



Equality, Diversity & Inclusion Sub-Committee

Date: MONDAY, 11 DECEMBER 2023
Time: 10.30 am
Venue: COMMITTEE ROOMS, WEST WING, GUILDHALL

Members:

Deputy Andrien Meyers (Chair)	Deputy Charles Edward Lord
Joanna Tufuo Abeyie (Deputy Chair)	Deputy Alastair Moss
Deputy Randall Anderson	Deputy Brian Mooney
Alderman Sir Charles Bowman	Deputy Ann Holmes (Chief Commoner)
Deputy Simon Duckworth	Deputy Alpa Raja
Mary Durcan	Ruby Sayed
Caroline Haines (Ex-Officio Member)	Catherine McGuinness
Florence Keelson-Anfu	Judith Pleasance

Enquiries: Kate Doidge
Kate.Doidge@cityoflondon.gov.uk

Accessing the virtual public meeting

Members of the public can observe all virtual public meetings of the City of London Corporation by following the below link:

<https://www.youtube.com/@CityofLondonCorporation/streams>

A recording of the public meeting will be available via the above link following the end of the public meeting for up to one civic year. Please note: Online meeting recordings do not constitute the formal minutes of the meeting; minutes are written and are available on the City of London Corporation's website. Recordings may be edited, at the discretion of the proper officer, to remove any inappropriate material.

Whilst we endeavour to livestream all of our public meetings, this is not always possible due to technical difficulties. In these instances, if possible, a recording will be uploaded following the end of the meeting.

Ian Thomas CBE
Town Clerk and Chief Executive

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 approve the public minutes and non public summary of the meeting held on 4 September 2023.

For Decision
(Pages 5 - 8)

4. **OUTSTANDING ACTIONS**

(Pages 9 - 10)

5. **DRAFT EQUALITY OBJECTIVES FINAL REPORT**

Report of the Chief Operating Officer.

For Decision
(Pages 11 - 30)

6. **COL CARE EXPERIENCED AS A PROTECTED CHARACTERISTIC POLICY APPROVAL**

Report of the Director of Children's and Community Services.

For Discussion
(Pages 31 - 40)

7. **EDI CHARTERS UPDATE REPORT 2023/2024**

Report of the Chief Operating Officer.

For Information
(Pages 41 - 54)

8. **TACKLING RACISM TASK FORCE (TRT) UPDATE**

Report of Chief Operating Officer.

For Information
(Pages 55 - 76)

9. **RESPONSIBLE PROCUREMENT UPDATE**

Report of the Chamberlain.

For Information
(Pages 77 - 80)

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

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

12. **EXCLUSION OF THE PUBLIC**

MOTION: That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following item(s) 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 Items

13. **NON-PUBLIC MINUTES**

To approve the non public minutes of the meeting held on 4 September 2023.

For Decision
(Pages 81 - 82)

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

15. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE COMMITTEE AGREE SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

Part 3 - Confidential Items

16. **EDI TRANSITION**

Chief Strategy Officer to be heard.

For Information
(Verbal Report)

This page is intentionally left blank

EQUALITY, DIVERSITY & INCLUSION SUB-COMMITTEE **Monday, 4 September 2023**

Minutes of the meeting of the Equality, Diversity & Inclusion Sub-Committee held at COMMITTEE ROOMS, 2ND FLOOR, WEST WING, GUILDHALL on Monday, 4 September 2023 at 10.30 am

Present

Members:

Deputy Andrien Meyers (Chairman)
Deputy Randall Anderson
Mary Durcan
Florence Keelson-Anfu
Deputy Charles Edward Lord

-

1. APOLOGIES

Apologies were received from Caroline Haines, Deputy Alistair Moss, Deputy Brian Mooney, Deputy Ann Holmes, and Catherine McGuinness.

Joanna Abeyie and Alderman Sir Charles Bowman observed the meeting remotely.

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

There were no declarations of interest.

3. MINUTES

RESOLVED – That the public minutes of the previous meeting held on 7 July 2023 be approved as an accurate record.

4. EDI SUB-COMMITTEE WORK PROGRAMME 2023/2024

The Committee received the EDI Sub-Committee Work Programme for 2023/24.

The Committee heard that that there would be an update on the Tackling Racism Taskforce's recommendations reported to the Sub-Committee at each meeting.

5. EDI CHARTERS UPDATE REPORT 2023/2024

The Committee received a report of the Chief Operating Officer concerning outlining charters that the City of London Corporation were part for discussion by the Committee.

The Committee reviewed the charters. It was clarified that the Women in Finance included those who identified as women in its activities, but this would be followed up by officers outside of the meeting.

A Member of the Committee expressed a concern from the LGBT+ community that removal and resignation of senior staff at Stonewall Diversity Champions could lead to reduction or omission of gender reassignment as part of its activities. The Member wished to seek reassurance that gender reassignment would remain part of Stonewall Diversity Champions activities before the Corporation agreed to continue being part of the charter. If this was not the case, the Sub-Committee agreed that the suitable replacement would be sought.

It was suggested that the future update report to the Sub-Committee provide further details on the benefits for staff from being part of the charters. It was acknowledged that the charters that were referred to in Agenda Item were not included as part of the report, and the list would be updated.

It was agreed that an update report would be provided at the December meeting of the Sub-Committee.

It was agreed that the Corporation would continue with the charters listed in Appendix 1 of the report, subject to the clarification and reassurance that Stonewall Diversity Champions would not cease in its gender reassignment activities.

RESOLVED –

- (i) That Members note the progress to date against the charters for which we are accredited.
- (ii) That Members agree to continue all charters listed in Appendix 1, subject to the clarification and reassurance from Stonewall Diversity Champions that it would not cease in its gender reassignment activities.

6. EDI CONSULTATION RESULTS SUMMARY (VERBAL UPDATE ON EARLY THEMES)

The Committee received a verbal report of the Chief Operating Officer. It heard that 150 individuals completed the survey, attended a workshop, or provided feedback through departmental meetings. The main themes of the feedback were tackling all forms of discrimination, social mobility, socio-economic diversity, equal pay, developing cultures of respect, and equal opportunities to progress within the workforce. The feedback on the objectives was overall strong, but the targets and objectives needed to be achievable and specific.

Members of the Committee discussed that 150 respondents were a low figure, and that the consultation be extended to receive a higher completion and response rate for achieving meaningful actions. It was agreed that officers would submit a report to the next Policy & Resources Committee for a business case for more funding to advertise the consultation and thus receive more responses.

7. CHIEF OPERATING OFFICER'S DEPARTMENTAL BUSINESS PLAN - QUARTERLY UPDATE

The Committee received a report of the Chief Operating Officer outlining the achievements in the five agreed strategic areas set out in the 2023/2024 business plan and the 90 days business plan.

The Committee raised that the review of resident feedback would not be completed until April 2024 and would be completed in collaboration with member services. Officers explained that resident feedback was mostly member-led, and data collected from the canvassing work completed at the last election could be used for election purposes only and therefore could not be accessed.

RESOLVED – That the report be received and its contents noted.

8. **WORKFORCE REPORTS**

The Committee received two reports of the Chief Operating Officer providing employee profile information for the years 2021-2022, and 2022-2023. The reports had been received at the last meeting of the Corporate Services Committee.

Members highlighted gender and ethnic minority imbalances and disparities in pay within the data. Officers explained that this had also been previously raised by Members at Corporate Services, and work needed to be done to address these concerns. This included recruitment processes and career progression plans. These actions would be overseen by Corporate Services.

Members also noted the low response rate, and why respondents chose not to answer certain questions. Members suggested that sampling techniques could be used with the data, and noted there would be a staff survey in March 2024.

RESOLVED – That the reports be received and their contents noted.

9. **TACKLING RACISM TASK FORCE UPDATE**

The Committee received a report of the Chief Operating Officer providing an update on the progress of the recommendations of the Tackling Racism Taskforce.

It was questioned why there were no actions for those recommendations which had not been completed. The Chief Operating Officer responded that some recommendations were currently unable to be completed (due to reasons such as IT operational systems not yet in place), and other recommendations were not updated due to officers being on leave. It was suggested that the respective chief officers should attend future meetings of the Sub-Committee to provide an update on the progress of the recommendations.

RESOLVED – That the report be received and its contents noted.

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

There were no public questions.

11. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT**
There were no public items of urgent business.
12. **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 Schedule 12A of the Local Government Act.
13. **NON PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB COMMITTEE**
There were no non-public questions.
14. **STAFFING AND RESOURCES (VERBAL UPDATE)**
The Committee heard a non-public verbal update on staffing and resources.
15. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE COMMITTEE AGREE SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**
The Committee heard a non-public item of other business, concerning a verbal update on statues.

The meeting ended at 11.57 am

Chairman

Contact Officer: Kate Doidge
Kate.Doidge@cityoflondon.gov.uk

Equality, Diversity, & Inclusion Sub-Committee – Outstanding Actions

No.	Date	Item	Action	Officer(s) responsible	To be completed/ progressed to next stage	Progress Update
23/01	4 Sept 2023	4	An update on the Tackling Racism Taskforce recommendations to be included as a standing item.	Chief Operating Officer	Completed	The EDI Officer (Service Delivery) has chased the TRT Recommendations with the various departments the actions were attributed to and has produced an update report for the EDI Sub-Committee ahead of the meeting in December.
23/02		5	Officers to provide clarification on Women in Finance	Chief Operating Officer	Completed	<p>EDI Officer (Service Delivery) has contacted the HM Treasury Women in Finance Team and has received clarification on this charter.</p> <p>The response from the HM Treasury Women in Finance Charter is as follows:</p> <p>As you know, a fundamental principle of the HMT Women in Finance Charter is that individual signatories are best placed to make the right decisions for their business. Due to this, the Charter has adopted a flexible approach which recognises the diversity of the sector and allows each signatory to set its own definitions and targets.</p> <p>So, in line with the approach outlined above, it is for the City of London Corporation to identify what part of its workforce falls in scope of its Charter commitments.</p>

23/04	5	Officers to confirm whether gender reassignment would continue to be part of Stonewall Diversity Champions activities	Chief Operating Officer	Completed	<p>EDI Officer (Service Delivery) contact Cecily Stevenson the account manager at Stonewall and she issued the following response:</p> <p>In our Diversity Champions scheme, we provide guidance on a range of topics relating to LGBTQ+ inclusion. This includes support and guidance on trans and non-binary inclusion in the workplace, which will touch on areas relating to the protected characteristic of gender reassignment in the Equality Act 2010.</p>
23/05	5	An update report on the EDI charters to be received at the December meeting of the Sub-Committee	Chief Operating Officer	Completed	EDI Officer (Employment) has written a new report on the EDI Charters with updated information.
23/06	6	Officers to submit a report to Policy & Resources with a business case for funding to advertisement for the EDI consultation	Chief Operating Officer	Not Completed	Chief Operating Officer had left the City Corporation due to an organisational structure change.
23/07	9	Chief Officers to attend future meetings to provide updates on the Tackling Racism Taskforce recommendations	Chief Operating Officer	Not Completed	Chief Operating Officer had left the City Corporation due to an organisational structure change. However, EDI Officer is working with senior managers and Chief Officers across all departments to ensure the TRT Recommendations are implemented.

Agenda Item 5

Committee(s): Equality Diversity & Inclusion Sub-Committee	Dated 11 th December 2023
Subject: Draft Equality Objectives Final Report	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	1,2,3,4,5, 8
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of: Emma Moore, Chief Operating Officer	For Decision
Report author: Micah McLean, EDI Officer	

Summary

Following a decision made by the members during the last EDI Sub-Committee meeting on 4th September, the Draft Equality Objectives Consultation was relaunched. During the last meeting the EDI Directorate had mentioned that 150 people had responded to the Draft Equality Objectives Consultation, this has now risen to 275 responses (representing more than 1,000 people). In addition, this is also higher than the typical responses rates received by other local authorities such as Brent, Ealing, and Newham Council. While the responses are lower than other local authorities such as Harrow Council, the feedback received represents a higher number of people.

This is a positive achievement for the City of London Corporation and demonstrates that there is wide representation from a variety of different groups in the City Corporation Draft Equality Objectives Consultation.

The purpose of this paper is to provide a breakdown of the results ahead of a decision that will be made by members during the EDI Sub-Committee scheduled to take place on 11th December 2023.

Recommendation(s)

Members are asked to note:

The achievements of the EDI Directorate in achieving more responses to the Draft Equality Objectives Consultation.

Members to agree on:

The approach of the EDI Directorate to the Draft Equality Objectives Consultation and next steps for this piece of work.

Main Report

Background

1. The Draft Equality Objectives Consultation was launched on 1st June 2023 and initially closed on the 31st August 2023. At this point, 150 responses had been received to the consultation through online surveys, a Draft Equality Objectives Workshop that had taken place on 27th July 2023, and meetings with Departmental EDI Boards.
2. However, following the comments made by members during the last EDI Sub-Committee meeting the team proceeded with producing and implementing a communication plan to improve results to the Draft Equality Objectives Consultation.

Overall Results and Benching Against Other LAs

3. The City of London Corporation's Draft Equality Objectives Consultation 274 responses are higher than the results received for similar consultations across London Local Authorities including: Brent Council (78), Ealing Council (250), and London Borough of Newham Council (150).
4. Appendix 1 provides a graph depicting how the City Corporations results compare to that of other local authorities.
5. All of the London Local Authorities apart from the London Borough of Newham Council had hired external consultants involved in producing their respective consultations.
6. However, the number of responses received to the Draft Equality Objectives Consultation has been achieved through the EDI Directorate utilising its existing relationships with staff across the City of London Corporation and its institutions, City businesses (e.g., Legal and General), Local Authorities (e.g., Islington Council and Hackney Council), Trade Unions and other external stakeholders.
7. The EDI Directorate achieved the increase in responses to the Draft Equality Objectives through the development of a communications plan developed by the team with feedback from senior colleagues.
8. This is a positive achievement for the City of London Corporation because it has fared better in comparison to other London Local Authorities delivering similar pieces of work. In addition, the methodology the EDI Directorate has used is cost effective but has delivered meaningful results.

Where the Responses Came From

9. The EDI Directorate launched two surveys pertaining to the Draft Equality Objectives that was completed by 109 people and 133 people respectively. The second survey was a simplified version of the first survey and was designed to increase the number

of responses to the Draft Equality Objectives Consultation by ensuring the questions respondents answered were more specific.

