Public Document Pack

Establishment Committee

Date: **MONDAY, 29 OCTOBER 2018**

Time: **2.00 pm**

Venue: **COMMITTEE ROOMS - 2ND FLOOR, WEST WING, GUILDHALL**

Members:
Deputy Edward Lord (Chair)
Deputy the Revd Stephen Haines (Deputy Chairman)
Randall Anderson
Sir Mark Boleat
Deputy Keith Bottomley
Deputy Kevin Everett
Sophie Anne Fernandes
Deputy Jamie Ingham Clark
Jeremy Mayhew
Sylvia Moys
Deputy Joyce Nash
Barbara Newman
Deputy Richard Regan
Deputy Elizabeth Rogula
Alderman William Russell
Ruby Sayed
Deputy Philip Woodhouse

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N.B. Part of this meeting may be subject to audio-visual recording.

Lunch will be served in the Guildhall Club at 1.00pm.

John Barradell
Town Clerk

AGENDA

Part 1 - Public Agenda

1. **APOLOGIES**

2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**

3. **MINUTES**
   To agree the public minutes and summary of the meeting held on 20 September 2018.

   For Decision
   (Pages 1 - 10)

4. **OUTSTANDING ACTIONS REPORT**
   Report of the Town Clerk.

   For Information
   (Pages 11 - 12)

Strategic Reports

5. **GENDER IDENTITY PROGRESS UPDATE**
   Joint Report of the Director of Community and Children's Services and Director of Human Resources.

   For Information
   (Pages 13 - 22)

6. **CITY CORPORATION MODERN SLAVERY STATEMENT**
   Report of the Chamberlain.

   For Information
   (Pages 23 - 46)

For Formal Decision

7. **DECLARATION OF INTERESTS AND REGISTER OF INTERESTS: SENIOR MANAGERS AT GRADES I AND J**
   Report of the Director of Human Resources.

   For Decision
   (Pages 47 - 58)

For Information

8. **EQUALITY AND INCLUSION UPDATE**
Report of the Director of Human Resources.

For Information
(Pages 59 - 76)

9. **OPERATION OF THE SCHEME OF DELEGATIONS APRIL 2018 - SEPTEMBER 2018**
Report of the Director of Human Resources.

For Information
(Pages 77 - 78)

10. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

11. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT**

12. **EXCLUSION OF THE PUBLIC**
MOTION - That under Section 100A(4) of the Local Government Act 1972, the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Local Government Act.

For Decision

Part 2 - Non-Public Agenda

13. **NON-PUBLIC MINUTES**
To agree the non-public minutes of the meeting held on 20 September 2018.

For Decision
(Pages 79 - 82)

14. **OUTSTANDING ACTIONS REPORT**
The Committee are asked to note there are no outstanding actions.

For Information

15. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

16. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

Part 3 - Confidential Agenda

17. **CONFIDENTIAL MINUTES**
To agree the Confidential minutes of the last meeting held on 20 September 2018.

For Decision

Strategic Reports

18. **PUBLIC INTEREST DISCLOSURE ACT 1998 - MEMBERS' ROLE**
Report of the Director of Human Resources.

For Information

For Formal Decision

19. **HONORARIA REQUEST**
Report of the Town Clerk.

For Decision

20. **HONORARIA REQUEST**
Report of the Chamberlain.

For Decision

21. **MARKET FORCES SUPPLEMENT REQUEST**
Report of the Principal, Guildhall School of Music & Drama.

Appendices to follow.

For Decision

For Information

22. **STAFF APPEAL SUMMARY**
Joint report of the Comptroller and City Solicitor and Director of Human Resources.

For Information

23. **EMPLOYMENT TRIBUNAL CASES**
Report of the Comptroller and City Solicitor.

For Information

24. **REPORT OF ACTION TAKEN**
Report of the Town Clerk.

For Information

25. **APPENDIX TO THE SCHEME OF DELEGATIONS**
Report of the Director of Human Resources.

For Information

26. **TOWN CLERK'S UPDATE**
The Town Clerk to be heard.

For Information

ESTABLISHMENT COMMITTEE

Thursday, 20 September 2018

Minutes of the meeting of the Establishment Committee held at Committee Rooms - Committee Rooms on Thursday, 20 September 2018 at 1.45 pm

Present

Members:

Deputy Edward Lord (Chair)
Deputy the Revd Stephen Haines (Deputy Chairman)
Deputy Keith Bottomley
Kevin Everett
Deputy Jamie Ingham Clark
Sylvia Moys
Barbara Newman
Alderman William Russell
Deputy Philip Woodhouse

In Attendance

Alderman Sir David Wootton
Shravan Joshi

Officers:

John Barradell	-	Town Clerk and Chief Executive
Angela Roach	-	Assistant Town Clerk
Bob Roberts	-	Director of Communications
Sufina Ahmad	-	Town Clerk's Department
Kristina Drake	-	Town Clerk's Department
Claire Holdgate	-	Town Clerk's Department
Sacha Than	-	Town Clerk's Department
Matthew Lock	-	Chamberlain's Department
Michael Cogher	-	Comptroller and City Solicitor
Vic Annells	-	Executive Director, Mansion House & CCC
Nicholas Gill	-	City Surveyor's Department
Damian Nussbaum	-	Director of Economic Development
Chrissie Morgan	-	Director of Human Resources
Janet Fortune	-	Human Resources Department
Tracey Jansen	-	Human Resources Department
Andrew Carter	-	Director of Community and Children's Services

The Chair advised the Committee that representatives from the recruitment agency TMP Worldwide were present and would give a presentation at Item Three of the Agenda on Attracting Talent. The Chair explained that an invitation had been extended to Members of the Public Relations and Economic Development Sub Committee and the Members Diversity Working Party for this item and welcomed Shravan Joshi and Sir David Wootton who were attending on behalf of those committees.

The Chair further advised that as part of the Member Diversity work taking place, to avoid the use of gendered language and taking into account workforce inclusion issues, they felt going forward it would be more appropriate to use the term Chair instead of Chairman, and asked Members to recognise their preference in using this. In response to a Member's question, the Chair explained that the Town Clerk's view was this was up to each individual postholder whether they would prefer to use the title of Chair or Chairman and there was no requirement to change Standing Orders to take account of this.

1. **APOLOGIES**

Apologies for absence were received from Randall Anderson, Sir Mark Boleat, Sophie Fernandes, Jeremy Mayhew, Deputy Joyce Nash, Deputy Elizabeth Rogula, and Ruby Sayed.

2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**

There were no declarations of interest.

3. **RECRUITMENT BRANDING - TMP PRESENTATION**

The Chair advised the Committee that TMP were the advertising consultancy used for the City's recruitment advertising requirements. They had been tasked with setting out proposals on how the City of London Corporation could be better perceived by those the Corporation was looking to employ and therefore building on and improving our talent attraction. The Chair introduced Liz King, Laurent Graudens and Dan Turner.

The TMP Representatives explained they had been asked to develop an employer brand to support recruitment across the organisation, the outcome of which was to come up with an Attracting Talent Strategy with the following key requirements:

- Identify and reduce barriers into the workforce
- Support workforce planning
- Strengthen employer brand
- Address key issues
  - Increase number of senior females
  - Increase BAME representation
  - Progress social mobility internally and externally
  - Attract millennials – Gen Y and now Gen Z
  - Use of social media to attract talent

The Representatives explained they had conducted research, which included focus groups, and taken views from both internal and external parties. It was explained that those who worked at the Corporation were proud of its traditions, charity work, contributions to different economies and the Corporation's ability to get work done. However, there were a range of negative perceptions from those outside of the organisation which would need to be dispelled in order for the Corporation to become an employer of choice and attract talent and increase diversity.

The Representatives advised that they would propose to create a campaign called *The City Of…* which the Corporation could then tailor and adapt, and visually the theme of reflections would be used with both photographs and films to convey the diversity of work carried out and sense of belonging.

In response to Members' questions, the Director of Human Resources advised that the detailed creative work had not yet been carried out as officers wanted to seek Members' feedback on the concept presented before carrying out any additional work to launch the brand itself. The Director of Communications added that officers within Human Resources were keeping his team informed, and the corporate messaging element would be considered at a later stage once work was carried out on areas such as the website.

The Chair thanked TMP for their work and the innovative concepts used in presenting a unique organisation.

4. **MINUTES**

RESOLVED – That the public minutes and summary of the meeting held on 9 July 2018 be approved as an accurate record.

5. **OUTSTANDING ACTIONS REPORT**

The Committee considered a report of the Town Clerk which provided details of outstanding actions from previous meetings.

RESOLVED – That the Committee note the report.

6. **INTERIM REPORT ON GENDER IDENTITY POLICY**

The Committee received a joint report of the Town Clerk and Director of Children and Community Services summarising the current response to the questionnaire issued as part of the City of London Corporation's exploration of the potential development of policy on gender identity.

The Chair provided some introductory comments to this Item explaining that Members would recall that on the recommendation of the Town Clerk this Committee, took a decision at its last meeting to develop an over-arching corporate policy on gender identity. This followed considerable media interest in the ability of trans people to access Corporation services and facilities in the Open Spaces Department and Barbican Centre, as well as the misconduct of certain activist groups at the Hampstead Heath bathing ponds.

The consultation survey was launched to assist in policy development and in discharging the City of London Corporation's statutory responsibilities under the Public Sector Equalities Duty by informing Corporation Members and Officers of public attitudes and expert opinion on this subject. The Chair explained that access to the Corporation's services and facilities is not an area where the Corporation would have much discretion, and nor should it.

It was explained that the Equality Act 2010, ensures that trans people, or those with the protected characteristic of 'gender reassignment' should not be discriminated against in any service or facility and public authorities like the City

of London Corporation have a legal duty to ensure trans people are included through all of its services. The Chair further advised that this is what the policy refresh is about: giving all of the City of London Corporation's services and facilities a policy framework together with support and guidance to ensure that trans and non-binary people have equal access.

The Director of Community and Children's Services informed the Committee of some points of clarity within the report before Members:

- The bullet point within Paragraph Three should read "70% are UK nationals".
- With regards to Paragraphs Six and Seven, the Equality Act 2010 permits exclusion of a transgender person from men-only/women-only services only if this is 'a proportionate means to achieving a legitimate aim'
- the presumption is in favour of inclusion, with exclusion permitted only in 'very restricted circumstances'

The Director further advised that over 30,000 people had looked at the consultations with over 15,000 respondents which was in excess of the expected numbers. Therefore, actions were being taken to commission support to analyse the responses provided and this would then be brought back to the Establishment Committee.

The Chair thanked Officers involved noting the significant attention this work had attracted and advised that in order to allow the required time for the analysis to take place, consideration would be given to moving the date of the next meeting.

RESOLVED – That the Committee note the report.

7. **APPRENTICESHIPS STRATEGY FOR 2018-23**

The Committee considered a joint report of the Town Clerk and Director of Human Resources which sought approval of the proposed final version of the City of London Corporation's Apprenticeships Strategy for 2018-23.

In response to a Member's question, the Director of Human Resources confirmed there were 108 apprentices with the eldest being 54 years of age and the youngest being 17. Responding to a Member's comments on nomenclature used within the report before Members, the Town Clerk agreed this could be given further consideration.

A Member noted the branding work taking place at the Corporation and referenced the earlier presentation from TMP, it was asked that the Apprenticeships Strategy fit into that work; it was further queried what the Corporation's levy was with regards to apprenticeships and whether the scheme could be looked at in conjunction with the City's Procurement process and its suppliers. In response to the query on the levy the Director of Human Resources explained that money was paid into a fund which could then be used for training costs associated with apprenticeships.

The Town Clerk explained that the City of London Corporation would hope to incorporate a wide range of the apprentices into the work force, but this would of course affect the number of apprenticeships subsequently required. The Town Clerk added that consideration could be given to evaluating suppliers on their willingness to work with the City of London Corporation on their intake of apprentices.

RESOLVED – That the Committee:

a) approve the final version of the Apprenticeships Strategy; and
b) note the proposed next steps for delivery and monitoring of progress.

8. **THE CITY OF LONDON CORPORATION'S SOCIAL MOBILITY STRATEGY FOR 2018-28**

The Committee received a report of the Chief Grants Officer and Director of City Bridge Trust which presented the final version of the City of London Corporation's Social Mobility Strategy for 2018-28. The Town Clerk explained this Strategy had been developed through the collaboration of a wide range of Departments across the organisation and had been approved by the Policy and Resources Committee and endorsed by the Public Relations and Economic Development Sub Committee.

RESOLVED – That the Committee note the equalities implications of the Social Mobility Strategy.

9. **ANNUAL STAFF CHRISTMAS LUNCHES**

The Committee considered a report of the Town Clerk which sought approval to agree an increase in costs from both staff and the Committee's budget for the Annual Staff Christmas Lunch. The costs would equate to a £3.00 increase for staff and £2.00 from the Committee budget.

Members noted that the caterer had requested an increased price of £5 per head, discussion took place on when the costs of the lunch had last increased, when this had been paid for from the Committee's budget versus when the costs had been passed on to staff, how the caterer had been selected and the overall costs of catering for these events.

RESOLVED – That the Committee:

a) note the increased costs for the lunches from £35 to £40 per head;
b) agree the ongoing contribution which the Committee will make to the Annual Staff Lunches should be increased by £2 per head; and
c) agree the contribution that staff members attending should make to the cost of the Staff Annual Lunches should be increased by £3 per head.

10. **HR DASHBOARD - JUNE 2018**

The Committee received a report of the Director of Human Resources which provided data to the Committee from the Corporate Human Resources Dashboard.

RESOLVED – That the Committee note the report.

11. **HR TRANSFORMATION PROGRAMME UPDATE**
The Committee received a report of the Director of Human Resources which provided Members with a quarterly update on the activities of the HR Transformation Programme.

RESOLVED – That the Committee note the report.

12. **REVENUE OUTTURN 2017/18**
Members received a joint report of the Town Clerk, Chamberlain, and Comptroller and City Solicitor which compared the revenue outturn for the services overseen by the Committee in 2017/18 with the final budget for the year.

RESOLVED – That the Committee note the report.

13. **REPORT OF ACTION TAKEN**
The Committee received a report of the Town Clerk which provided details with a decision taken under urgent authority since the last meeting.

In response to a Members' query on costs, the Chair explained this would be covered within the confidential section of the agenda.

RESOLVED – That the Committee note the report.

14. **MINUTES OF THE JOINT CONSULTATIVE COMMITTEE**
RESOLVED – That the public minutes and summary of the meeting of the Joint Consultative Committee held on 12 July 2018 be noted.

15. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
A Member informed the Committee that he had recently enquired on the process for providing positive feedback for members of staff, he explained that he had been informed that this feedback would then form part of the officer's appraisal. He raised the point that Members should be made aware of this fact. In response, the Director of Human Resources explained that the City of London Corporation was trialling an automated appraisal process and this would be brought before the Committee at a later date.

In response to discussion on whether Members could be asked to submit feedback, the Town Clerk advised that the City of London Corporation did not conduct 360 degree appraisals, but he encouraged Members to provide feedback to him if they witnessed particularly good work by officers.

16. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT**
There were no urgent items.

17. **EXCLUSION OF THE PUBLIC**
RESOLVED – That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds

that they involve the likely disclosure of exempt information as defined in Part I of the Schedule 12A of the Local Government Act.

Item	Paragraph
18,19,20, tabled late report at 27	3
21	4
24	1,2,3,4
25	1,2
26	1
27/27a	1,2,3

18. **NON-PUBLIC MINUTES**
The non-public minutes of the meeting held on 9 July 2018 were approved.

