effectively communicated progress on E&D to key stakeholders, keeping them up-to-date on the work being done in the LCS. We have demonstrated a lead on E&D initiatives, some of which have been adopted by the Law Society and SRA such as online training and the DAG.

The sharing of 'lessons learnt' from the EIA process has resulted in a number of requests from external organisations (including Financial Ombudsman Service, the General Medical Council, and the Independent Police Complaints Commission) in relation to sharing our best practice, to which we have been pleased to respond..

Action point 8: *Identify a range of external groups who cater for diverse users of legal services and to involve them in policy /impact assessment consultation.*

Progress:

- Established the Disability Advisory Group and involved that group in EIA consultation

Outcome:

National groups represented on the DAG who are actively involved in working with disabled people have assisted us with assessing our policies/processes and practices to ensure equality of opportunity for disabled people. This has resulted in a number of changes to our guidelines for staff.

Action point 9: *Build effective relationships with groups that support solicitors from diversity groups to inform how we handle complaints.*

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Progress:

- Attendance at Law Society BME Forum meetings (forum for support groups for Black and Minority Ethnic (BME) solicitors). The forum was keen to assist the LCS in helping to review its service delivery and to ensure fairness and consistency for solicitors from different ethnic backgrounds.
- Input from Association of Muslim lawyers (AML) and the Lawyers with Disabilities Division (LDD) on consultations.

Outcome:

The BME Forum and LDD welcomed the opportunity to act in a consultative capacity for future work with the LCS. A key learning for the LCS arising from this work, in particular from the BME Forum was the lack of awareness on LCS powers and its role amongst forum members. This may also be indicative of the level of awareness within membership in the represented groups. This has resulted in a number of requests from different groups for workshops on handling complaints.

Action point 10: *Establish a staff advisory group on diversity issues to inform LCS as an employer and service provider.*

Progress

- Established an Equality and Diversity Advisory Team (EDAT) consisting of members of staff who volunteered to assist LCS in implementing the E&D work and embedding E&D across the organisation.

Outcomes

EDAT has provided a forum for staff to discuss E&D-related issues and concerns and to make recommendations for improvement to the Diversity Working Group (DWG). A number of EDAT recommendations have resulted in activities. These have included the production of a LCS Diversity Calendar, Diversity Week events and piloting of the training programme, as well as consultation on equality impact assessments.

Action point 11: *Establish an advisory group on disability which includes staff (internal) and bodies/groups who work for the interests of disabled people (external).*

Progress

- LCS invited several organisations working with disabled people to form a Disability Advisory Group to assist LCS in improving the service it delivers to its disabled customers, staff and solicitors.
- Two members of staff and seven organisations agreed to be part of the DAG.
- Organisations currently represented are: Royal National Institute for the Deaf (RNID), The Royal National Institute for the Blind (RNIB), Mencap, Mind, Age Concern, Council of Disabled People and the Rowan Organisation.
- The group met twice in 2008 and has met three times in 2009.

Outcome:

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Our work on E&D has helped us to recognise that in order to deliver measurable equality outcomes that actually make a difference to people we need to adopt deeper working relationships with the people who use our services. The DAG has helped us to keep a person-centred focus to both reviewing the equality of access to our services for disabled people and identifying practical ways in which this can be delivered.

The DAG has assisted us with a range of EIAs and in reviewing our guidelines on dealing with 'customers with poor mental health'. The establishment and ongoing work of this group has raised our profile with both the national organisations represented and their respective memberships.

Action point 12: *Work with TLS and SRA to advise the profession on ways in which solicitors can build E&D into complaint handling and client care.*

Although the responsibility for providing advice, guidance and education to the profession rests with TLS and SRA, where possible, we have tried to advise the profession directly on ways of building E&D into complaints handling. An example of this includes building E&D considerations into our 'Practical Guide to Resolving Complaints' which was published last year and is widely available to the profession. We also built in information on E&D into workshops that were delivered to solicitors on 'Client Care and Complaints Handling.'

Additionally, we have had ongoing, positive policy and technical liaison with TLS and SRA about matters of mutual interest and, in the case of SRA, about the practicalities of working together. Throughout, our work has been informed by the LCS vision for Equality and Diversity: at every opportunity we have sought to promote working practices that are non-discriminatory, transparent, fair and accessible - being conscious of the possible impacts of our work on customers, solicitors, staff and other stakeholders.