10. This means that the EDI Directorate consulted with 240 people through online surveys. Appendices 2 and 3 highlight the different demographics of people that provided the feedback to the City Corporations Draft Equality Objectives through the online surveys.
11. Two letters were received from stakeholders associated with the City Corporation on behalf of a total of 785 people. Appendices 4 and 6 highlight the responses received from stakeholders in the form of letters.
12. Following the Draft Equality Objectives Consultation Workshop that took place on 27th July 2023 the City Corporation had the opportunity to hear the views from our stakeholders from including staff at the City of London and Across its Institutions, Metropolitan Police, Islington Council, GMB Union, Pride Equality Standard UK and The Museum of London on this piece of work. Over 30 staff across the City Corporation and its institutions, stakeholders, and partners were consulted with through this forum.
13. On 30th October 2023, The City Corporation's Innovation and Growth department submitted further feedback on our Draft Equality Objectives from 15 members of staff following their departmental EDI Board meeting. The response provided by the Innovation and Growth department to the Draft Equality Objectives Consultation can be seen in Appendix 5.

Next Steps

14. The EDI Directorate will be working with the Data Team to analyse the results and then make changes to the Draft Equality Objectives based upon the feedback received.
15. The final draft of the Draft Equality Objectives Consultation will then be produced and submitted SLT, ELB and members by end of the Q4 2023/2024.

Corporate & Strategic Implications

Strategic Implications

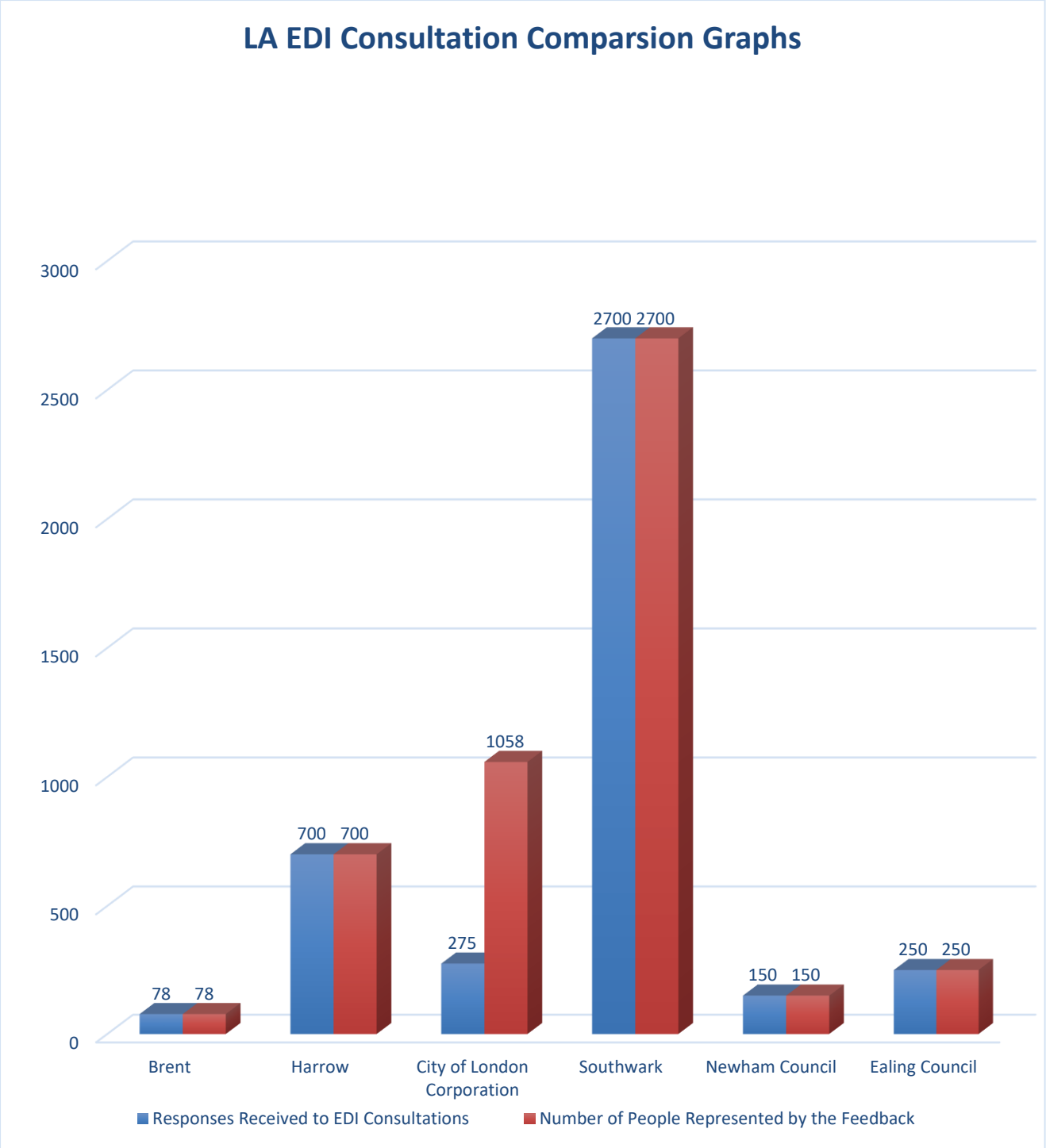
16. The proposals align with outcomes 1, 2 3, 4, 5 and 8 of the Corporate Plan 2018 to 2023. It also aligns with the CoLC's Social Mobility Strategy 2018 to 2028 and other Strategic Plans.
17. Resource implications –The project led by the EDI directorate is cross-cutting and it will have resource implications for all CoLC departments, services and institutions. Consequently, each department and institution should consider the human and financial resources required to achieve the Equality Objectives of the CoLC and to comply with the CoLC obligations under the Equality Act 2010 and related regulations.
18. Legal implications – The Public Sector Equality Duty (Section 149 of the Equality Act 2010) is supported by the specific duties regulation which requires public bodies to set themselves, specific and measurable equality objectives every four years. This proposal will enable the CoLC to comply with its obligations and specific duties regulations mentioned in the Equality Act.

19. Risk implications – The risk of non-compliance with the Equality Act 2010 and related regulations includes reputational damage and the possibility of the proceedings being brought by the Equalities and Human Rights Commission.
20. Equalities implications – This proposal will enable the CoLC to comply with the Public Sector Equality Duty 2010, Section 149 which covers the Public Sector Equality Duty and the Specific Duties regulations mentioned above. This proposal involves setting objectives required to comply with the Equality Act 2010. This proposal, is therefore, likely to have a positive impact on citizens protected by existing equality legislation which are age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership and pregnancy and maternity.
21. Climate implications – N/A
22. Security implications – N/A

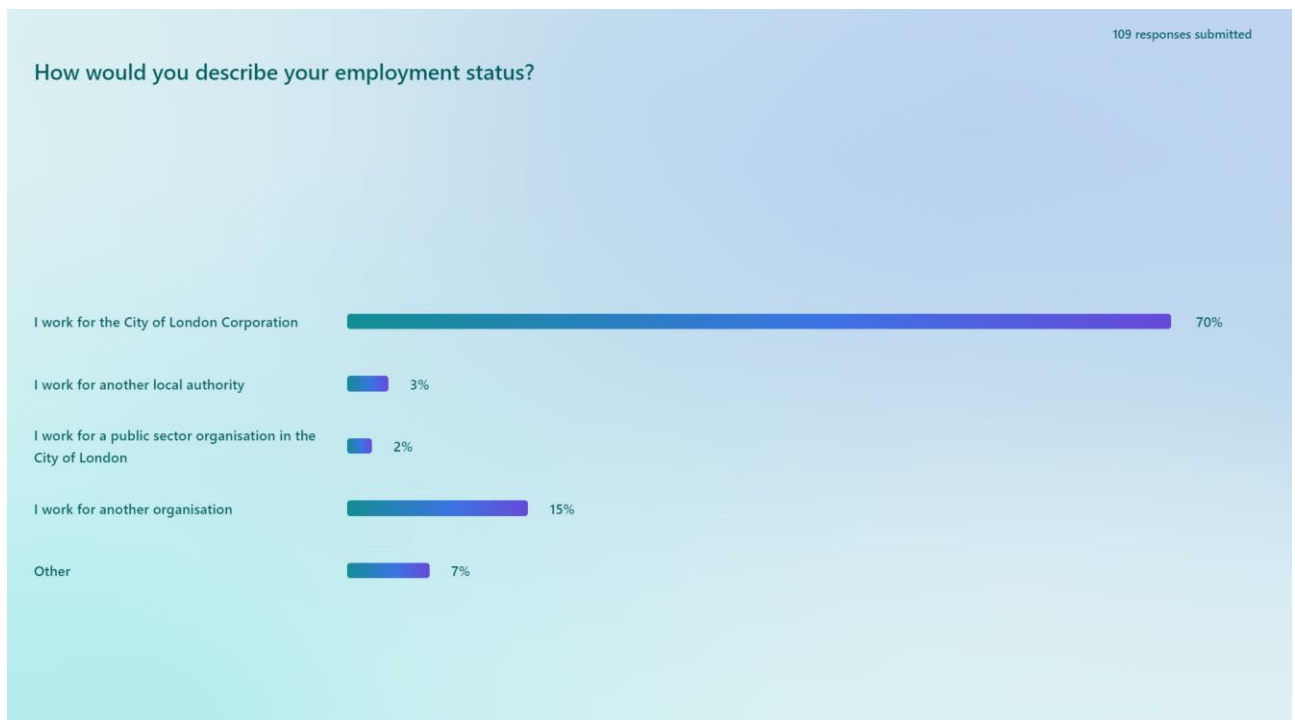
Conclusion

23. In conclusion, The City of London Corporation has made significant progress in improving responses to the Draft Equality Objectives Consultation in the space of a month and are currently seeking feedback from members pertaining to the next steps with members regards to this piece of work.

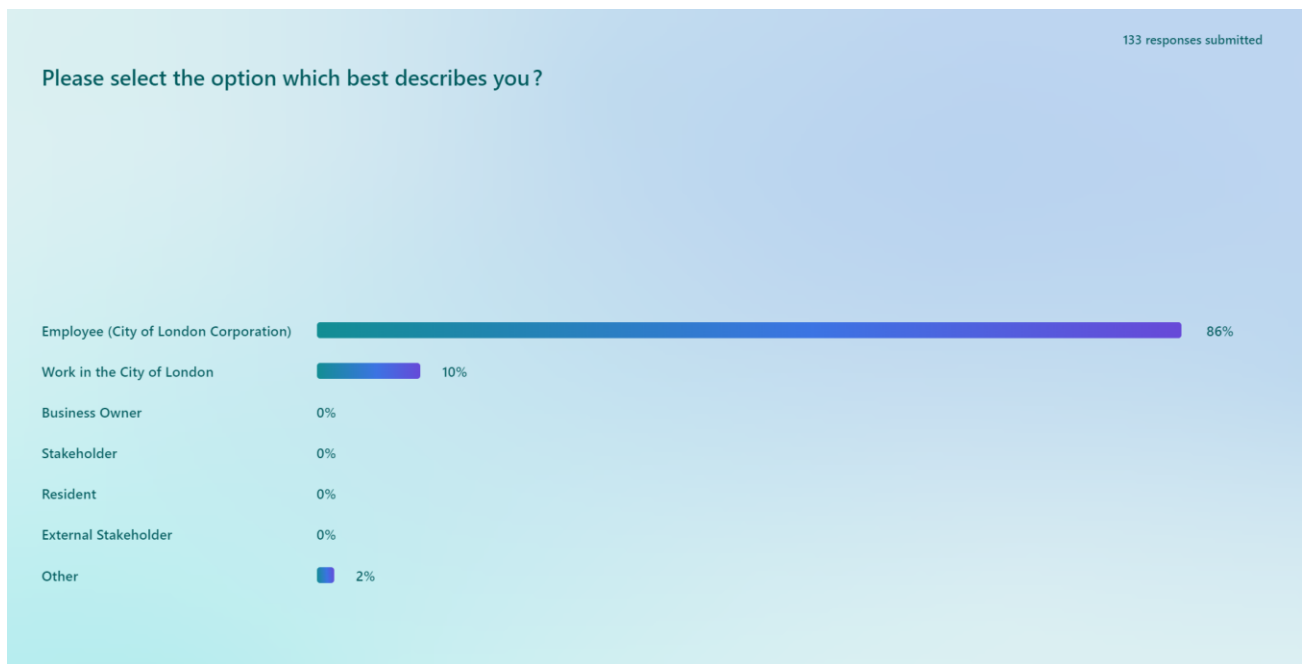
Appendix 1 – LA EDI Consultation Comparison Graph



Appendix 2 – Summary of Respondents from 1st Draft Equality Objectives Survey



Appendix 3 – Summary of Respondents from 2nd Draft Equality Objectives Survey



Appendix 4 – Responses from Epping Forest Heritage Trust



**Epping Forest
Heritage Trust**

Deputy Andrien Meyers and Dr Joanna Abeyie
Chairman and Deputy Chairman
Equality, Diversity and Inclusion Sub-Committee
City of London Corporation
The Guildhall
London EC2V 7HH

22nd August 2023

Consultation on your Draft Equality Objectives

Dear Andrien and Joanna

Thank you so much for engaging so widely on the draft Equality objectives for the City of London Corporation. I am delighted to respond on behalf of Epping Forest Heritage Trust, the charity and membership organisation which works alongside the City of London, as Conservator, with a vision to protect and preserve Epping Forest for the enjoyment of generations of people to come.

Firstly, congratulations on the draft objectives. We think they are a strong basis to build on. And we are delighted that you mentioned Epping Forest as "a national treasure" in your forward to the consultation. We agree!

However we are concerned that the draft objectives do not go far enough, especially in relation to access to the green spaces that you manage, including Epping Forest.

Recent polling carried out by Waltham Forest Council of its residents shows that men are more likely to visit Epping Forest than women, and white people are more likely to visit than Black or Asian people.

The polling was carried out in March and April 2023 by door to door interviews with a representative sample of 756 Waltham Forest residents.

The headline results were as follows:

- On average 36% of Waltham Forest residents visited Epping Forest at least once a week.
- 51% of residents in the north of the borough visited Epping Forest at least once a week, compared to only 24% in central Waltham Forest.
- Men visited the Forest more regularly than women with 40% visiting at least once a week, compared to 32% of women.
- 37% of 16-44 year olds and 41% of 45-64 year olds visited the Forest at least once a week compared to only 22% of 65 and overs



**Epping Forest
Heritage Trust**

Epping Forest Heritage Trust is a registered charity in England and Wales 275076 and a company limited by guarantee registered in England and Wales 1339783.

