



## Corporate Services Committee

**Date:** WEDNESDAY, 27 NOVEMBER 2024

**Time:** 1.45 pm

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

**Members:**

|                                      |                             |
|--------------------------------------|-----------------------------|
| Deputy Alastair Moss (Chair)         | Alderman Dame Susan Langley |
| Florence Keelson-Anfu (Deputy Chair) | Gregory Lawrence            |
| Deputy Randall Anderson              | Deputy Edward Lord          |
| Deputy Keith Bottomley               | Catherine McGuinness        |
| Alderman Sir Charles Bowman          | Timothy James McNally       |
| Deputy Henry Colthurst               | Benjamin Murphy             |
| Anthony David Fitzpatrick            | Mandeep Thandi              |
| Steve Goodman                        | James Tumbridge             |
| Deputy Christopher Hayward           | Philip Woodhouse            |

**Enquiries:** John Cater  
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<https://www.youtube.com/@CityofLondonCorporation/streams>

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**Ian Thomas CBE**  
Town Clerk and Chief Executive

# AGENDA

## Part 1 - Public Agenda

NB: Certain items presented for information have been marked \* and will be taken without discussion, unless the Committee Clerk has been informed that a Member has questions or comments prior to the start of the meeting. These for information items have been collated into a supplementary agenda pack and circulated separately.

1. **APOLOGIES**

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

3. **MINUTES**

To agree the public minutes and non-public summary of the meeting held on 23<sup>rd</sup> October 2024.

**For Decision**  
(Pages 5 - 8)

4. **EMPLOYMENT RIGHTS BILL UPDATE AND HR POLICY FRAMEWORK**

Report of the Executive Director of Human Resources & Chief People Officer.

**For Decision**  
(Pages 9 - 26)

5. **SPEAK UP ARRANGEMENTS & SYSTEM**

Joint Report of the Chamberlain and the Executive Director of Human Resources & Chief People Officer.

**For Decision**  
(Pages 27 - 36)

6. **\*VOLUNTEERING UPDATE**

Report of the Executive Director of Human Resources & Chief People Officer.

**For Information**

7. **HEALTH & SAFETY UPDATE**

Report of the Deputy Town Clerk.

**For Information**  
(Pages 37 - 40)

8. **COMMITTEE'S FORWARD PLAN**

Report of the Executive Director of Human Resources & Chief People Officer.

**For Information**  
(Pages 41 - 42)

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

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

11. **EXCLUSION OF THE PUBLIC**

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

**For Decision**

**Part 2 - Non-Public Agenda**

12. **NON-PUBLIC MINUTES**

To agree the non-public minutes of the meeting held on 23rd October 2024.

**For Decision**  
(Pages 43 - 44)

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

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

**Part 3 - Confidential Agenda**

15. **CONFIDENTIAL MINUTES**

To agree the Confidential minutes of the last meeting held on 23<sup>rd</sup> October 2024.

**For Decision**

16. **NEW SPITALFIELDS & BILLINGSGATE MARKETS WASTE MANAGEMENT & MARKET CLEANSING PROCUREMENT STAGE 2 AWARD**

Report of the Chamberlain.

**For Decision**

17. **CITY OF LONDON PAY AWARD 2024/25 - UPDATE FOLLOWING TRADE UNION ENGAGEMENT**

Joint Report of the Chamberlain and the Executive Director of Human Resources & Chief People Officer.

**For Decision**

18. **HR STAFFING**

Report of the Executive Director of Human Resources & Chief People Officer.

*To follow.*

**For Decision**

19. **AMBITION 25**

The Executive Director of Human Resources & Chief People Officer to be heard.

**For Information**

20. **TOWN CLERK'S UPDATE**

The Town Clerk to be heard.

**For Information**

## CORPORATE SERVICES COMMITTEE

Wednesday, 23 October 2024

Minutes of the meeting of the Corporate Services Committee held at Guildhall on  
Wednesday, 23 October 2024 at 1.45 pm

### Present

#### Members:

Deputy Alastair Moss (Chair)  
Florence Keelson-Anfu (Deputy Chair)  
Deputy Randall Anderson  
Deputy Henry Colthurst  
Anthony David Fitzpatrick  
Steve Goodman  
Deputy Christopher Hayward  
Alderman Dame Susan Langley  
Gregory Lawrence  
Deputy Charles Edward Lord  
Catherine McGuinness  
Timothy James McNally  
Benjamin Murphy  
James Tumbridge  
Philip Woodhouse

