

## **7 February 2024 Board meeting**

### **Executive Board report Appendix A –Quarter 3 Performance and Financial Position**

- In relation to Q3 2023/24 Productivity Efficiencies- Slides referenced combining of equality training courses as an example of productivity gains reported in this period.

### **Our approach to Environmental, Social and Governance (ESG)**

#### **2.1. Our approach to managing ESG-related risks and opportunities**

As a forward-looking public sector body, we are prepared to take calculated risks in the pursuit of ESG objectives, balancing the potential rewards with the challenges posed by a rapidly changing world. We aim to play a proactive role in addressing critical challenges such as climate change, social inequality, and responsible governance.

#### **3.1 Our vision**

“To foster a culture of sustainability across ONR; actively involving and inspiring our workforce to identify initiatives that contribute to a positive environmental and social impact, and those that reinforce our commitments to equality, diversity and inclusion and ethical governance.”

#### **3.3.2. Social inclusion and equality**

**Diversity and Inclusion** – We will continue to encourage new ideas and different perspectives, recognising the individuality of each of us and realising our strengths from the diversity of ideas, opinions and cultures. We will treat everyone with dignity and respect, providing equal access to opportunities for all and challenging unacceptable behaviours so that nobody's talent goes to waste.

**Inclusive procurement** – We will continue to highlight the importance of social value in our procurement and tendering processes; working with suppliers that prioritise social value and environmental best-practices.

#### **4.2.1. Equality, Diversity and inclusion (EDI)**

Our commitment to EDI is evidenced by our certification to the National Equality Standard (NES). The NES assessment provides companies with a comprehensive quality review of their EDI policies and practices, identifies areas for improvement and provides implementation recommendations. We continue to seek ways in which we can improve our EDI practices, and these form part of our 2022-2025 Diversity and Inclusion Action Plan.

Appendix A – Applicable legislation, statutory guidance and best-practice

#### **Social-related legislation/best practice:**

- The Equality Act 2010 (including the specific duties regulations) - requires organisations with more than 250 employees to publish information on gender pay gaps on a yearly basis, as well as reporting on their equality objectives at least every four years.

## **26 February 2024- Special Board meeting**

Corporate Plan 2024/25- [Published document](#)

30 April 2024

**End of year Performance report**

Corporate Milestones

**Exceptions**

Missed in year, will be delivered in 2024/25 (change control pending):

- Undertake Organisational Review Equality Impact Assessment

21 November 2024

**National Nuclear Strategic Plan for Skills**

**Key Plan Areas:**

13. Equality, Diversity & Inclusion

- Collect and analyze EDI data from the industry
- Develop an EDI Pledge for a sector-wide response
- Establish an EDI Working Group and a representative in the Nuclear Skills Delivery Board (NSDB), to deliver on targets

March 2025 Board

ONR interim strategy statement- [Published document](#)

June 2025 Board

- **Chair's report** – Paragraph 1: Of particular note internally, the ONR Chair met the Chair/Vice Chair of the Gender Equality Network and will be meeting their members at a later date. Paragraph 3 (d) - internally she met the Chair and Vice Chair of the Gender Equality Network to hear about their work across the organisation.
- **CE/CNI report** – paragraph 10 - Actions underway include a review of the Bullying and Harassment Policy, reminders for mandatory Equality and the Law training and commitment to a senior leadership session led by Prospect.
- **Increasing ONR's influence**’ - Stakeholder engagement update and further proposals - paragraph 13 - We have recently publicly corrected misinformation on Twitter/X by a vocal journalist and in early March issued a robust letter to the news desk at The Times requesting clarification on an article about equality, diversity and inclusion. In early May, we pushed the Guardian for a more detailed right to reply following an article about the government’s taskforce announcement.

September 2025 Board

**Annual Chairs Letter 2025 - within the proposals for updating Board on progress against the Minister's priorities**

4) <b>Culture, diversity and inclusion</b>	Continuing ONRs culture journey, ensuring it achieves its ambitions as a diverse and	*Staff surveys *Annual report and accounts *Gender pay report	*Effective delivery of D&I elements of the people and capability plan	ARAC – October 2025 - GIAA
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	inclusive organisation.	<ul style="list-style-type: none"> <li>*AMBS Follow-up self-assessment/diagnostic (need to revisit purpose and timing)</li> <li>*2025/26 GIAA audit</li> <li>*DWP Annual Assurance Assessment</li> <li>*Strategic risk register - Culture risk</li> <li>*National Equality Standard certification</li> </ul>	<ul style="list-style-type: none"> <li>*Independent (or self)-assessment/diagnostic confirms cultural progress (subject to being assured on purpose and timing)</li> <li>*Effective delivery of GIAA audit recommendations</li> <li>*Improved AAA self-assessment rating for D+I</li> <li>*Successful re-certification to National Equality Standard</li> </ul>	audit findings reported
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#### **ARAC – July 2025:**

