

Committee(s): Equality, Diversity, and Inclusion Sub Committee - For Decision Policy and Resources – For Decision	Dated: 21 st March 2024 18 th March 2024
Subject: City Corporation Equality Objectives 2024 – 2029	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	All Corporate Plan Outcomes
Does this proposal require extra revenue and/or capital spending?	Online publication incurs no additional cost. However, communication and delivery of the Equality Objectives may incur costs. These will be funded from the corporate EDI budget with any shortfall sought from Transformation funds in agreement with the Chamberlain.
If so, how much?	TBC
What is the source of Funding?	As described above
Has this Funding Source been agreed with the Chamberlain’s Department?	As described above
Report of: Chief Strategy Officer	For Decision
Report authors: Shelagh Prosser, Interim Director of EDI Micah Maclean, EDI Officer	

Summary

This report seeks approval to publish updated corporate Equality Objectives to meet our responsibilities under the Public Sector Equality Duty. Current Equality Objectives cover 2016-2020 and our statutory requirement is to publish one or more equality objectives every four years.

Draft Equality Objectives were developed in late 2022, with two public consultation exercises taking place between June and October 2023. Internal and external stakeholder feedback was received, indicating support for the objectives. However, feedback strongly highlighted the need for greater clarity and less overlap. This feedback was used to update the objectives; they have also been reviewed and adapted to align with the new Corporate Plan and People Strategy.

The updated Equality Objectives are:

- **Inclusive and Trustworthy Leadership** (previously ‘Aspirational Leadership’). This objective recognises the City Corporation has an inward and outward leadership role in advancing equity, equality, diversity, and inclusion (EEDI). It aligns to the Corporate Plan 2024-2029 and People Strategy 2024-2029.

- **Inclusive and Diverse Community** (previously ‘Dynamic and Engaged Workforce’). This recognises it is essential to tackle unlawful discrimination, inequity and unfair bias and the need for systemic change.
- **Accessible and Excellent Services** (unchanged). This aligns to the Corporate Plan outcome focussed on providing excellent services and our ambition to be world class.
- **Socio-Economic Diversity** (unchanged). The focus is internal and external, including social mobility and social inclusion. It also aligns with aspirations in the Corporate Plan, People Strategy and our commitments through the Social Mobility Index.

The previous draft objective focussing on data (**Understanding our Communities**) has been refocussed as a cross-cutting objective to support overall delivery. This approach underlines the importance of being evidence based in respect of advancing EEDI. Supporting actions are draft; they are aligned to the Corporate Plan, People Strategy and other commitments and charters to reflect consultation feedback. These will be refined and confirmed post completion of a review into EEDI taking place later in 2024.

Recommendation(s)

Members of the Policy & Resources Committee are asked to:

- Endorse and approve the revised Equality Objectives to enable their publication (on our website and intranet) in March 2024, thereby fulfilling our responsibility under the Public Sector Equality Duty, subject to the review and endorsement by the Equality, Diversity, & Inclusion Sub-Committee on 21st March 2024.
- Agree to delegate authority to the Town Clerk, in consultation with the Chairman and Deputy Chairman of Policy & Resources Committee, to make any subsequent changes to the Equality Objectives recommended by the Equality, Diversity, & Inclusion Sub-Committee at its meeting on 21st March 2024, in order to meet the target publication date.
- Note the Equality Objectives (2024-2029) will cover a five-year period to coincide with the Corporate Plan and People Strategy. However, there will be a review in 2028 to comply with the duty of publishing every four years.
- Note that activity to develop relevant equity, equality, diversity and inclusion (EEDI) datasets for the Objectives is required to develop robust performance metrics.

Members of the Equality, Diversity, & Inclusion Sub-Committee are asked to:

- Endorse the revised Equality Objectives to enable their publication (on our website and intranet) in March 2024, thereby fulfilling our responsibility under the Public Sector Equality Duty.
- Note the Equality Objectives (2024-2029) will cover a five-year period to coincide with the Corporate Plan and People Strategy. However, there will be a review in 2028 to comply with the duty of publishing every four years.
- Note that activity to develop relevant equity, equality, diversity and inclusion (EEDI) datasets for the Objectives is required to develop robust performance metrics.