#### Officers:

|                     |  |
|---------------------|--|
| Ian Thomas          | - Town Clerk   |
| Alison Littlewood   | - Executive Director of Human Resources & Chief People Officer |
| Michael Cogher      | - Comptroller and City Solicitor                               |
| Caroline Al-Beyerty | - The Chamberlain  |
| Greg Moore          | - Deputy Town Clerk  |
| Jen Beckermann      | - SRO, Destination City  |
| Sonia Virdee        | - Chamberlain's Department                                     |
| Chris Fagan         | - Chamberlain's Department                                     |
| Simon Latham        | - Acting Managing Director, City Bridge Foundation             |
| Oliver Sanandres    | - Director of Health and Safety                                |
| Caroline Reeve      | - City Bridge Foundation                                       |
| Tabitha Swann       | - Corporate Strategy & Performance                             |
| Sean Gregory        | - Guildhall School of Music & Drama                            |
| Kaye Saxton-Lea     | - Human Resources  |
| John Cater          | - Committee Clerk  |

#### 1. **APOLOGIES**

Apologies for absence were received from Deputy Keith Bottomley, Alderman Sir Charles Bowman, and Mandeep Thandi.

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 and non-public summary of the meeting held on 11<sup>th</sup> September 2024 be approved as an accurate record.

At this point, Mr Lawrence expressed his apologies for some of the remarks he made at the February meeting of the Corporate Services Committee during the item concerning the Workplace Attendance Policy. He stressed that he regretted if these contributions had caused distress or offence to staff and would do his best to avoid this happening again in the future.

4. **HEALTH & SAFETY UPDATE**

The Committee received a Report of the Deputy Town Clerk providing Members with a Health and Safety update.

Citing the recent Red Bull event at Tower Bridge as an example, a Member queried whether risks from third party events, both in the City and across its other assets, were being correctly assessed and mitigated. Officers stressed that whilst primary responsibility rested with the third party operator to mitigate any Health and Safety risks, the relevant City department for the specific asset would carry out a local risk assessment which would, depending on the nature of the risk, be filtered up to the relevant service Committee, in conjunction with the Audit and Risk Management Committee if necessary, to ensure that Members were sighted and engaged in the City's response.

In response to a query, officers confirmed that the competent individuals highlighted in the Report would not create calls for increased payroll or headcount; most competent individuals had already been appointed with work ongoing to complete the process at pace.

Separately, officers confirmed that the Health and Safety Framework would feed directly into the Audit and Risk Framework. Whilst the Corporate Health and Safety offered a second line defence, it was incumbent upon local department to ensure their Health and Safety management reporting either via Safe 365 or their own agreed arrangements was being effectively communicated to their Service Committee(s) on a regular basis. There was flexibility available across the City's departments and institutions when it came to risk appetite and some will have greater tolerance than others – the Health and Safety Framework would empower department's to better manage this tolerance with sufficient oversight and monitoring provided corporately.

The Town Clerk emphasised that it had been a fundamental objective to get to grips with these issues - we know what we know now because we have shone a light on this area and have carried out the work to find out what remedial action was required, these actions were being worked through swiftly and were key priorities for the organisation.

The Town Clerk asked officers to invite Quadriga back to assess our progress. Members agreed that this external assurance is the right approach.

In response to a query about whether, going forward, the format for this Report should include more tables, the Chair whilst acknowledging that specific information could be helpful, cautioned that the Committee was primarily responsible for overseeing broader cultural change and corporate wide processes for Health and Safety as opposed to getting involved in the finer detail which sat rightfully under the remit of the relevant Service Committees and the Audit and Risk Management Committee.

**RESOLVED** – that the Committee noted the Report.

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

There were no questions.

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

There were no urgent items.

7. **EXCLUSION OF THE PUBLIC**

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

8. **NON-PUBLIC MINUTES**

**RESOLVED** – That the non-public minutes of the meeting held on 11<sup>th</sup> September 2024 be approved as an accurate record.

9. **\*CASUAL WORKERS PENSIONS ARRANGEMENTS**

The Committee received a Joint Report of the Chamberlain and the Executive Director of Human Resources and Chief People Officer concerning the arrangements for Casual Worker's access to the Local Government Pension Scheme.

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

There was one question.

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

There were no items of urgent business.

12. **CONFIDENTIAL MINUTES**

The confidential minutes of the meeting held on 11<sup>th</sup> September were approved.

13. **CITY BRIDGE FOUNDATION STAFFING**  
The Committee considered a Report of the Acting Managing Director, City Bridge Foundation.
14. **DESTINATION CITY STAFFING**  
The Committee considered a Report of the Deputy Town Clerk concerning staffing arrangements at the Destination City Hub.
15. **CENTRAL CRIMINAL COURT STAFFING**  
The Committee considered a Report of the Executive Director of Mansion House, Private Secretary to the Lord Mayor.
16. **MUSIC EDUCATION ISLINGTON DEPARTMENT (GUILDHALL SCHOOL OF MUSIC AND DRAMA) STAFFING**  
The Committee considered a Report of the Principal, Guildhall School of Music & Drama.
17. **AMBITION 25**  
The Committee received a Report of the Executive Director of Human Resources & Chief People Officer concerning Ambition 25.
18. **TOWN CLERK'S UPDATE**  
The Town Clerk provided an update to the Committee.