19. **OUTSTANDING ACTIONS REPORT**
The Committee noted a report of the Town Clerk which provided details of non-public outstanding actions from previous meetings. Members noted this item had since moved to the public section of the agenda. In response to Members' queries on the pace and progress of this Project, the Chair reminded Members that at the last meeting of the Committee, Officers had agreed to put a timetable together for the October meeting.

20. **ATTRACTING TALENT**
The Town Clerk advised that with the exception of discussion related to Paragraph Seven of the Report before Members, the minutes of this Item should be recorded within the public section.

The Committee considered a report of the Director of Human Resources which informed Members of the progress of the Attracting Talent Programme, part of the HR Transformation Project. The Director of Human Resources explained this work included attracting people to work for the organisation and getting people settled into their roles. The team had reviewed the induction packs new starters received and would be provided with on their first day, the Director of Human Resources advised that induction packs were available for Members of this Committee should they wish to take one.

Discussion took place during which the following points were raised:

- The Director of Human Resources explained that the work being carried out by TMP, particularly the filming of staff could be adapted to use for different recruitment campaigns, particularly when looking at difficult to fill vacancies.
- Volunteers would be welcome to apply for roles being advertised and volunteering roles would also be advertised.
- Very little is spent by the City of London Corporation on agency fees, recruitment usually takes place directly with the market, and with the level of turnover, agency recruitment was not a viable option.

Discussion took place on costs which is contained within the non-public section of the minutes.

The Chair asked that the discussion at this Item alongside TMP's comments at Item Three be provided to the Public Relations and Economic Development Sub-Committee and Members' Diversity Working Party for information.

RESOLVED – That the Committee endorse the report.

21. **NON-PUBLIC MINUTES OF THE JOINT CONSULTATIVE COMMITTEE**
The non-public minutes of the meeting of the Joint Consultative Committee held on 12 July 2018 were noted.

22. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
A question was asked in respect of volunteers.

23. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**
There were no items of urgent business.

24. **CONFIDENTIAL MINUTES**
The confidential minutes of the meeting held on 9 July 2018 were approved.

25. **MANSION HOUSE AND CENTRAL CRIMINAL COURT EVENTS**
The Committee considered a report of the Executive Director of Mansion House and Central Criminal Court.

26. **COMMUNITY AND CHILDREN'S SERVICES REVIEW**
The Committee considered a report of the Director of Community and Children's Services.

27. **MFS REQUEST - GUILDHALL SCHOOL OF MUSIC AND DRAMA**
The Committee discussed a Market Forces Supplement request.

27a. MFS REQUEST – CITY SURVEYORS DEPARMENT
The Committee received a late report of the City Surveyor in relation to a Market Forces Supplement request.

28. **TOWN CLERK'S UPDATE**
Prior to this Item, a late report of the Director of Economic Development was tabled.

The Town Clerk provided an oral update in relation to staffing.

The meeting ended at 4.10 pm

Chair

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Establishment Committee – Outstanding Actions

Item	Date	Action	Officer responsible	To be completed/ progressed to next stage	Progress Update
1.	5 December 2017 26 February 2018	Revenue Budgets The Committee asked to receive information on Member related spending within Town Clerks, including staffing support, transportation costs, as well as ad hoc expense reclaims.	Town Clerk	October 2018	The Assistant Town Clerk to provide an oral update.
2.	5 December 2017 15 January 2018 26 February 2018 9 July 2018	Register of Interests for Chief Officers The DHR suggested that the guidelines for the Chief Officers Register of Interests should be reviewed.	Director of Human Resources	October 2018	A report would be provided in October 2018 with the revised guidelines for the Chief Officers' Register of Interests.
3.	9 July 2018	Guildhall Workplace Utilisation Programme A timetable for the Project to be provided to the Committee in October 2018	Director of Human Resources/City Surveyor	January 2019	The City Surveyor's Department are working with Corporate Strategy and Performance on a Space Utilisation / Agile Working report and the current timelines show that it is likely the report will be brought before the January 2019 meeting of the Committee.

Item	Date	Action	Officer responsible	To be completed/ progressed to next stage	Progress Update
4.	9 July 2018	Gender Identity Policy A draft policy to be provided to the Committee following the public consultation.	Director of Human Resources; Town Clerk; Director of Community and Children's Services	October 2018	The draft policy to be provided in October 2018.

Committee: Establishment Committee	**Date:** 29 October 2018
Subject: Gender Identity – Progress Update	**Public**
Report of: Director of Human Resources and Director of Children's and Community Services	**For Information**
Report author: Tracey Jansen Town Clerk's Department and Simon Cribbens Directorate of Children and Community Services	

Summary

This report summarises key initial findings from the Corporation's survey on gender identity, and updates members on progress in commissioning independent analysis.

Recommendation

Members are asked to note the report.

Main Report

Background

1. It was proposed by Establishment Committee on 9 July 2018 that officers undertake a piece of work to explore an over-arching policy on gender identity for the City Corporation. To support this work an online survey was developed to provide insight into the views of city residents, workers, visitors and other stakeholders.

2. The survey was open for responses from 25 July to 14 September 2018 on the online Survey Monkey platform.

3. We are currently commissioning a specialist provider with the skills, capacity and experience to use the high volume of data and textual responses the survey has generated to provide us with a detailed, independent analysis of the findings (see paras 13-15 below). This paper presents key initial findings from the survey using the basic analytical functions provided with the standard Survey Monkey package. The survey was designed as an engagement vehicle to seek views, rather than as a research tool.

Key messages from the survey

<u>Respondents</u>

4. While 39,623 people started the survey, a significantly lower number continued to the main questions in the body of the questionnaire, with response rates to these questions ranging between 21,030 and 21,096.

5. Around a third of respondents said that they lived and/or worked in the City of London, and a similar proportion say they use our services. Demographic information on respondents is provided in Appendix 1 of this report.

Responses[1]

6. 81% agreed that 'a person may come to feel that their gender is different from that assigned to them at birth', of which 65% strongly agreed. 11% disagreed with this proposition, 9% strongly disagreeing.

7. 74% agreed that a person who consistently identifies with a gender other than that assigned at birth should be accepted by society in their stated gender, of which 64% strongly agreed. 17% disagreed with this proposition, 11% strongly disagreeing.

8. 68% said that a person who consistently identifies with a gender other than that assigned at birth ought to be able to access services commonly provided to the gender with which they now identify, of which 61% strongly agreed. 26% disagreed with this proposition, 11% strongly disagreeing.

9. 67% agreed that where access to services and facilities is restricted this should relate to the gender with which the service user consistently identifies now, with 60% strongly agreeing. 27% disagreed with this proposition, 21% strongly disagreed.

10. On the proposition not to ask service users for 'proof' of their gender identity but to rely on service users to self-identify, this had the support of 65% (56% strongly supporting) and was opposed by 28% (with 23% strongly opposed).

11. On the adaption of facilities accessed according to gender to be gender neutral, this was supported by 63% (and strongly supported by 49%), with 27% disagreeing (21% strongly).

12. *Free text responses.* There was a very high volume of free text response, which will need to be reviewed and considered as part of the independent analysis. For example, we asked respondents what safeguards, if any, we should put in place to preserve the dignity of all service users, with 18,589 respondents commenting.

Next steps

13. The specification was published with a deadline for submissions of Thursday 18th October. Bids will be evaluated, and the contract awarded by 31st October. If volumes permit, then this timescale may shorten.

14. Full completion of the final report is planned for 31.12.18 with an interim presentation of findings to the Establishment Committee on 3.12.18.

15. Best value is being sought through an open market tender, with an indicative budget not exceeding £20,000.

16. Independent analysis will:

[1] Figures have been rounded for ease, but are available to two decimal points.

- Identify the range of common themes within the responses and summarise these in a clear and accessible way;
- Cross tabulate and filter responses to identify patterns
- Identify issues and/or themes that we may want to explore further.

17. Officers are also completing a review of key messages from relevant literature and good practice.

Corporate & Strategic Implications

18. The Corporate Plan aims to contribute to a flourishing society where:
    - People are safe and feel safe
    - People enjoy good health and wellbeing
    - People have equal opportunities to enrich their lives and reach their full potential
    - Communities are cohesive and have the facilities they need

    These outcomes are directly linked to the issue of gender identity.

Implications

19. This work has implications for understanding and developing our responsibilities under the Equalities Act 2010.

Appendices

- Appendix 1: Demographic and Equalities Data from the Gender Identity Survey

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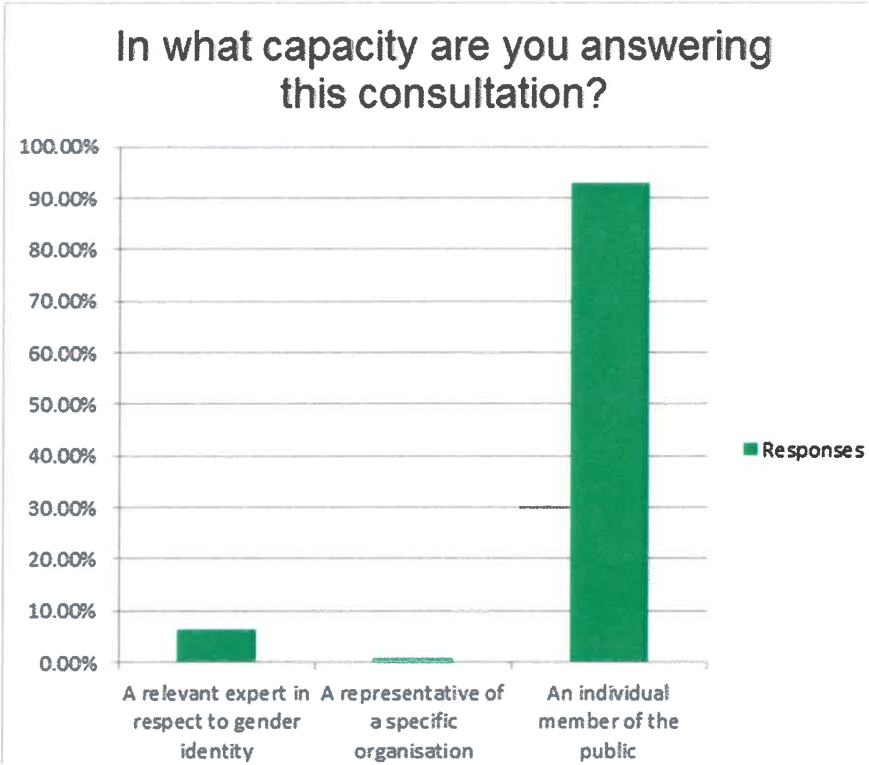
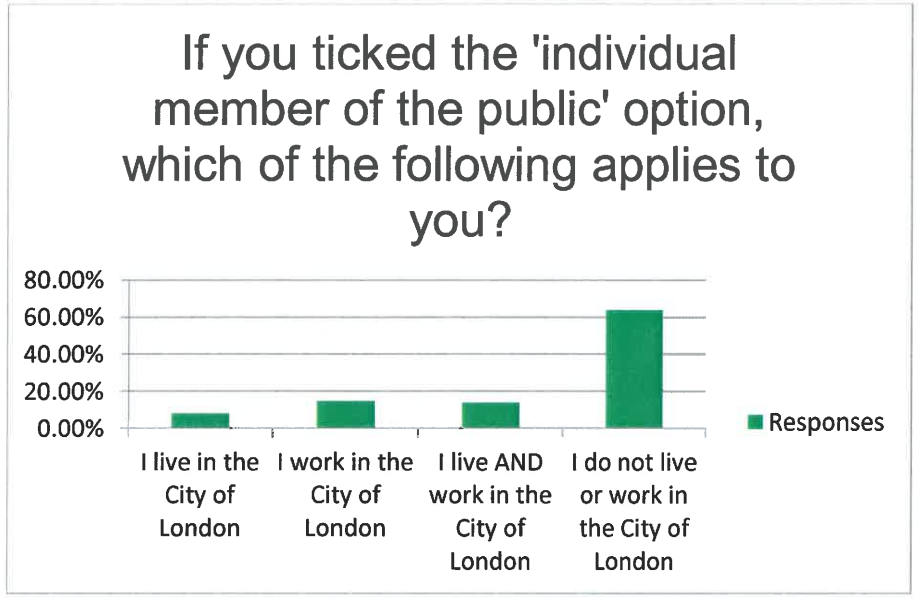
Appendix 1: Demographic and Equalities Data from the Gender Identity Survey

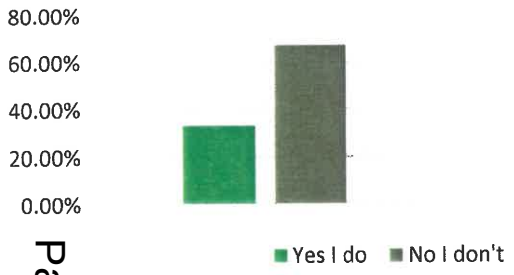


A relevant expert in respect to gender identity	6.36%	2522
A representative of a specific organisation	0.76%	300
An individual member of the public	92.88%	36801
	Answered	**39623**
	Skipped	**25**

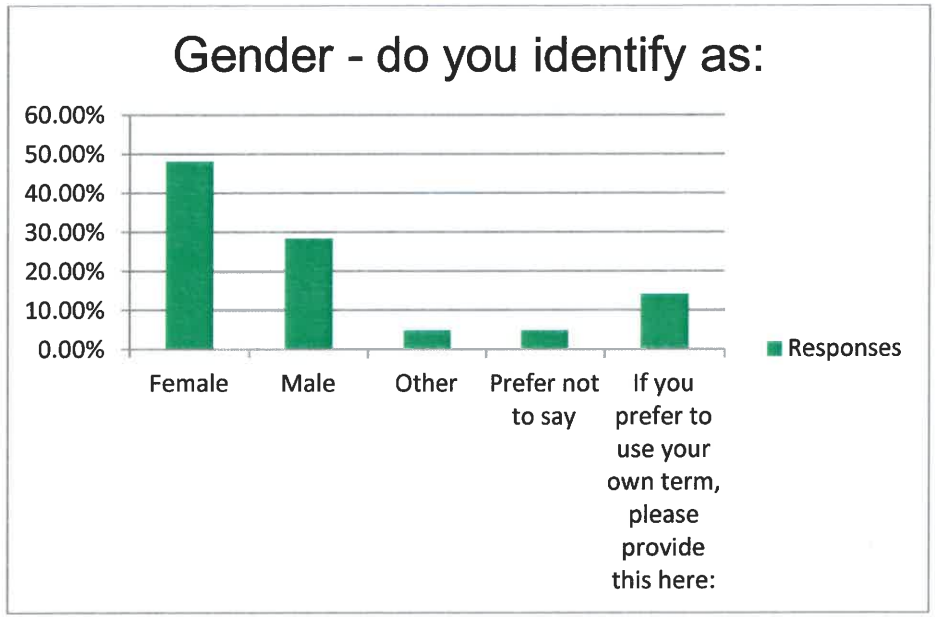


Answer Choices	Responses	
I live in the City of London	7.96%	2835
I work in the City of London	14.54%	5176
I live AND work in the City of London	13.66%	4865
I do not live or work in the City of London	63.83%	22727
	Answered	**35603**
	Skipped	**4045**