Registered office: The Warren Lodge,
Loughton,
Essex
IG 10 4RN



Appendix 5 – Feedback from the Innovation and Growth Department



Draft Equality Objectives – Request for Equality Representatives (Deadline 24th October 2023)

Link to Draft Equality Objectives: [Consultation on our Draft Equality Objectives 2023-27 \(cityoflondon.gov.uk\)](https://www.cityoflondon.gov.uk/consultation/consultation-on-our-draft-equality-objectives-2023-27)

Link to survey: [Consultation on our Draft Equality Objectives 2023 - 2027 \(office.com\)](https://www.office.com/consultation-on-our-draft-equality-objectives-2023-2027)

Name of Equality Representative Completing Form: Erin Skinner

Department: Innovation & Growth

Number of people involved in board/focus group: 15

Key Questions:

1. Why is the Draft Equality Objectives Consultation relevant to you?

- Provides a framework for us to engage with to build our own EDI plans.
- Gives a sense of shared objectives to allow us to communicate EDI plans and get buy in from our colleagues.
- Helps us to break down silos and work with other departments on shared objectives.
- Allows us to engage on a key corporate priority. •

2. What do you think is the greatest priority for Equality, Diversity and Inclusion in the City of London?

Data – getting the data right so we know which interventions are needed and when. Understanding the impact of those interventions and how we can learn from them.

Gathering data to understand our baseline.

3. How could the Draft Equality Objectives be Improved or Strengthened?

A greater sense of action from the objectives and supporting materials. They currently are quite broad and it isn't clear what specific actions will take place under each of the headings to achieve the objectives.

There is no clear measurement of success to help understand what each of the interventions might mean in practice (links to the data point above)

Appendix 6 – Letter from the City of London Access Group



City of London Access Group

Tel: 020 7332 1995

E-mail: colag@cityoflondon.gov.uk

Response to Consultation on CoL Draft Equality Objectives

2023 - 2027

A. Our Corporate Commitment – p8

Bullet point 2: [Promote and champion diversity, inclusion and the removal of institutional barriers and structural inequalities.](#)

The City of London (CoL) is failing in this regarding disabled people who are members of the City of London Access Group (CoLAG). The aspirations in this document are unfortunately divorced from what's happening on the ground, despite the best intentions of some CoL staff. I provide examples throughout this document drawn from my personal experience of volunteering for CoL to illustrate my point.

[Ref second column about the City's workforce](#)

Women and Black and minority ethnic communities are mentioned as being under represented. There is not any mention of the underrepresentation of other groups of people with protected characteristics, such as disabled or older people.

p9

After meeting Dr Joanna Abeyie at a BBC event for disabled people in 2022, I didn't have time to follow up with her in order to establish a relationship between CoLAG and the [newly established EDI Sub-committee](#), because I was swamped with work for an ongoing organisational review of CoLAG. No additional resources have been allocated to support me as Chair during the review, which has made it very difficult to progress matters. Additional resources in the form of an external consultant were brought in but to assist CoL - she actually created more work for me as CoLAG chair, which I again discuss in more detail later in my response. This disparity in support simply serves to undermine inclusion.

B. The City Corporation's Draft Equality Objectives p10

[We understand that our approach must adopt an intersectional perspective...](#)

Intersectionality is mentioned, but which protected characteristics will be considered as priorities in this context? E.g. will it be race with socio - economic status, rather than also disability and socio - economic status?

[Why are we undertaking this consultation? p10](#)

[Our approach going forward will involve coproducing our EDI strategy in partnership with our institutions and stakeholders. We are committed to co-creating a world-class EDI ecosystem in the City of London.](#)

What does coproduction and co - creation mean to the EDI Sub - committee in this context at a practical level?

Our five draft Equality Objectives - in brief – p11

1. Aspirational leadership

[Taking a broad and intersectional approach to equality, diversity and inclusion...](#)

Again, who will be prioritised amongst those with protected characteristics and what will this translate into in practice?

2. Dynamic and engaged workforce

You have overlooked volunteers, without which, the City couldn't operate in its current format.

3. Accessible and excellent services

[Creating a community centred approach to service delivery bolstered by an inclusive community and stakeholder engagement strategy](#)

CoL's current engagement strategy is not as inclusive as it needs to be and feedback from some of your marginalised communities is sometimes ignored in favour of other more powerful stakeholders.

A good example is that the input of disabled people on CoLAG regarding the exclusionary nature of colourful crossings was ignored in favour of discharging the wishes of a powerful funder. Our advice was only followed upon the imposition of a Mayoral moratorium on the installation of these crossings.

4. Understanding our communities

Will your [data led and evidence based approach to understanding and working with your communities and networks](#) embrace qualitative as well as quantitative data? Not all important information can be reduced to graphs and bar charts: including soft data to capture the stories of those who live, work in and visit the City is also needed.

Ref 2 & 4 - where would I as a disabled volunteer fit into this framework?

Equality Objective 1: Aspirational Leadership: p12

We Will

Bullet point 1: [...senior leaders are well equipped to lead the EDI agenda and to act as EDI ambassadors](#)

I was very recently told by a senior Planning Officer that disabled people like to give their time for free to help improve their environment - they aren't seeking financial recompense. Yet when a volunteer is required to work three or more days a week to replace a staff team which has been disbanded, this is not inclusive, but arguably exploitative. Nor is it inclusive when other volunteers may be asked to work less often, but are not accorded any recognition over extended periods of time and when finally they are, it is minimal.

At assistant director level, I hear warm words, but see little proactive driving through of change to improve EDI. The internal processes of CoL are bureaucratic and the cogs and gears turn so slowly, that those requiring change are left to battle on for long periods of time unsupported and arguably exploited, which simply serves to reinforce their marginalised status. It isn't enough to simply initiate or sign off a process, e.g. an organisational review in the case of the group which I chair. Senior staff must ensure change towards inclusion is properly resourced and drive it through in a timely fashion, rather than leaving less senior staff to do it, who may be less committed to the EDI agenda or lack the seniority to drive it through and make it happen.

A further example of deficiencies in leadership around EDI is provided by a meeting I was invited to speak at on the controversial topic of colourful crossings. After I outlined the

accessibility issues posed by them, a Common Councillor told me that people like me (i.e. disabled) should stay at home and that if we did go out and use a colourful crossing, then we would have to accept that accidents would happen. The clear inference was that it would be our fault were we to be knocked down and killed on these crossings. This was because she thought that they looked nice and brightened up her area. I'm not often left speechless, but I was on that occasion for a short period of time. This leadership clearly wasn't inspirational in terms of EDI, as well as being an unacceptable to treat a volunteer. It points to the need for EDI training to embrace CoL volunteers as well as staff.

Bullet point 2: [Enable and empower our staff networks....](#)

A disabled member of staff was not aware there was a network for disabled people, until I as a disabled volunteer, asked if there was an Employee Resource Group (ERG) for disabled CoL staff and she set out to try to find one. No proactive approach was made to engage her.

Bullet point 6: [Set aspirational EDI targets and metrics...](#)

An overreliance on statistics and data will miss some of those stories right under your nose. Not every person neatly fits into a box, as an intersectional approach helps us to understand, whilst not every experience which you ought to be capturing, analysing and acting upon will necessarily be picked up by a rigid approach to information gathering.

Last bullet point: [EDI Sub-committee has an overview of all equalities related work through our EDI governance structure](#)

The Sub-Committee was not aware of the existence of the City of London Access Group (CoLAG), which I chair. This became apparent when I met the Deputy Chair at a BBC event aimed at recruiting disabled people to participate in programming and another member of the committee at the annual CoL Transportation dinner. They were both surprised and asked me to follow up with them, but due to my work burden for CoLAG, was unable to do so - even if I could have sent them an initial email, I would not have had the capacity to follow through and meet them, etc.

Our Five Targets

Bullet Point 3: [the Disability Confident Scheme](#) is largely meaningless and discredited in terms of validating how disabled friendly an employer is to work for, because there is zero or little external validation involved (depending upon the level of certification achieved) and that which does exist, is not quality checked. I am one of several disabled people in receipt of a national bursary from the Shaw Trust and PurpleSpace engaged in a project analysing the deficiencies of the scheme and suggesting how it may be improved. Many disabled people have no confidence whatsoever in the scheme, as we are all too well aware of its deficiencies. The government department responsible for it is well aware of its deficiencies, though planned improvements have been delayed by judicial review.

It is complacent to rely upon the Disability Confident Scheme as a way of benchmarking progress with regard to the inclusion of disabled people in the City's work. CoL needs to find a more robust and better respected way of measuring its progress with regard to the inclusion of disabled people in the City's work.

Bullet point 4: [Our key decisions are informed by our equality Impact assessments guidance and forms.](#)

CoL's EqlAs are variable in standard and often lack the input of disabled people themselves and therefore miss key issues which they should highlight.

[Equality Objective 2: Dynamic and Engaged Workforce: p13](#)

We Will

Bullet point 4: Monitor the variety of other workers we have such as casual, temporary, voluntary, and other hidden workforce.

I have never been surveyed in the 3.5 years that I have been volunteering for CoL, which leads me to ask how often is monitoring conducted?

What is done with the monitoring information collected? If CoL doesn't act on what the monitoring identifies, there's not much practical benefit to be gained from doing that monitoring in the first place.

Bullet point 6: Introduce targeted strategies and mitigations to reduce pay gaps and address other inequalities.

Reviewing at least expenses for volunteers, as well as basic recognition and reward mechanisms (e.g. vouchers for time spent, or time banking benefits) should be included within the remit of your aspirations, because it is important in tackling exploitation of volunteers from disadvantaged groups. Its omission from your draft objectives is a serious deficiency.

Bullet points 7 and 8: physical and digital accessibility of work for all employees and enhancing our inclusive workplace culture

As volunteer chair of CoLAG, I have had to contend with severely reduced resource since spring 2021 (budget frozen, officer level Secretariat support withdrawn and replaced by entry level and less support) and withdrawal of all resources by December 2021. I have received no expenses since becoming chair in January 2021. Until recently, no member has had any remuneration, although I have recently insisted on this, which is paid, most often via voucher, at a very low level for attendance at focus sessions / workshops only, i.e. not for preparation or follow - up work, or indeed any other group activity.

I have received no ICT support, despite having outdated hardware and software, which makes it difficult for me sometimes even to participate in important meetings which CoL insists are held on Microsoft Teams, against the wishes of many CoLAG members. Whilst CoL initially provided technical support to enable generally older CoLAG members with low level ICT skills to participate in meetings and consultations, that was formally taken away in December 2021, although we occasionally had ad hoc technical support from a previous member of staff purely down to their personal kindness and support for our group. Since that member of staff is not currently in role, we have no technical support. The work we do is therefore not entirely and certainly not optimally digitally accessible to us.

Expenses for in - person meetings have also long been taken away, since our budget was frozen in April 2021. We have not met in person since spring 2020. In this way too, the physical accessibility of our work is compromised, as occasionally meeting in person is helpful to cementing group cohesion.

Our Five Targets

Bullet point 1: Staff survey results show improved outcomes in engagement, ability to influence work and sense of well-being...

Volunteers should also be surveyed. As an unsupported Chair of a group carrying out substantial and important work for the City, who is disabled and on an extremely limited income, I feel very stressed by the volume of work I am asked to undertake for CoL, so much so that it regularly undermines my physical and emotional health.

Bullet point 2: Annual workforce data on staff recruitment and retention shows similar recruitment and career progression rates for staff across underrepresented groups.

The work I do has essentially replaced the work of an in - house team and I'm often treated by staff members as if I do actually work for CoL. As part of the review of the group I chair,

CoL's legal team has been consulted, presumably to ensure any remuneration I receive does not confer the status upon me of being an employee. How is this congruent with a fair career progression for somebody in my position?

Also, I'm sure CoL provides staff with contracts, but when I have asked if there are plans to introduce volunteer contracts so that we know what we can expect in return for our labour, I'm told that that isn't on the agenda. Why not? Perhaps if potential volunteers knew upfront that we would be totally unsupported in our roles, we could make a more informed decision not to take them on in the first place. E.g. I was told I needed to only find 1.5 hours every other month as a minimum time commitment for my role when considering taking it on, whereas partly due to withdrawal of CoL support, I have not infrequently had to work a three to four day week.

Bullet point 3: HR data on pay and grade gaps shows an improving picture across all underrepresented groups.

A review of the organisation I chair has been dragging on for almost two years and still nothing has actually changed practically, as I'm informed that even piecemeal improvements cannot be implemented, e.g. expenses paid, until the overall package can be taken to Committee for approval. I have insisted on some very modest remuneration for myself and other group members which remunerates me for a maximum of 1/10 of my time input, although it does cover more of other members' time input, albeit at a very low level in terms of value. In the meantime, the exploitation of a socio - economically disadvantaged disabled person continues. I'm promised jam tomorrow, but in the best part of two years it still hasn't arrived, despite repeated assurances to the contrary that it is about to do so.

Equality Objective 3: Accessible and Excellent Services: p14

We Will

Bullet point 1: Ensure that our services...are accessible and co-created with service users and stakeholders through an agreed approach to consultation, coproduction and engagement.

This unfortunately does not mirror my experience as Chair of CoLAG, a good example being the ongoing externally facilitated review of the group. Thus I had no involvement in:

- the CoL decision to bring in an external consultant to facilitate what was initially an internally led review, with no communication about this from CoL for several months, despite repeated queries on my part
- writing the brief for tendering the work
- selecting the consultant.

When I informed the relevant CoL staff that the appointed consultant had themselves recently asked me how to go about doing what CoL had just appointed them to do, I was told it was too late to reverse the decision, which obviously was a direct result of a total lack of co - commissioning and coproduction. I was then nonetheless expected to work with and support that consultant, despite their manifest shortcomings for the role, which meant that I effectively had to perform some of the consultant's work unremunerated. A CoL staff member and officially apologised, but this failed to improve the extant situation and condemned me to months of unpaid administrative support and covering up for an incompetent external consultant.

On a different point, whilst generally well disposed towards advancing inclusion of disabled people in the work of CoL, the staff with whom I regularly engage cannot even agree

amongst themselves on a consistent approach to recognition and reward for the members of the group I chair for the City.