**The meeting ended at 3.30 pm**

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Chairman

**Contact Officer: John Cater**  
**John.Cater@cityoflondon.gov.uk**



# Agenda Item 4

|  |  |
|--|--|
| <b>Committee(s):</b><br>Corporate Services Committee – For decision  | <b>Dated:</b><br>27/11/2024  |
| <b>Subject:</b> Employment Rights Bill Update and HR Policy Framework  | <b>Public Report:</b><br>For decision                                |
| <b>This proposal:</b> <ul style="list-style-type: none"><li>• provides business enabling functions</li></ul> |  |
| <b>Does this proposal require extra revenue and/or capital spending?</b>                                     | No   |
| <b>If so, how much?</b>  | N/A  |
| <b>What is the source of Funding?</b>  | N/A  |
| <b>Has this Funding Source been agreed with the Chamberlain’s Department?</b>                                | N/A  |
| <b>Report of:</b>  | Alison Littlewood, Executive Director of HR and Chief People Officer |
| <b>Report author:</b>  | Thomas Kennedy, HR Policy Manager, People and HR                     |

## Summary

On 10 October 2024, the Government published Employment Rights Bill 2024. The Bill introduced several proposed employment reforms which are subject to consultation and are expected to take effect no earlier than 2026. The Bill is likely to impact 16 of the City of London Corporation’s 71 HR policies.

As part of the People Strategy 2024-2029, the City Corporation has committed to undertaking a comprehensive compliance and risk management audit of all HR policies. The Employee Handbook has not been reviewed in its entirety in over 20 years. This report details the current state of the Employee Handbook and the work required over the next 12 to 18 months to bring the handbook up to date. This paper was presented the City Corporation’s Senior Leadership Team in October 2024 and the comprehensive review of the Employee Handbook was supported.

Due to the volume of policies requiring review over the next 18 months, this report requests Delegated Authority be given to the Town Clerk and Chief Executive in consultation with the Chair and Deputy Chair of Corporate Services Committee, to consider and approve changes to HR Policies.

## Recommendation

Members are asked to asked to:

- Note the proposed reforms in the Employment Rights Bill 2024
- Approve the proposed review of the City Corporation Employee Handbook

- Approve that Delegated Authority be given to the Town Clerk and Chief Executive in consultation with the Chair and Deputy Chair of Corporate Services Committee, to consider and approve changes to HR Policies and report back to the Committee in line with People Strategy reporting.

## **Main Report**

### **Background**

1. The Government has published the Employment Rights Bill 2024 which introduces proposed employment reforms which are subject to consultation and are not expected to take effect any earlier than 2026. The Bill is likely to impact 16 of the City Corporation's HR policies. The timing of these changes will align with the planned review of the Employee Handbook.
2. There is a significant need to update the Employee Handbook and ensure that the City Corporation's policies are up to date and in line with recent legislative and regulatory changes, whilst also reflecting internal and external changes at the City Corporation. The City Corporation has committed to undertaking a comprehensive compliance and risk management audit as part of the People Strategy which will allow for an increased focus on supporting managers and employees to work together more efficiently. The last comprehensive review of the Employee Handbook was undertaken over 20 years ago.
3. The City Corporation's Ambition 25 project is likely to impact 17 HR policies, predominantly relating to allowances, salary scales and grading, and annual leave provisions. The HR Policy team will work closely with the Ambition 25 team and ensure ongoing engagement.
4. Considering the upcoming legislative changes, the Ambition 25 project and the length of time since the last comprehensive review, it is imperative that all policies contained in the Employee Handbook are reviewed over the next 12 to 18 months. This will ensure compliance, streamlining of the Employee Handbook and the introduction of toolkits and guides to reduce employee relations cases.

### **Employment Rights Bill**

5. The Employment Rights Bill was published on Thursday 10 October alongside a 'Next Steps' paper outlining future reforms.
6. The changes proposed as part of the Employment Rights Bill will predominantly impact policies related to probation and family leave entitlements. Key changes to note are outlined below:
  - **Unfair Dismissal and Probation** - Unfair dismissal protection will become a day one right, with the Government proposing a statutory probation period of nine months.