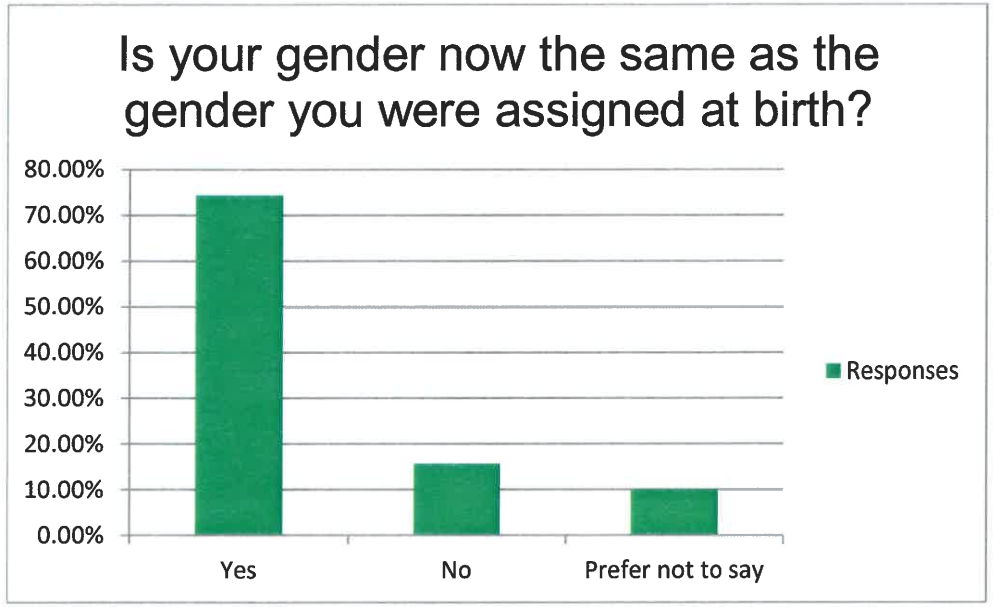
Do you regularly use any of the City's Services which may be affected by this consultation



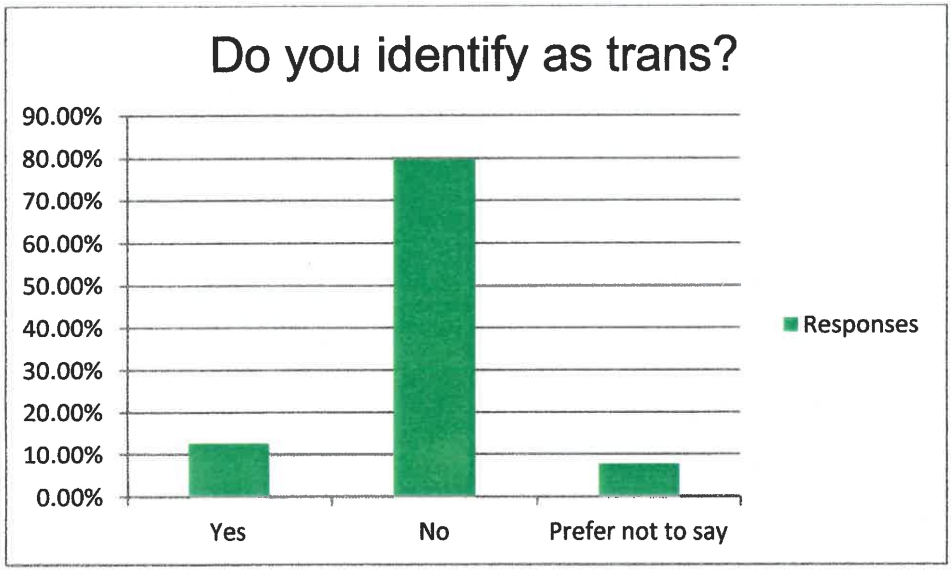
Yes I do	9337	32.98%
No I do not	18977	67.02%
	Answered	**28,334**
	Skipped	**11,294**

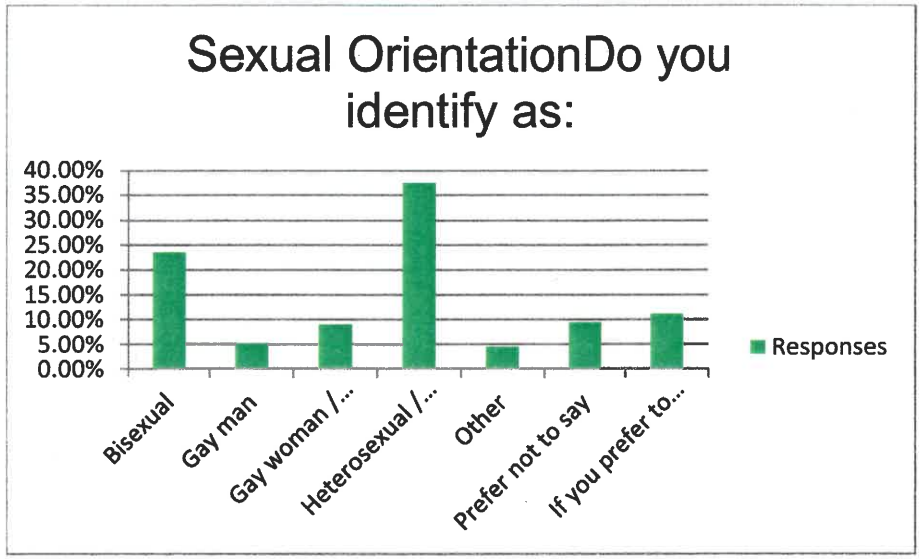


Female	48.08%	10152
Male	28.39%	5994
Other	4.72%	997
Prefer not to say	4.73%	998
If you prefer to use your own term please provide it	14.08%	2973
	Answered	**21113**
	Skipped	**18535**



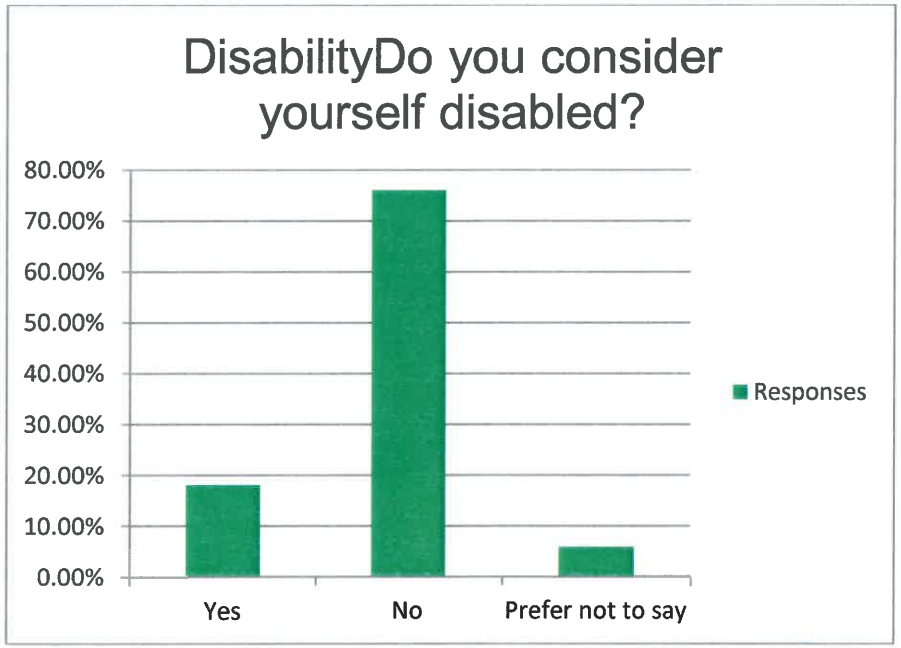
Yes	74.32%	15518
No	15.67%	3271
Prefer not to say	10.02%	2092
	Answered	20880
	Skipped	18768





Yes	12.58%	2643
No	79.83%	16773
Prefer not to say	7.59%	1595
	Answered	**21010**
	Skipped	**18638**

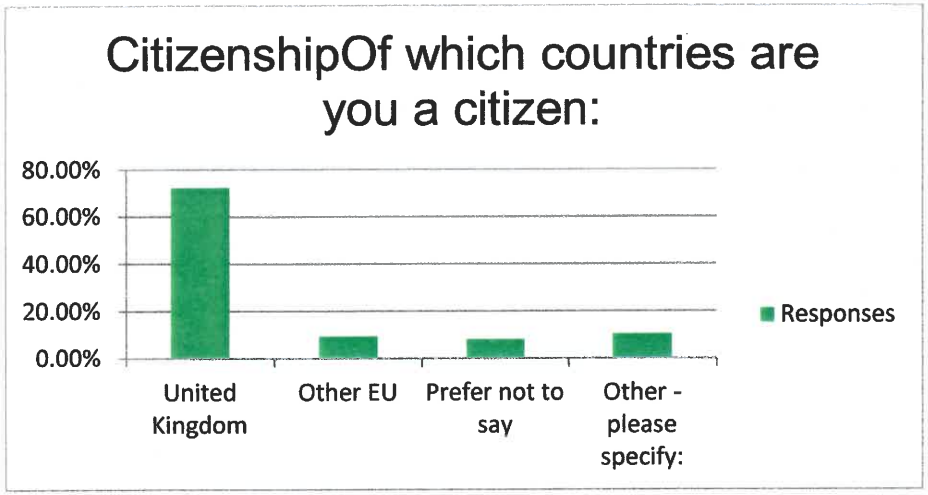
Bisexual	23.60%	4975
Gay man	5.11%	1077
Gay woman/lesbian	8.92%	1881
Heterosexual/straight	37.44%	7891
Other	4.41%	930
Prefer not to say	9.39%	1980
If you prefer to you your own term, please provide this here	11.12%	2345
	Answered	**21079**
	Skipped	**18569**



Yes	18.05%	3803
No	76.06%	16027
Prefer not to say	5.89%	1241
	Answered	**21071**
	Skipped	**18577**

Religion or Belief – Do you consider yourself to be

Buddhist	1.12%	236
Christian	10.83%	2279
Hindu	0.29%	61
Jewish	2.78%	584
Muslim	2.21%	466
Non-religious	65.74%	13836
Sikh	0.11%	23
Other	3.53%	743
Prefer not to say	8.21%	1728
If you prefer to use your own definition, please specify	5.18%	1090
	Answered	**21045**
	Skipped	**18603**



United Kingdom	72.32%	15242
Other EU	9.26%	1951
Prefer not to say	7.98%	1682
Other – please specify	10.44%	2201
	Answered	**21076**
	Skipped	**18572**

How do you describe your ethnicity?

Arab	1.08%	214
Asian or Asian British: Indian	0.87%	172
Asian or Asian British: Pakistani	0.69%	136
Asian or Asian British: Bangladeshi	0.20%	39
Asian or Asian British: Chinese	0.47%	93
Asian or Asian British: Other	0.57%	113
Black or Black British: African	1.06%	209
Black or Black British: Caribbean	0.58%	115
Black or Black British: Other	0.36%	72
Mixed: Asian and White	1.78%	353
Mixed: Black and White	1.42%	281
Mixed: Other	3.86%	763
White: British	56.18%	11112
White: Irish	4.52%	893
White: European	14.35%	2838
White: Gypsy or Irish Traveller	0.37%	74
White: Other	11.63%	2301
If other or you'd prefer to use your own definition, please specify		2091
	Answered	**19778**
	Skipped	**19870**

There is also information on age, but we will need to do further analysis to provide a summary of this.

Meeting Establishment Committee	Date 29 October 2018
Subject City Corporation Modern Slavery Statement	**Public**
Report of The Chamberlain	
Report Author Natalie Evans, Responsible Procurement Manager, City Procurement	**For information**

Summary

1. This Report accompanies the proposed City of London Corporation 'Modern Slavery Statement' developed in response to the Modern Slavery Act 2015.

2. The City of London Police has a responsibility to help identify and eliminate modern slavery through its law enforcement remit and the City Corporation through its business activities, ensuring effective due diligence procedures are in place to safeguard against modern slavery taking place within our organisation, our jurisdiction and our supply chain.

3. The Corporation also plays a philanthropic role by funding activities designed to support refugees and asylum seekers who have experienced human trafficking, disrupt global human trafficking and combat its practice in the UK.

4. This Modern Slavery Statement brings together the roles, remits, commitments and all work undertaken by the City of London Police, Department for Children and Community Services, Community Safety, Port Health & Public Protection, HR, City Procurement, the Barbican, City Bridge Trust and Heart of the City, also detailing future plans for continuous improvement.

Recommendations

That Establishment Committee:

- Notes the publication of a voluntary Modern Slavery Statement by the City Corporation
- Notes the version submitted, including the 'Modern Slavery Policy' contained within and 'continuous improvement' plans detailed throughout.

Main Report

Background

5. The Modern Slavery Act 2015 was enacted in response to prioritisation of this issue by the UK Government. It requires commercial entities that operate in the UK, with a turnover of more than £36m, to produce an annual Modern Slavery Statement detailing current and planned actions to tackle this crime.

6. The City Corporation is not a relevant commercial organisation as defined by section 54 of the Act. However, it is recommended that the City Corporation comply with its annual reporting requirements on a voluntary basis in the interest of due diligence and transparency, and to appropriately reflect the organisation's strong commitment to responsible business principles. It should also be taken into account that many other public authorities, including numerous London boroughs have already published their own Statement.

7. Representatives from the City of London Police, the Barbican, City Procurement, Children and Community Services, Community Safety and Corporate Strategy and Performance came together in early 2018 to establish the City Corporation's inter-departmental Working Group on Modern Slavery.

8. The first priority of the Working Group was to bring together all current action taking place to tackle modern slavery, to harmonise approaches and ensure that resources and lessons learned are shared across the Corporation. The proposed Modern Slavery Statement was developed based on this work.

9. Earlier this year, the City Corporation made a pledge, signed by the Chairman of Policy & Resources Committee, to tackle modern slavery as part of the Evening Standard's anti-slavery campaign. This Statement would represent a transparent way of demonstrating the organisation's commitment to this pledge.

10. The Modern Slavery (Transparency in Supply Chains) Bill 2017-2019 is currently progressing through the House of Lords. Amongst other amendments, this Bill proposes to extend the scope of the existing Act to public sector authorities. The publication of this Modern Slavery Statement could therefore also be viewed as a way of future proofing the City Corporation's approach.

Methodology

11. The Statement is divided into five sections, structured to reflect our actions according to the City Corporation's responsibilities and the level of control or influence the organisation is able to exert:

- **Our Organisation –** Overarching commitments and organisational approach
- **Our People –** The Corporation's employees.
- **Our Jurisdiction –** People living, working in and visiting the Square Mile.
- **Our Wider Community – C**haritable organisations and business community.
- **Our Supply Chains –** Domestic and global supply chains.

12. Each section is separated into four parts, according to the requirements of a Modern Slavery Statement under s.54 of the Modern Slavery Act.

- **Remits and relevant risks** – Within the remit of each department; identifying the people, places, trades and industries at the highest risk.

- **Policies and commitments** – Overarching and department-specific policies and commitments to tackling modern slavery and other labour rights abuses.
- **Existing interventions** – Actions already being undertaken to identify and deal with modern slavery and to minimise the risk of it occurring.
- **Continuous improvement** – Assessing the effectiveness of our current interventions, creating plans to bridge identified gaps, developing appropriate performance indicators, monitoring and reporting on progress.

All actions described within the 'continuous improvement' sections will be combined to form an action plan, which will be overseen by the Responsible Business Implementation Group, coordinated by the Inter-departmental Working Group on Modern Slavery and undertaken by relevant City Corporation Officers.

Corporate and Strategic Implications

13. The following aims and outcomes within the Corporate Plan underpin the City Corporation's commitment to combatting human and labour rights abuses:

Contribute to a flourishing society:

- People are safe and feel safe
- People enjoy good health and wellbeing
- People have equal opportunities to enrich their lives and reach their full potential

Support a thriving economy:

- Businesses are trusted and socially and environmentally responsible

14. The Responsible Business Strategy 2018-23: sets out the City Corporation's stance on advocating for human rights in its decision-making processes so that people are treated appropriately and with dignity. It also details its commitment to actively preventing fraud, corruption and bribery in its own operations and influencing supply chains and partners to do the same.

