

Institute and Faculty of Actuaries, **Regulatory Board**

<b>Subject</b>	DEI changes to the Actuaries' Code and Code Guidance
<b>Meeting date</b>	14 May 2025
<b>Previous Steer/Approval</b>	<p><b>November 2021</b> Board was updated on the IFoA's wider work on its strategy around DEI and provided steer on proposed regulatory work.</p> <p><b>February, April, July 2022</b> Board was updated via regular Executive updates on work to review DEI requirements.</p> <p><b>November 2022</b> Board discussed and approved proposed changes to the Code to go out for consultation.</p> <p><b>May 2023</b> Board considered outcome of consultation, approved changes to the Code and approved proposals for implementation</p> <p><b>November 2023</b> Board considered outline supporting guidance</p> <p><b>February 2024</b> Board approved the member engagement plan</p> <p><b>8 May 2024</b> Board discussed Council response to draft guidance</p> <p><b>14 May 2024</b> Board approved in principle decision to go out to consultation on guidance subject to conditions</p> <p><b>16 July 2024</b> Board was updated on the outcome of Council's mid-strategy review of its five-year DEI strategy and, having seen the changes made by Council to the DEI strategy, agreed to proceed with the consultation</p> <p><b>August 2024</b> Board approved (by email) draft guidance to go out for consultation</p> <p><b>17 December 2024</b> Board considered outcome of consultation – meeting continued to January 2025</p> <p><b>23 January 2025</b> Board further considered outcome of consultation, approved changes to the Code and the amendment to the existing Code guidance</p> <p><b>18 February 2025</b></p>

	Board approved publication of the consultation feedback paper, with the amended Code and Code Guidance, subject to further amendments to be circulated by email  <b>March 2025</b>  Board approved (by email) the consultation feedback paper, with amended Code and Code Guidance
<b>International issues considered?</b>	Yes
<b>Author</b>	Ashley MacIntyre, Senior Regulatory Lawyer
<b>Reviewer</b>	Emma Gilpin, Head of Regulatory Policy
<b>Purpose</b>	Approval

### **A: Executive Summary**

1. This paper relates to the Regulatory Board’s (the Board’s) consultation on proposed Diversity, Equity and Inclusion (DEI) changes to the Actuaries’ Code (Code) and the decision to proceed with certain changes to the Code and amend the existing Code guidance, subject to an eight-week exposure period which allowed members to highlight any significant objections to the changes to the Code and Code Guidance.
2. It provides the Board with the comments received during the eight-week exposure period, and seeks Board approval to proceed with implementation of the revised Code and Code Guidance to come into effect in August 2025.

### **B: Background**

3. On 23 January 2025, the Board further considered the outcome to the consultation on draft guidance to support DEI changes to the Code and agreed:
  - Not to proceed with the proposed change to the Code that would have introduced a specific requirement for Members to ‘encourage diversity, equity and inclusion’.
  - To proceed with the other changes to the Code, that is:
    - i. Existing amplification 1.1 is amended to provide that “Members must show respect for everyone”.
    - ii. New amplification 1.2 is introduced to provide that “Members must not subject other to bullying, victimisation or harassment”.
    - iii. New amplification 5.2 is introduced to provide that “Members should speak up if they believe that others are being treated unfairly or excluded unreasonably”.
  - Not to proceed with the proposed stand-alone DEI guidance and instead amend the existing Code guidance to reflect the new provisions.
4. The Board also agreed to follow up on alternative ways to achieve the promotion of DEI.

5. On 18 February 2025, the Board considered a draft consultation feedback paper setting out the decision of the Board, together with the revised Code and Code guidance, and agreed to publication of the documents, subject to further amendments to be agreed by email.
6. In March 2025, the Board approved by email the consultation feedback paper, the revised Code and Code guidance.
7. On 18 March 2025, the consultation feedback paper, the revised Code and Code guidance were published. The documents are attached at Appendix 1.
8. At the same time as publishing the documents, members were notified of an eight-week exposure period which started when the consultation feedback paper was published and allowed Members to highlight any significant objections to the changes to the Code and amended Code Guidance. It was also noted that if no significant issues were found in the proposals, the changes to the Code and revised Code Guidance would come into effect in August 2025.

#### **C: Responses during the exposure period**

9. The eight-week exposure period started on 18 March 2025 and ended on 13 May 2025.
10. A small number of responses were received and are set out at Appendix 2. Respondents have not specifically consented to their comments being published and are therefore to be treated as confidential.
11. In addition to these responses, on 12 April 2025, **[Redacted]**, who co-ordinated the response to the consultation signed by 102 individuals and 7 past members (attached at Appendix 3 for reference), contacted various members of the IFoA, including the President, the Chair of the IFoA Board and the General Counsel expressing concerns that the signatories to the co-ordinated response had not received a considered reply to the concerns raised. The correspondence is attached at Appendix 4.
12. The Chair of the Board and General Counsel have subsequently met with **[Redacted]** to discuss the correspondence and can provide an oral update on that conversation.

#### **D: DEI webinar**

13. On 1 May 2025, a webinar was held where the Chair of the Board and the Executive shared information on the outcome and next steps following the consultation. The webinar was attended by 46 members.
14. Following the webinar, one member contacted the Chair of the Board with questions arising from the webinar, but specifically noted that this was not to be regarded as a significant objection to the proposals. The correspondence is attached at Appendix 5.

#### **E: Outcome of exposure period**

15. The objections submitted during the exposure period do not raise any new issues, all have previously been raised in some form during the consultation, and the Board considered the

detailed comments received during the consultation in making its decision to proceed with the proposed changes to the Code and Code Guidance.

16. It is therefore recommended that the Board conclude that no significant issues have been identified during the exposure period that would justify departure from the agreed approach.
17. As set out in the consultation feedback paper, assuming no significant issues are found during the exposure period that cause the Board to change its view, the changes to the Code and revised Code Guidance will come into effect in August 2025.

#### **F: Timing and next steps**

18. The table below sets out proposed next steps.

<b>Date (2025)</b>	<b>Action</b>
Late May/early June	Member communication to confirm no fatal flaws and changes will go ahead
June – July	Promotion of new changes to Members.
August	Code changes and amended Code guidance come into effect.

19. It is proposed that the changes to the Code and Code guidance come into effect on 4 August 2025.
20. A plan for engaging with Members to promote the changes to the Code is being developed with the IFoA's Communications Team.

#### **G: Decision for Board**

21. The Board is asked to consider the responses received during the eight-week exposure period and approve:
  - Confirmation that no significant issues have been found to the proposed changes to the Code and Code Guidance during the exposure period.
  - The implementation of the changes of the Code and Code Guidance with effect from 4 August 2025.

#### **H: Appendices**

- **Appendix 1:** Consultation feedback paper, agreed changes to the Code, shown in mark-up and amended Code guidance
- **Appendix 2:** Responses received during exposure period
- **Appendix 3:** Response to the DEI guidance consultation signed by 102 individuals and 7 past members
- **Appendix 4:** Member correspondence dated 12 April 2025
- **Appendix 5:** Member correspondence following DEI webinar