



Institute  
and Faculty  
of Actuaries

# Diversity, Equity and Inclusion

## Guidance

by the Disciplinary Committee of  
the Institute and Faculty of Actuaries

# Diversity, Equity and Inclusion

## 1. Introduction

- 1.1 This Guidance has been issued by the Disciplinary Committee of the IFoA.
- 1.2 It is for use by:
  - (a) Panels, to support them in carrying out their responsibilities;
  - (b) any other party; and
  - (c) IFoA staff.
- 1.3 This Guidance aims to promote transparency and consistency in the approach of Panels and the IFoA staff.
- 1.4 This Guidance applies to all Complaints and applications being considered under the Disciplinary Scheme of the IFoA (effective 1 August 2023) (the Scheme). For Complaints that are being considered under a former version of the IFoA's Disciplinary Scheme, the version of the Guidance applicable to the former version of the Disciplinary Scheme should be applied to the extent that it is possible to do so, otherwise this Guidance will apply.
- 1.5 This Guidance should be read alongside:
  - (a) the Scheme; and
  - (b) any Regulations issued by the Disciplinary Committee; and
  - (c) any other relevant Guidance published by the Disciplinary Committee.
- 1.6 Where there is any conflict or inconsistency between the Scheme and this Guidance, the Scheme shall be followed. Where there is any conflict or inconsistency between Regulations and this Guidance, the Regulations shall be followed.
- 1.7 Definitions of defined terms used in this Guidance are set out in the Scheme and Regulations.
- 1.8 This Guidance should not be treated as legal advice. When appropriate, the Legal Adviser will advise the Panel on questions of law and/or procedure, which may include advice on the use of this Guidance.
- 1.9 The Disciplinary Committee will review this Guidance every three years or earlier if needed.

## 2. Aim

- 2.1 This Guidance:
  - (a) sets out what Diversity, Equity and Inclusion (DEI) is and why it is important in the disciplinary process;

- (b) aims to assist those who need to make decisions under the Disciplinary Scheme by setting out the factors that they need to consider and be aware of from a DEI perspective to ensure that their decision making and behaviour is fair and non-discriminatory at all times; and
- (c) explains the approach that should be taken to disciplinary communications.

### 3. What is DEI?

3.1 The IFoA has a deep and abiding belief in DEI, rooted in its commitment to act in the public interest and for the good of society. The IFoA has a clearly stated purpose to '*champion and embody the benefits of a globally diverse and inclusive profession*' and does not tolerate unfair discrimination.

3.2 All decision makers involved in the disciplinary process should familiarise themselves with the [IFoA's DEI strategy](#). Any questions concerning DEI should be directed to [DEI@actuaries.org.uk](mailto:DEI@actuaries.org.uk).

3.3 Decision makers in the IFoA's disciplinary processes include:

- (a) IFoA staff;
- (b) Investigation Actuaries;
- (c) Conveners;
- (d) Disciplinary Pool members;
- (e) Independent Reviewers; and
- (f) Appeals Assessors.

3.4 For the purposes of this Guidance:

- (a) **Diversity:** means recognising differences and variety in people and their skills and experience and appreciating these variations.
- (b) **Equity:** means that individuals have access to the support and resources they need, as opposed to the same support and resources as each other. Equity also includes looking at and challenging systemic inequity, not just how individuals are affected.
- (c) **Inclusion:** means that all individuals involved in the disciplinary process will be valued, that they will be encouraged and listened to, and that their individual contributions will be appreciated.

### 4. Why is DEI important in the disciplinary process?

4.1 Decisions made within the disciplinary process can have a profound effect on individuals, and also have the potential to influence how the profession is perceived by different groups of members and by the public. Decision makers and IFoA staff involved in the disciplinary process must ensure that their decision making and behaviour is fair and non-discriminatory.

4.2 By involving a diverse group in the disciplinary decision making process:

- (a) people may be more likely to think 'outside the box' and challenge each other; and

- (b) there is a clear demonstration that everyone is encouraged to be a part of the process.
- 4.3 DEI ensures improved decision making through bringing in different views and mitigating against bias and pre-judgement. DEI encourages other ideas to be taken into consideration in deliberations. It is essential to hear from people who come from truly varied backgrounds and experiences, who will challenge the status quo.
- 4.4 The public interest, IFoA members, including Respondents, and others involved in the disciplinary process, such as witnesses and those raising complaints, are all best served if the disciplinary process is carried out to a very high standard. This aim will be supported if decision makers in the IFoA's disciplinary process recognise and respect the differences of the diverse groups of people with which they may come into contact and actively engage with them. Decision makers should also challenge discriminatory or inappropriate behaviour and recognise any personal emotions or prejudices that may influence their judgment, in order to be able to put these aside.