15. The Responsible Procurement Strategy 2015-18 aims to deliver best value in a way that improves the lives of those in its supply chain and helps the City Corporation make procurement decisions that act as a catalyst for positive change. It details the City Corporation's commitment to tackling human and labour rights violations, including modern slavery.

Conclusion

16. The publication of a Modern Slavery Statement would constitute a clear and transparent demonstration of the City Corporation's commitment to tackling modern slavery, both internally and externally. It brings current and future actions into one place allowing all departments and other relevant entities an oversight and a point of reference to ensure effective collaboration.

17. The length of the Statement reflects the requirements set under s.54 of the Act and moreover the comprehensive amount of work already being undertaken.

Appendices

Appendix 1 - City of London Corporation Modern Slavery Statement

Author: Natalie Evans, Responsible Procurement Manager
T: 0207 332 1282 E: Natalie.evans@cityoflondon.gov.uk

City of London Corporation Modern Slavery Statement

1. This Modern Slavery Statement, covering the year November 2018 – October 2019, is made in response to s.54 of the Modern Slavery Act 2015 ("the Act"). It sets out the steps that the City of London Corporation ("City Corporation") has taken and is continuing to take to ensure that modern slavery is not taking place within our business, within the Square Mile or within our supply chains.

2. For the purposes of this Statement and associated Policy, the term 'Modern Slavery' encompasses slavery, servitude, human trafficking, forced or compulsory labour and child labour.

3. The City Corporation is not a relevant commercial organisation as defined by section 54 of the Act. However, it will comply with its annual reporting requirements on a voluntary basis in the interest of due diligence and transparency, and to appropriately reflect the City Corporation's strong commitment to responsible business principles.

4. This Modern Slavery Statement is divided into five sections:

   i. **Our Organisation –** The City Corporation's approach to tackling modern slavery. This overarching commitment is supported at the highest level and inter-departmental collaboration is used to ensure a harmonised and effective approach.

   ii. **Our People –** Helping to protect our own employees, based at any City Corporation location, from becoming victims of modern slavery through fair recruitment practise, pay and conditions, and having support mechanisms in place such as access to whistleblowing and an employee assistance programme.

   iii. **Our Jurisdiction -** Creating conditions that minimise the risk of modern slavery occurring within the Square Mile, identifying modern slavery that does occur within our geographical jurisdiction, referring any victims on to the help and support they need and ensuring any perpetrators of this crime are brought to justice.

   iv. **Our Wider Community –** Using our influence to facilitate positive action on modern slavery amongst charitable organisations and our wider business community.

v. **Our Supply Chains –** Using responsible procurement and contract management due diligence procedures to minimise risks of modern slavery taking place within our domestic and global supply chains.

5. Within each of these five sections, the following aspects are described, as per the requirements of a modern slavery statement under s.54 of the Act:

   a. **Remits and relevant risks** – Within the remit of each department; identifying the people, places, trades and industries at highest risk of being associated with modern slavery

   b. **Policies and commitments** – Overarching and department-specific policies and commitments to tackling modern slavery and associated human and labour rights abuses

   c. **Existing interventions** – Actions already being undertaken to identify and deal with modern slavery and to minimise the risk of it occurring. This includes training & awareness programmes and due diligence procedures such as referrals, site visits & spot checks, contractual provisions and contract monitoring & management.

   d. **Continuous improvement** – Assessing the effectiveness of our current interventions, creating plans to bridge identified gaps, developing appropriate performance indicators, monitoring and reporting on progress.

i. Our organisation

a. Remit and relevant risks

6. The Square Mile is the historic centre of London and is home to the 'City' – financial and commercial heart of the UK. The City Corporation provides local government services for the Square Mile and supports and promotes the City as the world leader in international finance and business services. The organisation's responsibilities extend far beyond the City boundaries in that it also provides a host of additional facilities for the benefit of the nation, including air and sea ports, the Barbican and various open spaces.

7. City Bridge Trust is the funding arm of Bridge House Estates, of which the City Corporation is the sole trustee. It was established to make use of funds surplus to bridge requirements and provides grants totalling around £20m per year towards

charitable activity benefitting Greater London. Heart of the City is a business-led charity, limited by guarantee and housed the City Corporation, which is its main funder and Treasurer.

8. The City of London Police is the territorial police force responsible for law enforcement within the City of London, with other specific remits nationally. The City of London Police is divided into four directorates: Crime Investigation, covering serious & organised crime, terrorism, acquisitive criminality and violent crime; Economic Crime, which looks at fraud; Intelligence and Information, responsible for coordination of intelligence and information management; and Uniform Policing, providing policing response and specialist skills and support both internally and to other police forces.

9. From an organisational perspective, it is recognised that modern slavery is a crime that is prevalent both within and outside of the UK, across many industries and as such it is a risk that the City Corporation takes seriously. However, rather than this risk being looked at in isolation, modern slavery is managed alongside a range of other risks that must be dealt with as part of our business activities e.g. implementing responsible procurement, tackling serious and organised crime, safeguarding of children and vulnerable adults, health and safety in construction etc.

b. Policies and commitments:

10. The recently published Corporate Plan (2018-2023) sets out the priorities of the City Corporation as the governing body of the Square Mile, dedicated to a vibrant and thriving City, supporting a diverse and sustainable London within a globally successful UK. The following aims and outcomes within the Plan underpin the City Corporation's commitment to combatting human and labour rights abuses such as modern slavery:

10.1 ***Contribute to a flourishing society:***

- People are safe and feel safe
- People enjoy good health and wellbeing
- People have equal opportunities to enrich their lives and reach their full potential

10.2 ***Support a thriving economy:***

- Businesses are trusted and socially and environmentally responsible

11. The Responsible Business Strategy 2018-23: 'Towards a Sustainable Future' describes in more detail how the City Corporation intends to achieve the above aims and outcomes. This Strategy sets out the organisation's objective of creating positive

impact and reducing negative impact across all its activities and decisions. More specifically, the Strategy states the City Corporation's stance on advocating for human rights in its decision-making processes so that people are treated appropriately and with dignity. The Strategy also details its commitment to actively preventing fraud, corruption and bribery in its own operations and influencing supply chains and partners to do the same.

12. The following is the City Corporation's stand-alone Policy on modern slavery:

Overarching City of London Corporation Modern Slavery Policy
The City Corporation recognises its responsibility to help identify and eliminate modern slavery through its business activities. The organisation will ensure that effective due diligence procedures are in place to safeguard against any form of modern slavery taking place within our business, our jurisdiction or our supply chain. These procedures will be reviewed and continuously improved upon over time.

c. Existing interventions

13. Representatives from the City of London Police, the Barbican, City Procurement, Department for Community and Children's Services, Community Safety and Corporate Strategy and Performance Team came together in early 2018 to establish the City Corporation's inter-departmental Working Group on modern slavery.

14. The first priority of the Working Group was to bring together all current action taking place to tackle modern slavery by the City Corporation, to harmonise our approach and ensure that resources and lessons learned are shared across the City Corporation. This current Modern Slavery Statement was developed based on this work.

d. Continuous improvement

15. The Working Group plans to invite representatives from other relevant departments to contribute their ideas going forward, including HR and Licensing. A network of 'Safeguarding Champions' is to be re-launched in the coming months, acting as departmental points of contact and channels for dissemination of key messages to and from the Working Group.

16. The next priority of the Working Group going forward is to identify any gaps or weaknesses and plan future interventions and areas for potential collaboration that could be used to continuously improve our approach. The principal areas identified so far are an increased number of internal and external training and awareness raising initiatives.

17. Specific continuous improvement plans are discussed more fully as part of the following sections covering Our People, Our Community and Our Supply Chain.

ii. Our People

a. Remit and relevant risks

18. This section covers the City Corporation's work helping to protect our own employees from becoming victims of modern slavery. These City Corporation-wide efforts are led by our Human Resources Department.

b. Policies and commitments

19. Alongside the City Corporation's Modern Slavery Policy outlined in Section 1.b, the City Corporation has a series of policies, codes of conduct and adopted principles that set out how the organisation makes sure that people are working legally, that everyone is treated fairly and with dignity, and that people conduct themselves appropriately.

20. **Recruitment Policy:** The City Corporation operates a robust recruitment policy, including conducting 'right to work in the UK' checks for all employees. All offers of employment are conditional on these checks being completed to the organisation's satisfaction. Where an individual is working in the UK on a visa or work permit of a fixed term, the City Corporation requires the individual to provide proof of their continuing right to live and work in the UK before continuing their employment.

21. These processes are managed and overseen by our HR department and guidance is provided to all recruiting managers to ensure these checks are carried out effectively. They represent an initial measure of safeguarding against the City Corporation employing any individual that has been illegally trafficked and/ or is being forced to work against their will.

22. **Whistleblowing Policy:** The City Corporation's Whistleblowing Policy applies to all staff. It details the channels through which employees should raise serious concerns,

providing assurance that there should be no fear of reprisals. Concerns regarding potential instances of modern slavery can be raised in this way alongside other forms of abuse and coercion staff may be experiencing or suspicious of. Staff are made aware of this Policy through various channels including during induction training and the staff intranet.

23. **Codes of Conduct:** Our continued success relies on the trust and confidence of the public and therefore all staff and elected representatives are expected to uphold the highest standards of personal conduct and integrity including a requirement for all staff to uphold the Nolan Principles on standards in public life.

24. There are 100 Common Councilmen and 25 Aldermen serving as elected representatives, collectively referred to as 'Members'. Members represent public interest and inform how the City Corporation should carry out its various activities. Members adhere to the City Corporation's Code of Conduct for Members.

25. Similarly, City Corporation employees must adhere to the City of London's Employee Code of Conduct. This incorporates requirements to abide by City of London anti-corruption measures and that all employees are treated with fairness and equality.

26. The Code also sets out the expectation that employees, and other stakeholders including suppliers, who have serious concerns about the conduct of any aspect of the City Corporation's work to come forward and voice those concerns. It commits the organisation to treating any suspicion of wrongdoing seriously, with concerns reviewed and analysed in accordance with the Whistleblowing or Complaints Policy, considering the Public Interest Disclosure Act, the Human Rights Act and if appropriate the City Corporation's Anti-Fraud and Corruption Strategy.

c. Existing interventions

27. **Policy implementation:** The City Corporation strives to be an excellent employer with a modern suite of employment policies and procedures. Corporate HR ensures the effective management of policies, this includes routine reviews to be in compliance with legal and mandatory requirements, alignment to best practice, monitoring and enforcement oversight.

28. It is the responsibility of all managers across the organisation to put written policies and procedures into practice. Under the 'Managing People Policy', managers are primarily responsible for ensuring their consistent application so that all employees

are managed in a fair and consistent manner. It is also important for Managers to support employees in understanding and interpreting policies correctly.

29. Corporate HR ensures the ready accessibility of its HR policies and procedures through the Employee Handbook, HR Topics pages, Managers' Guide and a New Starters' Resource page; all of which are located on the intranet. In addition, the provision of a suite of training workshops/briefings, e-learning, team meetings and staff/manager news items are just some of the means of cascading either changes or new policies and procedures.

30. The City Corporation has an Employee Assistance Programme, which operates 24/7 for 365 days of the year, to provide staff and their partner or a family member confidential support on a wide range of work and personal issues which may include cases of modern slavery.

31. **Training:** The City Corporation has made an e-learning course available to all staff and Members. This hour-long online modern slavery training aims to raise awareness of the issue and help staff recognise their role in identifying and reporting concerns.

32. **Living Wage:** The City Corporation is proud to be an accredited Living Wage employer. This commits us to paying at least the Living Wage to all staff, contractors and sub-contractors according to the parameters set by the Living Wage Foundation. The City Corporation also goes one step further by paying the Living Wage to all apprentices and interns.

d. Continuous improvement

33. The City Corporation has on-going commitment to train all managers as part of the organisation's Health and Wellbeing Strategy. The strategy has also included the roll out of Mental Health First Aiders within the departments. These roles are well placed as the potential first point of contact for employees who are experiencing any mental health issues or emotional distress, to identify potential signs of Modern Day Slavery.

34. The City Corporation is currently reviewing methods of monitoring payment of the Living Wage, along with the scope of the policy application. Any changes will be reported on as part of the next City Corporation modern slavery statement published in November 2019.

35. Coinciding with the publication of this Modern Slavery Statement, Chief Officers will encourage all staff to take a high-level version of the online modern slavery training.

The number of staff that have undertaken this training will be used as a performance indicator of information dissemination going forward.

iii. Our Jurisdiction

a. Remit and relevant risks

36. This section covers the protection of the community of the Square Mile from modern slavery. It is the City Corporation's responsibility to create conditions that minimise the risk of modern slavery occurring, monitor the highest risk trades and industries to identify any instances of modern slavery that do occur within our geographical jurisdiction. Any cases on modern slavery identified in the City would need to be referred to the City of London Police and the City of London's Single Point of Contact (SPOC), the Safeguarding and Quality Assurance Service Manager. Support would be offered to victims of modern day slavery through the Adult Social Care Team or Children's Social Care team. These services would then make a referral through to the National Referral Mechanism to support the victims of modern slavery and ensure any perpetrators of this crime are brought to justice. These interventions involve the Safer City Partnership (SCP), Community Safety team, Markets and Consumer Protection Department's Licensing team, the Department for Community and Children's Services Safeguarding and Quality Assurance team and the City of London Police.

37. The SCP brings together statutory and non-statutory representatives who aim to contribute towards keeping the City safe. Statutory partners include the City Corporation, City of London Police, London Fire Brigade, London Probation trust and the NHS Clinical Commissioning Group.

38. There is no typical victim of slavery. Victims are men, women and children of all ages, ethnicities and nationalities and cut across the population. However, it's normally more prevalent among the most vulnerable or within minority or socially excluded groups. Potential victims of human trafficking were reported from 116 different nationalities in 2017 according to the National Crime Agency's National Referral Mechanism statistics. Albanian, UK and Vietnamese nationals were the most commonly reported potential victims. 5,145 potential victims were submitted to the National Referral Mechanism in 2017, which was a 35% increase on 2016. In 2017, the National Referral Mechanism received 4714 referrals in England of which 2,464 potential victims of modern slavery cases were men, while 2247 were women, 2753 were adults and 1961 were children. The biggest increase in type of exploitation for adults is sexual

exploitation and children is labour exploitation. Other vulnerable groups include, but are not limited to, people who are/ have been involved in illegal activities, those who do not have a right to remain in the UK, children who are fleeing their home countries and seek out refuge in the Square Mile.

39. People at the highest risk of being victims of modern slavery in the Square Mile include sex workers, street traders, people employed in the hospitality industry i.e. hotels and restaurants, cleaners, construction workers and those providing domestic and care services or personal health and beauty services.

40. The City of London Corporation has responsibilities for over 40 sites outside the Square Mile including air and sea ports, open spaces, schools, housing estates, markets and cultural attractions. In terms of the sections of this modern slavery statement that cover our responsibilities in these areas:

    40.1 In terms of people within our workforce, the interventions described in 'Section ii: Our People' applies, no matter the location of the site

    40.2 In terms of suppliers or contractors, the interventions described in 'Section v: Our Supply Chains' applies, no matter the location of the site or department

41. In terms of any other person, who is not an employee or supplier to the City Corporation, being identified to be at risk of, or of currently being a victim of modern slavery on one of our sites outside the Square Mile, or being identified by someone affiliated with one of these satellite sites, the relevant police force, and Border Force in the case of ports, should be informed as they would have jurisdiction in this geographical area and would deal with the matter as part of their own policing strategy and through the National Referral Mechanism.

b. Policies and commitments:

42. The Department for Community and Children's Service's has identified a representative who will be acting as the single point of contact (SPOC) for modern day slavery for the City Corporation. This role is currently being held by the Safeguarding and Quality Assurance Service Manager, who supports referrals through to the National Referral Mechanism.