Regarding the existence of an [Ethical Policy](#), I have never been informed about nor read this and would like to know how its contents sit with the excessive and arguably exploitative workloads I have personally experienced 'volunteering' for CoL.

Concerns also exist within CoLAG around being asked by a senior member of staff to undertake the work of professional access consultants, as we have people with that experience as members, for an extremely modest rate of remuneration.

Moreover, in more than one case very modest amounts of remuneration agreed to by CoL have never actually been paid, as certain members of staff have refused to take responsibility for the remuneration process after the engagement took place, leaving it to me as Chair to design and implement an invoicing process which I lacked the capacity to carry out.

Bullet point 2: [Strengthening equality impact analysis in service planning, decision-making and impact evaluation...](#)

CoL's EqlAs are variable in standard and often lack the input of disabled and older people themselves and therefore miss key issues which should be identified and analysed. What are the plans to improve the quality of the EqlAs and to actually involve in their production the people who are likely to be impacted by the policies and developments being analysed? Many CoL staff lack sufficient understanding of accessibility and inclusion to produce high standard, comprehensive EqlAs, but when this issue is raised (diplomatically), this legitimate concern is dismissed.

More broadly, this objective should not just relate to services, but accessibility and excellence in everything that CoL does.

[Equality Objective 4: Understanding Our Communities: - p15](#)

We Will

Bullet points 1 & 2: [Key datasets and evidence based approach](#)

As previously stated, a data - led and evidence - based approach to understanding and working with CoL's communities and networks must embrace not only quantitative, but also qualitative data. Otherwise CoL risks failing to capture some of the critically important lived experience and stories of those who live, work in and visit the City.

A good example is that I have repeatedly informed mid - level and senior staff that with no remuneration (or minimal and only very recent remuneration by way of voucher) and no expenses for what at times is a three to four day week role, I am forced to subsist on £500 a month disability benefit, as I am unable to take on additional work. I have repeatedly explained over a period of almost two years that I am not in a financial position to effectively subsidise CoL, given that I do not receive expenses to cover my utilities costs. These may not seem like much if you are a CoL Assistant Director, but are a lot if you live on a very low income. When it was apparent that this abstract information appeared not to be understood, I tried to make it easier for the staff to digest and act on by explaining this means that I cannot turn on my heating during the day in wintertime when undertaking CoL work, still to no avail. I asked if they could at least approve expenses ahead of any wider form of recognition coming out of the organisational review, but was told this wasn't possible.

Thus experience has been that some of the people I work with as chair of CoLAG are so far divorced from the lived experience of socio - economically disadvantaged people that they appear incapable of conceiving of what it is like to work in freezing cold wintertime conditions

which exacerbate the symptoms of one's disability. There is an unwritten assumption that anyone volunteering for CoL is essentially well - heeled, but that isn't necessarily the case, a point I have to make repeatedly to gain any traction.

I am concerned this point wouldn't be picked up by a purely data - led approach, in which case, CoL would also be failing to really understand the communities with which it works.

CoL also risks failing to secure the support of the communities involved unless you give them space to respond in the way that they feel is most appropriate to expressing their views, as opposed to the way that CoL feels is most appropriate to package their responses.

With regard to CoL's annual reporting cycle, I have been a member of CoLAG for 3.5 years and haven't been surveyed once, so re - examining and extending the reach of this work is important.

Bullet point 3: ...consulting, understanding and working with our communities...

Clearly, you must reach well beyond residents' meetings, as acknowledged, but what will the wider community engagement stakeholder strategy you mention actually comprise in practice? As I mentioned, as CoLAG Chair I have twice met members of the Sub - Committee, but it's been left to me to follow up. I have lacked the resources - including time, given my excessive workload - to do so, given that I am totally unsupported in my role, whereas you have more resource than I and could have proactively taken it upon yourselves to follow up with CoLAG.

CoL therefore does need to evaluate and strengthen its arrangements for consulting, understanding and working with its communities. It is critical that you take it upon yourselves to reach out more broadly, rather than waiting for some communities to come to you.

Bullet point 5: Delivering better health outcomes for hidden workers

As previously stated, the work I do for CoL exerts a physical and emotional toll on my health.

Unfortunately I am not familiar with this report, but CoL should perhaps concentrate on getting its own house in order before telling others how they should do things. It may be that the report contents are so urgent that isn't possible. Nonetheless I am not comfortable with CoL telling others how to do things given the poor practice I experience which has a negative impact upon my well - being as a CoL volunteer.

Our Five Targets

Bullet point 5: information to influence your work

Influencing CoL's work isn't dependent only on residents having the necessary information.

CoLAG often - not always – has the information we need, but the real issue is that what we say is not always acted upon when it is incongruent with what CoL senior managers and officers have already decided they want to do. It's as much about culture change in terms of the attitudes of mid - level and senior staff, some of whom think they know best and have it all sussed around accessibility and inclusion, despite not having the lived experience of certain protected characteristics themselves. CoLAG members repeatedly encounter a deep rooted professional arrogance amongst not all, but some members of staff, which really impacts our ability to be heard and to make a difference in a positive way.

Also it isn't just residents who need to be targeted with this aspiration and although the point subsequently refers to those who may live outside the City, the term 'residents' alone is inappropriate.

Finally, it isn't just about people who use CoL facilities and services, but also those who do things for CoL or engage with the City in other ways, including as volunteers.

Equality Objective 5: Socio-economic diversity p16

I am broadly very much in favour of this objective, but again, volunteers seem to have been left out of your analysis, plans and aspirations, with the emphasis upon your paid workforce, although schools and care leavers are mentioned.

I am also concerned that many of the aspirations and goals in the document focus on monitoring, rather than actually changing things on the ground. I appreciate that the prevailing situation needs to be documented before resources can be justified to rectify any identified problems, but monitoring on its own will only achieve change slowly. I would feel more confident in the ability of this document to achieve change at an appropriate speed if at least some mention is made of the potential for concrete plans embracing actions based on the findings of your monitoring.

We Will

Bullet points 1 & 3: Five-Point Pathway & outreach programs

My experience suggests best practice needs to be shared internally and programmes run internally before you concentrate on sharing best practice with external partners and running outreach programmes. Please refer back to my response to the first two bullet points under 'We Will' regarding Equality Objective 4 on page 8 regarding myself as a low income disabled person effectively subsidising CoL operations.

I believe that it is unreasonable that as previously stated, I do not receive expenses and very recently only very partial remuneration at variable low rates, despite essentially replacing paid staff. This is particularly so given I was initially told the time commitment involved for chairing CoLAG could be as little as 1.5 hours every other month. The situation is exacerbated, because as a disabled person unable to work full time, the work I do for CoL prevents me from taking up other offers of paid work. When I warn I will have to seriously consider resigning to undertake properly paid work, I am always assured that the organisational review will be concluded swiftly and that remuneration will soon be in place. Since November 2021 however, change has not been forthcoming and I remain socio - economically disadvantaged. Again, please refer to page 8.

Bullet point 3: ...outreach programmes to address barriers from underrepresented groups

I am aware of CoL staff in middle ranking management positions who cannot afford to attend performances in your own venues. Similarly when I am asked for my views about the accessibility of CoL operated venues, I admit that I have not been able to attend for some time, as I cannot afford to do so. It's a terrible indictment of CoL and potentially embarrassing and humiliating for the individuals concerned to have to admit to being too poor to attend events put on by the organisation for which they work or volunteer.

Thus outreach programmes to address barriers from underrepresented groups therefore need to start very close to home with your own employees and volunteers.

Bullet point 5: meeting socio-economic diversity targets

Despite having all resourcing withdrawn, I have nevertheless faced criticism for a lack of diversity amongst the membership of the group I chair beyond disability and (older) age. I am acutely aware of this issue and would very much like to recruit members from a more diverse background, but with the review dragging on, I cannot recruit additional volunteers when I do not know the nature of the reconstituted group to which I would be recruiting them. In this instance, CoL blames me for a situation essentially of its own making.

Our Five Targets

There is also a significant crossover between socio - economic diversity and the use of certain facilities in the City, such as the Barbican, by younger City residents, e.g. from the Golden Lane estate. I have repeatedly witnessed the predominantly elderly Barbican residents do everything that they can in consultations to argue that young adults should be excluded from the areas where they live, e.g. because the former want to use some of the spaces to skateboard.

As a disabled person I fully appreciate the residents' health and safety concerns around skateboarding, but it concerns me that efforts are repeatedly made to design out the inclusion of young adults from many iconic City spaces and no effort that I have witnessed made to even allocate them some small space for their own requirements. The provision of spaces for younger people seems to stop around the age of 10, as per the plans for enhancing the Barbican Podium with a playspace which will not appeal to even older children.

C. The Consultation Process p18

Our Consultation Principles

Inclusive

As previously indicated, CoLAG has not usually been proactively sought out on EDI matters. On this occasion, I was told about the in - person consultation event by an individual CoL member of staff.

Accessible

The draft objectives have been circulated in an inaccessible format for those who do not have paid - for PDF editing software, including volunteers such as myself. A Word version should be made available to enable people to more quickly comment on the document itself, without needing to replicate parts of the text to pinpoint the part of the document one is critiquing - a much more time - consuming process.

By being in - person only, the July 2023 consultation event excluded those unable to travel to the event for accessibility reasons, including staff members and volunteers. Moreover, with it timed just after lunch, it required those travelling in to travel during their lunchtime, thereby potentially forgoing the opportunity to eat.

Only hard and electronic copies of the document are mentioned. Is it available in easy read, braille or British Sign Language formats for example?

Your draft document states that: '[We endeavour to engage with all interested individuals, groups and organisations and will actively seek out and welcome the views of those who do not normally get involved in consultations](#)'.

I have been invited to contribute to this consultation process by a member of staff, but when I have sought to email in my submission to the consultation, I have received an email stating that: 'The Microsoft 365 group, ediconsult@cityoflondon.gov.uk, is configured to reject messages sent to it from outside its organization -- unless the sender is a guest group member. amandacsi@yahoo.co.uk isn't part of the organization, and it isn't a guest group member'.

Physically excluding digital contributions to the process from your stakeholders who do not have a City of London configured email address is not inclusive and not accessible. This restriction

needs to be removed, otherwise you will continue to actively exclude voices from the communities with which you profess you want to engage.

Our Key Consultation Questions

As I try to demonstrate throughout this document with practical examples drawn from my experience of chairing a CoL group, it's not that I don't support the contents of this draft document as far as it goes, but rather that I think the draft objectives simply **don't go far enough** in various ways, including in terms of:

- the breadth of diversity embraced in terms of protected characteristics: there seems to be an emphasis upon gender and race, but not upon disabled and LGBTQI+ people, for example, which is fairly universal beyond CoL
- the type of stakeholder prioritised: generally the workforce and nearly always excluding volunteers
- the area of activity emphasised: e.g. exclusively services in objective 3
- insufficiently emphasising the need for CoL to be more proactive in consistently reaching out to all the communities you need to engage with
- insufficiently attributing responsibility to CoL for outturns, rather than sometimes pushing it back to the communities you seek to serve or other stakeholders
- the need to go beyond monitoring to outline practical changes which will be made when problematic issues come to light, which I've no doubt they will.
- a failure to explain both the incentives and disincentives to promote / ensure compliance amongst staff and other stakeholders, i.e. what is the jeopardy if staff simply decide to pay only lip service to the objectives and conversely, what will you do to encourage them to adopt them?
- a failure to address the issue of funding, which is always used in the case of CoLAG to justify inaction and perpetuate the inequitable status quo.

I also question **five targets** being selected for each of the five objectives. Are all of them equal priorities? Could one objective have made do with four targets, whilst another might have benefited from six? It comes across as gimmicky, rather than authentically tied to need. It may be that the Sub - committee had a long list of more than five targets for each objective and you simply agreed on your top five, but if this was the case, it would have been helpful for that to be explained.

In broad terms, the document also feels very **theoretical** and divorced from my practical experience of volunteering for CoL. It looks fine on paper, but what will it actually mean in practice and how long will it take to catalyse change on the ground? In my experience, CoL takes a very long time to respond, unless something is manifestly in what it perceives to be its interests, like saving money at the expense of volunteers, in which case change can be implemented with zero warning to those negatively impacted.

I'm disappointed, because I really hoped that this document would usher in some real change in the City, but I struggle to believe that it will, certainly not for people like me in my position. Probably I approached the document with an anticipation which was naïve. Perhaps the negative aspects of my experience of volunteering for CoL has overshadowed my perception, although my disaffection is shared by several of my CoLAG colleagues, who have become very disillusioned with CoL as a result of the withdrawal of support for our

work. Ironically, this is regarded as important not only amongst ourselves, but also by CoL staff members, but is not recorded the priority it requires. It would appear that ensuring accessibility and inclusion in the City's built environment and open spaces unfortunately isn't regarded to be as important as relaying the athletics track at Parliament Hill, renewing the Barbican, or a whole host of other funding commitments the City has recently made, a tiny fraction of the outlay for which could revolutionise CoLAG's operation and experience of our members, including me as Chair.

Ultimately, I can only judge what is written here on the basis of my experience, rather than based on reading the aspirations which may never come to fruition off the page to practically improve the situation for the group which I chair, my individual personal situation and ultimately, the experience of many people with protected characteristics when engaging with and being physically present in the City of London. This document feels like a missed opportunity - it needs to go further.

Amanda Jacobs

Chair

28 July 2023

amandacsj@yahoo.co.uk / 07932 568346

Agenda Item 6

<p>Committees: Equality, Diversity and Inclusion Sub-Committee – For discussion</p> <p>Community and Children Services – For decision</p> <p>Policy and Resources – For decision</p> <p>Court of Common Council – For decision</p>	<p>Dated:</p> <p>11th December 2023</p> <p>13th December 2023</p> <p>14th December 2023</p> <p>11th January 2024</p>
<p>Subject: CoL Care Experienced as a Protected Characteristic Policy approval</p>	<p>Public</p>
<p>Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?</p>	<p>Contribute to a flourishing society</p> <ol style="list-style-type: none"> 1. People are safe and feel safe. 2. People enjoy good health and wellbeing. 3. People have equal opportunities to enrich their lives and reach their full potential. 4. Communities are cohesive and have the facilities they need.
<p>Does this proposal require extra revenue and/or capital spending?</p>	<p>No</p>
<p>If so, how much?</p>	<p>NA</p>
<p>What is the source of Funding?</p>	<p></p>
<p>Has this Funding Source been agreed with the Chamberlain’s Department?</p>	<p>NA</p>
<p>Report of: Judith Finlay, Director Community and Children’s Services</p>	<p>For Decision</p>
<p>Report author: Chris Pelham, Assistant Director People Directorate, Community and Children Services</p>	

Summary

In May 2022, the Independent Review of Social Care published its final report to Government: [Final Report - The Independent Review of Children's Social Care](#). The

review looked in-depth at the experience of care, including the experience of people who had been in care. The review considered extensive feedback and consultation from public bodies, national voluntary organisations and charities, on the experiences of care. The final report recommended that Government should make care experience a protected characteristic.