- within the Regulatory Assurance report on Realising our Potential (RoP):
  - one of the recommendations refers to ‘Embed Equality, Diversity & Inclusion practices into Realising our Potential (RoP)’s framework and monitor progress actively’.
  - The findings on HR processes refers to ‘Additionally, HR consider that following the introduction of the Praise and Recognition approach ONR is seeing an equality of distribution (proportionately) between genders: women received a higher median in bonus payments compared to male colleagues’.
  - In the management response it refers to ‘I appreciate that a process that could rely on staff to lead discussions may put some staff at a disadvantage. I have committed to review how ONR is approaching EDI, which includes how we engage with staff around these topics, and I will create an EDI action plan (potentially embedded within the broader people plan) which will consider suggestions such as this. I also believe this point links to developing Line Manager capability, confidence and consistency. At present, we are reviewing HR capability and capacity and how HR is organised to enable more focus on progressing EDI initiatives.

#### **ARAC – June 2025:**

2024/25 Annual Report- Published Document

#### **ARAC – January 2025:**

- Extract from minutes:

## **5 ONR Organisational Review - Close**

5.1 The Interim HR Director presented an update against the ONR Organisational Review, noting progress made against pay and grading, and an aligned organisational structure. Outstanding activity to be undertaken to address remaining risks includes: (a) undertaking a training needs analysis; (b) launch of R2A2s for some generic roles in Regulatory Directorate; (c) exploration of further integration within Regulatory Operational Directorate; (d) proceeding to the next phase of pay and grading informed by the Equality Impact Assessment under Business as Usual (BAU); (e) undertaking a lessons learned exercise and benefits realisation reporting.

- Organisational Review update
  - ‘what is left to do’:
    - Next phase of pay and grading to be undertaken by HR as part of BAU in 2025 informed by the formal Equality Impact Assessment (HR)
  - Risks:
    - Staff view that pay and grading has not delivered required changes to address some of the perceived inequalities across purposes (and in other areas in the wider organisation –review further post staff check in survey with a commitment that the new HR Director will review pay ranges in 25/26 informed by the outcome of the Equality Impact assessment (HR)

#### **ARAC – October 2024:**

- Strategic Risk Update – STR10 - Insufficient Organisational Capability and Capacity – position statement refers to ‘Equality impact assessment - to complete by the end of September 24’
- ONR1016
- Policy compliance report – single tender action - Provision of Diverse Recruitment Services 2024/25
  - Vercida is an organisation that is an expert in leading the way in diversity and inclusion, providing solutions for organisations wanting to attract diverse talent and create a culture of inclusion. Other organisations focus on targeting specific Equality, Diversity & Inclusion (ED&I) areas, but VERCIDA targets the complete range of ED&I areas.

#### **ARAC – April 2024:**

- reference is made in the strategic risk update on – the need for compliance with Social obligations, such as the Equality Act and management of HSW regulations, whilst ensuring effective stakeholder engagement (also referred to in the January 2024 papers).

#### **ARAC - January 2024:**

- Extract from the minutes - **Deep Dive: STR 173 Vulnerability in ONR’s Environmental Social Governance (ESG):**

The Committee discussed and noted that:

- b) ONR’s strategic targets for equality and diversity can be reported against, and must include specific actions and targets that can be measured.
- Extracts from the Our approach to Environmental, Social and Governance (ESG):

- our vision - “To foster a culture of sustainability across ONR; actively involving and inspiring our workforce to identify initiatives that contribute to a positive environmental and social impact, and those that reinforce our commitments to equality, diversity and inclusion and ethical governance.”
- Social inclusion and equality:
  - Diversity and Inclusion – We will continue to encourage new ideas and different perspectives, recognising the individuality of each of us and realising our strengths from the diversity of ideas, opinions and cultures. We will treat everyone with dignity and respect, providing equal access to opportunities for all and challenging unacceptable behaviours so that nobody's talent goes to waste.
  - Inclusive procurement – We will continue to highlight the importance of social value in our procurement and tendering processes; working with suppliers that prioritise social value and environmental best-practices.
  - 31. Our commitment to EDI is evidenced by our certification to the National Equality Standard (NES). The NES assessment provides companies with a comprehensive quality review of their EDI policies and practices, identifies areas for improvement and provides implementation recommendations. We continue to seek ways in which we can improve our EDI practices, and these form part of our 2022-2025 Diversity and Inclusion Action Plan.
- Social-related legislation/best practice: The Equality Act 2010 (including the specific duties regulations) - requires organisations with more than 250 employees to publish information on gender pay gaps on a yearly basis, as well as reporting on their equality objectives at least every four years.