43. The Community Safety Team's commitment is to help keep all those who live, work or visit the Square Mile safe. The Team works closely with our communities to

understand their concerns and priorities and provide advice to help prevent people becoming a victim of crime and to promote awareness of how to report problems.

44. The City of London Police's Action Plan on Modern Slavery and Human Trafficking uses a four-pronged approach based on protection, preparation, prevention and pursuit. The actions are described in part c) below.

c. Existing interventions

45. **City of London Police:** Specific roles and responsibilities are delegated within the Force around training and intelligence and to deal with the victim(s), the suspect or organised crime groups and the subsequent investigation. The City of London Police's response to modern slavery is coordinated through the Force Lead, the Chief Inspector of Uniformed Policing – Custody and Response. The current Action Plan on Modern Slavery and Human Trafficking uses a '4 P's' approach:

45.1 ***Protect*****:** This action includes close working with public bodies and private industry to identify vulnerabilities and improve the Force's target hardening capability in response. Intelligence and information sharing is essential to this work, enabling all parties to identify the threat and protect the economy and our communities:

- Promote awareness of the signs of modern slavery;
- Develop victim centric processes; and
- Collaborate with stakeholders and partners to identify early intervention opportunities.

The City of London Police form an essential part of the City Corporation's Working Group on Modern Slavery.

45.2 ***Prepare:*** This work includes developing positive relationships with law enforcement agencies and wider community, including the public, private and third sectors. The aim is to engage strategically and tactically to build specialist knowledge, enhance the Force's capability and effectives and to cut crime and protect the public:

- Intelligence picture to be regularly updated;
- Roll out training to frontline officers to educate and promote awareness in recognising victims at the earliest opportunity;
- Establish best practice regarding investigation of modern slavery offences; and
- Educate and inform City of London Police staff and partners/stakeholders.

As an example of recent work carried out as part of this action, train-the-trainer training was rolled out in Summer 2018 to City of London Police officers in order to facilitate knowledge as widely as possible on recognising the signs of modern slavery whether as part of the role of front office staff, a PC on patrol or a Detective executing a search warrant.

45.3 ***Prevent:*** This action encompasses the design and management of campaigns with partners to highlight the impact of the organised crime gang. These initiatives should deter individuals from committing organised crime and encourage people to report it. Creating a hostile operating environment for organised crime groups is essential.

- Conduct visits to perceived vulnerable premises;
- Promote convictions in media;
- Conduct prison visits;
- Promote use of orders for Slavery and Trafficking Prevention Orders.

The City of London (CoL) Police take an active role in identifying victims of modern slavery and human trafficking within the Square Mile and within high risk industries, for example by speaking to sex workers in brothels in collaboration working with partner charities and also by visiting construction sites and providing inputs within the community to other areas considered to be more susceptible to this crime type such as within the hospitality trade.

45.4 ***Pursue:*** This includes arrests, seizures and criminal prosecutions. Work takes place alongside public, private and third sector professionals to disrupt organise criminals, their associates, business endeavours and way of life.

- Identify offenders involved in modern slavery and bring to justice;
- Disruption of organised crime groups continuing to offend;
- Establish strong and effective collaborations to tackle modern slavery.

46. **Department for Community and Children's Services (DCCS):** has a responsibility to safeguard children and adults in the City of London, this responsibility is in conjunction with other agencies, as set out in the 'Working Together to Safeguard Children' guide to inter-agency working to safeguard and promote the welfare of children, published in July 2018. Further guidance is also available within the Pan London Safeguarding procedures for adults and children. The Joint City and Hackney Safeguarding Board for Adults and the corresponding Board for Children has oversight on the training and development of strategies on modern slavery, as does the Safer Community Partnership.

47. **Serious and Organised Crime (SAOC) Board:** The Board works to improve the collection, collation and analysis of data on modern slavery, including sexual and labour exploitation in order to understand and help mitigate the threat of these crimes.

48. **Public Protection and Environmental Health:** The City Corporation's Markets and Consumer Protection Department, amongst other remits, is responsible for regulating most of the premises within the Square Mile. As part of the Department's everyday duties they conduct inspections e.g. to ensure health & safety or food safety, at sites that may pose a risk of being associated with modern slavery including massaging and special treatment premises, construction sites, hotels, restaurants and street trading stalls. The team forms part of the Safer City Partnership and Serious and Organised Crime Board and responds to requests from HM Revenue & Customs and Police requests to look out for certain activities they are suspicious of.

d. Continuous improvement

49. **The City of London Police:** The comprehensive interventions that form part of the Action Plan on Modern Slavery and Human Trafficking detailed in part c) above will continue to be rolled out over the coming year. The effectiveness of these measures will be monitored alongside other policing objectives as part of the Force's overall approach.

50. **The Department of Community and Children's Services:** It is currently working with safeguarding partners, formally known as the Local Safeguarding Board for both Children and Adults on the development of a 'Joint Strategy for Modern Day Slavery'. The City of London has been tasked by the Board to develop a Strategy on Modern Slavery that focuses on the demography and needs of the City. There will be a focus on raising awareness around modern slavery across the City Corporation, including through training. Resources and ideas from both organisations will be pooled and lessons learned from similar local authority initiatives will be drawn on to create a meaningful and effective joint approach.

51. **Serious and Organised Crime (SAOC) Board:** The SAOC Board has identified modern slavery as a high priority threat that can have devastating impacts. It provides an advisory function and reports into the Safer City's Partnership. The SAOC will continue to find effective ways of raising awareness about modern slavery and working in partnership with agencies that intercept and dismantle organised crime groups, preventing them from profiting from modern slavery and human trafficking. Improved procedures to share intelligence on organised crime groups will be

developed with the eventual aim of preventing recruitment of vulnerable people into modern slavery.

52. **Community Safety:** Events aimed at raising awareness of modern slavery amongst City Corporation staff and City businesses will take place over the next year. These will be focused on helping delegates to recognise potential signs of modern slavery and to know what to do in such circumstances.

iv. Our Wider Community

a. Remit and relevant risks

53. This section covers the City Corporation's wider influence within surrounding boroughs, Greater London, the UK and further afield.

54. **City Bridge Trust:** The City Corporation plays a philanthropic role through the City Bridge Trust, which provides £20m per annum in grant funding across Greater London. The Trust supports work which reduces inequality and grows more cohesive communities for a London that serves everyone. The Trust aims for London to be a city where all individuals and communities can thrive, especially those experiencing disadvantage and marginalisation.

55. **Heart of the City**: runs the UK's only responsible business programme specifically designed to include SME's. This two-year Foundation programme equips and coaches business leaders to run successful companies that make a positive difference to people, places and the planet. Focusing on the practical, its events, online resources/templates and network are designed to support those companies new to responsible business with complex issues, such as tackling modern slavery. Heart of the City's network of contributor companies has responsible business expertise and resource in-house and they provide foundation members with support, mentoring and guidance. Funding from the City of London Corporation, City Bridge Trust and the City of Westminster Council has made places available for year one of the programme, enabling businesses to get involved without a designated responsible business budget.

56. Members of the network are businesses across a broad spectrum of industries, operating across London. The main risks of modern slavery within financial and other professional service industries are within their wider supply chain.

57. **The City of London Fairtrade Steering Committee** is administered by the charity JustShare on behalf of the City of London Corporation. Chaired by the Lord Mayor's Chaplain and attended by City Corporation Elected Members and relevant staff, the Recorder of London, Cheapside Business Alliance and various livery company representatives; it leads action on promoting fair trade within the Square Mile.

b. Policies and commitments:

58. Following a review of its charitable funding, the City Bridge Trust launched its new grant programme, 'Bridging Divides'. This programme has the following funding priorities: a) Connecting the Capital, b) Positive Transitions, and c) Advice & Support. These will help the Trust to achieve its vision for London to be a city where all individuals and communities can thrive, especially those experiencing disadvantage and marginalisation.

59. The City Corporation believes that the concept of fair trade is central to sustainable development and aims to be recognised by its stakeholders and partners as an organisation that actively supports and promotes the concept of Fairtrade and fairly traded products. In support of this commitment, the City Corporation signed its Fairtrade Resolution in 2007.

c. Existing interventions

60. **City Bridge Trust:** The Trust is currently inviting applications from specialist support services that will enable positive transitions in relation to children and young people, migrants and refugees, disabled people, ex-offenders and survivors of domestic and sexual abuse; modern day slavery; trafficking; and hate crime.

61. The Trust currently funds the 'Helen Bamber Foundation', which supports refugees and asylum seekers who have experienced human trafficking, 'Stop the Traffik', which aims to systemically disrupt global human trafficking and modern slavery networks by building resilient communities and the 'Human Trafficking Foundation', which was established to support and add value to the work of the many charities and agencies operating to combat human trafficking in the UK.

62. **Heart of the City** supports businesses to create and implement a responsible business strategy, focusing on increasing activities across four key areas – community, environment, workplace and marketplace. To date over 750 businesses (600 of which are SMEs) have completed the charity's Foundation programme. Each member is supported by an account manager and online resources including modules,

templates and tip sheets on ethical sourcing within procurement and tackling issues of modern day slavery.

63. **The Fairtrade Steering Committee** organises a number of events to promote fair trade and ethical sourcing more generally. In November 2017, it ran an event aimed at raising a broader awareness of modern slavery, which featured speakers from the City Corporation's Procurement team and the Cambridge Centre of Applied Research in Human Trafficking, alongside Baroness Young of Hornsey, sponsor of the Modern Slavery (Transparency in Supply Chains) Bill 2017-2019.

d. Continuous improvement

64. The Bridging Divides grant programme will see around £100m distributed over the next five years to tackle inequality across the Capital and will continue to fund organisations that help to tackle modern slavery in the UK and support its victims.

65. Heart of the City provides online resources for its members regarding responsible procurement as well as a guide to the Modern Slavery Act. Should a Foundation Programme member have specific questions, Heart of the City can connect them to a volunteer from a Contributor company (often larger firms). These experienced responsible business professionals should be able to assist or signpost elsewhere.

v. Our Supply Chains

a. Remit and relevant risks

66. City Procurement is the City Corporation's centralised procurement team who deal with the majority of contracts worth £10,000 or more. Exceptions to this include agreements between the Barbican and its artists and services commissioned by the Department for Community and Children's Services. Interventions described in this section relate to those contracts for supplies, services and works over the £10,000 threshold. Staff undertaking procurement exercises below this value on behalf of the Corporation will be encouraged to undertake online training to ensure they consider the risks of modern slavery as part of their due diligence processes.

67. City Procurement take the lead on tackling modern slavery within our supply chains, but work in conjunction with stakeholder departments with the greatest risk of procuring goods, services or works associated with this crime.

68. The highest risks of people falling victim to modern slavery in our UK-based supply chain include construction workers, those undertaking service contracts in relatively low paid industries such as cleaning, catering, security, agriculture and the care industry. Although not necessarily defined in the same way, the City Corporation recognises that those industries can often operate as part of the gig economy

69. The highest risks of modern slavery further up our globalised supply chain, especially forced and child labour, are associated with the production and manufacture of electronic equipment, textiles, agricultural commodities and construction materials. Conflict minerals including gold, tin, tantalum and tungsten, found in computer equipment and vehicles are also of significant concern.

b. Policies and commitments:

70. The City Corporation's 2015-2018 Responsible Procurement Strategy aims to deliver best value in a way that improves the lives of those in its supply chain and help the City Corporation make procurement decisions that act as a catalyst for positive change. It is based on three pillars; social value, environmental sustainability and ethical sourcing. The latter details the City Corporation's commitment to tackling human and labour rights violations, including but not limited to modern slavery.

c. Existing interventions

71. **Commercial Contract Management (CCM):** The CCM team's role is to embed best practice consistently across the City Corporation's contract management provision, including supplier performance monitoring. The team have developed a 'Performance Scorecard' to ensure that a standard and robust approach is taken to monitor, gather evidence and handle risks or failing performance. One of the ten elements covered by the Scorecard is ethical sourcing and in particular; supplier compliance with the Modern Slavery Act.

72. All relevant suppliers that wish to tender for City Corporation contracts must provide evidence that they have met the requirements of the Modern Slavery Act 2015 in order to be able to bid.

73. A series of interventions are currently being used to ensure compliance with human and labour rights legislation, including the Modern Slavery Act, according to the nature of the contract in question. The following are interventions currently taken amongst our highest risk categories of spend:

a. ***Communities and Children's Services:*** Services for vulnerable young people, such as care leavers, and vulnerable adults are monitored regularly to ensure that safeguarding requirements are in place. New services are commissioned using the Corporation's minimum safeguarding standards. These are based on the set of minimum expectations developed by The City & Hackney Safeguarding Children Board (CHSCB) and provide clarity to both commissioners and contractors of services as to what must be considered when engaging external services. Due diligence procedures include Disclosure and Barring Service (DBS) checks, reviews of safeguarding policies, procedures and complaints. Providers ability to meet these standards are tested through the procurement process.

b. ***Textiles:*** As part of the City Corporation's current police uniform contract led by the Metropolitan Police, contractors are required to meet a strict corporate responsibility code of conduct covering product, environmental and ethical standards. Specific requirements include annual third-party audits, declarations of manufacturing facilities and registration with a shared audit database.

c. ***Electronic equipment:*** Over the last year, the City Corporation has introduced ethical sourcing requirements within the specifications of contracts involving electronic equipment including closed circuit television (CCTV) cameras and multi-functional devices (MFDs). Within 12 months, contractors are required to produce a supply chain map highlighting key risks including forced and child labour. Subsequently the contractors establish a strategy, in collaboration with the City Corporation, to mitigate these risks. Specific actions may include strengthened contractual requirements with their own supply chain, internal or third-party auditing and/or affiliations with organisations who specialise in supply chain transparency. As part of its social value offering, the City Corporation's IT managed service provider is currently undertaking a supply chain mapping exercise on IT hardware used to support the services delivered to the City Corporation.

d. ***Construction materials:*** The City Corporation is now taking a more robust approach to mitigating the risks associated with construction materials used as part of works contracts e.g. bricks, steel, timber, natural stone products etc. As part of the recently established intermediate and major works frameworks, the City Corporation requires contractors to present their current due diligence procedures within a month of contract

commencement. Feedback is then provided on any further interventions the City Corporation considers necessary. Proposals for continuous improvement are then developed by the contractor and mutually agreed as part of an ongoing action plan, which is monitored quarterly as part of ongoing key performance indicators (KPIs).

74. The Barbican, of which the City Corporation is the founder and principal funder, publishes its own annual Modern Slavery statement. As committed to in its 2017/18 statement, the Barbican has recently introduced a standard clause in all its future contract for services and suppliers that commits suppliers to comply with the Barbican/City Corporation's Policies on modern slavery and human trafficking, both in engaging the supplier's own staff or in relation to sub-contractors and agents.

75. Additional clauses also recently introduced require suppliers to ensure they fulfil the obligations set out City Corporation's Equal Opportunities Policy and ensure all staff and all other people engaged or managed by external suppliers and visiting companies are treated with dignity and respect.

76. The City Corporation helped establish and co-Chairs the London Responsible Procurement Network (LRPN), a group of public sector representatives who meet regularly to share best practice and develop harmonised approaches to achieving social value, environmental sustainability and ethical sourcing. This Group also feeds into the London Heads of Procurement Network, facilitated by London Councils. A series of meetings and workshops dedicated to modern slavery have already taken place with the aim of sharing effective interventions and learning lessons from one another on how to effectively tackle modern slavery within London's public sector supply chains.

d. Continuous improvement

77. Over the next year, a 'Supplier Code of Conduct' will be developed by City Procurement with the aim of detailing the City Corporation's expectations more clearly to our supply chain and facilitating a more rigorous approach to contract management.

