



Government response to the Intelligence and Security Committee of Parliament Report on Diversity and Inclusion in the Intelligence Community

Presented to Parliament
by the Prime Minister
by Command of Her Majesty

September 2018



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Introduction

On 18 July 2018, the Intelligence and Security Committee published a report: Diversity and Inclusion in the UK Intelligence Community (HC 1297). This follows on from their report on Women in the UK Intelligence Community (HC 970) published on 5 March 2015 to which the Government responded on 26 May 2016 (CM 9271).

The Government welcomes the Committee's recognition that considerable work that has been done to promote diversity not only in relation to gender, but also in relation to race, sexuality and disability across the intelligence community. In their report they state: 'we have found that there has been significant progress in recent years...We welcome those improvements'. (HC 1297 p.1).

As outlined in the Prime Minister's response on 18 July, the heads of all of the organisations covered by the report (GCHQ, MI5, the Secret Intelligence Service, Office for Security and Counter Terrorism in the Home Office, National Security Secretariat in the Cabinet Office, Defence Intelligence and Joint Intelligence Organisation (collectively referred to in this report as the 'Intelligence Community') consider the issue of diversity to be of crucial importance to the success of their organisation. The National Security Adviser, Sir Mark Sedwill explains it as follows:

"The current national security environment is more complex than ever before. We face multifaceted threats from many corners of the world, facilitated by rapidly evolving technologies. To meet these challenges, we need a national security workforce of different backgrounds, perspectives and ways of thinking. Diversity and inclusion are Mission Critical."

The Intelligence Community has worked hard to introduce a variety of initiatives to support individuals from under-represented groups, improve talent pipelines and to encourage the broadest spectrum of new talent possible. For example, MI5 and SIS have been listed in the Times Top 50 employers for women, and achieved a Gold banding in the Business in Community's Race and Gender benchmarking. MI5 was named as Stonewall Workplace Equality Index Employer of the Year in 2016 and was 5th in 2017. SIS and GCHQ were also included in the Top 100, the latter having risen 135 places in three years. GCHQ won the Pink News Public Sector Award in 2017. MI5 was named Employer of the Year at the British LGBT Awards in 2018. GCHQ, SIS and MI5 have all achieved Level 3 Leader Status in the Accredited Disability Confident Scheme and been named among the Best Employers for Race by Business in the Community. GCHQ has re-entered the Times Top 100 Graduate Employers List, based on the views of 20,000 students. Both SIS and MI5 also feature on the list.

Since the ISC undertook its review, there has been further progress with 38%, 35% and 27% of staff at Senior Civil Service level in MI5, GCHQ and SIS respectively being female (increases of nearly 7%, 8% and 3%). Across the Intelligence Community, departments and agencies continue to innovate through working with external partners and sharing best practice.

Nevertheless, the Government and all Agencies recognise that there is still a long way to go and are unwavering in their commitment to draw upon the skills, talent and experience of all sectors of society in order to do their vital work effectively and to reflect the diverse population they protect.

Recommendations

The Committee highlighted a number of issues in this Report and made nine key recommendations which they suggest the intelligence community should focus on. These are in **bold** below. The Government's response is set out below each recommendation.

Improved collection, analysis and dissemination of workforce data. Data is an essential tool to help organisations identify workforce talent gaps, assess the efficiency and effectiveness of their diversity and inclusion efforts, and promote transparency and accountability. What gets measured is what gets done. The quality of data held across the community varies significantly- all need to reach the standard of the best performing. All organisations should take positive action to improve reporting rates on all protected characteristics amongst their workforce, by effectively communicating to all staff why declaration rates are so important in improving diversity – an individual's decision not complete staff personnel surveys (or, in many instances, to tick the box 'Prefer Not To Say') has ramifications for the business as a whole. Each organisation should also develop aspirational targets for applications, recruitment and progression, and report against their performance annually. Making this information more widely available will motivate those organisations that are not performing as well as others to tackle this issue with the determination and sense of urgency it deserves.

The Intelligence Community is seeking to improve declaration rates on protected characteristics. Across the Agencies there have been numerous senior-led campaigns to encourage greater participation. The Agencies' equal opportunities monitoring policy sets out clearly what they monitor and why, how they maintain confidentiality and how the information will be used. This particularly focuses on engaging with people who currently choose not to declare at all. GCHQ have worked with external partners to consider ways to improve data capture and SIS ensure that staff receive timely reminders to update their information. Defence Intelligence will undertake a diversity data campaign this Autumn, highlighting the importance of providing workforce data. It will request quarterly recruitment data broken down into diversity categories to improve understanding of diversity in the organisation. More data will enable the Community to improve practices for individuals from under-represented groups, though it is important to recognise that the decision to declare protected characteristics is a personal one.