The Government chose not to implement this recommendation, but local authorities across the country are taking their own action to adopt this principle within their local authority policy and procedural arrangements.

In January 2023, Lambeth became the first London local authority to commit to treating care experience as an additional equality strand, alongside the protected characteristics set out in the Equality Act 2010. Since then, six more London local authorities have made this commitment, and all other London local authorities are considering this as part of their commitment to the London Care Leavers Compact. This is in addition to a further 24 local authorities nationally, with many more making progress on approvals to also adopt the Compact.

The London Care Leavers Compact was established in 2022 to deliver a consistent and high-quality offer for care leavers across the capital. Supported by the Department for Education's funded London Innovation and Improvement Alliance, the Compact provides a framework for all London local authorities to develop consistency, breadth and quality in the support offered to London's care leavers.

The City of London's own Corporate Equalities Objectives set out our commitment to meeting the ambitions of the London Care Leaver Compact.

A report was presented to the Safeguarding Sub-Committee in June 2023, noting the progress that the City of London Corporation (CoLC) has made in respect of the Care Leavers Compact. The report also highlighted our commitment to having care experienced adopted as a protected characteristic.

This report is seeking approval to adopt a specific City of London policy approving care experienced as a protected characteristic (see Appendix 1). In doing so, the CoLC will be further demonstrating its ambitions towards improved opportunities for care leavers in line with the CoLC's wider commitment to strengthening social mobility and equal access opportunities for all.

The policy will go to the Equality, Diversity and Inclusion Sub-Committee for information/discussion, then Community and Children's Services Committee and Policy and Resources Committee for approval and, if approved, it will continue on to the Court of Common Council for approval.

Recommendations

Members are asked to:

- Endorse the CoLC's recognition of care experienced as if it were a protected characteristic where practicable and, in doing so, approve the CoLC's specific policy, 'Care Experienced as a Protected Characteristic' (Appendix 1).

Main Report

Background

1. A CoLC care leaver is a young person aged between 18 and 25 who has been looked after by the CoLC for more than 13 weeks after their 14th birthday, including some time after their 16th birthday. All CoLC care leavers are entitled to access support from the Children Social Care Service. We proactively encourage them to engage with this support through the allocation of a qualified social worker throughout their period in care, up to the age of 25 years. Care leavers are also referred to as 'care experienced', which is reflected in this paper and the 'Care Experienced as a Protected Characteristic' policy.
2. The Independent Review of Children's Social Care headed by Josh MacAlister published a final report in May 2022 that noted:

Many care experienced people face discrimination, stigma, and prejudice in their day to day lives. Public perceptions of care experience centre on the idea that children are irredeemably damaged and that can lead to discrimination and assumptions being made. One young person told the review that a teacher had told them "You're smart - for a kid in care", another young person said "I don't want people to point out that I am in care if I don't want that mentioned. It makes me so cross – that shouldn't happen."

This stigma and discrimination can be explicit, and often comes with assumptions about the likely characteristics of children and adults that have care experience. They can also be implicit and are evidenced in the way care experience is discussed in schools, workplaces, and the media. At its worst this can lead to care experienced people being refused employment, failing to succeed in education or facing unfair judgements about their ability to parent when they have children and families of their own. Hearing testimony from care experienced people sharing the discrimination they have experienced, even from a very young age, it is clear that such discrimination can be similar in nature to other groups that have a legally protected characteristic under the Equality Act (2010). So, while there may be ways that society can help reduce stigma and discrimination, including creating greater public consciousness on these issues, just as with other areas of equality, there is a case to go further. Therefore, the government should make care experience a protected characteristic.

3. The Government chose not to implement this recommendation, but councils across the country are now taking their own action. Seven London local authorities have currently adopted care experienced as a protected characteristic, with all other London local authorities exploring this option as part of the wider regional work of the London Care Leavers Compact. This is in addition to 24 other local authorities nationally adopting care experienced as a protected characteristic.

4. The City of London, alongside the other 32 London local authorities, is committed to meeting the goals and ambitions of the London Care Leaver Compact and has set this out in our own Corporate Equalities Objectives.
5. Furthermore, as part of the CoLC commitment to the Care Leaver Compact, the City of London will be working with partners across the Square Mile to enhance employment and training opportunities for all care leavers. This workstream will align with Destination City ambitions and support the CoLC to improve social mobility opportunities for people who are care experienced.
6. As corporate parents, all council officers and Members share a collective responsibility to ensure that care experienced children and young people who may have had disrupted experiences of family life get the support they need to live the happiest and healthiest lives possible. This includes responsibilities to:
 - Ensure that the support we provide to our care experienced children and young people is of the same quality we would expect for our own children
 - Challenge the negative attitudes and prejudice that exist in relation to care experienced children and young people in all aspects of society
 - Act as champions for the needs of our looked-after children and care leavers in all our spheres of influence
 - Proactively seek out and listen to the voices of our care experienced children and young people when developing new council policies.
7. As already noted, the Independent Review of Children's Social Care 2022 recommended that:

“Government should make care experience a protected characteristic” and “new legislation should be passed which broadens corporate parenting responsibilities across a wider set of public bodies and organisations.”
8. While this recommendation was not implemented by the Government, having a specific CoLC policy that recognises care experienced should where practicable be treated as a protected characteristic will demonstrate our commitment to challenging and eliminating discrimination and prejudice against this group of young people.

Current Position

9. As at the start of November 2023, the CoLC was supporting 56 care leavers. Of this group, 89% were in employment, education or training, and 96% were in suitable accommodation.
10. In respect of our commitment to the London Care Leaver Compact, specific CoLC examples include:
 - Our policy of making Council Tax exempt for all our care leavers

- Meeting the cost of using Transport for London bus services for our care leavers
- Prioritising our care leavers within our housing allocations policy.

11. CoLC Members have always demonstrated a commitment to supporting our care experienced population. Following a focused visit of our care leaving services in November 2018, Ofsted noted that:

“Care leavers in the City of London benefit from a strong service that ensures that they are very well supported. They receive effective help which enables most to achieve good outcomes. There is a determined and appropriately ambitious political and corporate focus to sustain and improve outcomes for care leavers.”

12. Furthermore, in 2020, during the full Inspection of Children Social Care Services, Ofsted judged the experience and progress of ‘Children in Care and Care Leavers’ to be “Outstanding” noting the following:

- Children in care and care leavers are extremely well supported.
- Commitment to ensuring that needs are met is demonstrated by senior leaders, councillors, health partners and children’s social workers, resulting in an extremely good level of service.
- Extremely strong involvement and interest from council members.
- Particular sensitivity shown regarding cultural diversity.
- Strong use of advocacy and independent visiting.
- Good housing offer, with support and moving only when ready.

13. In 2023 Ofsted introduced a separate judgement on care leavers, in recognition of the unique set of presenting needs of this cohort of young people.

14. Oversight and monitoring of the impact of policy and service performance in respect of our young people who are care experienced is reported to the Safeguarding Sub-Committee, Chaired by the Chair of Community and Children’s Services.

15. Establishing a specific CoLC policy will treat care experienced as a protected characteristic and will further demonstrate our continued ambition and commitment to delivering outstanding support for our care experienced population. The proposed change will extend the protection against direct and indirect discrimination to this group in our local policy and practice. It should be noted that the requirement to make “reasonable adjustments” under the Equality Act (actions and alterations to increase accessibility) applies specifically and only to the protected characteristic of disability. Any local change will remain consistent with that requirement and limitation in order not to create the risk of discrimination against other protected characteristics.

Options

16. There are two options:

- a) For Members to approve that the CoLC should treat care experienced as if it were a protected characteristic where practicable to do so as set out in the specific policy (Appendix 1). This is the preferred option.

In doing so, we will be contributing to meeting the specific goal set out in the Corporation's Equalities Objectives 2023-2027 to implement the London Care Leaver Compact.

It will also demonstrate our commitment to improving social mobility opportunities for people who are care experienced, and support the wider ambitions to enhance employment and training opportunities for care experienced people in the Square Mile and the CoLC.

- b) For the Community and Children's Services Committee not to approve that the CoLC should treat care experienced as if it were a protected characteristic. This is not the preferred option.

Pursuing option (b) will mean the CoLC is not aligned to the regional and national local government ambitions to improve equal access to opportunities for people who are care experienced.

Proposals

17. To adopt option (a) and treat care experienced as if it were a protected characteristic, as set out in the policy at Appendix 1. In doing so, the CoLC recognises that:

- Care experienced people are a group who, without this protection, are likely to face discrimination as defined by the principles set out in the Equality Act 2010
- Future decisions, services and policies made and adopted by the CoLC should have due regard to the requirements set out in the CoLC 'Care Experienced as a Protected Characteristics' policy.
- In discharging the Public Sector Equality Duty under s.149 of the Equality Act, the Corporation will include care experienced in the annual publication of information relating to people who share a protected characteristic in services and employment and generally have due regard to the need to eliminate discrimination against and promote equality of opportunity for care experienced people.

18. If agreed by Members, the report will go to the Equalities Diversity and Inclusion Sub Committee for information and discussion, and Policy and Resources and the Court of Common Council for approval.

Corporate & Strategic Implications

19. **Financial implications:** Having this status should not impact on the current funding for people who are care experienced. Implementation of the policy would require regular monitoring, with emerging risks presented to Members as required.
20. **Resource implications:** Having this status should not impact on the current funding for people who are care experienced. Implementation of the policy would require regular monitoring of impact in terms of finance and resource, with emerging risks presented to the Community and Children's Services Committee as required.
21. **Legal implications:** The Corporation is entitled to adopt the policy outlined above. Treating care experienced as if it were a Protected Characteristic will not directly bring into play the enforcement mechanisms set out in the Equality Act. However a failure to take into account the policy where it applies or departing from it where it is not reasonable to do so may result in Judicial Review.
22. **Risk implications:** Adopting this policy will reduce the likelihood of care experienced people in CoLC encountering discrimination because of this personal characteristic. It is likely to assist and ensure that there is access to equal opportunities to CoLC care experienced people in terms of education, employment, training and housing needs. The Corporation will be expected to follow the Policy unless there are reasonable and justifiable reasons for not doing so.
23. **Equalities implications:** An individual is protected from discrimination based on a certain characteristic. The Equality Act 2010 sets out the following protected characteristics;
 - Age
 - Disability
 - Gender reassignment
 - Marriage and civil partnership
 - Pregnancy and maternity
 - Race
 - Religion or belief
 - Sex
 - Sexual orientation
24. While acknowledging that the status of care experienced is not currently recognised as a legally binding protected characteristic within the Equality Act 2010, adopting the specific CoLC policy strengthens equal access of opportunity to care experienced people in the City of London. As such, it is a change in approach, not law, whilst adhering to the spirit and principles of the Equality Act 2010..
25. Furthermore, we will be contributing to meeting the goal set out in the Equalities Objectives to implement the London Care Leaver Compact and demonstrating our commitment to improving social mobility opportunities for people who are care experienced. Adopting this policy will also enhance our ongoing commitment as a

corporation to meeting the broader goals and ambitions regarding Equality, Diversity & Inclusion, as set out in our Equalities Objectives 2023–2027.

26. **Climate implications:** There are no known climate implications.

27. **Security implications:** There are no known security implications.

Conclusion

28. This report has set out the background and context to why the CoLC should adopt its own specific policy that recognises care experienced should be treated as a protected characteristic. In doing so, the CoLC will demonstrate its continued commitment to supporting the broader Equality, Diversity & Inclusion agenda, as set out in our Equalities Objectives 2023–2027.

29. The Corporation will be taking a clear regional leadership role in recognising that adopting this policy will provide equal opportunity access to a group of people who would otherwise be discriminated against because of their history of being in care.

30. Adopting the policy will also demonstrate our regional commitment to the Care Leaver Compact, provide a strong foundation for the CoLC to be a leader in developing opportunities for all care experienced people in the Square Mile, and meet our Destination City ambitions.

Appendices

- Appendix 1 – City of London Corporation: Care Experienced as a Protected Characteristic – Policy

Chris Pelham

Assistant Director People Directorate, Community and Children Services

T: 020 7332 1636

E: chris.pelham@cityoflondon.gov.uk

Appendix 1: City of London Corporation

Care Experienced as a Protected Characteristic – Policy

October 2023

Introduction

The City of London Corporation (CoLC) recognises that people who are care experienced may face unique challenges as they transition into independence and adulthood. The CoLC is committed to creating an inclusive and supportive environment for people who have been in the care of the CoLC. This policy reflects our commitment to ensuring that people who have been in the care of the CoLC will not be discriminated against because of their status as a care experienced person.

Definitions

Care experienced: An individual who has been in the care of the CoLC, either foster care, residential care, semi-independent provision, or other similar arrangements, and has since reached the age of 18, and is entitled to support until they are 25 years old.

Objectives

To provide CoLC care experienced people with equal access to education, training employment, and accommodation.

To collaborate with relevant agencies, organisations, and stakeholders to ensure that comprehensive and holistic support is available to CoLC care experienced people.

To create a supportive and inclusive environment that promotes the wellbeing and integration of CoLC care experienced people within the community.

Key Principles

Equal Opportunities: CoLC care experienced people shall have access to the same opportunities and rights as their peers, regardless of their care history.

Tailored Support: Services and support shall be tailored to the individual needs of CoLC care experienced people, recognising their unique circumstances.

Collaboration: The CoLC shall collaborate with educational institutions, employers, housing providers, and other relevant organisations, including the Corporation itself, to ensure that a coordinated and effective support network is available for CoLC care experienced people.

Advocacy: The CoLC shall actively advocate for the rights and needs of CoLC care experienced people within its policies and procedures, including acknowledgement

by all departments of their understanding and commitment to this policy within their corporate parenting responsibility.