78. Work planned for the coming year to improve our approach to implementing appropriate due diligence procedures within specific high-risk categories includes:

    a. **Construction Sites:** Moving forward, City Surveyors, the Department of the Built Environment and others involved in managing construction works on behalf of the City Corporation will work with City Procurement, City of

London Police and others to develop an approach to mitigating the risk of modern slavery taking place on its construction sites. It will involve the use of more detailed contractual provisions, awareness raising with supervisors on site and increased compliance checks. This work will take place alongside other action taken in response to increased levels of CSCS card fraud and incidences of illegal workers on UK construction sites.

b. **Textiles:** When establishing our new corporate uniform contract, the City Corporation will undertake an approach similar to that currently implemented in the existing police uniform contract, especially in regards to increased transparency of manufacturing locations and audit procedures.

c. **Food:** During the mobilisation period of the new corporate catering contracts, the City Corporation will work with its three catering contractors, as part of the CCM approach and through supplier relationship management, to ensure appropriate due diligence procedures are undertaken, especially in relation to mitigating risks of exploitation of workers involved in food processing, harvesting and the fisheries industry.

79. The City Corporation will continue to collaborate with other public sector bodies as part of the LRPN and with the London Heads of Procurement (LHoP) to improve its own approach to tackling modern slavery and share learning and best practice with other public authorities.

80. Through its Commercial Contract Management team, the City Corporation will form closer relationships with a broader set of key suppliers and use a partnership approach to identify and help mitigate the risks of modern slavery occurring in our global supply chains.

81. The City Corporation will refresh its Modern Slavery Statement annually; the next will be published in November 2019. This will include updated policies and commitments, interventions, with a summary of progress made during November 2018 – October 2019 alongside future plans for continuous improvement.

Chief Officer sign-off: This Modern Slavery Statement was approved by the City of London Corporation's Summit Group on 26th September 2018

Signed: *John Barradell* Town Clerk

Elected Member sign-off: This statement was approved by the City of London Corporation's Policy and Resources Committee on 15th November 2018

Signed: *Catherine McGuinness* Chairman, Policy & Resources Committee

Committee Establishment Committee	Date: 29/10/2018
Subject: Declaration of Interests and Register of Interests: Chief Officers and Senior Managers at Grades I & J	**Public**
Report of: Chrissie Morgan - Director of Human Resources	**For Decision**
Report author: Carol Simpson – Town Clerk's	

Summary

At the Establishment Committee of 9 July 2018, Members received a report detailing the Declaration of Interest process for Officers. It was noted that a further report would be forthcoming with revised guidelines for the Chief Officers' Register of Interests. Members also asked that, the Chief Officers' Register of Interests and Senior Managers, should mirror that of Members.

Officers have now further reviewed the process for Chief Officers and Senior Managers at Grades I & J, including any other staff with the same level of seniority. This report seeks approval of a revised process for all such senior management grades which will mirror in the main the current process for Members. However, whilst the Register of Interests for Chief Officers is in the public domain this should not apply to Senior Managers at Grades I & J. These arrangements will ensure parity and consistency across the senior management tiers.

Recommendations

That the Committee:

i. Approves the revised Declaration of Interests and a separate Register of Interests process for Chief Officers and Senior Managers at Grades I & J; which will reflect in the main the process currently carried out by Members with the exception that only the Register of Interests for Chief Officers will continue to be in the public domain.
ii. Notes the revised breakdown of disclosure requirements illustrated in the Declaration and Register of Interests Summary Table attached as Appendix 1; and the Declaration and Register of Interests Managers' Guidance attached as Appendix 2.

Main Report

Background

1. The Officers' Code of Conduct provides the overarching policy and guides how City Corporation Officers (and other relevant workers) address and manage actual or potential conflicts of interest. Interests declared can be categorised as pecuniary or non-pecuniary.

2. The objective of making declarations is to ensure that Officers demonstrate high ethical standards in carrying out official duties; to in turn demonstrate that decisions made are free of bias, in order to maintain public confidence in the City Corporation.

3. The previous Committee report addressed matters around what constitutes a conflict of interest and set out the various methods to make the different types of declarations required within the Code of Conduct.

Current Position

4. On an annual basis Chief Officers complete a Declaration of Interest form submitted to the Town Clerk; this form remains an internal only document, unless there is an overriding legal requirement for disclosure i.e. where a request is made under the Freedom of Information Act and no exemption applies. The completed Declaration of Interest form is held securely by Corporate HR. The form already contains many of the areas covered in the Member Register of Interests and it is suggested that this is now expanded to include additional areas.

5. The Declaration of Interest form is also completed by other specified Officers on an annual basis and any other member of staff who may be required to complete a declaration for a specific purpose as set out in the Code of Conduct. There is currently no default requirement for Senior Managers at Grades I & J to complete a Declaration of Interest form annually based on their grade alone. However, as Senior Managers, many are invariably responsible for contract placement which would require them to complete a form when involved in procurement but not necessarily on an annual basis. All staff in City Surveyors are required to complete an annual Declaration of Interest form.

6. Chief Officers must also complete a Register of Interest form annually which is submitted to the Establishment Committee to review specifically the approximate time spent on outside voluntary and / or paid work, or interests for potential conflicts. In accordance with the July 1997 Negotiating Sub-Committee decision this information became part of the public record and named individual records are available in public committee papers.

7. There is no current requirement for Senior Managers at Grades I & J to complete a separate Register of Interest form, as described above for Chief Officers.

8. There is a separate declaration on Related Parties[1], whereby transactions and / or relationships in connection with the City Corporation's activities are recorded by The Chamberlains Department, which are then published in the City Corporation's annual financial statements anonymously. This is a separate process managed by the Chamberlain and does not form part of the recommendations within this report.

[1] As required by the City Corporation Finance Committee for every Member of the Court and each Chief Officer.

9. An area in which Members have previously indicated their concern relates to the data capture regarding membership of organisations not open to the public with formal membership and commitment of allegiance, and which has secrecy about rules and / or membership e.g. Masonic, a Society Trust. These membership declarations are currently included within the Code of Conduct and in turn the Declaration of Interest process, applicable to all Officers.

10. Summit Group in September 2018 considered this matter and recommends that the revised Declaration and Register of Interests process for Chief Officers now includes all Senior Managers at Grades I & J, including any other staff with the same level of seniority.

11. Consideration has been given to aligning Members and Officers disclosures, but this raises a range of issues. Members complete a Register of Interests which must be made available for public inspection, in compliance with the Localism Act 2011 and the City Corporation Members' Code of Conduct[2]. Whilst the Chief Officers complete a Declaration of Interests and separate Register of Interests form with the latter becoming part of the public record, as outlined in paragraph 4 above.

12. Furthermore, different reporting requirements currently apply to Officers. For instance, to attempt to align Officers disclosures regarding political party membership[3] and trade union membership, such information is classified as 'special category data' under the Data Protection Act 2018 which dictates its processing must be proportionate to the aim pursued and be necessary for reasons of substantial public interest i.e. necessary to discharge our public functions.

13. Similarly, where Members make pecuniary interests declarations in respect of their spouse, civil partner, or person living as such as required under the Localism Act 2011; it would be disproportionately intrusive to request the same information for Officers where there is no legislative requirement to do so. In addition, the Human Rights Act 1998 gives people the right to a private life; thereby in requesting these disclosures they must outweigh the individual's right to a private life. However, this does not detract from the fact that the Officer's Code of Conduct presently requires declarations of any benefit derived by their partner, spouse or relative or anyone else in a close personal relationship e.g. sponsorship of an event or service. In addition, employees should not be involved in employment decisions for any other employee who is a relative, partner or someone with whom they are in a close personal relationship.

Proposals

14. Taking all of these matters into account it is proposed that in order to achieve the transparency Members have asked to be considered, that the additional categories included in the Members' Register of Interests are required to be disclosed by Chief Officers and Senior Managers at Grades I & J, as part of the new proposed annual Declaration of Interest. However, this is with the

[2] Including any disclosable pecuniary interests specified in Regulations made by the Secretary of State.

[3] Apart from disclosure of political activities in accordance with the Local Government Officers (Political Restrictions) Regulations 1990 for Officers in politically restricted posts.

exceptions detailed in paragraphs 12 and 13 above. The additional categories Officers declare will not form part of a public record but will have the same level of scrutiny and consideration. For clarity, the additional disclosures required relate to:

- Land within the area of the City of London Corporation.
- Licenses (alone or jointly with others) to occupy land in the area of the City of London.
- Corporate tenancies, where to the Officer's knowledge (a) the landlord is the City of London Corporation; and (b) the tenant is a body in which the Officer has a beneficial interest.
- Securities. Any beneficial interest in securities of a body where that body (to the Officer's knowledge) has a place of business or land in the area of the City of London Corporation; and exceed specified values.
- Membership of a Livery company, City Company without Livery, Guild or Company seeking Livery Membership.
- Think tank membership - an organisation one of whose principal purposes include the influence of public opinion or policy and which is likely to seek to affect the policy of the City Corporation, or which may have an impact on its services or stakeholders.
- Professional association membership.
- Trade association membership.

15. Senior Managers at Grades I & J will complete an annual Declaration of Interest in the same way as their Chief Officer counterparts; and a Register of Interests form but this will not form part of the public record.

16. A breakdown of disclosure requirements is illustrated in Appendix 1 of this report. Corporate HR will provide a template letter and form for this information to be requested annually.

17. The relevant department's Chief Officer will make an assessment of the potential risk and impact of any declaration for Senior Managers at Grades I & J, consulting internally as required for relevant professional advice. Either the declaration made will be confirmed as acceptable with or without any recommendations (to mitigate any potential conflict of interest); or the declaration is not considered to be acceptable. Depending on the recommendation this will be acted on and recorded accordingly.

18. As with the Chief Officer Declarations of Interest, returns from the Senior Managers at Grades I & J will be reviewed by the Director of HR to maintain an overview of all senior management disclosures, monitor completion levels and retain centrally.

19. The Register of Interests forms for Chief Officers will continue to be reported to Establishment Committee, but those for the Senior Managers at Grades I & J will be held centrally by the Director of HR with access governed by Data Protection legislation.

20. To ensure transparency, any Senior Manager with no declarations will be required to submit a nil return.

21. It is proposed that the Director of HR has the delegated authority to take forward any consultation required as set out under Implications at paragraphs 27 and 28 of this report; and reflect any agreed changes in the Officers' Code of Conduct.

Corporate & Strategic Implications

22. Revisions to the Chief Officer and Senior Officers Declaration of Interest brings this group into closer alignment to that of disclosures required by Members.

23. The means of review of the Chief Officers' Register of Interests should continue as historically practiced, by the Establishment Committee as a matter of good governance.

24. It is proposed that Senior Managers at Grades I & J complete both the Declaration of Interest and the Register of Interests declaration process as outlined in this report. This will coincide with the City Corporation's Scheme of Delegation for the authorisation of appointments at this level and ensure parity and consistency across the senior tier of management. However, the review process for this senior management group will be approval from their service department Chief Officer.

25. Guidance for managers has been produced to ensure that a consistent approach is taken when reviewing declarations made by Officers (Appendix 2).

26. Corporate HR will also produce guidance for staff around the declaration process, to aid identifying situations of potential or actual conflict. In addition, we propose that there is an annual communication from the Town Clerk about Nolan Principles, Code of Conduct, conflicts of interest and gifts and hospitality.

Implications

27. For Chief Officers and Senior Managers at Grades I & J, these proposals represent a significant policy change for those currently in post, as it sets a new requirement that must be complied with in the Officers' Code of Conduct.

28. Consultation will be needed including taking into account Officer's individual issues, either with the revised declaration process and/or with a current interest.

Conclusion

29. The obligation of declarations by Officers is set on the premise to avert any conflict of interests by connection or association with a third party that is (or appears to be against the best interests of the City Corporation; or which could give grounds for suspicion that their position within the City Corporation is being used to gain an unfair advantage for or from a third party.

30. Upon review there is merit in the closer alignment to the disclosures made by Members in the Declaration and Register of Interests process for Chief Officers and Senior Managers at Grades I & J, given their seniority and ultimately their position of influence within the organisation.

Appendices

Appendix 1 - Declaration and Register of Interests Summary Table
Appendix 2 - Declaration and Register of Interests Managers' Guidance.

Background Papers

Establishment Committee, Declarations of Interest and appended revisions to the Code of Conduct, 09/07/2018.

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Appendix 1

Declaration of Interests and Register of Interests Summary Table

Declaration of Interests **All Officers in scope** Compulsory for the Town Clerk, Chief Officers and Senior Managers at Grades I & J, including any other staff with the same level of seniority, on an annual basis. Retained in Corporate HR.	**Declaration of Interests: Additional categories** **The Town Clerk, Chief Officers and Senior Managers at Grades I & J** Compulsory for the Town Clerk, Chief Officers and Senior Managers at Grades I & J, including any other staff with the same level of seniority, on an annual basis. Retained in Corporate HR.	**Register of Interests** **The Town Clerk, Chief Officers and Senior Managers at Grades I & J** Compulsory for the Town Clerk, Chief Officers and Senior Managers at Grades I & J, including any other staff with the same level of seniority, on an annual basis. Retained in Corporate HR.	**Register of Interests** **The Town Clerk and Chief Officers** Compulsory for the Town Clerk and Chief Officers. The ROI is reported to Establishment Committee. Published in the public domain.
• Relationships of a direct or indirect pecuniary nature with external contractors, or potential contractors. • Outside commitments, before they are entered into. • Personal interests. Any financial or non-financial interests that could bring about conflict with the City Corporation's interests; for instance, membership of any organisation not open to the public. • Sponsorship – Giving and Receiving. Any benefit derived by an employee, their partners, spouse or relative or anyone else in a close personal relationship where the City Corporation gives support in the community through: sponsorship or an event or service, grant aid, financial or other means.	• Land within the area of the City of London Corporation. • Licenses (alone or jointly with others) to occupy land in the area of the City of London. • Corporate tenancies, where to the Officer's knowledge (a) the landlord is the City of London Corporation; and (b) the tenant is a body in which the Officer has a beneficial interest. • Securities. Any beneficial interest in securities of a body where that body (to the Officer's knowledge) has a place of business or land in the area of the City of London Corporation; and exceed specified values. • Membership of a Livery company, City Company without Livery, Guild or Company seeking Livery Membership. • Think tank membership, an organisation one of whose principal purposes include the influence of public opinion or policy and which is likely to seek to affect the policy of the City Corporation, or which may have an impact on its services or stakeholders. • Professional association membership. • Trade association membership	• Details of outside work and interests, approx. time per annum. • Details of outside paid work and interests, approx. time per annum.	• Details of outside work and interests, approx. time per annum. • Details of outside paid work and interests, approx. time per annum.

Note: Hospitality and Gifts are disclosed through a separate on-line process.

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Declaration & Register of Interests

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The Code of Conduct sets out the principles for the management of conflicts of interest. Inappropriate or ineffective management of interests can have serious implications for both the City of London Corporation and Officers.

What is a conflict of interest?

A set of circumstances by which a reasonable person would consider that an individual's ability to apply judgement or act could be impaired or influenced by another interest they hold and against the best interests of the City Corporation. Such conflicts may be:

- Actual, if there is a material conflict between one or more interests; or
- Potential, if there is the possibility of a material conflict between one or more interests in the future.