- **Flexible Working** - Employers will only be able to refuse an application if it “reasonable” to do so and will need to explain why they consider it reasonable to refuse the application. The eight statutory reasons for refusal will remain the same.
- **Zero Hours Workers (Casuals)** - Employers may be obliged to offer guaranteed hours to zero-hours workers and workers on "low" guaranteed hours who regularly work more than those hours. These should reflect the hours someone regularly works over a reference period. Employers will be required to give to reasonable notice if they are required to work a shift, or if a shift is cancelled or changed.
- **Family related leave** - Several reforms have been introduced regarding family leave including bereavement leave, carers' leave, parental leave, paternity leave and termination after statutory family leave.
- **Equality (Race and Disability) Bill** - Will provide for the full right to equal pay for ethnic minorities and disabled people and is expected to introduce mandatory ethnicity and disability pay reporting.
- **Equality Action Plans** - Large organisations will be required to develop, publish and implement equality action plans with regard to prescribed matters related to gender equality; this will include gender pay gaps and supporting employees going through menopause.
- **Sexual Harassment:** The new statutory duty on employers to take 'reasonable steps' to prevent sexual harassment will be strengthened to a duty to take all reasonable steps. This is likely to include carrying out risk assessments, having clear anti-harassment policies and having clear procedures for the reporting of sexual harassment and handling of complaints. Employers will be liable if a third party harasses an employee during the course of employment.

A more detailed summary of proposed changes is provided at [Appendix 1](#).

## Current Position – HR Policies

7. The City Corporation Employee Handbook contains 71 individual policies, and a total of approximately 150 documents, inclusive of forms and appendices. Almost all policies are past their review periods, several policies have been flagged for deletion as they have been made redundant, and others require consolidation into existing policies.
8. Many of the City Corporation’s policies have not kept up with changes to modern employment practices and lack a robust link to ACAS Codes of Practice and guidance. This increases the City Corporation’s risk of cases being taken to Employment Tribunal due to non-compliance.

## Future Position

9. The City Corporation has committed to undertaking a comprehensive compliance and risk management audit of all HR policies.

10. As outlined in the City Corporation's People Strategy, the aim of this work is to ensure that *"Our policies, processes and practices will be fully legally compliant and simple to use and understand. They will support managers and employees to work together easily and efficiently, giving them the tools to deliver their work well."*
11. To achieve this, the HR Policy Team is beginning to draft revised policies that align to ACAS guidance, ensuring the City Corporation is legally compliant and operating in line with modern employment practices. Where ACAS Codes of Practice apply, such as disciplinary and grievance processes, the City Corporation will mirror the ACAS codes to ensure the utmost legal compliance.
12. Of the City Corporation's policies, 41 policies have guidance available from ACAS which will be used to review all policies and processes.
13. A Governance Framework is attached at [Appendix 2](#) which outlines:
  - Engagement with the recognised Trade Unions, Senior Employee Representatives, EEDI Team, Staff Networks, City Corporation Institutions
  - Accessibility of all documents in the Employee Handbook, ensuring that all colleagues at the City Corporation have equal access to the Employee Handbook.
  - A connected approach with HR Teams, including Learning and Organisational Development, Systems and Management Information, Operations and HR Business Partnering.
  - Engagement with key projects including Ambition 25 and the introduction of ERP.
14. The framework is a draft which will be further developed with key stakeholders as the policy review process gets underway.
15. It is proposed that a HR Policy Review Group will be convened which will involve stakeholders from EEDI, Trade Unions and Senior Representatives, Institutions, relevant HR teams, and Staff Networks where appropriate. This group will contribute to finalising the framework and act as the foundation for the review of the Employee Handbook.

## **Prioritisation**

16. After analysis of the current Employee Handbook and initial engagement with stakeholders across the City Corporation, People and HR have identified the five priority policies to be reviewed:
  - Probation Procedure
  - Disciplinary Procedure
  - Grievance (Complaint) Procedure
  - Sickness Absence Policy and Sickness Absence Management (SAM) Formal Procedure
  - Family Leave Policy (consolidation of Maternity, Paternity, Parental, Adoption, Shared Parental, Special Leave and Time Off)

17. These policies have been identified as the highest priority as they directly impact employee relations and case management, organisational compliance, legal risk and employee wellbeing.
18. These policies are the most significantly impacted by the Employment Rights Bill and require review and update as early as possible prior to the Bill's implementation.
19. Alongside the high priority policies, the City Corporation will begin working with the relevant departments and institutions on policies which have been escalated for review due to recent legislative changes, business need or strategic priorities. These include:
  - Substance Misuse and Alcohol Testing Policy
  - Domestic Abuse and Stalking Policy
  - Whistleblowing / Speak Up Policy
  - Bullying, Harassment and Sexual Harassment Policy
  - Appeals Policy