In parallel, there are efforts underway in the organisations covered by the report to make it easier for staff to declare. For example, recent improvements to the Cabinet Officer HR management system mean that staff receive regular reminders. Similarly, the Home Office HR Management system will encourage declaration supported by an OSCT all-staff communications campaign. The Agencies are also introducing a new enterprise resource planning system that will facilitate the collection and analysis of diversity and inclusion statistics.

Across the Intelligence Community, there are efforts to tackle this issue with determination. Ambitious targets have been set which reflect the value these organisations place on diversity.

Targeting talent in under-represented groups to recruit. The Committee was interested in the concerted effort being made by the Agencies to attract candidates from under-represented groups to apply for careers in their organisations – it is essential that these campaigns and initiatives continue to evolve and develop. They should ensure that they scope new ideas and approaches with their own ‘in-house’ experts – the men and women already working in their organisations. A return by SIS to the ‘tap on the shoulder’ approach is obviously reaping dividends, and consideration should be given to seeing if other Agencies and organisations might also adopt this approach. This ‘targeting’ approach was one of the key recommendations in the Committee’s 2015 Report ‘Women In the UK Intelligence Community.’

The Intelligence Community recognises that it needs to reach out to the public in order to overturn their misconceptions and encourage applicants from all backgrounds.

The Agencies have worked hard to create new and innovative recruitment campaigns, examples of which are contained in the Annex to the ISC’s report. New methodologies and outreach programmes continue to be developed to encourage applicants from under-represented groups. There is evidence that this approach is working: MI5 has seen an increase in BAME and female applications across campaigns in Q1 2018 compared with Q4 2017/18. Since February 2017, female applicants to GCHQ were considerably higher than in 2016/17. This illustrates the impact that recruitment campaigns are having on applications. In policy departments, efforts are being made to recruit policy advisers from different backgrounds (such as non-graduates) for example through OSCT’s policy apprenticeship scheme.

The Agencies are carefully considering where targeting may be an appropriate approach and are working closely together to share best practice in relation to this.

At the same time, they are widening the profile of engagement with schools and universities where possible, and will continue to work with women’s charities, and affinity groups (those linked by common interest or purpose). GCHQ run a programme called “GCHQ Decoded”, which is noted by the ISC. They undertake careers question and answer sessions within universities that are particularly aimed at BAME groups, and hold face-to-face events for candidates from under-represented groups. This helps to demystify GCHQ’s mission and provides an insight into the recruitment and vetting process.

Furthermore, the Agencies are upgrading and improving public facing websites to debunk myths about their work and to share with the public as much as possible about the threats that the UK faces and the nature of the intelligence community’s work to protect national security.

Using positive action to improve the diversity of the candidate pool. All posts should be subject to fair and open competition. Job specifications, where it is not already being done, should be drafted in gender neutral and jargon- free language, and provide an accurate reflection of essential and desirable skills to ensure applications from a wider set of individuals. Selection and interview panels should include individuals from different backgrounds to help eliminate bias – where this is difficult within an

organisation they should consider asking members from another part of the intelligence community to help. Tailored unconscious bias training should be mandatory for all staff with responsibility for recruiting and promotions. Aspirational diversity targets should be set for appointments. Where proposed shortlists won't achieve agreed targets, they should be submitted to Board level Executives and Diversity Champions for consideration.

In all of the organisations covered by the report, efforts are underway to broaden the diversity of the candidate pool. For example, the intelligence Agencies have sought to introduce a wider range of tests to reduce adverse impact in the recruitment process where this has been identified, and are exploring implementing Positive Action initiatives where appropriate. They have recently entered partnership with a recruitment agency which specialises in the coaching and recruitment of BAME graduates.

All the Agencies are broadening the range and diversity of interview panels to make sure that the interview process itself is inclusive. OSCT are piloting, for all SCS appointments, the inclusion of one staff member from a BAME background on the recruitment panel. OSCT shares job specifications and adverts with Networks to ensure that they are as inclusive as possible and uses 'Textio' for its job adverts. This is an app that specifically looks at language to make it more gender neutral. GCHQ has a tool for assessing gendered language in adverts which encourages recruiters to advertise in a gender neutral way.