Measures and Provisions

Education and Training: The CoLC to provide opportunities for access to scholarships, bursaries, and mentorship programmes to facilitate access to higher education and skill development for CoLC care experienced people. Prioritise care leavers for work experience opportunities, adult education services and ringfenced apprenticeships.

Employment: The CoLC to collaborate with employers (including internally) to offer opportunities to access internships, job training, apprenticeships and, career guidance to CoLC care experienced people.

Housing: The CoLC to prioritise the opportunity for CoLC care experienced people to access affordable housing and support, that ensures an opportunity for a smooth transition to independent living.

Implementation and Monitoring

The CoLC will regularly assess the effectiveness and impact of this policy through data collection, feedback mechanisms, and stakeholder consultations, reporting back to the relevant CoLC committees on the progress of the implementation.

In the delivery of the Public Sector Equality Duty, the CoLC will include care experience in the publication and review of Equality Objectives.

Future decisions, services and policies made and adopted by the CoLC should be assessed through Equality Impact Assessments to determine the impact of changes on people with care experience, alongside those who formally share a protected characteristic.

Committee(s): Equality Diversity & Inclusion Sub-Committee	Dated 11 December 2023
Subject: EDI Charters Update Report 2023/2024	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	1,2,3,4,5, 8
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain’s Department?	N/A
Report of: Emma Moore, Chief Operating Officer	For Information
Report author: Siyka Radilova, EDI Officer	

Summary

The City of London Corporation is a signatory of several charters which demonstrate and help benchmark the importance of Equality, Diversity and Inclusion to the organisation. Since 2014 the Corporation has been a member of the following Charters and agreements: Women in Finance, Business in the Community (BITC) Race at Work Charter, Social Mobility Index, Stonewall Diversity Champions, Disability Confident, London Living Wage Foundation.

The purpose of this report is to outline the various charters that the City of London Corporation is part of for consideration by Members on their continued suitability for us and review our progress against current commitments.

Recommendation(s)

Members are asked to:

Note: progress to date against the charters for which we are accredited.

Main Report

Background

1. In 2022, a focused EDI Directorate was set up to ensure that the City Corporation develops and implements impactful EDI strategies that enhance the competitiveness, attractiveness and vibrancy of the Square Mile. Prior to this date limited resource was dedicated to this area and resource was sat within Corporate HR, alongside semi-dedicated roles in some of our Institutions. The establishment of the directorate has enabled better but still developing focus on the charters the Corporation has signed up to over time.

2. In accordance with the Equality Act 2010 and the 9 protected characteristics, the participation of the Corporation in EDI Charters and agreements is aligned to the work of the EDI Directorate to follow recommendations from those accredited charters and adopt best practice. The EDI Directorate is dedicated to matters beyond the Equality Act 2010. An example is social mobility and diversifying the workforce, supporting employees from different socio-economic backgrounds in the aim of providing equal opportunities for all.
3. We currently are accredited to Women in Finance, Business in the Community (BITC) Race at Work Charter, Social Mobility Index, Stonewall Diversity Champions, Disability Confident, London Living Wage Foundation. Charters such as Women in Finance have been driven by our work with the FPS sector through Innovation & Growth. Others have been selected due to particular focus of Members or links to broader corporate objectives and commitments such as the Living Wage Foundation. We are currently in the process of obtaining Ban the Box accreditation.

Questions asked during the EDI Sub- Committee in September 2023

4. What is the definition of women within the charter Women in Finance:

“A fundamental principle of the HMT Women in Finance Charter is that individual signatories are best placed to make the right decisions for their business. Due to this, the Charter has adopted a flexible approach which recognises the diversity of the sector and allows each signatory to set its own definitions and targets.

So, in line with the approach outlined above, it is for the City of London Corporation to identify what part of its workforce falls in scope of its Charter commitments” – HM Treasury Women in Finance Charter Team.

Therefore, Women in Finance Charter also represents trans-women.

5. The Members wished to seek reassurance that gender reassignment would remain part of Stonewall Diversity Champions activities before the Corporation agreed to continue being part of the charter. If this was not the case, the Sub-Committee agreed that suitable replacement would be sought.

“In our Diversity Champions scheme, we provide guidance on a range of topics relating to LGBTQ+ inclusion. This includes support and guidance on trans and non-binary inclusion in the workplace, which will touch on areas relating to the protected characteristic of gender reassignment in the Equality Act 2010.” – Cecily Stevenson - Client Account Manager, Stonewall.

Therefore, gender reassignment remains part of Stonewall Diversity Champions activities.

Corporate & Strategic Implications

Strategic implications

6. The proposals align with outcomes 1, 2 3, 4, 5 and 8 of the Corporate Plan 2018 to 2023. It also aligns with the CoLC's Social Mobility Strategy 2018 to 2028 and other Strategic Plans.
7. Resource implications –The project led by the EDI directorate is cross-cutting and it will have resource implications for all CoLC departments, services and institutions. Consequently, each department and institution should consider the human and financial resources required to achieve the Equality Objectives of the CoLC and to comply with the CoLC obligations under the Equality Act 2010 and related regulations.
8. Legal implications – The Public Sector Equality Duty (Section 149 of the Equality Act 2010) is supported by the specific duties regulation which requires public bodies to set themselves, specific and measurable equality objectives every four years. This proposal will enable the CoLC to comply with its obligations and specific duties regulations mentioned in the Equality Act.
9. Risk implications – The risk of non-compliance with the Equality Act 2010 and related regulations includes reputational damage and the possibility of the proceedings being brought by the Equalities and Human Rights Commission.
10. Equalities implications – This proposal will enable the CoLC to comply with the Public Sector Equality Duty 2010, Section 149 which covers the Public Sector Equality Duty and the Specific Duties regulations mentioned above. This proposal involves setting objectives required to comply with the Equality Act 2010. This proposal, is therefore, likely to have a positive impact on citizens protected by existing equality legislation which are age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership and pregnancy and maternity.
11. Climate implications – N/A
12. Security implications – N/A

Conclusion

13. Signing to the charters and agreements described in the report shows that the City Corporation is prepared to seize the opportunity to drive the corporate change necessary to tackle inequalities, including gender inequality and the institutional racism that exist, rather than seeing how it progresses moving forward. City Corporation is a unique organisation, with a role that goes beyond that of a local authority or financial institution, therefore making the right decisions on following good practices provided by most relevant accredited charters and schemes would pave the way towards becoming an excellent example of a diverse and inclusive institution that genuinely promotes equality and equal opportunities for all.

Appendices

- Appendix 1 - EDI Directorate's Race Equality Action Plan
- Appendix 2 - City of London Corporation commitments to EDI
- Appendix 3 - Core purpose of the Charters and Schemes discussed in the report.

Siyka Radilova
EDI Officer (Employment)
Email: siyka.radilova@cityoflondon.gov.uk

Appendix 1 – Charter commitments: current position

Current Position

Charter/ Agreement	Joining Date	EDI stream/ Protected Characteristic	Updates	Recommendation
Women in Finance	December 2017	Sex and/or Gender reassignment (refer to main report)	<p>In December 2017, the Corporation became a signatory of the Women in Finance Charter to promote gender balance in the financial services industry.</p> <p>The number of women in senior roles (Grade G+) at the time the Corporation joined was 20% and this rose to 33%, 37% and 43% in 2020, 2021, and 2022 respectively (compared to a target of 45% by 2023). Our current achievement is 54% women in leadership positions.</p>	<p>Recommendation - Retain</p> <p>The Corporation to continue its engagement with the charter in order to accelerate its effort for gender equality and increase the number of women in leadership positions.</p>
Business in the Community (BITC) Race at Work Charter	2019	Race	<p>Since 2019, the Corporation has been a member of the Business in the Community, Race at Work Charter (BITC).</p> <p>The 7 commitments we have signed up to in the charter are:</p> <ul style="list-style-type: none"> • BITC Commitment 1: Appoint an Executive Sponsor for race equality; Complete • BITC Commitment 2: Capture ethnicity data and publicise progress; Complete 	<p>Recommendation – Retain</p> <p>The Corporation to continue its engagement with the charter BITC Race at Work Charter in order to strengthens the Corporations commitment to race equality, adding the importance of setting realistic equality targets at corporate and departmental levels that can be scrutinised and addressed publicly in a purposeful way. Active progress</p>

			<ul style="list-style-type: none"> • BITC Commitment 3: Commit at board level to zero tolerance of harassment and bullying; Not-completed. • BITC Commitment 4: Make equity, diversity and inclusion the responsibility of all leaders and managers; Partially completed. • BITC Commitment 5: Take action that supports Black, Asian, Mixed Race and other ethnically diverse employees career progression; Partially completed. • BITC Commitment 6: Support race inclusion allies in the workplace; • BITC Commitment 7: Include Black, Asian, Mixed Race and other ethnically diverse-led enterprise owners in supply chains; Completed <p>While the Corporation has only fully met BITC Commitments 1, 2, 6 and 7, work is taking place to meet the other three commitments which will require: 3) for consideration by Members as part of the relevant policy and procedure update from HR; 4) by formal inclusion of EDI objectives in standard objectives; and 5) development of targeted programmes with trackable impact Achievement will</p>	<p>against the 3 incomplete commitments as set out.</p>
--	--	--	---	---

			be further supported by the development of a Race Equality Action Plan.	
Social Mobility Index	2018	Social Mobility	<p>The Corporation has been a member of the Social Mobility Index Charter since 2018.</p> <p>In 2018, the Corporation has listed 66th which rose to 56th, 50th, 40th before dropping to 67th in 2019, 2020, 2021 and 2022 respectively. However, the Corporation is making efforts to ensure it moves back up the rankings in the Social Mobility Index.</p> <p>This initiative will be supported by the recent creation of the Social Mobility Network with the Chief Operating Officer as its executive sponsor.</p> <p>In addition, the Corporation will be introducing other schemes such as a Graduate Scheme (spearheaded by the Young Employees Network) and a structured work experience plan for 2024 (developed by the Talent and Organisational Development Team).</p>	<p>Recommendation – Retain</p> <p>The Corporation to continue its engagement with Social Mobility Index. Going beyond the protected characteristics as set at the Equality Act 2010, the Corporation is committed to social mobility and providing equal opportunities to all its employees, regardless of their socio-economic background. The EDI Directorate takes into consideration recommendations established by The Social Mobility Index in order to be an exemplary employer. Socio-economic diversity is likely to be one of our Equality Objectives.</p>
Stonewall Diversity Champions	2019	Sexual Orientation Gender reassignment (refer to main report)	<p>In 2019, the Corporation became members of the Stonewall Diversity Champions programme.</p> <p>Through membership of this Charter, other initiatives such as City Belonging Project and the City Pride Staff Network the City Corporation demonstrates its ongoing commitment to ensuring that</p>	<p>Request – Retain</p> <p>The Corporation has not made best value of membership to date. There may be other indices or charters which provide a better general EDI assessment alongside Stonewall.</p>

			LGBTQIA+ communities can be their authentic selves in the Square Mile.	
Disability Confident Scheme	2020	Disability	<p>In 2020, the Corporation obtained its Disability Confident Employer status.</p> <p>Whilst we adhere to the scheme and provide full support and reasonable adjustments to individuals with different disabilities there is further work to be done on accessibility of our places and services.</p>	<p>Recommendation – Retain The Corporation to continue its commitment to Disability Confident Scheme and expand on this through the newly founded Accessibility Forum (officers).</p>
London Living Wage Foundation	2014	Social Mobility Pregnancy and maternity Marriage and civil partnership	<p>The Corporation has been a supporter of the Living Wage since 2014. Since 2020, the Corporation has been an accredited Living Wage Employer and payment of the Living Wage is a requirement across all of our suppliers as well as being paid to all casual and other temporary or agency staff.</p> <p>The City Corporation has also been meeting with the Living Wage Foundation to ensure it meets the criteria to meet the <u>Living Hours Standard</u>. We are an active supporter of the London Living Wage group through Member and Chief Officer representation including corporate hosting and event support.</p>	<p>Recommendation – Retain The Corporation to continue its commitment to London Living Wage. By paying the real Living Wage, employers are voluntarily taking a stand to ensure their employees can earn a wage which is enough to live on. By partnering with London Living Wage foundation, City of London Corporation is demonstrating its commitment to fair pay and to supporting its employees work- life balance.</p>

White Ribbon UK	N/A	Sex	<p>The Corporation has been supporting City of London Police who received White Ribbon Accreditation in October 2023. The Corporation is supporting the campaign- White Ribbon Day- the 25th of November, which marks the start of 16 days of action to engage men and boys to end violence against women and girls by addressing its root causes. The Town Clerk is a White Ribbon Ambassador; We are offering White ribbons to all staff and members as a gesture of support; we are holding evens to raise awareness.</p>	<p>Any further recommendation on wider accreditation beyond City of London Police would need to be part of a larger piece of work to review all existing and prospective Charters.</p>

Appendix 2 – City of London Corporation Commitments in EDI

Equality Act 2010 – Protected Characteristics

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

Social Mobility and Socio- Economic Background Diversity

Appendix 3 – Core purpose of the Charters and Schemes discussed in the report.

Women in Finance

Women in Finance Charter a pledge for gender balance across financial services. This is a commitment by HM Treasury and signatory firms to work together to build a more balanced and fair industry. Firms that sign up to this Charter are pledging to be the best businesses in the sector. The Charter reflects the government's aspiration to see gender balance at all levels across financial services firms. A balanced workforce is good for business – it is good for customers, for profitability and workplace culture, and is increasingly attractive for investors.

Business in the Community (BITC) Race at Work Charter

Business in the Community (BITC) is committed to empowering employers to tap into this economic potential by accelerating change for ethnically diverse employees. We work with our network of private and public sector partners to offer tailored practical advice and share new insights to drive long-term change. We are also calling on the government to mandate ethnicity pay gap reporting.

Social Mobility Index

The Social Mobility Index is a framework for measuring social mobility in the UK. It enables a systematic look at social mobility outcomes, as well as the drivers behind social mobility. It sets out a long-term vision for measuring and monitoring social mobility outcomes over the next 30 years across the UK.

The Social Mobility Commission (SMC) published the first Social Mobility Index in 2016. The original index included data on geographic disparities across England in some social mobility drivers.