Considering conflicts of interest

When reviewing Declarations or Registers of Interests a wide range of different types of declaration may arise. Points to consider could include:

- **Outside employment:** How the interest might impact upon service delivery and the Officers duties i.e. whether work can be re-distributed to avoid an interest becoming prejudicial.
- **Health, safety and well-being:** Any concerns relating to fatigue due to excessive working hours i.e. that they cannot perform their substantive post at their full capacity, any health and safety issues or a breach of the Working Time Regulations.
- **Personal capacity:** The duration of the issue disclosed, is there a temporary impact which may in fact be manageable; or a long-term commitment which might be unsustainable.
- **Compatibility:** How the interest sits alongside their work for the City Corporation i.e. whether it will conflict with or be detrimental to the City Corporation's interests, for example, if their official duties overlap in some way with their proposed work.
- **Resource implications:** If there is likely to be an impact on others in the section, within the department or beyond.
- **Reputational risk:** Whether the interest could bring the City Corporation into disrepute, harm or weaken the public's confidence in our services i.e. a direct financial benefit from a commissioning decision or grant awarded to an Officer's own private company / charity.
- **Coercion:** If opportunities are being exploited to further personal or political causes (or those of others) in order to influence decision making to their own ends rather than in the public interests or best interests of the City Corporation.
- **Financial reward:** The recommendations or products or services albeit individually or through a company, they are associated with for financial gain.
- **Relationship boundaries:** Line managers should not be in a position where they manage relatives or someone they are in a close personal relationship with, giving cause for actual or perceived conflicts i.e. the potential for collusion or more favourable supervisory decisions.
- **Supervisor or specialist input:** Any comments from the Line Manager of the Officer making the disclosure, or a subject specialist i.e. Commercial Director in City Procurement or Head of Audit and Risk Management.

When you receive a Declaration of Interests / Register of Interests (as applicable)

Before coming to a view about a conflict of interest, discuss with the Officer how the conflict or reputational risk will be managed to clarify the circumstances and issues involved. You may decide to request further information or documentation from the Officer to assist in the review and decision-making process where necessary. With regards to personal relationships you should consult Corporate HR about the options available.

To note, that if an interest is declared but there is no risk of a conflict arising then no action is warranted.

Assessing the level of risk posed by the conflict

Where a conflict or potential conflict is identified, first consider the level of risk posed to the City Corporation against the following categories:

- **Category 1, Trivial:** Insignificant and does not create a real risk of conflict of interest or duty, or bias or the appearance of bias.
- **Category 2, Perceived risk**: Does not create a real risk of conflict of interest, duty or bias; but might reasonably cause others to think it could influence a decision.
- **Category 3, Real risk**: A real risk of conflict of interest, duty or bias i.e. where harm or serious harm could occur without some form of intervention, some of these may well be not acceptable.

How to mitigate the risk of conflicts

Whilst each Officer's declarations will be different and context-specific, solutions to mitigate risks should be proportionate to the level of risk, for example:

Category 1, Trivial:

- Making a professional judgement to note the declaration but nevertheless allowing participation in a meeting.
- Deciding that no action is warranted.

Category 2: Perceived risk:

- Putting in place specific work supervision requirements to ensure impartiality.
- Ensuring the Officer doesn't receive the documentation for the agenda item where an interest has been declared.
- Restricting the Officer's involvement in associated discussions or meetings; and excluding them from the decision-making process such as a procurement panel / committee item decision.

Category 3, Real risk:

- Removing the Officer from the activity, noting this may have a detrimental effect on the quality of the decision-making, therefore the situation should be carefully assessed to ensure it is proportionate to the management of the risk.
- Removing the Officer potentially from their role altogether if the conflict is so significant. Advice should be obtained from Corporate HR.

A written audit trail of any information considered, and actions taken should be retained.

Confirming the declaration to be acceptable or not

Chief Officer's confirming the Declaration or Register of Interests for their staff as acceptable or not, should provide appropriate commentary i.e. to confirm how the conflict will be managed, or a brief explanation as to why the interest is not acceptable. Then sign and date the form. The Declaration of Interest form should then be returned to the Human Resources Business Partner (HRBP) / HR contact along with any relevant information obtained as part of the decision-making process.

For Chief Officers the Declaration and Registers of Interests form is reviewed by the Town Clerk. Noting that the Register of Interest form is considered by the Establishment Committee and in the public domain.

The Director of HR will maintain an overview of all senior management disclosures, monitor completion levels and retain centrally.

Links / Other resources

For further advice on the application of the Declaration or Register of Interest process, please contact Corporate HR; and where appropriate Legal, Audit or Procurement according to the nature of the guidance sought.

- Code of Conduct

Committee Establishment Committee	Date: 29 October 2018
Subject: Equality and Inclusion Update Report	**Public**
Report of: Director of Human Resources	**For Information**
Report author: Tracey Jansen Town Clerk's Department – Human Resources	

Summary

This report updates Members of the Committee on equalities and inclusion activities since the last report in July 2018. In particular it notifies the Committee of the Equality and Inclusion (E&I) Action Plan 2018 -19; the Staff Networks' 3rd anniversary events; and the newly published Annual Performance Summary Report for 2017-18.

Recommendation

Members are asked to note the report.

Main Report

Background

1. At the meeting of this Committee in July 2018, I reported on the workforce profile information for the year 2017-2018. The report also provided Members with a summary of the main equalities and inclusion initiatives and actions that have taken place over the year 2017-18. This report provides a further update.

Current Position

2. The Equality and Inclusion (E&I) Board has met to consider and agree the E&I Action Plan. The plan has been aligned to the business planning process and so now runs from 1 April 2018 to 31 March 2019. The plan is attached as Appendix 1.

3. The service delivery activities in the plan have not yet been updated pending the commencement of the new Equalities Manager based in DCCS who will review the service deliery actions. However, Members will be aware that DCCS are now

leading on the development of an over-arching policy on gender identity for the City Corporation.

4. Highlights in the E&I Action plan are as follows:

    - All departmental Chief Officers will have reported to the E&I Board by the end of the financial year
    - We will be reporting on our disability and black asian and minority ethnic pay gap by the end of the 2018
    - We are considering the implications and feasibility of developing a City Corporation wide work experience service which will provide both direct opportunities and through partnerships and brokerages
    - We have set a target of 45% women in senior posts (grade G and above) by 2023.
    - We will be undertaking an audit of committee reports and other decision making to check for public sector equality duty test of relevance and/or equality impact assessment
    - We will be training our middle and senior managers to provide mentoring and coaching for under-represented groups
    - We are developing unconscious bias training - the online learning short course is now available through City Learning
    - We are registering to become a Stonewall Diversity Champion

5. The Staff Networks have celebrated their 3rd anniversary and a number of events took place in September. These included a stall outside the Gild restaurant with information about Networks; an insight lunch event aimed at managers; an all staff event in the Basinghall Suite attended by over 70 staff and managers. Speakers at the event were the Head of Planning and Performance Management, Allianz Global Corporate and Specialty; Head of Diversity and Inclusiveness, Ernst and Young LLP; and a Partner at Make Architects and Co-Chair of RIBA Architects for Change.

6. The 2017-18 Annual Performance Summary report has been completed and is available as a pubic record on the internet.

Proposals

7. The Equality and Inclusion Board will continue to monitor progress on delivering the E&I Action Plan and report back to this Committee periodically.

Corporate & Strategic Implications

8. The Equality and Inclusion Action Plan contributes to corporate plan aims: People have equal opportunities to enrich their lives and reach their full potential; Communities are cohesive and have the facilities they need; We have access to the skills and talent we need.

Implications

9. Funding is available for some of the activities in the E&I Plan. In relation to others, bids will be made for funding as necessary.

Conclusion

10. The Equality and Inclusion Action Plan brings together in one place all of the corporate wide initiatives which are monitored through the Equality and Inclusion Board. In addition, Chief Officers are answerable to the Board on directorate specific actions and to demonstrate their personal leadership and their involvement and support of the work of the Staff Diversity Networks.

Appendices

- Appendix 1 – Equality and Inclusion Action Plan 2018 –2019

Background Papers

2017-18 Annual Performance Summary: https://www.cityoflondon.gov.uk/about-the-city/how-we-make-decisions/Documents/equality-inclusion-city-of-london-2017-2018.pdf

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The City of London Corporation

Equality and Inclusion Action Plan

April 2018 – March 2019

22.08.2018

The following action plan sets out what the City of London Corporation will do over the next year to promote equality and diversity; ensuring an inclusive workplace and inclusive services for our customers.

In this plan, we have identified key challenges for the Corporation in embedding equality and diversity throughout the organisation, aligning this with key criteria outlined in the Equality Framework for Local Government and areas for development highlighted through Investors in People (IiP).

This is a living document and will be reviewed and amended as appropriate. We welcome views on the priorities identified. Comments should be sent to Tracey Jansen, Assistant Director Human Resources (tracey.jansen@cityoflondon.gov.uk), and Marcus Roberts, Head of Strategy and Performance, DCCS (Marcus.roberts@cityoflondon.gov.uk).

Challenge 1: The political and executive leadership's commitment to equality is recognised and understood throughout the organisation and our local communities. This supports the City of London Corporation in meeting its statutory requirements as set out in the Public Sector Equality Duty (PSED)

N.B. Although not all City Corporation departments are subject to the PSED, the Board has agreed that all CoL departments will act in the spirit of good practice as set out in the Public Sector Equality Duty where possible.

Lead:	HR/DCCS
Relevant plans and reference to Equality Framework for Local Government/Investors in People (IiP)	Corporate Plan 2018 – 2023 Leadership, partnership and organisational commitment – EFLG IiP Standard - 1 Business Strategy, 4 Leadership & Management and 10 Continuous Improvement

Expected outcomes:

- Chief Officers demonstrate leadership and responsibility for embedding equality and inclusion within their departments, working closely with Equality Representatives and HR business partners to meet the requirements of the Public Sector Equality Duty
- Members demonstrate a clear understanding and a personal commitment to equality, diversity and inclusion in line with the Public Sector Equality Duty and the Member/Officer protocol
- The Equality & Inclusion Board will scrutinise and have corporate oversight of equalities work across the organisation
- Equality and inclusion is included in the corporation's decision-making frameworks in the Corporate Plan, departmental Business Plans, Service Plans and individual workplans

Measure of success:

- The political and executive leadership have publically committed to reducing inequality, fostering good relations and challenging discrimination.
- Decision makers understand what 'equality' means and why it matters locally
- Partnership working arrangements are being reviewed with the voluntary and community sector and the wider community to ensure that local equality priorities are addressed
- Equality objectives for the organisation have been set and published in accordance with the requirements of the specific duties to support the Public Sector Equality Duty.
- Appropriate structures are in place to ensure delivery and review of equality objectives
- Structures are in place to ensure equality outcomes are integrated into business objectives

Ref	Actions	End date	Review date	Lead Officer	RAG	Comments
1.1	Chief Officers, their departmental Equality Reps and HR business partner to attend the E&I Boards annually and report progress on: • How you and your leadership team are working with and supporting Equality Representatives/HR business partner to raise awareness of E&I in your department • Identification of Departmental equality measures to track progress against the Corporation's Equality Objectives • How equality and inclusion is outlined as a key priority in the departmental business plan and the workforce development plan • How your department ensures effective policy making and service delivery through the use of equality analyses and tests of relevance to meet the Public Sector Equality Duty • Your involvement and support of the work of the Staff Diversity Networks • Consideration of departmental & Corporate Risk Register to reflect any risks identified through departmental E&I Action Plans/workforce plans/business plans	Ongoing	April 2017	Chief Officers	Green some to attend in coming year	Chief Officers attend the Board on a rotating basis.
1.2	Chief Officers to work with Equality Representatives and HR business partners to develop departmental E&I action plans or to have incorporated actions in their workforce plan/business plans and to receive updates on progress on a quarterly basis	Ongoing	April 2017	Chief Officers/DCCS/HR	Green	MB collecting examples of E&I Action Plans and sharing with Equality Representatives to demonstrate best practice. Depts may also decide to incorporate E&I into business plans.
1.3	Review the Terms of Reference for the Equality and Inclusion Board and the Staff Diversity Networks on an annual basis	Sept 18		DCCS/HR	Green	To formally consider including social mobility in PSED toolkit.
1.4	An annual meeting for E&I Board (including Equality Representatives, Chief Officers and Chairs from the Staff	December 2018		DCCS/HR	Green	To discuss format at E&I – bring forward to 2018 - 9

	Diversity Networks) to assess strengths, weaknesses and areas for improvement					
1.5	Further equalities training session as part of the Member Development Programme on standards/behaviours outlined in the Member/Officer protocol and how to review an Equality Analysis to ensure that Members are well-sighted on equality considerations in line with the Public Sector Equality Duty	June 2017		DCCS/HR/Committee Services	Green	

Challenge 2: Creating a working environment that is inclusive and values the diversity of the workforce. Develop & analysis of HR dashboards within departments, and Corporation as a whole, to identify and analyse trends in relation to the protected characteristics.

Lead:	HR
Relevant plans and reference to Equality Framework for Local Government/IiP	Knowing your communities - EFLG Involving your communities - EFLG A skilled and committed workforce – EFLG IiP Standard – 3 People Management Strategy, 4 Leadership & Management and 10 Continuous Improvement

Expected outcomes:

- Embedding and ownership of equalities in employment consistently across the corporation
- Development and progression of workforce planning within departments (resourcing and talent management).
- Used to inform HR policy review and development, learning & development interventions and work undertaken with departmental HR Business Partners.
- Increase awareness and action regarding employee equalities related issues – using this information and trends identified to plan and implement strategies to improve the recruitment, progression, achievement and retention of staff with protected characteristics

Measure of success:

- The organisation understands its local labour market, the barriers faced by those from vulnerable or marginalised individuals and groups, and the impact these have on achieving a diverse workforce.
- The organisation's workforce strategy includes priority equality considerations and objectives. Specific and measureable employment targets have been set to improve workforce diversity.
- Systems are in place to collect and analyse employment data across a range of practices (recruitment, training, leavers, grievance and disciplinaries etc.)
- The organisation has assessed all aspects of the working environment to ensure that the needs of all its employees are met
- Equality considerations for individuals are integrated into appraisal systems

Ref	Actions	End date	Review date	Lead Officer	RAG	Comments
2.1	Chief Officers to work with their HR business partners and Equality Representatives to use the annual workforce profile and departmental HR dashboards, GPG to inform business plans workforce plans and/or E&I plans to identify and address differential patterns in the recruitment, promotion, progress and achievement of CoL staff against the protected characteristics.	Ongoing	Sept 2018	Chief Officer HR/DCCS	Green	
2.2	Undertake Ethnicity and Disability Pay Gap	March 18	Dec 18	HR	Green	
2.3	The HR Business Plan, Transformation Plan and HR BAU policies and processes are aimed at removing barriers preventing those with protected characteristics from progressing within the organisation.	Ongoing	April 2017	HR	Green	
2.4	Expanding the work experience offered and working in partnership with external organisations and brokerages to provide opportunities to a wider audience targeting our schools and a range of disadvantaged groups in collaboration with brokerages as appropriate, and also our commitment to the armed forces. A target of 20% of all managers to offer work experience/apprenticeships opportunities in year one and this will be reviewed once the full scheme has been developed. This would mean approximately 200 places in the year, with a view to increasing the target once the new scheme is in place	March 19	Oct 18	HR	Green	
2.5	Supporting activities that address the Women in Finance Charter such as: providing a wider range of leadership development skills for aspiring women leaders increasing the opportunities for career grade progression greater outreach and collaborative working with external organisations setting a target of 45% women in senior management posts (grade G and above) by 2023	March 19		HR	Green	
2.6	To seek approval to include Social mobility as part of the PSED toolkit along with the Equalities Act protected characteristics. This will also indicate the commitment we have to addressing Social Mobility.	March 19		HR	Green	