While not mandatory for all staff, the Agencies and other departments follow best practice by ensuring that unconscious bias training forms a key part of the professional development of staff involved in recruitment and vetting.

Review the process for developed vetting to ensure that it is not unreasonably acting as a barrier to greater diversity. More should be done to clearly explain the vetting process to potential applicants, especially those from currently under-represented groups who may be less familiar with the process. This could, for example, be included in a 'myth-busting' section in recruitment outreach efforts. Senior leaders should consider whether anything more might be done to bring security, HR and recruiting managers together, to agree consistent messaging and ensure vetting, security, diversity and inclusion approaches are developed holistically. It is also clear that consideration should be given to delivery of cultural training to vetting officers and managers, in order to ensure an informed awareness of cultural norms across different communities – promoting a more diverse cadre of vetting officers is also recommended. We also heard from some of the Agency Heads that they would like greater discretion over how the Nationality Rules should be applied in individual cases. On the face of it the Committee would support such flexibility, but a further review should be undertaken to consider the practicalities and potential impact of adopting such an approach.

The Government and Agencies welcome the ISC's recommendations. Substantial work is underway across the Community to ensure vetting supports diversity. For example, the Agencies will establish a central vetting team by 2021. Similarly, Government Security Group is currently reviewing the entire National Security Vetting architecture, including in terms of policy, design, format and process. This includes a programme of work specifically dedicated to breaking down barriers to diversity and inclusion and encouraging a more diverse range of applicants to posts with high security clearance requirements.

The report acknowledges that it is right that the vetting process is thorough and intrusive, but we are working to ensure that the process is as inclusive as possible and that applicants can access information about what the process involves. The Government agrees that more could be done to explain vetting to all recruitment candidates, and to reassure them that the process is not unlawfully discriminatory. Vetting and recruitment teams are looking to work more closely together to develop new communication approaches, partnering with diversity groups to identify and address likely areas of concern for diversity applicants.

At the same time, efforts are being made to actively encourage individuals from a diverse range of backgrounds and professions to apply to become vetting officers and provide training on diversity issues for all new vetting officers in addition to unconscious bias and 'cultural competence training'. This training is designed to equip vetting officers to sensitively manage candidates from a wide range of backgrounds. The scope and frequency of this work is being expanded.

The nationality rules of SIS and GCHQ were revised earlier this year. The same changes are being explored in MI5. These rules remove the requirement that the parents of Agency employees must have demonstrably substantial ties to the UK. Henceforth, British applicants with parents from any EEA, Commonwealth or 5 Eyes country will be eligible to apply, irrespective of whether the parents have close ties to the UK. The new rules also allow most dual nationals to retain their second nationality. Nationality rules will not be removed wholesale from the vetting process given they enable vetting officers to assess the loyalty of candidates towards the UK. The impact of the new rules will be monitored.

The report notes the lack of good data on the overall impact of vetting on diversity, but does not make a specific recommendation. The Intelligence Community agrees that more data should be made available and is looking to make this a priority.

Career management and targeted professional development opportunities. Progress in the number of staff identifying as BAME and disabled at SCS level has been negligible for many years, and whilst the number of senior women has significantly improved the proportion is still not as high as it could be. Organisations should ensure that they have put in place systems for identifying talent in their workplace that operate fairly and without unconscious bias – if necessary they should be reviewed by professional experts. There is plenty of evidence that staff from under-represented groups need more active encouragement and support to apply for jobs or promotion. One of the key recommendations from the Committee's 2015 Report 'Women In The UK Intelligence Community' was in the area of career management: *There is plenty of evidence that women need more encouragement to apply for jobs or promotion. So what is the system doing about it? Agencies should provide more centralised career management, sponsorship, and talent management for women to help them think strategically about their careers, to raise their ambitions and ultimately to help them fulfil their potential.*

Ensuring diversity at SCS level is vitally important for the Intelligence Community.

The Agencies have all set ambitious targets in this respect and consider it a priority for their boards. Both MI5 and GCHQ now have BAME representation at SCS level. Diversity of thought must be present at every level. This is supported by the appointment of Director level champions for each characteristic.

Talent identification and management is key to increasing diversity at SCS and there are a number of initiatives in train to manage the development, skills and capabilities of the senior management cadre and to review the talent pipelines into these grades: at MI5, diversity is a key consideration for Talent Review Panels, and at GCHQ the 9 box talent matrix is also reviewed for diversity and appropriate supportive action is taken in response.

