

Dear

We're inviting you to take part in our pilot survey on diversity and inclusion.

In July, we published our [joint discussion paper DP 21/2 on diversity and inclusion \(DP\)](#) in the financial sector. The paper was co-authored by the PRA, FCA and the Bank of England, in its capacity as regulator of Financial Market Infrastructures.

Chapter 4 of the DP sets out our thinking on the collection and reporting of diversity data. It also outlined our plans for a voluntary pilot data survey. As the survey is voluntary, we rely on your support to ensure we have a representative response across each sector. Your response will help ensure that further policy development in this area takes into account your views.

The pilot will seek to:

1. understand the levels of diversity within firms in order to inform future policy developments
2. understand what categories of data firms currently collect on diversity and inclusion in relation to staff
3. understand firms' strategies and plans to collect diversity and inclusion data in the future, including potential challenges and barriers faced and
4. inform the development of any future regular data collection

The deadline for submission of the survey is **15 November 2021** and we look forward to receipt of your response.

How to respond

If you are willing to participate, please input your responses directly into the link enclosed. This link corresponds to your FRN number and enables entering your responses into a survey software platform. Firms are asked to enter responses into this platform and not send responses in a document format.

Firms are asked where possible to complete this survey on a solo firm basis that corresponds to their FRN number. Whilst we would prefer for you to complete the survey on a solo basis, for ease of analysis, if your firm is part of a UK group and collects data for its UK staff on this basis, you may also provide data on a group basis, making clear your approach in Part 1 of the survey questions. We have also provided a third option for firms to complete this survey in case firms may collect data is not in line with the solo or UK group basis. Should firms choose this option, please make clear your approach and list the relevant FRNs.

The survey does not need to be completed in one go and you will be able to return to the survey link as it will save your responses at every stage. For information, we have provided a [survey preview](#) of all the questions, and a list of [definitions](#) in pdf format to enable firms to easily read the questions. We also include the questions in a [Word document](#) that firms might find useful to collate and conveniently obtain input from relevant areas of your business. We hope that this will make responding as convenient as possible. Please note that whilst the pdf shows all questions and all response options, when the platform is used, the survey will dynamically adapt to firm answers and only show relevant questions and options to that firm. Therefore, the survey will be customised for each firm and appear shorter for some firms.

If you have any queries about the survey, please see our [frequently asked questions](#) or

contact dp21-02@fca.org.uk.

Overview of the survey

You will see that the survey asks for your firm's position on data collection in respect of a range of characteristics. We do not expect firms to have information on all the characteristics listed. However, we have set out as broad a range of characteristics as possible, in order to avoid prioritising, or giving the impression of prioritising, any characteristic(s) over others, given the purpose of the pilot is to understand what data firms currently collect.

We appreciate that firms will be at different stages on the diversity and inclusion data collection journey. Because we want to understand which characteristics firms collect data on or plan to collect in the future, it will be really helpful to us if firms indicate where they collect no data in any category. Should we decide to go ahead with a regular diversity and inclusion data collection, such information will help to design any future data collection exercise in a proportionate and realistic way tailored to the intended firm population.

We are also grateful for feedback from firms as to what challenges they may experience or anticipate experiencing in collecting diversity and inclusion data. We have included a free text box for this purpose.

The survey aims to collect aggregated data, rather than specific information relating to individuals. There are parts of the survey where you can enter free text. Whilst we do not assume that your responses will include personal data, and it may not, firms should consider their obligations under applicable data protection legislation. Where free text responses are made available, please ensure responses do not include personally identifiable information.

As part of the follow up to this data request, we will be looking to undertake a Cost Benefit Analysis (CBA), in the coming months. This will enable us to estimate the costs to the financial services industry to implement any policy proposals we consult on after taking into account feedback to the DP. You may therefore receive a request from us for further information in due course. If you are contacted at that time, we would appreciate if you could provide the information required.

Data protection

As part of this survey, we ask for numbers of employees that fall into specified categories defined by characteristics. For certain characteristics, the numbers may be so small as to lead to identification of individuals. In those circumstances, we will treat that data as personal data and we will collect and use it under Article 6(1)(e) of the UK GDPR (it is necessary for the performance of a task carried out in the public interest) and Section 8(c) of the DPA 2018.

Some of the data may be classified as "special category data" under Article 9 GDPR. The relevant characteristics falling under Article 9 are disability, gender reassignment, race and sexual orientation. The condition we rely on to process any information you provide in your response which is special category data under Article 9(2)(g) of the UK GDPR (it is necessary for reasons of substantial public interest) and paragraph 8 of Schedule 1 to the DPA 2018 which relates to processing data for equality of opportunity or treatment purposes.

The FCA and the Bank of England (the controllers) are controllers of the personal data

collected through this survey. The controllers will use this personal data to help inform further policy development in respect of diversity and inclusion in financial services ([see 4.10 of DP 21/2](#)). The data will be retained in accordance with our published retention schedules. Further information on how and why we use your personal data, including your rights, can be found here:

FCA: <https://www.fca.org.uk/privacy/personal-data-and-surveys-consultations-and-market-research> and here: <https://www.fca.org.uk/privacy/>

Bank of England: [Privacy and the Bank of England | Bank of England](#)