Main Report

Background

1. The Equality Act 2010 Public Sector Equality Duty requires public bodies to publish one or more equality objectives every four years. The current Equality Objectives were published in 2016 and cover the period 2016-2020.
2. The Equality Objectives 2016-2020 published on the City Corporation website are:
 - Increase community engagement and improve cohesion within our communities so that people feel safe.
 - Support the City's most disadvantaged groups and develop our understanding of our communities.
 - Improve the way we listen to our communities and respond to their feedback to improve our services.
 - Promote staff development and career progression to ensure equality of opportunity for promotion and the development of a workforce that reflects the make-up of our communities.
3. No evidence could be found of an action plan to take forward these Objectives or any performance measures. The City Corporation Equality Performance Report October 2019 – December 2020¹ did state that the Objectives would be reviewed and updated for the period 2021-2024. TOM restructuring and staffing changes meant this was delayed, pending expansion of and recruitment into the corporate EDI function.

Current Position

4. Draft Equality Objectives were produced in late 2022, aligning with the four improvement modules set out in the Local Government Association (LGA)

¹ <https://www.cityoflondon.gov.uk/assets/about-us/plans-and-policies/annual-equalities-inclusion-report-2020-21-appendix-1.pdf>

Equality Framework for Local Government (EFLG). This provides a structure to enable local authorities to meet their obligations under the Equality Act 2010 and to benchmark their performance against best practice.

5. In accordance with the EFLG framework, the draft Equality Objectives were as follows:

Equality Objective 1: Aspirational Leadership: Taking a broad and intersectional approach to equality, diversity and inclusion which appeals to people from all backgrounds.

Equality Objective 2: Dynamic and Engaged Workforce: Enabling career progression opportunities for all staff and the development of a suitably skilled workforce that reflects the composition of our communities.

Equality Objective 3: Accessible and Excellent Services: Creating a community-centred approach to service delivery bolstered by an inclusive community and stakeholder engagement strategy.

Equality Objective 4: Understanding Our Communities: Promoting a data-led and evidence-based approach to understanding and working with our communities and networks.

Equality Objective 5: Socio-Economic Diversity: Working collaboratively with our stakeholders to enable opportunities for everyone to flourish and reach their full potential regardless of their socio-economic background.

Each Objective included commitments and targets (see Appendix 1).

6. A revised set of draft Equality Objectives were discussed at EDI sub-committee on 7th March 2023 and approval as a basis to consult internal and external stakeholders. The first consultation, 01/06/23 - 31/08/23 received 109 unique responses. The second, 05/09/23 - 31/10/23 received 133 unique responses. Feedback for both consultation exercises was received from internal and external respondents (with more of the former).
7. Analysis of responses revealed broad support for the themes covered by the Objectives. However, feedback criticised lack of clarity, specificity, accountability and repetitiveness. It also highlighted that consultation content, language, presentation, terminology, and progress measures could be improved.
8. The headline descriptors for the draft Objectives have been updated to take account of stakeholder feedback and a summary of feedback and the lessons identified is included at Appendix 2.
9. The updated Objectives were also mapped against the Corporate Plan and the People Strategy, neither of which were agreed at the time of developing the draft Equality Objectives. They are also informed by ongoing programmes, commitments and charters including the Social Mobility Index and Tackling Racism Taskforce recommendations.

10. The revised Equality Objectives are:

- **Inclusive and Trustworthy Leadership (linked to the People Strategy)**

We are committed to making systemic change through championing and advancing equity, equality, diversity and inclusion (EEDI) in everything we do. To do this we will develop a community of leaders who:

- adopt values-based behaviours and are accountable for advancing EEDI, internally and externally
- confidently create and sustain an inclusive environment by understanding how conscious and unconscious bias impacts on decision making and take action to address this
- understand how the complexity and intersection of people's identities can impact on access to opportunities and experiences
- ensure stakeholder engagement is accessible and inclusive taking into account the diversity of the communities we serve
- provide public spaces and a cultural offering responsive to the diversity of the Square Mile and beyond
- demonstrate that decisions are evidence-based and measurable

- **Inclusive and Diverse Community**

Representation and experience ensure the City Corporation is an employer of choice where people thrive. Activities align with the People Strategy including:

- enhance our approach to attracting, developing and retaining excellent, diverse, local and national talent
- develop leadership capacity and capability to actively champion EEDI
- ensure that leaders take responsibility for creating a safe physical and psychologically safe working environment that is free from discrimination, harassment and bullying
- develop and review policies and procedures through an EEDI lens to ensure that they are fair, inclusive and are applied consistently.
- take action to improve the robustness of our workforce data and regularly analyse it to identify trends and use the data to inform action to ensure that the key stages of the employment lifecycle are fair and inclusive of all
- extend and enhance the EEDI training offer to focus on awareness raising, skills building and inclusive culture development
- embed EEDI considerations into general training
- create a total reward and recognition offer that is fair, inclusive and acknowledges individual contribution, performance and supports progression