As highlighted in the ISC's report, the Agencies have also developed leadership schemes for promoting talent of individuals from under-represented groups, noting that these schemes will take time to bear fruit at a senior level. In addition, the Minority Ethnic Talent Association (META) is a cross-government leadership scheme specifically for BAME staff and within Whitehall we are stepping up development programmes including the Whitehall Senior and Future Leaders Schemes.

Defence Intelligence has also undertaken a substantial amount of work to increase both female and disability representation among its staff at SCS level. This includes the introduction of female mentoring circles and working in conjunction with the Business Disability Forum to increase awareness and acceptance of disability and to educate line managers.

Each organisation should provide tailored career management, sponsorship or mentoring of talented staff, especially those from under-represented groups, to help them think more strategically about their careers, raise their ambitions and ultimately to help them fulfil their potential. More should be done to measure the effectiveness of these interventions. Retention is also an important issue – the reasons why individuals are choosing to leave an organisation should also be measured, with all organisations conducting exit interviews with departing staff.

Efforts are underway across the Intelligence Community to ensure that under-represented groups are supported in managing their careers.

The Agencies provide sponsorship opportunities and mentoring and coaching services where these are identified as beneficial for staff. Later this year, GCHQ are re-launching their sponsorship scheme, Rising Stars, to match high potential staff with SCS sponsors.

Understanding retention and conducting exit interviews are important. It may be necessary to explore different ways of offering exit interviews to encourage staff from under-represented groups to participate both fully and honestly in this process.

Address the issue of a lack of BAME role models at a senior level. This was a recurring theme in our meetings with staff across all the Agencies and organisations we visited. The appointment of BAME Non-Executive Directors at Board level, for example, would be an important start. The BAME network leaders we met are to be commended for their hard work and dedication in championing the support and promotion of BAME staff in their organisations. These are often individuals working in more junior grades – it would be understandable if they felt under a certain onus to do a considerable amount of the 'heavy lifting', and drive this agenda from the bottom up.

Ambitious targets have been set to increase the number of BAME role models at senior levels. The Intelligence Community has introduced BAME leadership programmes and is working to incorporate feedback from these programmes to ensure that they are tailored to

the needs of BAME staff. In the short term, external role models are being identified, for example as guest speakers. In the longer term, it may be possible to recruit BAME staff at senior levels, including through industry interchange projects.

OSCT is working on a number of initiatives to directly address BAME representation at senior level, including a sponsorship programme with SCS level support to ensure those from a BAME background showcase their talent and fulfil their potential.

Diversity and inclusion to be fully integrated into the business and supported by sufficient resource allocation and effort. The Committee was impressed by the energy and commitment of the many individuals we spoke to who had set up, and were often leading, diversity networks in their organisation. However, in many instances they were undertaking this work in addition to their busy ‘day job’, and it was clear that in many instances organisations were relying on volunteer staff to initiate, organise and administer this important activity.

The Committee recognises the value that staff networks are bringing to this agenda by ‘demonstrating initiative, energy and commitment when it comes to galvanising support for, and recognition of, under-represented groups’ (CM 9271 p.5). All of the organisations covered by the report look to volunteer network members to act in a consultative manner, drawing upon their unique perspectives. These networks have helped to deliver significant progress, and the Government and Agencies would like to publicly thank them for their support, particularly as, as the ISC state, many of them do so alongside their normal roles.

In GCHQ, the women’s network have been active in contributing to their review and response to the Gender Pay Gap, the LGBT network has led an initiative to engage with HR service providers, and the Disabled Employee Network has been provided with funding to trial the use of innovative assistive technologies.

In MI5, the LGBT network has made a significant contribution to policy and cultural change which has received external recognition. Together with the gender network, it has worked hard to raise awareness of Trans* issues through new awareness training and guidance for vetting officers. Their BAME network has also worked to assist vetting teams and like at GCHQ, the disability network is helping MI5 to improve IT and physical access, most notably through a Tech Challenge to provide innovative solutions for hearing impaired colleagues.

In SIS, the BAME network has been active in providing advice to support external engagement activities, and has supported internal recruitment policy development. Both the LGBT network and the disability network have provided valuable advice on HR policy changes that may affect their staff.

These hard-working volunteers are supported by senior staff champions and all SCS level staff embed diversity and inclusion in their business areas.

Corporate resource is allocated to diversity teams within each of the agencies and in many of the other organisations covered by the report. In addition, there is dedicated resource in GCHQ in relation to disability and neurodiversity.