3. Strategic Objective Three: *Identify and tackle any inequality in our service delivery.*

Action points 13 & 14: *All policies/processes/practices of high, medium and low equality relevance are equality impact assessed.*

Progress:

- We revised our EIA toolkit and methodology and trained 12 more members of staff as impact assessors.
- We identified ten key areas as 'high' priority for equality impact assessments:
 - Helpline function
 - Complaints acceptance policy
 - Conduct referrals to the SRA
 - Use of Local Conciliation Officers
 - Conciliation function
 - Reasonable Offer Made (ROM) function
 - Adjudication function
 - LCS internal complaints policy
 - Special Payments Policy
 - Restricted communications policy

Outcome

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The completion of the assessments was delayed by the availability and the quality of the data; our research team faced numerous difficulties in attempting to assure the quality of the data available for assessors to use. All assessments have now been completed, these have been quality assured and published. The recommendations arising from the assessments are currently being implemented in a manner proportionate to the stage that LCS has reached in its lifecycle, with closure anticipated in 2010.

We were able to identify a series of trends and patterns from our assessments. For example:

- We learnt that our restricted communications policy had the potential to be disadvantageous towards disabled customers, in particular those with whom communications might be restricted because of aggressive behaviour linked, for example, to a mental health issue. We also noted that if the restriction meant the customer must communicate in writing there would be a significant negative impact on customers who cannot write due to disability.

We took these findings to consultation with people with disabilities and we learnt that although they supported the principle and business justification for having such a policy, more could and should be done in order to identify customers with such needs and meet these needs before things ever got as far as restrictions being applied. Also that we should consider utilising the services of mental health advocacy organisations to assist in cases where customers are particularly vulnerable (where a carer is not available) – generally speaking we should not be restricting communications with people who have mental health issues.

- We identified an upward trend in the number of customers from ethnic backgrounds experiencing a closure of their case resulting from our 'reasonable offer made' process (where the solicitor makes an offer of settlement that, taking into account the available evidence, we consider to be reasonable, but the customer declined to accept it.) We commissioned an audit to determine the reason for this. No particular reason could be identified giving rise to the apparent trend and we are pleased to find that there is no evidence of negative impact arising from this procedure.
- We recently completed an EIA looking at our process for referring possible misconduct to the SRA for risk-assessment (and, if appropriate, regulatory action against the solicitor). We learnt that a high proportion of solicitors from ethnic minorities are subject to conduct referrals in comparison to their white counterparts. This was the only area that required a full EIA, which is currently being finalised.
- We learnt that women (complainants) are more likely to conciliate a complaint than their male counterparts.

We have found conducting impact assessments to be a thoroughly worthwhile, useful and illuminating process. We have learnt a great deal from the process. The assessments have confirmed what we already thought in some cases; in others we have learnt new things. We will seek to use what we have learnt to improve our service for our diverse customer/solicitor base in the year ahead, in the context of the LCS Plan 2010, which incorporates the LCS E&D strategy for the period until closure.

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Of course, the real challenge for us and other organisations is to move beyond compliance and just doing what we have to do – even where we do it well: to use feedback in order to learn and improve, and keep reviewing good practice. As such, we are working hard to ensure that the lessons learnt from the EIA process are not lost. We have made a number of changes to our existing policies/processes in light of EIA findings and we will be sharing these lessons learnt with the OLC.

Action points 15: All new policies/processes are equality impact assessed.

Due to the closure of LCS in 2010, we will not be developing any new policies/processes. However, our aim is to ensure that key decisions that are taken in 2010 in the lead up to closure are assessed for their impact on our customers, solicitors and staff.

Action point 16: *All policies/processes/practices are regularly monitored and reviewed once equality impact assessed.*

All the functions that have been equality impact assessed have a review date in three year's time when the LCS will no longer be in existence. Steps are being taken to share the learning from the equality impact assessments with the OLC.