## 5. Unconscious Bias and Decision Making

- 5.1 Unconscious bias is a filter, based on hundreds of mental shortcuts created over a lifetime. Many filters are fine, for example stopping at a red light without thinking about it is a filter that is useful. An example of a filter which is not useful is a stereotype. These filters are used to sift through information, as well as environmental data and triggers which are present at any moment. This filtering enables people to make quick decisions as to what action is necessary in each situation. Unconscious bias operates at such a high speed that people are usually unaware of it. This can be problematic, especially when bias takes the form of making assumptions about groups of people.
- 5.2 People can feel uncomfortable talking about biases. This may be based on the concept that all bias is 'wrong' and must be eradicated. It is important to recognise that bias is part of human nature and to identify where the risks of bias are.
- 5.3 Decision makers involved in the disciplinary process should challenge their unconscious biases for two reasons:
  - (a) because these biases occur in the unconscious mind, they have the potential to influence decision making without the decision maker even being aware of it;
  - (b) biases about other people are guesses and, as such, they may lead to making incorrect assumptions.
- 5.4 Decision makers should ensure that their judgments are not affected by the following biases:
  - (a) **affinity bias:** a preference for people like ourselves which may lead you to be more kindly disposed towards the person;
  - (b) **prove-it-again bias:** for those who we see as different from ourselves we may expect them to prove their worth over and over again;
  - (c) **horns effect:** judging someone negatively on a characteristic which is unrelated to the decision being made, for example seeing their shoes are not polished and assuming they are inattentive;
  - (d) **halo effect:** judging someone positively on a characteristic which is unrelated to the decision being made, for example finding out someone ran a marathon and assuming they will be highly motivated.

## 5.5 Decision makers should:

- (a) focus on what is objectively true or has been proved to the required standard;
- (b) encourage challenging discussions and value rigorous debate;
- (c) challenge potential and actual bias and be receptive to questions from others about potential and actual bias;
- (d) try to separate their feelings from their thoughts and identify the reasons for those feelings, for example if the person reminds them of someone they know;
- (e) consider what stereotypes they may hold which could affect their decision making;
- (f) learn from mistakes and encourage others to do the same.

5.6 The IFoA is a global body with a worldwide membership. Decision makers should consider whether there are any cultural differences which may influence behaviour of Respondents or witnesses. They should also be aware of any differences in the interpretation of language which may be relevant to their decision making.

## 6. Appointment of Panel members, Independent Reviewers and Appeals Assessors

6.1 Panels are appointed in accordance with Rule 20 of the Disciplinary Scheme, the Appointments Regulations and the Appointment of Panel members, Independent Reviewers and Appeals Assessors Guidance. Panel members, Independent Reviewers and Appeals Assessors must be selected based on the following objective criteria:

- (a) their ability to carry out the role;
- (b) their availability;
- (c) conflict checks.

## 7. Communication

7.1 DEI is an important consideration in disciplinary communications. If communications do not take account of DEI there is a risk of causing offence or harm or discriminating without meaning to or being aware of it.

7.2 Decision makers and IFoA staff involved in the disciplinary process should follow the Best Practice Inclusive Language Principles, which include:

- (a) take your time: being inclusive takes time and conscious thought.
- (b) do your research: where there is uncertainty, check whether what is being said is correct/appropriate.
- (c) use language that includes: consider how to broaden categories to be inclusive, for example:
  - (i) use gender neutral words where it makes sense, for example “they” instead of “he”;
  - (ii) avoid terminology that implies victimhood, for example “afflicted by”, “suffers from”;

- (iii) avoid jargon. Lay persons and Members may or may not share the same verbal shortcuts, acronyms and idioms. Avoiding jargon ensures communications are accessible for everyone;
- (iv) use plain language to ensure communications can be easily understood by any potential users, and
- (v) avoid micro-aggressions. Micro-aggressions are seemingly small, subtle and often unintentional forms of prejudice. This might show up as an offhand comment or a bad joke.

## 8. Adjustments to the disciplinary process

- 8.1 Adjustments should be made for those participating in the disciplinary process, including Respondents, Applicants and witnesses. Further information is set out in the Adjustments to the disciplinary process Guidance.

### Document control

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