Continued strengthening of leadership engagement and accountability. This Report recognises the critical role that many of the senior leaders in the UK intelligence community have played in fostering a diverse and inclusive workforce. This is to be commended. We encourage organisations to reward and recognise efforts by senior leaders and other staff to participate in mentorship, sponsorship and recruitment; to disseminate demographic data more widely; and to encourage and support difference in the workplace. Further work in this area might include:

- **encouraging senior leaders to actively seek out information on who and where the talent is when it comes to under-represented groups in their organisation, and to ensure that they are being given appropriate career management and support;**
- **reverse mentoring: senior leaders and executive board members should, where they are not already doing so, undertake reverse mentoring with individuals from under-represented groups within their organisation, to better understand their unique challenges as well as the positive impacts from diversity; and**
- **a clear diversity and inclusion objective to be included in the annual appraisals of all line managers, at every level, to ensure that they take positive action seriously.**

The Committee's report makes it clear that 'at a senior level in the intelligence community there appears to be genuine commitment and a growing understanding that diversity and inclusion is essential to the successful delivery of business objectives' (CM 9271 p. 19).

Senior leaders recognise the importance of a diverse workforce and an environment in which our staff can be themselves and reach their full potential. As part of the transformation of NSS culture, a Director has been appointed as Diversity and Inclusion 'champion' to embed good practice and ensure that leaders in NSS recognise the importance of, and actively promote, diversity and inclusion.

The Agencies are seeking to ensure that senior leaders take Diversity and Inclusion into account and their participation in mentorship, sponsorship and recruitment is expected. SIS's management objectives include a section on 'looking after your team' and 'supporting a diverse and inclusive service'. MI5 is looking to embed diversity and inclusion further in their new leadership pathway. GCHQ has incorporated diversity and inclusion in its performance management framework so that people are responsible for making improvements to diversity and inclusion in the areas they are responsible for.

The Agencies also look to recognise contributions to improving diversity, equality and inclusion through special events. GCHQ run an internal inclusion awards scheme based on nominations from colleagues for those who have made an exceptional contribution.

Formal reverse mentoring and career sponsorship schemes are also already in place. GCHQ's scheme, Trading Perspectives, is well established, and MI5 and SIS have similar schemes. All members of the Defence Intelligence Command Group have a reverse mentor. OSCT run a Champion-Sponsor programme and this has helped in its ambition to achieve greater diversity and to be a more inclusive working environment.

Greater accountability, collaboration and sharing of best practice. We would encourage the National Security Adviser to act as a driving force behind further

progress across the whole community, with the NSC (O) providing a forum in which best practice can be shared and performance challenged. The setting up by OSCT of the Security and Defence Diversity and Inclusion Network (SaDDIN) is a welcome development, with the potential to be an important platform for co-ordinating and directing effort when it comes to auditing progress across the intelligence and community and scoping areas for greater collaboration, such as recruitment and training. It is essential that SaDDIN supports, and adds value to, the important work already being undertaken by the networks in the Agencies and organisations. The Committee will be following its progress with interest and looks forward to receiving regular updates from the Network on its programme of work.

While accountability for performance on diversity and inclusion remains the responsibility of departments and agencies, collaboration across the community is strong and there is commitment to sharing best practice, using external benchmarking as a way of measuring progress. Diversity practitioners from across the community and other NSC(O) departments regularly meet to share information and work on joint initiatives and we all participate fully in the Security and Defence Diversity and Inclusion Network (SaDDIN).

The Agencies collaborate particularly closely through programmes such as our leadership schemes and through regular interaction, also with our 5EYES partners. As well the Agencies' LGBT Annual Conference, colleagues will also be attending MI5's LGBT national conference this year, which will be addressing specifically the ripple effect and impact on the global intelligence community of MI5's performances in the Stonewall Workplace Equality Index and LGBT Awards. The GCHQ LGBT+ network is one of the founders of Pride in Public, a consortium of LGBT+ networks across the public sector, including many in defence and intelligence, aimed at improving the workplace for public sector workers across the UK.

The National Security Adviser has appointed his two deputies, Madeleine Alessandri and Christian Turner, as 'senior sponsors' for diversity and inclusion across the community. He takes a strong personal interest in the NSC(O) Shadow Board which the NSC (O) established to provide constructive challenge and diversity of thought to supplement NSC (O)'s discussion, and in part to provide a development opportunity for staff from under-represented groups. He also endorsed the 'Mission Critical' toolkit and is regularly updated on the work of the SaDDIN.

NSC (O) will provide a platform for sharing best practice within and beyond the traditional security and intelligence community.

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