- **Accessible and Excellent Services**

Consideration of equity, equality, equality, diversity and inclusion is integral in the design, development, implementation and evaluation of our services. This aligns to our Corporate Plan outcomes; activities to deliver this objective may include:

- strengthen the confidence and capability of our employees to have due regard to equality when planning services and evaluating their impact
 - ensure our public spaces are inclusive and accessible
 - take a community-centred approach, as set out in our Ethical Policy, to help us better understand the challenges our communities face and include them in our planning and decision-making processes.
 - Continue to ensure that our website and public documents adhere to accessibility standards
- **Socio-Economic Diversity**

Someone's socio-economic background should not limit their potential to flourish. Activities to address this may include, cognisant with the Social Mobility Index recommendations for improvement:

- continue to use our influence to advance socio-economic diversity across the City, building on the success of the Socio-Economic Diversity Taskforce report and its recommendations
- collaborate with a variety of communities to enable opportunities for those from lower socio-economic backgrounds to get in, get on, and belong in the City Corporation
- continue to measure our performance as an employer across the eight areas set out in the Social Mobility Index
- Closer working across the City of London Corporation family to collectively and holistically tackle barriers for underrepresented groups.

The original draft Equality Objective, '**Understanding our Communities**' focussing on data and evidence is repositioned as a cross-cutting activity to achieve the updated Equality Objectives. Robust data is integral to the effective delivery of EEDI; currently very little data exists meaning that an evidence base requires building from a very low baseline.

The Equality Objectives are positioned as a dynamic cross-cutting framework for advancing and integrating the City Corporation's commitment to advancing EEDI as a leader, employer and service provider. They will be collectively owned across all departments and institutions. Publishing these objectives is the starting point for continuous improvement.

11. To monitor progress, performance measures will be developed - these are predicated on setting up supporting data activity. These replace targets proposed alongside the original objectives and will provide a more effective long-term mechanism of measuring progress that simultaneously supports our statutory reporting requirements on EEDI data. The EDI team will work with colleagues across the organisation to develop appropriate performance indicators for the Equality Objectives.
12. Once agreed, the Equality Objectives will be published on our website and intranet on 25th March, thereby meeting our legal responsibility.

Corporate & Strategic Implications

Strategic implications – All Corporate Plan Outcomes and the five Themes of the People Strategy will be impacted by the agreement and implementation of the Equality Objectives. There is also a relationship to a number of other key corporate strategies.

Financial implications - Agreeing the Equality Objectives does not require additional funding. Communication and delivery of the Equality Objectives may incur costs.

Resource implications –The EDI directorate is a small cross-cutting function which exists to advise and support the City Corporation in its equity, equality, diversity and inclusion ambitions and obligations under equalities legislation. The effective delivery of the Equality Objectives is dependent on all City Corporation departments, services and institutions taking action. Consequently, each department and institution should consider the human and financial resources required.

Legal implications – Public Sector Equality Duty (s.149 of the Equality Act 2010) requires public bodies to develop and publish one or more Equality Objectives every four years.

Risk implications – not publishing Equality Objectives poses legal and reputational risks.

Equalities implications – The Equality Objectives provide a cross-cutting framework by which the City Corporation can respond to the requirement to have due regard to the three aims of the Public Sector Equality Duty: to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010; to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; to foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Climate implications – None

Security implications – None

Conclusion

13. The Equality Objectives described in the report provide a response to the legal requirement on the City Corporation to publish one or more equality objectives every four years. This requirement is currently unmet.
14. The Equality Objectives presented in the report have been updated reflecting the consultation feedback and make more explicit the relationship between the Equality Objectives and the outcomes of the Corporate Plan 2024-2029 and the themes of the People Strategy 2024-2029. This is to ensure that advancing EEDI is integral to those strategies that will shape and drive the organisation over the next five years.
15. The Equality Objectives provide a direction of travel not a destination and reflect the fact that we are at an early stage in taking a systemic evidence-based approach to EEDI.

Appendices

Appendix 1 - Original draft Equality Objectives with commitments and targets

Appendix 2 - Equality Objectives – Consultation Summary and Lessons Learned

Background Papers

- EDI Subcommittee 12th December 2022
- Policy & Resources Committee 19th January 2023
- EDI Subcommittee 7th March 2023
- EDI Subcommittee 4th September 2023 (verbal)
- EDI Subcommittee 12th December 2023

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