	Undertake a one off anonymised survey around the social mobility indicators for all staff to help us to better understand the makeup of our work force to inform further developments of the Social Mobility agenda as well as raising general awareness. Develop a voluntary survey that applicants for positions are invited to complete.					
2.7	Complete HR Transformation Programme not included in this plan in particular Agile Resourcing and City Well workstreams	March 19			Green	

Challenge 3: Embedding equalities and inclusion at all levels of management and in service delivery to support the wider commitment to meeting the Public Sector Equality Duty (PSED)

Lead:	DCCS/HR
Relevant plans and reference to Equality Framework for Local Government/IiP	Leadership, partnership and organisational commitment – EFLG Responsive services and customer care – EFLG IiP Standard – 1 Business Strategy

Expected outcomes:

- To improve Corporation-wide understanding and adherence to the Public Sector Equality Duty (PSED).
- Mainstream the use of Test of Relevance/Equality Analysis to inform policy-making and service delivery

Measure of success:

- The organisation ensures that procurement and commissioning processes and practice take account of the diverse needs of clients, and that providers understand the requirements of the public sector Equality Duty
- Structures are in place within the organisation and across partnerships to understand community relationships and map community tensions
- The organisation has an agreed approach to conducting equality analysis/ impact assessment of policy and service decisions
- The organisation has systems to collect, analyse and measure data on how all sections of the community are able to access services
- Appropriate mechanisms are in place to ensure that human rights considerations are identified when planning services and that customers and citizens are treated with dignity and respect

Ref	Actions	End date	Review date	Lead Officer	RAG	Comments

3.1	Undertake an audit of committee reports and other decision making for compliance with our PSED in this year's plan. We will consider whether this can be undertaken in collaboration with internal audit	Dec 18		DCCS/HR Chamberlains	Amber	
3.2	Run monthly E&I drop-in sessions for staff members to raise issues relating to equality and inclusion	ongoing		DCCS	Green	First one took place on January and all dates in diary for the rest of the year
3.3	Develop an Equality Objectives report that highlights key departmental PIs/Equality Measures against the Corporation's Equality Objectives 2016 – 2020 (for internal use and promotion on Colnet)	October 2017		DCCS	Amber	MB to develop for the E&I Board in October 2017 [needs to be refreshed]
3.4	Research and report on the development of an overarching Gender Identity policy/position.	March 2019	September 2018	DCCS/HR	Green	Project underway preliminary research current being undertaken.

Challenge 4: Continue to strengthen and support the role of Equality Representatives across the organisation.

Lead:	DCCS
Relevant plans and reference to Equality Framework for Local Government/IiP	IiP Standard – 7 Involvement & Empowerment

Expected outcomes:

- Equality Representatives have a clear understanding of their roles and work closely with their Chief Officers to embed equality and inclusion within their departments.
- Equality Representatives feel able to support/signpost colleagues with equality and inclusion-related queries

Measure of success:

- Structures are in place within the organisation and across partnerships to understand community relationships and map community tensions (1.10)

Ref	Actions	End date	Review date	Lead Officer	RAG	Comments
4.1	Organise quarterly meetings for Equality Representatives to provide updates on the work of the E&I Board and progress of the E&I Action Plan. Ensure that Equality Representatives have the opportunity to feed into the agenda of the meeting.	January 2017		DCCS	Complete	Dates for quarterly meetings finalised.
4.3	Provide a range of bespoke E&I training, development and networking opportunities to support the Equality Representatives role		April 2017	DCCS	Green	Five half-day sessions on completing an EA rolled out for Equality Reps and HR business partners

4.4	Support the Equality Representatives in the collation of relevant information for the Public Sector Equality Duty (PSED) Annual Return for the 2017 E&I Annual Report		April 2017	DCCS	Green	To be discussed at Equality Reps meeting in April 2017.
4.5	Review Equality Representatives role profile/schematic on an annual basis	October 2017		DCCS	Green	To be reviewed at next Equality Reps meeting
4.6	Ensure that Colnet is up-to-date so Corporation staff are aware of the role of the Equality Representatives		April 2017	DCCS	Green	E&I hub to be reviewed as part of the E&I Colnet campaign
4.7	Share evidence of best practice between departments to support Equality Reps in their role (departmental E&I action plans, Equality Measures, evidence of good practice)		April 2017	DCCS	Green	This is done through the Equality Reps group and on E&I hub

Challenge 5: Coordinated communication & engagement with service users, residents, City workers and visitors particularly those from protected groups.

Developing the intelligence we have about these groups to inform service improvements and development through informed decision-making that pays due regard (as defined by PSED).

Lead:	DCCS
Relevant plans and reference to Equality Framework for Local Government/IiP	CSDG, Corporate Plan Knowing your communities – EFLG Involving your communities – EFLG IiP Standard – 1 Business Strategy and 7 Involvement & Empowerment

Expected outcomes:

- The City of London Corporation has a good understanding of the profile of its internal and external customers against the protected characteristics
- This understanding informs decision making and service delivery throughout the organisation, from frontline officers to senior officers and Members, allowing us to advance equality of opportunity, tackle discrimination and foster good relations between different communities and groups

Measure of success:

- An organisational awareness and understanding of what information is collected internally and by partners, including voluntary and community sector stakeholders
- Systems are being developed to collect and analyse soft and hard data /intelligence about communities, their needs and aspirations
- Plans are in place to collect, share and use equality information with partners
- Structures are in place within the organisation and across partnerships to understand community relationships and map community tensions
- The organisation has a clear understanding of the level of participation in public life by different communities/protected characteristics
- Structures are in place to ensure equality outcomes are integrated into business objectives

Ref	Actions	End date	Review date	Lead Officer	RAG	Comments
5.1	Support the development of a Customer Services Strategy, which includes: - Mapping exercise of the City of London internal and external customers - A communications plan and engagement activities - Sharing outcomes and data from engagement activities (residents insight) - How the City of London Corporation will learn from feedback/complaints - What capturing and sharing of data is there with partners and commissioned providers.	July 2017		DCCS	Green	Chris Earlie is leading on the development of the Customer Services Strategy is being developed and will invite officers from the E&I Board to contribute to this agenda.
5.2	An 'equalities data' page on the E&I Colnet hub which signposts CoL staff to Joint Strategic Needs Assessment (JSNA), City residents profiles, surveys and other types of engagement information that inform decision making and service delivery	July 2017		DCCS	Green	MB to work with Internal Communications to develop the new webpage on the E&I hub
5.3	Share information gathered through the completion of the Public Sector Equality Duty Annual Return and discussion with the Equality Representatives on 'Equalities data' page on Colnet	October 2017		DCCS	Green	Part of E&I hub update
5.4	Sharing equalities information of CoL communities (plus the communities in other boroughs that we deliver in) on 'Equalities data' page on Colnet	October 2017		DCCS	Green	Part of E&I hub update
5.5	Work with the Head of Strategy and Performance to identify how we can more effectively capture corporate performance data about our communities.	July 2017		DCCS	Amber	To be reviewed for next E&I Board meeting in July 2017
5.6	Compliments and complaints process / templates – capturing monitoring information to address issues relating to groups with protected characteristics Ensure that the complaints procedure that must be followed in respect of a complaint made by members of the public under the fluency duty is put in place	April 2017		Angela Roach	Red	Outstanding
5.7	Develop further training/guidance/case studies on how service user consultation/feedback can effectively shape service delivery	October 2017		DCCS	Green	Part of E&I hub update

Challenge 6: Training & development opportunities relating to equality and inclusion raise staff and manager awareness both at induction and on a regular basis	
Lead:	HR
Relevant plans and reference to Equality Framework for Local Government/IiP	IiP Standard – 2 Learning & Development Strategy, 8 Learning & Development and 9 Performance Measurement

Expected outcomes:

- Staff understand their roles and responsibilities in relation to the Equality Act 2010 and readily apply these principles to their day-to-day work
- Managers with responsibility for service delivery complete further equality and inclusion training on the Equality Act 2010

Measure of success:

Ref	Actions	End date	Review date	Lead Officer	RAG	Comments
6.1	Requirement for all staff and managers to complete mandatory e-learning on 'Equality in the Workplace' on City People	End Aug 2018	Sept 18	HR	Green	Currently 576 completed; 104 in progress; 22 registered but not started; all staff in scope (April 18)
6.2	Encourage managers to complete the 'Equality Act 2010' and 'Equality Analysis' and Diversity training for managers through an E&I Colnet campaign	End Aug 2018	Sept 18	Chief Officers DCCS/HR	Green	EA 2010 72 complete;9 in progress;17 not started 1074 in scope Equality analysis 49 Completed;10 in progress;22 not started. 1074 in scope (April18)

6.3	A further briefing session with Chief Officer Group to clarifying the possible consequences of non-compliance with Public Sector Equality Duty, with case studies of judicial reviews/challenges	Dec 2018		DCCS/HR	Green	To be undertaken with Legal input following audit
6.4	Sharing of good practice guidance and examples on meeting the Public Sector Equality Duty through E&I reps and the E&I hub	October 2017		DCCS	Green	Part of E&I hub update
6.5	Provide more face-to-face training on completing an Equality Analysis and a broader range of equalities training, including customer insight and stakeholder engagement	October 2017		DCCS	Amber	To be reviewed for next E&I Board meeting in July 2017
6.6	Using our middle and senior managers to provide mentoring and coaching for under-represented groups (By June 19) Developing coaching skills is key to ensuring that managers can ensure a high quality work experience opportunity as well as developing their people manager skills in general. .	June 19		HR	Green	
6.7	Development of the revised performance review framework (nine box grid) maintains a focus on E&I.	Dec 18		HR	Green	
6.8	Scope the possibility of an equality and inclusion staff conference as part of City Learning Live	By March 19		HR L/D	Green	
6.9	Create an induction leaflet on equality and inclusion, including content from the Annual Report and the Staff Diversity Networks	December 2018		HR L/D		
6.10	Develop Unconscious bias training Online short course available for all staff Inclusion in Recruitment and Selection, coaching conversations and the new managers training. Masterclasses					

Challenge 7: Staff networks foster an inclusive, engaging and supportive work environment

Lead:	HR
Relevant plans and reference to Equality Framework for Local Government/IiP	EFLG Knowing your communities IiP Standard – 5 Management Effectiveness and 7 Involvement & Empowerment

Expected outcomes:

- All employees are aware of the existence of the Staff Diversity Networks and are freely able to participate in them

Measure of success:

- The organisation creates opportunities for a range of communities to be involved in decision making
- The organisation has assessed all aspects of the working environment to ensure that the needs of all its employees are met

Ref	Actions	End date	Review date	Lead Officer	RAG	Comments
7.1	Consult the Staff Diversity Networks on their section of the E&I Action Plan	June 2018	Sept 18	HR	Green	To be consulted ahead of E&I Board
7.2	Involve the Staff Networks in E&I stakeholder discussions including policy development as appropriate.	Ongoing		HR	Green and on going	The networks continue to be consulted on policy development and review and guidance as appropriate. The networks are also invited to the range of focus groups and consultation exercises on a range of range of HR issues and topics.
7.3	Source appropriate L&D interventions to support the network leads in their role.	Ongoing		HR	Green	
7.4	Staff Networks to provide an annual report to the E&I Board	June 2018		HR	Amber	Progress has been made and all do provide regular updates although not all provide an annual report as such
7.5	The E&I Board to provide more support to increase the Staff Diversity Network membership e.g. an equalities induction leaflet, 60 second interviews with Network Chairs	On going August 2018		HR	Green on Going	Information is included as part of induction of staff. COPA awards included a new award for E&I and networks were

						specifically mentioned as an example of commitment. Staff network float Also see comms actions below.
7.6	Develop the business case for a new DE&I consultant to support the staff network and to reach out to city firms to develop staff networks and work collaborate sharing best practice hosting events etc.	July 18		HR	Green	
7.7	Register to be a to Stonewall Diversity Champions	December 2018		HR		

Challenge 8: The organisation effectively communicates and promotes a clear commitment to advancing equality and fostering good relations across all local communities to staff, partners and service users	
Lead:	Internal Communications/DCCS
Relevant plans and reference to Equality Framework for Local Government/IiP	Leadership, partnership and organisational commitment – effective communication IiP Standard – 1 Business Strategy, 3 People Management Strategy and 5 Management Effectiveness

Expected outcomes:

- The organisation communicate its commitment to promoting equality
- Key publications reflect the organisation's commitment to equality and fostering good relations
- Better communication between all layers of the Corporation from frontline officers to Chief Officers on equality and inclusion

Measure of success:
Communications promote a clear commitment to advancing equality and fostering good relations across all local communities (1.8)

Ref	Actions	End date	Review date	Lead Officer	RAG	Comments

8.1	Bi-monthly catch ups between internal communications and Project and Equality Manager to support the development of the E&I Engagement Action Plan		April 2017	Internal Communications	Green	Regular catch ups being held
8.2	Six-monthly awareness raising campaigns around equality and inclusion, including regular updates as and when needed		April 2017	Internal Communications	Green	First awareness raising campaign delivered in March
8.3	Regular Colnet articles to promote the equality and inclusion agenda in the department: - 60 second interviews with Equality Representatives - 'Did you know' equality facts about the City of London Corporation - Information about E&I drop-in sessions, face-to-face training and e-learning - Promotion of E&I questionnaire	Ongoing		Internal Communications	Green	
8.4	Review all content relating to equality and inclusion on Colnet and corporate site to ensure that it is up-to-date	Ongoing		DCCS/Internal Communications	Green	
8.5	Support the networks to develop and update their intranet pages	Ongoing		Internal Communications	Green	
8.6	Promote the Equality and Inclusion Annual Report on the intranet and corporate site through 60 second interviews, insight lunches and site visits to recognise the role of Equality Representatives and good practice around meeting the Equality Duty at the City Corporation	~~October 2017~~ December 2017		Internal Communications	Green	Will be completed following Annual Report publication on corporate site and Colnet
8.7	Working with Internal Communications to raise awareness of the E&I hub on Colnet and the role of the Equality Representatives	October 2017		DCCS/Internal Communications	Green	Will be completed following Annual Report publication on corporate site and Colnet
8.8	Publish an article to outline the feedback from the E&I Staff Consultation and actions to take forward	October 2017		DCCS/Internal Communications	Green	Will be completed following Annual Report publication on corporate site and Colnet

Committee(s):	Date:
Establishment Committee	29th October 2018
Subject: Operation of the Scheme of Delegations April 2018 – September 2018	**Public**
Report of: Chrissie Morgan - Director of Human Resources	**For Information**
Report author: Marion Afoakwa – Human Resources, Town Clerks	

Summary

In line with the Scheme of Delegations the report provides information on any redundancies, early retirements (including those made under the '85-year rule'), ill health retirements and Market Forces Supplements (MFS) approved in the reporting period 1 April 2018 to 30 September 2018.

Recommendation

Members are asked to:

- Note the actions taken under delegated authority.

Main Report

Background

1. In line with the Scheme of Delegations, the report provides information on redundancies, early retirements (including those made under the '85-year rule'), ill health retirements and MFS payments this reporting period.

2. There have been 8 redundancies in this reporting period.

3. There have been no ill health retirements.

4. There have been no early retirements including those made under the '85-year rule'.

5. 15 new Market Forces Supplements were agreed during this period.

6. In the last 12 months (October 2017 - September 2018) there have been 16 redundancies and 0 ill health retirements.

7. Appendix 1 (within the confidential section of the agenda) provides a table summarising the information.

Conclusion

8. The Establishment Committee is asked to note the actions taken under delegated authority.

Appendices:
Appendix 1 (within the confidential section of the agenda) - table summarising information for the period April 2018 to September 2018

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By virtue of paragraph(s) 3, 4 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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