## **Next Steps**

20. Following approval from Corporate Services Committee, the HR Policy team will begin progression of the initial policies for review, in order of priority.
21. A RACI (Responsible, Accountable, Consulted, Informed) matrix has been developed to guide the policy review process for each of the 71 policies requiring review.
  - People and HR are responsible and accountable for 47 policies contained within the Employee Handbook and will lead on the review of these policies
  - Other City Corporation departments are accountable for 24 policies contained within the Employee Handbook and will lead on the changes as the subject matter experts in conjunction with the HR Policy Team.
22. Taking into account the significant engagement and consultation required during the policy review process, and the introduction of the Employment Rights Bill, it is anticipated that the project will be completed within 18 months from approval by committee.
23. A policy review period of a maximum of 3 years will be implemented to ensure that our policies remain up to date and compliant. In instances where there are legislative changes or internal requirements, reviews will be undertaken as required.

## **Corporate & Strategic Implications**

Strategic implications – The comprehensive review of HR policies covers two key activities in the City Corporation's People Strategy under Building Brilliant Basics. As outlined in the People Strategy, this work places focus on policies that have the

greatest impact on managers and employees, undertaking work on those prioritised as most urgent in year one.

Financial implications – None

Resource implications – None

Legal implications – The review of HR policies will ensure that the City Corporation is meeting its legal and legislative obligations to all employees.

Risk implications – None

Equalities implications – The review of HR policies will focus on embedding EEDI principles and work closely with Staff Networks to demonstrate that the City Corporation values the rich diversity and creative potential people with different backgrounds, skills and abilities bring to the workplace.

Climate implications – None

Security implications – None

**Thomas Kennedy**

HR Policy Manager

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## **Appendices**

Appendix 1 – Employment Rights Bill 2024 Summary

Appendix 2 – Draft HR Policy Review Framework

# Appendix 1: Proposed Employment Rights Bill Changes

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| Policy Area                       | Proposed Change  |
|-----------------------------------|--|
| Zero Hour Contracts               | <ul style="list-style-type: none"> <li>Employers must offer those on zero-hour contracts a casual contract which reflects hours worked over a proposed 12-week reference period.</li> <li>Employers must give reasonable notice of any shift curtailed, cancelled, or moved.</li> </ul>  |
| Right to Request Flexible Working | <ul style="list-style-type: none"> <li>Employers must state the grounds on which a flexible working request has been refused and why the refusal is reasonable.</li> <li>Employers will only be able to refuse an application if it “reasonable” to do so. The eight statutory reasons for refusal will remain the same.</li> </ul>  |
| Statutory Sick Pay                | <ul style="list-style-type: none"> <li>The lower earnings limit for statutory sick pay will be removed.</li> <li>The three-day waiting period for statutory sick pay will be removed.</li> </ul>   |
| Allocation of Tips Policies       | <ul style="list-style-type: none"> <li>Employers will be required to consult employees when tipping policies are revised or developed.</li> </ul>  |
| Family Leave                      | <ul style="list-style-type: none"> <li>It will be unlawful to dismiss an employee who is pregnant/on maternity leave in the 6 months after their return.</li> <li>Similar protections will be introduced for those returning from adoption, shared parental, paternity, or bereavement leave.</li> <li>The qualifying period for paternity and parental leave will be removed, making it a day one right.</li> <li>A statutory right to bereavement leave for all employees will be introduced.</li> <li>Unpaid carers leave will be reviewed with the view to introduce paid carers leave.</li> </ul> |
| Sexual Harassment                 | <ul style="list-style-type: none"> <li>Employers must take <i>all</i> reasonable steps to prevent sexual harassment.</li> <li>Employers will be fully liable for third-party harassment if not <i>all</i> reasonable steps were taken to prevent it.</li> <li>Workers who report sexual harassment at work will be given the same protection as whistleblowers.</li> </ul>   |
| Unfair Dismissal                  | <ul style="list-style-type: none"> <li>The two-year service eligibility criterion will be removed, making protection from unfair dismissal a day one right.</li> <li>The Government is proposing a statutory probation period of nine months.</li> </ul>   |