Action point 17: *Staff, key stakeholders and those particularly affected by our policies, processes and practices are consulted.*

Progress:

- Outreach work with Age Concern (who previously didn't know about us).
- Built relationships with support groups for solicitors, and involved them in consultation
- Established DAG – external
- Established internal staff diversity groups

Outcome:

Throughout our EIA process and our E&D activities generally, we ensured that our staff and key stakeholders were given opportunity to share their experiences with us, and to offer comments and ideas. As a result, our EIAs have been developed in a people-focused and informed manner.

Action point 18: *Evidence of equality impact assessments is published and is accessible.*

Summary reports for all our equality impact assessments have been published on our external and internal websites with details of contacts for further information.

Action point 19: *Undertake analysis of customer satisfaction surveys (forms).*

Progress

- Analysis undertaken on quarterly basis.
- Historic data gathered and analysed as part of the 'Understanding our Customers' project.

Outcome:

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We have been able to analyse our customer satisfaction data by the different equality and diversity 'strands'. We have been able to determine whether any gaps in service delivery exist and whether these are linked to the diversity profile of our customers in any way.

Action point 20: *Building E&D into procurement.*

We have tried to embed equality and diversity into our procurement processes wherever possible. For example, where relevant, our tender adverts have stated our commitment to ensuring our service is anti-discriminatory, fair, transparent and accessible. Firms expressing an interest have been asked to demonstrate their commitment to equality and diversity. This information has been captured through the Law Society protocol on procurement which we adopted. (This protocol was launched with the Law Society's Diversity and Inclusion Charter last summer). Evidence from firms demonstrating their commitment to equality and diversity formed part of the criteria in the short listing process.

Action point 21: *Work with key stakeholder to research means of identifying solicitor user profile.*

In the absence of publicly-available data on the profile of the users of solicitors' services, we have carried out our profiling work against the 2001 census data. We are aware this approach is flawed as not everyone will have used a solicitor, but it was the best method available to us. We feel it is important that steps are undertaken in order to research the profile of the users of solicitors' services for more robust and accurate data analysis to determine discrepancies and trends on diversity grounds.

We have liaised with the Law Society and more recently with the Legal Services Board (via consultation responses) to explain the importance of such data and to encourage them to identify the best way to achieve this.

4. Strategic Objective Four: *Deliver training and raise organisational diversity awareness*

Action point 22: *Produce a diversity strategy which outlines our commitment and aims and objectives in promoting and mainstreaming diversity in the LCS.*

Before we finalised and published our E&D strategy, all members of LCS staff were asked to participate in a consultation on the draft – 172 members of staff participated in the survey and provided a range of views on the strategy and on E&D in the LCS generally. A report on the findings of this consultation was discussed at the Consumer Focus Committee of the Board of the LCS in October 2008. Information from this report is available to all staff on the staff intranet. The valuable feedback we received from this consultation enabled us to finalise and publish our strategy in October 2008. From this strategy we were able to draw up a clear, achievable and measurable E&D action plan. Regular internal information bulletins have been sent to all LCS staff with updates on the E&D strategy and on delivery of the action plan.

Action Point 23: *Initial diversity training delivered.*

All our staff successfully completed the e-learning training programme, which was rolled out late last year. The programme consisted of three separate modules: 'Essentials on E&D', 'Exploring E&D' and 'Managing E&D'. The first two modules

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were completed by all staff and the managing diversity package was completed by all staff with line management responsibility.

One of the main concerns voiced about e-learning in general is the lack of face to face discussion and communication involved. This is why we set aside time at team meetings in order to provide colleagues with the time and space to discuss and share the learning.

We conducted an evaluation of this programme. The feedback received from staff has been positive and the training has been a success. It has raised the profile and awareness of E&D issues in the organisation and has certainly led to debate and discussion amongst staff, many of whom have approached {the E&D manager? Others/} for informal discussions and to share experiences and ideas.

We acknowledge that In order for the benefits from the e-learning to be maximised, the programme should not be used as a 'one off' or 'stand alone' training programme. Instead, we should consider innovative ways of providing updates and refresher sessions (as suggested in the evaluation feedback) through existing channels of training and communication such as Insight, guidance notes, workshops in team meetings etc. we will be looking at how we can continue this training/awareness raising in 2010 through existing channels of communication.