Stonewall Diversity Champions

Stonewall stands for lesbian, gay, bi, trans, queer, questioning and ace (LGBTQ+) people everywhere. It imagines a world where all LGBTQ+ people are free to be themselves and can live their lives to the full. Stonewall is part of a vibrant global movement for change made up of LGBTQ+ people, their allies, families and friends. It fights for freedom, for equality and for potential.

Disability Confident

Disability Confident is creating a movement of change, encouraging employers to think differently about disability and take action to improve how they recruit, retain and develop disabled people.

Being Disability Confident is a unique opportunity to lead the way in your community, and you might just discover someone your business cannot do without. It was developed by employers and disabled people's representatives to make it rigorous but easily accessible.

London Living Wage

A movement of businesses, organisations and people ensuring that everyone can earn a wage that meets their everyday needs. By paying the real Living Wage, employers are voluntarily taking a stand to ensure their employees can earn a wage which is enough to live on.

White Ribbon

White Ribbon is the UK's leading charity engaging men and boys to end violence against women and girls.

Their mission is to prevent violence against women and girls by addressing its root causes. They work with men and boys to change long-established, and harmful, attitudes, systems and behaviours around masculinity that perpetuate inequality and violence.

This page is intentionally left blank

Committee(s): EDI Sub-committee – For Information	Dated 11 th December 2023
Subject: Tackling Racism Task Force update	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	1,2,3,4,5, 8
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain’s Department?	N/A
Report of: Emma Moore, Chief Operating Officer	For Information
Report author: Micah McLean, EDI Officer	

Summary

In July 2021, The Tackling Racism Taskforce (TRT) submitted a report to the Policy and Resources Committee highlighting what the City Corporation does to tackle racism in all its forms and to assess whether any further actions could be taken to promote economic, educational, and social inclusion.

Further to the update provided at the September meeting of this Sub-Committee, this report sets out further detail on progress for Member consideration, including expected timescales for completion of those not yet completed.

Recommendation(s)

Members are asked to note:

The updates on the implementation of the Tackling Racism Taskforce (TRT) recommendations.

Main Report

Background

1. Following the previous iteration of this report that was presented to members on 4th September 2023, there has been significant progress in the implementation of the TRT recommendations that were put forward in 2021. Most of the recommendations are either partially complete or completed. However, some actions have remained outstanding particularly within the Business Workstream.

2. Several of the TRT recommendations will be completed by the middle of next year, particularly with regards to the DCCS that is delivering these recommendations alongside its annual calendar of events.
3. In addition, the vast majority of the Staff Workstream recommendations will also be completed by the end of the 2024/2025 annual year.
4. Over the remainder of this financial year, the EDI Directorate will work with the relevant departments in the areas covered by the 'Findings and Recommendations of the TRT' to ensure that any open actions are either completed or partially completed before Q2 2024/2025.

Open Actions

5. An updated table has been provided in this report at Appendix 1 highlighting all actions that are currently open. Pertaining to the Business Workstream multiple departments struggled with these recommendations and a request for these items to be reviewed has been made.
6. In addition, the EDI Directorate is working with the Chamberlain department to support this department with regards to the implementation/review of these recommendations in light of a new governance structure being in place.

Partially Completed Actions or Actions To Be Completed In 2024/2025

7. The second table provided in Appendix 2 highlights all the actions that are expected to be completed in the 2024/2025 annual year, which applies to the staffing and education related recommendations.
8. Wherever possible, expected completion dates for TRT Recommendations have been included where this information has been received by the EDI Directorate.

Completed Actions

9. A third table provided in Appendix 3 provides information on the actions that have been complete.
10. More than twelve of the TRT recommendations are now closed which is an improved from what was presented at the last EDI Sub-Committee meeting that took place on 4th September 2023.

Corporate & Strategic Implications

11. Strategic implications – The proposals align with outcomes 1, 2 3, 4, 5 and 8 of the Corporate Plan 2018 to 2023. It also aligns with the CoLC’s Social Mobility Strategy 2018 to 2028 and other Strategic Plans.
12. Resource implications –The project led by the EDI directorate is cross-cutting and it will have resource implications for all CoLC departments, services and institutions. Consequently, each department and institution should consider the human and financial resources required to achieve the Equality Objectives of the CoLC and to comply with the CoLC obligations under the Equality Act 2010 and related regulations.
13. Legal implications – The Public Sector Equality Duty (Section 149 of the Equality Act 2010) is supported by the specific duties regulation which requires public bodies to set themselves, specific and measurable equality objectives every four years. This proposal will enable the CoLC to comply with its obligations and specific duties regulations mentioned in the Equality Act.
14. Risk implications – The risk of non-compliance with the Equality Act 2010 and related regulations includes reputational damage and the possibility of the proceedings being brought by the Equalities and Human Rights Commission.
15. Equalities implications – This proposal will enable the CoLC to comply with the Public Sector Equality Duty 2010, Section 149 which covers the Public Sector Equality Duty and the Specific Duties regulations mentioned above. This proposal involves setting objectives required to comply with the Equality Act 2010. This proposal, is therefore, likely to have a positive impact on citizens protected by existing equality legislation which are age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership and pregnancy and maternity.
16. Climate implications – N/A.
17. Security implications – N/A.

Conclusion

18. The EDI Directorate will continue to provide quarterly updates to the TRT actions to this Sub-Committee. Several of the recommendations have been incorporated into departmental business plans or programmes where noted. Continuous progress is being made quickly and there is widespread commitment from different department to have the recommendations of TRT implemented by the end of next year.
19. However, some TRT recommendations do remain outstanding, but the EDI Directorate is committed to providing support and challenge to departments with to ensure progress is made in these areas.

Appendices

Appendix 1 – TRT Recommendations (November update) Open Actions

Appendix 2 – TRT Recommendations (November update) Partial Complete Actions

Appendix 3 – TRT Recommendations (November update) Closed Actions

Micah McLean

EDI Officer

E: micah.mclean@cityoflondon.gov.uk

TRT Recommendations Table (Updated 24.11.2023)

Appendix 1 – Open Actions

Open ACTIONS

1. Staffing Workstream
Key Recommendations

	Objective	Recommendation	Status – not sure who completed last update	15 Nov 2023	Deadline	Responsible Officer
6	Bullying and Harassment	A revised HR policy on bullying and harassment be developed at the City Corporation. (Already approved at Establishment Committee in September 2020)	Not Completed. A large number of policies need reviewing within HR and a schedule of review has been drawn up. Given limited resource this is unlikely to be completed until Q3 2024/25.	Not complete. Many policies require review, and a schedule of reviews will be created. Current vacant policy role means this work has not yet begun due to lack of resource, but this policy will take precedence as soon as role is appointed given its urgent nature.	Q1 2024/25	Alison Littlewood/Cindy Vallance, HR

2. Governance Workstream
Key Recommendations

ALL COMPLETE

3. Police Workstream Key Recommendations

	<u>Objective</u>	<u>Recommendation</u>	<u>Action Completed/Not Completed</u>	<u>Why</u>	<u>Responsible Officer</u>
1	Police Force	<p>The Tackling Racism Taskforce would encourage the City of London Police to sign up to the 40% recruitment target that the Metropolitan Police had recently announced.</p> <p>The Tackling Racism Taskforce would also recommend the City of London Police set a retention target of Black, Asian and Minority Ethnic officers. It was recommended that the staffing initiatives already approved and listed in this report be adopted by the City of London Police.</p>	Partially complete.	The City of London Police launched their Race Plan Event on 20 th November and mentioned that a recruitment and retention for staff from BAME background within CoL Police had been set.	Kam Dhaliwal / Carly Humphries

4. Education Workstream Key Recommendations

a\	<u>Objective</u>	<u>Recommendation</u>	<u>Completed/Not Completed</u>	<u>Why</u>	<u>Responsible Officer</u>
1	Staff	The Schools ensure recruitment and retention of a diverse range of staff and governors, as well as career progression. Consideration should be given to the introduction of teacher apprenticeships.	Not Completed. Awaiting update from CLS, CLSG and Freemans, as this recommendation is not within the CoLC remit to deliver. CoLAT is an independent employer to the CoLC. The Aldgate	<p>Deborah Bell mentioned that this action was outside her remit and needed to be removed from the list of TRT Recommendations.</p> <p>Please could the EDI Sub – Committee decide if these</p>	Deborah Bell

		Equality and inclusion training, as well as difficult conversations training, should be rolled out to all staff.	School staff are employed by their Governors. The independent schools have their own CoLC Boards to manage their arrangements. This was confirmed by Members of the Education Board at their June 2023 meeting.	actions could be removed from the current list of recommendations. Therefore, this recommendation cannot be implemented by DCCS.	
--	--	--	---	--	--

5. Business Workstream
Key Recommendations

	<u>Objective</u>	<u>Recommendation</u>	<u>Completed/Not Completed</u>	<u>Why</u>	<u>Responsible Officer</u>
2	Charter	The City Corporation should formally support the Change the Race Ratio campaign and the Race Fairness Commitment (but not to become full signatories to these)	Not Completed.	For consideration by EDI Sub-Committee as part of wider review of Charters in Q4 2023/24.	EDI Directorate
3	Events	The City Corporation consider offering invitations to interested groups to host 2021 Awards and Events in our venues (such as The Investing in Ethnicity Awards, the Black British Business Awards and the Empower Gala Dinner) These connections could be maintained to invite relevant and senior diverse business leaders to future City Corporation events and dinners.	Partially Complete.	According the Rembrancers Diversity Notes they have delivered an events programme that appeals to a wide demographic of people that reflects current society. In addition, they have increased BAME	Rembrancers

				Targeted events (i.e., Black History Month Breakfast and Reception).	
4	Conferences and events	To actively discourage all-white panels by creating a policy for our own events to always have a diverse mix (of all protected characteristics) on panels and, when City Corporation representatives are invited to speak on panels organised by external stakeholders, to encourage others to consider adopting a similar policy. Consideration should be given to targets for diverse attendees of City Corporation conferences and events	Not Complete.		Innovation & Growth/Rembrancers
5	#10000BlackInterns	The City Corporation should support the #10000BlackInterns initiative by identifying at least one area of activity that could develop and host an intern programme, committing to offer at least one paid internship.	Not Completed.		Innovation & Growth
7	Data collection, disclosure and action	The City Corporation should write to individual firms, promoting the ambitions of the Financial Services Skills Commission in encouraging more data collection, disclosure and reporting.	Not Completed.		Innovation & Growth

8	Investments	<p>To change our own criteria for investments to include a specific target on diversity (as we have done on climate action)</p> <p>The City Corporation should write to asset managers asking them how they manage diversity within their organisation</p> <p>The City Corporation should explore with the asset managers how diversity is captured within their investment process and how this can be reported.</p>	To be reviewed following new governance arrangements.	To be reviewed following the new governance arrangements in place.	Chamberlain's
---	-------------	---	---	--	---------------

Appendix 2 – Tackling Racism, Taskforce, Partially Complete Actions

4. Education Workstreams

	<u>Objective</u>	<u>Recommendation</u>	<u>Completed/Not Completed</u>	<u>Why</u>	<u>Expected Completion Date</u>	<u>Owner</u>
5	Work Experience	There should be a focus on work experience placements and consider not always giving the most 'capable' student a placement, but those where there would be most impact.	Partially Complete	<p>This will be a key focus as the Education, Cultural & Creative Learning and Skills strategies are rewritten during 2023 for Education Board sign off in early 2024. Additionally, 20 supported internships have been committed to for delivery between now and 2025. These will be for young people with additional needs.</p> <p>The Head of Learning and Organisational Development is currently recruiting for a post to deliver on co-ordinated work experience and internship offers on behalf of the Corporation.</p> <p>The Education Strategy Unit and City of London Academy Trust are co-delivering a London – Bridge the Gap conference in January 2024 to employers seeking pledges to offer work experience opportunities to</p>	Q2 2024/2025	Deborah Bell

				<p>disadvantaged young Londoners.</p> <p>In partnership with the Lord Mayor's Appeal, the Education Strategy Unit is supporting the offer of taster days to girls and young women with major City based employers.</p>		
7	Governance	It is recommended that the City Corporation should support the Academies by creating and promoting an alumni network, of which members could be encouraged to stand as a governor to contribute towards a more representative governing body for each of the schools.	Almost Completed.	<p>This recommendation was not able to be progressed due to the pandemic. Local Governing Body recruitment is a matter for CoLAT and individual schools and not one which the Education Strategy has a remit to lead and influence. It is anticipated to be a feature of the revised Education, Cultural & Creative and Skills Strategies for 2024-28, with consultation discussions in train to date. Key partners in alumni activity have been approached to progress this ambition.</p> <p>Sir John Cass School has been renamed the Aldgate School to better reflect our knowledge and understanding of our current commitment to inclusion.</p>	Q3 2024/2025	Deborah Bell

				A date for the inaugural alumni network event has been set for 21st June 2024.		
--	--	--	--	--	--	--

Staffing Workstreams

	Objective	Recommendation	Complete/Not Complete	Why?	Expected Completion Date	Owner
2	Mentoring	Mentoring and reverse mentoring schemes be developed at the City Corporation. (Already approved at Establishment Committee in September 2020)	Partially complete – mentoring programme through WIN Network for their members. HR to consider how to establish this as part of the HR Transformation programme. ETA end 2024.	Partial progress. Mentoring and reverse mentoring pilots already underway within WIN and YEN staff networks & under discussion to pilot for DITS and City Surveyors. Following review & exploration of hosting system, intention to launch across City Corporation.	Q2 2024/25	Alison Littlewood/Cindy Vallance HR
3	Training	All local training budgets at the City Corporation are amalgamated to HR, and professional and technical training, which supports service delivery, is funded from local risk. (Already approved at Policy & Resources Committee in September 2020.)	Partially complete – this has been more complex to arrange through budget adjustments as a lot of training spend is not visible. Suggest pause or cancel this recommendation pending wider review of mandatory and vocational training currently underway.	Not yet complete. Budgets under review for 2024/25 for possible short-term supplement to the training budget. Full implementation of this recommendation will require a full review of all central and decentralised training budgets monitored by Finance and consultation with Chief Officers prior to making any longer-term recommendations to amalgamate training budgets in HR and to increase focus on EDI training.	Q1 2024/25	Alison Littlewood/Cindy Vallance, HR & Caroline Al-Beyerty, Chamberlain