|   |   |
|---|---|
| Collective Redundancy Consultation                                  | <ul style="list-style-type: none"> <li>• Collective redundancy consultation will be triggered by the number of people impacted across the business rather than in one workplace.</li> </ul>   |
| Fire and Rehire   | <ul style="list-style-type: none"> <li>• Considered unfair dismissal if an employee is dismissed for not agreeing to the terms of a new contract (except in specific financial circumstances).</li> </ul>   |
| Equality Action plans   | <ul style="list-style-type: none"> <li>• Large organisations must develop and publish an action plan to address gender pay gaps and provide support for employees experiencing the menopause.</li> </ul>  |
| Trade Unions  | <ul style="list-style-type: none"> <li>• Employers must give all new employees a written statement of their right to join a trade union.</li> <li>• Trade unions will have the right to request access to workplaces to conduct meetings, recruit, or organise workers.</li> <li>• Trade union recognition will be made easier by reducing application thresholds.</li> </ul> |
| Right To Switch Off<br><i>(Next Steps document)</i>                 | <ul style="list-style-type: none"> <li>• A code of practice will be introduced to prevent employees being contacted out of working hours without reasonable cause.</li> </ul>   |
| Surveillance/AI Technology<br><i>(Next Steps document)</i>          | <ul style="list-style-type: none"> <li>• Consultation is expected on workplace surveillance technology. This is anticipated to address trade union consultation obligations.</li> </ul>   |
| TUPE<br><i>(Next Steps document)</i>                                | <ul style="list-style-type: none"> <li>• A comprehensive examination of TUPE regulations and implementation will take place.</li> </ul>   |
| Single Employment Status<br><i>(Next Steps document)</i>            | <ul style="list-style-type: none"> <li>• Consultation is expected on moving towards a single status of worker to differentiate between workers and the self-employed.</li> </ul>  |
| Equality (Race and Disability) Bill<br><i>(Next Steps document)</i> | <ul style="list-style-type: none"> <li>• A bill will be launched to provide the full right to equal pay for ethnic minorities and disabled people.</li> <li>• This may include mandatory publication of pay reporting for ethnic minorities and disabled people.</li> </ul>   |



# HR Policy Review Framework

## [DRAFT]

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### Introduction

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1. The City of London Corporation (City Corporation) is committed to meeting its legal obligations as an employer and is undertaking a comprehensive compliance and risk management audit of all HR policies.
2. The aim of this HR Policy Review Framework (the framework) is to ensure that our policies, processes and practices will be fully legally compliant and simple to use and understand. They will support managers and employees to work together easily and efficiently, giving them the tools to deliver their work well, in line with the City Corporation People Strategy.

3. HR Policy Documents bring together important information about employment within the City Corporation including:
  - Sets out the obligations and responsibilities for employees, line managers and the City Corporation;
  - Contains further details of contractual Terms and Conditions as summarised in the Statement of Particulars of Employment for employees; and
  - Contains policies, procedures, schemes and codes which are non-contractual, but discretionary and may be subject to change.
4. There is a significant need to update the Employee Handbook and ensure that the City Corporation's policies are up to date and in line with recent legislative and regulatory changes, whilst also reflecting internal and external changes.
5. This framework and process outlines how HR policies, procedures and guidance will be reviewed and updated to ensure they comply with statutory requirements and are in line with best practice.

## **Current Position**

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6. The City Corporation Employee Handbook contains 71 individual policies, and a total of approximately 150 documents, inclusive of forms and appendices. Almost all policies are past their review periods, several policies have been flagged for deletion as they have been made redundant, and others require consolidation into other existing policies.
7. Many of the City Corporation's policies have not kept up with changes to modern employment practices and lack a robust link to ACAS Codes of Practice and guidance. This increases the City Corporation's risk of cases being taken to Employment Tribunal due to non-compliance.

## **Prioritisation**

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### **High Priority Policies**

8. After analysis of the current Employee Handbook and initial engagement with stakeholders across the City Corporation, People and HR have identified the five priority policies to be reviewed:
  - Probation Procedure
  - Disciplinary Procedure
  - Grievance (Complaint) Procedure

- Sickness Absence Policy and Sickness Absence Management (SAM) Formal Procedure
  - Family Leave Policy (consolidation of Maternity, Paternity, Parental, Adoption, Shared Parental, Special Leave and Time Off)
9. These policies have been identified as the highest priority as they directly impact employee relations and case management, organisational compliance, legal risk and employee wellbeing.
10. These policies are the most significantly impacted by the recently announced Employment Rights Bill and require review prior to the Bill's implementation. The policies identified above will be prioritised for review from December 2024 for completion and publication by March 2025.

### **Additional Priorities**

11. Alongside the high priority policies, the HR Policy Team will begin working with the relevant departments and institutions on policies which have been escalated for review due to legislative changes or departmental priorities. These include:

- Substance Misuse and Alcohol Testing Policy
- Domestic Abuse and Stalking Policy
- Vehicle Telematics Policy
- Whistleblowing / Speak Up Policy
- Bullying, Harassment and Sexual Harassment Policy
- Appeals Policy

12. All the policies identified above will be prioritised for review from December 2024 for completion and publication by March 2025. If additional policies are identified for urgent review, these will be managed and prioritised appropriately as they arise.

### **Compliance and Policy Relevance**

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13. Policy reviews will focus on legal and legislative requirements of UK employment laws, including the Employment Rights Act 1996 and Equality Act 2010. Changes will be made in advance of the implementation of the Employment Rights Bill 2024. The Bill introduces reforms which are likely to impact 16 of the City Corporation's policies.