Action point: 24: *Ensure E&D is promoted and reflected within our decision making processes.*

We have worked extremely hard, helped by our EIA process, to ensure that our decision-making and change-implementation processes increase the transparency, fairness and accessibility of our services. We want to ensure that our policies and processes are inclusive and take into account the diverse backgrounds and needs of our diverse customer and solicitor base.

To help us achieve this we set up a strategic 'Diversity Working Group' (DWG) chaired by our CEO – Deborah Evans. Both the LCS Board and the DWG have acted as scrutiny groups, ensuring that the activities in the E&D action plan have been carried out and that appropriate steps have been taken to promote E&D within our decision-making processes. In the lead up to closure in 2010, this work will be ongoing and of even more importance. We will take particular care when making decisions that reshape our services; at this time it is necessary to focus on our core business of complaint-handling, and non-core projects and initiatives are being brought to a conclusion with this in mind.

Action point: 25: *Invite internal and external speakers to raise awareness on diversity issues.*

We held the inaugural LCS diversity week this year. The aim of the week was to raise awareness on key topics which had been identified from the E-learning programme evaluation. Staff organised a combination of educational and awareness-raising workshops and 'fun', inclusive activities.

The workshops covered covered topics including sexual orientation, mental health, disability awareness, human rights and religion or belief. Fun activities included belly dancing, bhangra workshops and yoga meditation sessions, as well as a number of quizzes aimed at encouraging everyone to get involved.

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Staff feedback about the workshops was very positive; the most popular sessions were the workshops on mental health awareness and working with people who have learning disabilities. Nearly everyone who attended the sessions stated they would use the learning from the sessions to change the way in which they themselves and their team worked. Attendees asked for more sessions on these issues.

Action point 26: *Equality and Diversity updates [are provided] to Board/CEO/SM.*

Quarterly updates detailing progress on E&D work and highlighting relevant issues have been produced and submitted to the LCS Board. In addition, E&D has featured as a regular part of the CEO report to the Board. The DWG has met on a monthly basis and has been kept updated on our E&D work.

Action point 27: *Recognising and marking key diversity events.*

We designed a yearly programme of activities to recognise and mark key diversity days. This programme was launched by the distribution of the LCS Diversity Calendar (a paper desk top calendar) containing dates which recognise key aspects of diversity (age, disability, gender, race, religion, sexual orientation and human rights.) The calendar also provided additional contextual information on key events.. The calendar was designed after consultation with LCS staff; all were offered the opportunity to submit events that they would like to see included.

Key events that may affect the organisation either by way of staff absences and/or communication with customers (for example religious festivals) were communicated via regular monthly emails to LCS managers.

The objective of the yearly programme of activities was to raise awareness of the different events that may be important to our staff, customers and solicitors.

Action point 28: *Create a dedicated area on the internal and external website to communicate E&D information.*

The Legal Complaints Service website (www.legalcomplaints.org.uk) has a section under "About us" dedicated to Equality and Diversity. This provides information on our E & D Policy for external users and customers. We also provide access to Equality impact assessments that have taken place on various LCS policies procedures and functions. This part of the website is reviewed regularly and updated as necessary.

Additionally LCS staff has access to a dedicated 'Equality and Diversity information resource.' This resource was created to pull together all information related to E&D and provide access to it through an easy-to-use resource. The resource provides a wealth of information which includes:

- Background information to E&D and why we do it,
- Information on our policies and procedures – this not only includes HRD policies but also casework related policies, LCS wide strategies and E&D related legislation
- Diversity groups – the various groups that exist in LCS and their remit. E.g. EDAT, DWG

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- Useful links and personal development – This provides an overview of the e-learning package that all staff undertook as well as providing links to the many useful E & D organisations
- Diversity calendar – An electronic calendar for 2010 providing information on important diversity dates and events.
- Key events and news – Provides news on various LCS E&D events that have taken place in the organisation.

The resource has been well received by staff; users have indicated they appreciate only having to go to one place to access information and have found the information to be useful.