5	Work Experience	Current and possible schemes that support work experience programmes with schools and young adults in the City of London be explored. (Already approved at Establishment Committee in September 2020)	Partially complete – scheme to be introduced in 2024 under the L&OD Team.	Near completion. Work Experience scheme already exists but somewhat ad hoc with insufficient resource to fully support. New role approved and will start by Jan 24. Will report to Apprenticeship Manager and lead on new Graduate Scheme & review of Work Experience Scheme.	Q4 2023/24	Alison Littlewood/Cindy Vallance, HR
7	Data	Consideration be given as to how the City Corporation could better utilise the collected, published data and information on diversity of its workforce at all levels (including the introduction of a peer review).	Not Completed. Current establishment project underway to cleanse employee data and provide better baseline for data-led activity and analysis. This will also enable a standard monthly MI suite to be produced for review and action by departments. ETA Q2 2024/25	Partial progress. Establishment project completed Sep 23. Review of EDI questions and new draft version created and under review with particular focus on institutions to ensure compliance to all external reporting bodies (eg. HESA for GSMD). System adjustments by HR and communications in collaboration with EDI targeted by 31 Mar 2024 to enable improved reporting for the 2024/25 year.	Q4 2023/24	Alison Littlewood/Cindy Vallance, HR

Appendix 3 – Tackling Racism Taskforce, CLOSED ACTIONS

1. Staffing Workstream

Key Recommendations

	<u>Objective</u>	<u>Recommendation</u>	<u>Action Completed/Not Completed</u>	<u>Responsible Officer</u>
4	Staff Support	<p>A scheme be developed at the City Corporation that provides and defines a “safe space” for staff and provides clarity on the terms of reference(s) for meetings convened to discuss tackling racism with staff.</p> <p>Training be given to key individuals across the organisation who will provide support and guidance for staff on an individual and confidential basis.</p>	Completed – Dignity at Work Advisors introduced in 2021. In addition, The EDI Officer (Service Delivery) is currently working with	EDI Directorate

2. Governance Workstream

Key Recommendations

	<u>Objective</u>	<u>Recommendation</u>	<u>Action Completed/Not Completed</u>	<u>Responsible Officer</u>
1	Member Diversity	<p>Remuneration of Members should be reviewed and resolved, mindful of improving diversity and inclusion.</p> <p>A series of promotional activities in the lead up to the 2022 Common Council Elections should take place to encourage a diverse range of candidates to consider standing for election.</p>	Completed	Mark Gettleson

		A dedicated senior Officer responsible for Member diversity and inclusion needs to be appointed.		
2	Events	More needs to be done to review diversity of events (this is also covered in the business workstream).	Completed	Mark Gettleson/ events team
3	Livery	The Tackling Racism Taskforce want to underline the importance of the Diversity Charter and would encourage Liveries to sign up to it. The Tackling Racism Taskforce would also encourage a strong diversity and inclusion process for new guilds and liveries when they are being set up. • Where possible, and in other areas of the Taskforce's work, there has been importance placed on collecting and reporting data on ethnicity to improve monitoring and auditing on diversity. The Tackling Racism Taskforce advise that this might be something that individual Livery Companies might like to consider.	Completed	Mark Gettleson/ Greg Moore
4	Talking about racism & diversity	Approve the guidance note for Chairs, Members and Officers when talking about equality and diversity in relation to race, outlined in Appendix 3.	Completed	Mark Gettleson

3. Police Workstream
Key Recommendations

	<u>Objective</u>	<u>Recommendation</u>	<u>Action Completed/Not Completed</u>	<u>Responsible Officer</u>
2	Governance	The Police Authority Board should take a particular focus on diversity and inclusion as one of its objectives.	Completed.	Kate MacLeod
3	Engagement	It was noted that the City of London Police do some good work in this area, but the public do not tend to know about this. The Tackling Racism Taskforce would therefore recommend improving communications on the diversity work they do.	Completed. Head of Comms recruited. Recently, the CoL held a Race Action Plan event which highlighted to all colleagues at the City Corporation and across its institutions the positive work that is taking place in the area of race equality.	Kate MacLeod

4. Education Workstream
Key Recommendations

	<u>Objective</u>	<u>Recommendation</u>	<u>Action Completed/Not Completed</u>	<u>Responsible Officer</u>
2	Curriculum	The curriculum should not portray black and minority ethnic people as 'victims' but tell a positive story. As part of this, the Tackling Racism Taskforce would encourage the schools to build on its strong Continual Professional Development (CPD) offer for teachers on ways to use cultural resources in learning and to reinvigorate curriculum with culturally diverse content.	Completed. Decolonialising the curriculum has been a key piece of work through Head Teachers Forums.	Deborah Bell

3	Partnership Working	There should be more joined up partnership working, e.g. between the City of London Police and the family of schools.	Completed. CoLP work alongside City Education Partners including the Family of Schools, most notably via the Safeguarding Education Forum. In addition, CoLP are one of the three Statutory Partners that represent the Senior Leadership Team of the City and Hackney Safeguarding Children Partnership. Schools are also represented at this level through the Director of Children's Services and the Chief Executive for City of London Academy Trust. These arrangements are ongoing, and allow for close partnership and collaboration across the system at a strategic level.	Deborah Bell/Chris Pelham
4	Bursaries	Bursaries at the independent schools could be advertised to academies and change the conversation, so it was less about 'class' or 'race' and more about education itself.	Completed. Bursaries and scholarships to CoL independent schools are widely publicised to CoLAT schools as Social Mobility through educational opportunities. Positive individual examples are available (subject to GDPR).	Deborah Bell/Chris Pelham
6	Adult Skills / Lifelong Learning	Consideration should be given as to what support could be offered to children at risk of exclusion and to offer and promote mentoring by Members and officers to young people. The important work of the Culture Mile Learning team to help children access and be exposed to cultural institutions should be recognised.	Completed. Whilst this operational aspiration is the remit of local Governors of CoLAT and the Aldgate School, the Education Strategy Unit (through the City Premium Grant), has funded the Apprentice Academy provision within CoLAT secondary schools as an alternative to suspensions and permanent exclusions. This funding continues into 2024 to date.	Deborah Bell

5. Business Workstream
Key Recommendations

	<u>Objective</u>	<u>Recommendation</u>	Completed/Not Completed	<u>Responsible Officer</u>
1	Socio-economic diversity taskforce	The Tackling Racism Taskforce support and promote the work of the Socio-Economic Diversity Taskforce	Completed	Oliva Larkin/ Innovation and Growth
6	Black SMEs/ microbusinesses	The City Corporation should encourage Black SMEs/ microbusinesses to take part in the pop-up market in the Guildhall Yard. (The current market provider, Street Food Markets, is itself a majority Black-owned, all-BAME Director led SME)	<p>Completed. An SME event held at the City Centre – this was an event organised by Chamberlain’s procurement aiming to get more SME / BME suppliers into the procurement process.</p> <p>This event was supported and attended by City Surveyor’s staff, particularly in its projects division where construction remains dominated by large firms.</p> <p>The event was organised by Responsible Procurement, and this will be annua event going forward.</p> <p>In addition, The Gild food provision is delivered by the SME provider, Street Food Markets who are a collection of entrepreneurs and food vendors, under the umbrella of Street Food markets Ltd, the parent company. This includes food types such as Indian, Mexican, African, BBQ, vegan, crepes, Burgers, and much more. There are 3500 vendors signed up through this initiative.</p>	John Galvin, City Procurement and Chamberlains

<p>9</p>	<p>Procurement</p>	<p>The Tackling Racism Taskforce endorse City Procurement’s approach to targeted advertising of contracts where there is a recognised under-representation of BAME organisations in that industry.</p> <p>The Tackling Racism Taskforce endorse the new strand of work being initiated by City Procurement to assess whether targeted action (new policies and procedures) for contracts under £100,000 can be effective in increasing the proportion of under-represented minority owned SMEs, especially micros and small companies in our supply chain.</p> <p>The Tackling Racism Taskforce note the approach that Chamberlain’s are intending to take to improve the functionality of CBIS and the granularity of data held on our suppliers, in order to establish appropriate baselines and the ability to measure the Corporation’s performance.</p>	<p>Procurement hosted its own meet the buyer event in partnership with the London Chamber of Commerce and Industry at the Small Business Research and Enterprise Centre. All 125 tickets were reserved, with 75 people in attendance; 38 SMEs in total.</p> <p>They provided two supplier readiness sessions at the event; a bid writing panel moderated by the Councillor Singh and a presentation on ESG by Heart of the City. The event was attended by additional buyers from Bloom, Canary Wharf Group and two other London councils.</p> <p>The event was opened by Councillor Singh and the evening portion of the event was opened by Deputy Ameer.</p> <p>In addition, Results from the annual MSDUK benchmarking exercise for the City Corporation's supplier diversity programme shows a jump in progress from 'evolving' to 'progressive' (39% to 59%) and just slightly over the average across all of the corporate members. Our scores increased across five of the ten categories. We've recently introduced a Supplier Diversity Monitoring form for contracts over £100,000, updated the contracts register to capture this information and the process will be included in the Procurement Authorisation Report for under £100,000.</p>	<p>Lisa Moore</p>
----------	--------------------	--	--	-------------------

			<p>The next meet the buyer event (to be held in early 2024) will be focused on contracts under £100,000 and will be in partnership with Westminster and Islington.</p>	
--	--	--	--	--

This page is intentionally left blank

Committee(s): Equality, Diversity and Inclusion Sub-Committee	Dated: 11 December 2023
Subject: Responsible Procurement Update	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	1, 3, 5, 7, 8, 10
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	£0
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain’s Department?	N
Report of: Caroline Al-Beyerty, Chamberlain	For Information
Report author: Lisa Moore, Responsible Procurement Manager, Commercial Services	

Summary

The City Corporation has made a clear commitment to drive added-social value through all its procurement and contract activity. The Responsible Procurement Policy seeks to advance six commitments with its supply chain. The Commercial Services facilitate and report on the progress of these commitments, but every officer with buying responsibilities has an important role to play in seeking to advance them.

The Equality, Diversity and Inclusion Sub committee is asked to note the approach set out in this paper and the contribution procurement can have in driving the City’s strategic policy objectives. To ensure alignment, a review of the responsible procurement commitments will be undertaken once the new Corporate Plan, People Policy and the City Corporation’s EDI objectives have been approved.

Recommendation(s)

Members are asked to note the contents of this report.

Main Report

Background

1. The City Corporation’s Procurement Code outlines the rules which must be followed when buying on behalf of the City Corporation including the institutions.
2. Within the City’s Procurement Code there is an entire section dedicated to responsible procurement (rules 45 – 54). Rules which are particularly relevant to this committee include; Rule 45 regarding the City Corporation’s Responsible

Procurement Policy; Rule 46 on Supplier Diversity and Local Procurement; Rule 48 on Equity and Diversity; and Rule 50 on Modern Slavery.

3. In July 2022, Policy & Resources Committee approved an updated Responsible Procurement Policy which outlines the importance of responsible procurement as part of the overall value delivered through procurement; the responsibilities of buying officers at each stage of the commercial life cycle and the six responsible procurement commitments the City Corporation actively work on with its supply chain.
4. The six responsible procurement commitments are: taking climate action; promoting supplier diversity (diverse owned enterprises and SMEs); embedding equity, diversity and inclusion; guarding against modern slavery; facilitating work-related opportunities and delivering meaningful social value outcomes.
5. This policy also introduced a mandatory 15% responsible procurement weighting for all strategic procurement tenders.
6. Additional information and toolkits are available to officers to facilitate understanding and ways to implement responsible procurement including:
 - Information on Equalities in Procurement is published on SharePoint including when to undertake an equalities impact assessment and sectors with known links to discrimination or inequality which should be used to determine relevant specifications and tender questions.
 - EDI toolkit – outlines why this commitment is important to the City Corporation and how to incorporate EDI into specifications, tender questions and contract monitoring.
 - Supplier Diversity toolkit made available end of November 2023 with the same format as the EDI toolkit.

Current Position

7. The City Corporation is an active member of MSDUK, a supplier diversity advocacy organisation working for inclusion of ethnic minority businesses in corporate supply chains, and is leading the London Responsible Procurement Network's subgroup on supplier diversity. Updates on the City Corporation's expanded supplier diversity commitment have been provided to the EDI sub-committee as part of the Tackling Racism Taskforce updates.
8. The Commercial Service is currently undergoing an ISO20400 audit on sustainable procurement which looks at policies, procedures, and implementation of responsible procurement. Results will be available later this year and shared with Executive Leadership Board.
9. Commercial Services recently implemented a Supplier Diversity Monitoring Form and made changes to the City Corporation's contracts register so it can track supplier diversity for contracts over £100,000. It is also exploring new ways to get better supplier segmentation through new technology services.

10. In 2024, to ensure alignment with corporate policy, a review of the responsible procurement commitments will be undertaken after the new Corporate Plan, People Policy and the City Corporation's EDI objectives have been updated.

Key Data

11. Currently, data regarding progress against our responsible procurement commitments are not held centrally. However, as set out in previous paragraphs, the Commercial Service is currently working to develop corporate monitoring and reporting processes. The Corporation has committed to producing its first annual responsible procurement setting out progress achieved in the financial year 23/24. As part of this update, both quantitative and qualitative data will be available.

Corporate & Strategic Implications –

12. Strategic implications – The commitment to responsible procurement is aligned with the City Corporation's Corporate Plan to contribute to a flourishing society and support a thriving economy.

13. Financial implications – Policy & Resources Policy Initiative Fund has provided the funding for our MSDUK membership and for supplier diversity events.

14. Resource implications – None

15. Legal implications – None

16. Risk implications – Commercial Services considers responsible procurement as part of the risk management profile of each contract requirement but there are no specific risks to highlight as part of this paper.

17. Equalities implications – The commitments in the RP policy should positively impact or seek to reduce negative impacts on people with protected characteristics.

18. Climate implications – None

19. Security implications - None

Conclusion

20. This report seeks to highlight how the procurement process can drive the City Corporation's policy objectives, provide an update on resources available to officers and how Commercial Services will report on impact in the future.

Appendices

Links have been provided instead of separate documents.

- [City Corporation's Procurement Code](#) [external link]
- [City Corporation Responsible Procurement Policy](#) [external link]

Background Papers

- Follow-Up Paper to Responsible Procurement Policy Update, Agenda item 6, Policy & Resources Committee, 7 July 2022

Lisa Moore

Responsible Procurement Manager, Commercial Services, Chamberlain's

T: 020 7332 3273

E: lisa.moore@cityoflondon.gov.uk

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

Document is Restricted

This page is intentionally left blank