14. Several policies in the Employee Handbook are no longer relevant to the City Corporation. Where this is the case, those policies will be removed, moving toward our goal of a more streamlined Employee Handbook.

15. There are a number of policies in the handbook which are similar in nature and may cause confusion. As part of this review, the HR Policy team will examine the detail of

policies to ensure that there are no conflicts between policy documents, and other employment documents such as contracts or job descriptions.

## **Communication and Training**

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16. During the policy review processes, where applicable, the HR Policy Team will work with the Internal Communications Team and the Learning and Organisational Development Team. This will ensure that communications are tailored to the required audience, and that training is provided to ensure successful implementation of new policy requirements and updated processes.
17. The HR Policy Team will also continue to engage with Systems and Management Information, Operations and HR Business Partnering to ensure that processes and system reflect the updates being made.

## **Toolkits and Guidance**

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18. In order to ensure the policies and procedures contained in the Employee Handbook are accessible and can be effectively implemented, policies will be supplemented by 'toolkits'. It is anticipated that these toolkits will comprise of employer guides and manager guides, with specific processes and requirements clearly identified and articulated dependant on the policy.

## **Completing the Equality Impact Assessment (EQIA)**

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19. When a policy document is developed, it is a requirement that the potential impacts on the on the nine protected groups outlined in the Equality Act 2010, as well as the three additional characteristics recognised by the City Corporation are appropriately assessed.
20. An Equality Impact Assessment (EQIA) helps us to create equitable policies, practices, activities, service changes or procedures by encouraging effective analysis on how these may affect different groups or communities when implemented. It supports the Corporation in assessing whether the impacts are positive, negative, or unlikely to have an impact on each of the protected characteristic groups.
21. The equality duty requires completion of an EQIA when developing or reviewing a policy and needs to include focus on how that policy will apply to groups and individuals.
22. The City Corporation's Equality, Equity, Diversity and Inclusion (EEDI) team can provide guidance and support on the EQIA.

## **Consultation and Engagement**

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23. The HR Policy Manager is responsible for ensuring stakeholders are actively engaged and consulted as appropriate, in order to actively contribute to and provide feedback on the development or review of a policy document.
24. Consultation and engagement for HR policy documents must include as a minimum:
- EEDI Team and Staff Networks
  - Recognised Trade Unions and Senior Management Representatives
  - City Corporation Institutions
  - HR Business Partnering Teams
25. If the policy document has implications on the work of another department at the City Corporation, consultation and engagement should be undertaken with the relevant department. For example, matters with financial implications should involve consultation with Chamberlain's department.

### **Engagement with EEDI and Staff Networks**

26. The City Corporation values the rich diversity and creative potential people with different backgrounds, skills and abilities bring to the workplace. The City Corporation is therefore committed to ensuring meaningful consultation with the Staff Networks and the EEDI team.
27. To ensure appropriate engagement and a streamlined approach to feedback, the HR Policy Team will work closely with the EEDI team to ensure policy development and reviews are in line with our EEDI objectives. The HR Policy Manager will work with EEDI Team to ensure that Staff Networks are actively engaged in the policy review and development process to provide a meaningful contribution on behalf of their members.
28. If a policy document is likely to impact a specific Staff Network, they may be consulted in a more robust manner to provide specific input to policy document development. For example, a policy document related to colleagues with a disability or long term health condition may specifically benefit from more in depth engagement with the Disability, Ability and Wellbeing Network (DAWN).

### **Consultation and Engagement with recognised Trade Unions and Senior Management Representatives**

29. The City Corporation recognises and consults, for the purposes of salaries and terms and conditions of employment, with GMB and Unite only. The City Corporation also consult with Employee Representatives from Grades H – J and Senior Management Grade.
30. Trade Unions and Senior Management Representatives are to be consulted or engaged with on matters related to HR policy document development and review.

### **Engagement with Institutions**

31. Most HR policies will be directly adopted by the City Corporation's Institutions.
32. Institutions, through their Head of People HR or appropriate People and HR lead are to be consulted on matters related to HR policy document development and review.

### **Engagement with HR Teams**

33. The HR Business Partnering team should be consulted on matters related to HR policy document development and review to ensure a coordinated approach.
34. Where appropriate, other relevant HR teams should be engaged with during policy engagement and review if there will be impacts on their work. For example, the Organisation Development and Training team may be required to develop training for the new or updated policy and or process.

### **Engagement with key projects**

35. The HR Policy Team will work with stakeholders involved with key projects during the review of the Employee Handbook. Most notably, the Ambition 25 Project and Enterprise Resource Planning (ERP) Programme, to ensure any impacts or relevant changes are reflected within HR policies.