5. Strategic objective five: *Be a fair and diversity orientated employer.*

Action point 29: Impact assessments on relevant HR policies, processes and systems

A total of 10 impact assessments have been completed including:-

Recruitment policy
Benefits policy
Flexible working policy
Disciplinary
Grievance
Bullying & Harassment
Equal Opportunities policy
Performance Development review process

An equality impact assessment schedule has been in place in 2009 and will be revised in January 2010 and published on Insight (internal website). This has been based upon business priorities and also the needs of the diversity strategy. Not all of these equality impact assessments have been published and work is being completed to have these published by year end on Insight and external websites.

Moving forward in 2010 the equal opportunities and religious & cultural observance policies are to be revised in Q1 2010 with consultation with employees and stakeholder groups.

Action point 30: monitor and record [staff] diversity data to aid in the equality impact assessment process

Human Resources and Development (HRD) launched an “update your diversity details” to all employees in July 2009. This included asking employees for details on religion, sexual orientation and disability.

This is a rolling campaign and includes an updated diversity form, Three Chief Executives introduction and frequently asked questions. This followed feedback from the Diversity Working Group in SRA and the LCS Disability Advisory Group that more information should be provided with clear explanations of why the data was needed.

So far there have been 500 responses to the diversity data. This has been updated on HRD electronic systems so that diversity monitoring data is more inclusive.

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HRD also launched an employee attitude survey on 24 November – 23 December 2009 and the key diversity data is also requested anonymously so that the Society has an opportunity to review key diversity trends also.

The aim of this data collection is to look at areas of employment that may have a disproportionate or negative impact upon groupings of employees with certain personal characteristics.

Action point 31: audit of all staff objectives and behaviours conducted

In 2009, the LCS, SRA and TLS established performance management moderation panels. The purpose of these panels has been to review the objectives being set and to ensure consistency of approach. Each of the moderation panels has been chaired by the relevant Chief Executive and consisted of nominated members of senior management supported by HRD. Each panel have each reviewed a sample of some 20% of all objectives set and have identified a number of best practice actions. The moderation panels will also be responsible for ensuring the fair and consistent application of the performance appraisal ratings.

The moderation panels have made recommendations that will make the performance review documents simpler and easier to use and understand. They have also recommended improvements to the process; for example, the need for recording regular “one-to-one” discussions between team members and managers. A summary of these best practice actions will be sent to all managers shortly and then they will be cascaded at team meetings. They will also form part of managers’ ongoing training in performance management. Workshops are continuing in November – December 2009.

The moderation exercise identified a number of E&D related trends, however these are not significant concerns and will be monitored to see if a similar pattern emerges at year end. At that point further investigation and action will be considered.

Action point 32: the group diversity policy and LCS diversity strategy [is] communicated to all staff

All employees have received copies of the Law Society Group Framework and the LCS strategy. A comprehensive range of e-learning training on equality and diversity was delivered in 2008 / 2009 which has continued with all new employees to LCS. This training provided information and links for the group equal opportunities policy and the LCS E&D strategy.

Conclusion

The restricted timeframe of the organisation’s life brought about by the arrival of the Office for Legal Complaints (OLC) has impacted on both what has been achieved and what can be achieved. There is more we would have liked to do were it not for the opening of the OLC some time in 2010. Different approaches may have been considered and more time allocated to gathering information. In particular we would have liked to have done more work to address the shortcomings in regard to data collection.

However, these considerations should not take us away from just what has been achieved. We believe that we have made impressive progress on equality and

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diversity, in particular in the last two years. This demonstrates a clear aim within the LCS to embed E&D within the very fabric of the business to ensure a service that is fair and accessible to everyone.

Looking forward, we acknowledge that the closure of the LCS will have an impact on the scale of activities and initiatives we are able to deliver in 2010. We are also conscious that there remains much to do to ensure that we continue to meet our own aspirations and the needs of all our customers, solicitors and our own staff in the lead up to closure and beyond.

We have, identified a number of key E&D objectives in our 2010 Business Plan which supersedes our E&D strategy. These objectives will enable us to assess the impact of our key decisions about service delivery that affect our customers, solicitors and staff and ensure that we share the lessons that we have learnt with our stakeholders.

We aim to work closely with the OLC to share the valuable lessons we have learnt on achieving our vision so that the real and lasting value of the work we have done is not lost and can help to inform the OLC in its complaint handling role going forward.