## **Review Periods**

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36. The HR Policy team must ensure the timely review of all policy documents that have been issued as part of the Employee Handbook. The maximum review period for HR policies is three years.
37. Policy Directives and Guidelines are to be reviewed and updated by their review date and may be updated earlier if there are changes in law, policy or practice requiring an amendment or rescission.

38. The author must establish whether the document is to be updated, replaced with a different document type, or made obsolete.
39. The HR Policy Team will work with IT colleagues to implement an automated policy update reminder to policy owners to ensure that policies are addressed on time.

## Accessibility

---

40. Accessibility is at the forefront of policy production. Policies will be written in clear, plain English to ensure that the message of the policy is accessible to everyone who reads it. The accessible font Arial will be used in a minimum of size 12 to make the document dyslexia friendly. Left alignment and bolding will also be implemented as per the British Dyslexia Associations guidelines.
41. All tables and graphs will have a description box underneath which clearly denotes the contents of the table/graph in writing to ensure those with visual impairments who use a screen reader can access information. Similarly, all images will have alternative text (alt text) which provides a written description of the images content. High contrast colours will be implemented throughout to ensure titles or headings can be clearly visually differentiated. These accessibility features align with the governments WCAG 2.2 guidelines and will be met throughout the process of policy consultation, production and publication.

## Prioritisation Summary

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| Priority Policies – For update by March 2025   |
|--|
| <a href="#">Disciplinary Procedure</a>   |
| <a href="#">Grievance (Complaint) Procedure</a>  |
| <a href="#">Probation Procedure</a>  |
| <a href="#">Sickness Absence Policy</a> and <a href="#">Sickness Absence Management (SAM) Formal Procedure</a> |
| Family Leave Policy (Consolidation)  |
| - <a href="#">Maternity Leave Policy</a>   |
| - <a href="#">Parental Leave Policy</a>  |
| - <a href="#">Paternity Leave Policy</a>   |
| - <a href="#">Special Leave and Time Off Policy</a>  |
| - <a href="#">Shared Parental Leave Policy</a>   |
| - <a href="#">Adoption Leave Policy</a>  |

| Corporation Priorities – For update by March 2025           |
|---|
| <a href="#">Domestic Abuse and Stalking Policy</a>          |
| <a href="#">Substance Misuse and Alcohol Testing Policy</a> |
| <a href="#">Bullying and Harassment Procedure</a>           |

|                                       |
|---------------------------------------|
| <a href="#">Whistleblowing Policy</a> |
| Vehicle telematic (New)               |
| Appeals Policy (New)                  |

| <b>Remaining Policies – For review from March 2024</b>  |
|---|
| <a href="#">Acceptable Use of IT Policy</a>   |
| <a href="#">Acting Up and Partial Acting Up Policy (Temporary placement to a higher post)</a> |
| <a href="#">Allowance Rates</a>   |
| <a href="#">Annual Leave Policy</a>   |
| <a href="#">Bicycle Loan Scheme</a>   |
| <a href="#">Buying Additional Leave Scheme</a>  |
| <a href="#">Capability Procedure</a>  |
| <a href="#">Car &amp; Motorcycle Assisted Purchase Scheme</a>                                 |
| <a href="#">Car / Motor vehicle / Bicycle Mileage Allowance and Congestion Charge Scheme</a>  |
| <a href="#">Career Break Policy</a>   |
| <a href="#">Childcare Voucher Scheme</a>  |
| <a href="#">Code of Conduct</a>   |
| <a href="#">Conflicts of Interest Policy</a>  |
| <a href="#">Continuous Service</a>  |
| <a href="#">Contract Hours, Overtime &amp; Unsocial Hours Scheme</a>                          |
| <a href="#">Data Protection Policy (Employees)</a>  |
| <a href="#">Disclosure and Barring Service Policy</a>   |
| <a href="#">Employee Assistance Programme</a>   |
| <a href="#">Employment Screening Policy</a>   |
| <a href="#">Equal Opportunity Policy</a>  |
| <a href="#">First Aid Provisions at Work Policy</a>   |
| <a href="#">Flexible Working Policy</a>   |
| <a href="#">Flexitime Scheme</a>  |
| <a href="#">Gender Identity Policy</a>  |
| <a href="#">Health, Safety and Wellbeing Policy</a>   |
| <a href="#">Ill Health Retirement Procedure</a>   |
| <a href="#">Induction of New Employees Policy</a>   |
| <a href="#">Job Evaluation Maintenance Procedures</a>   |
| <a href="#">Learning &amp; Organisational Development Policy</a>                              |
| <a href="#">Leaving the City Policy</a>   |
| <a href="#">Lone Working and Preventing Violence</a>  |
| <a href="#">Long Service Award Policy</a>   |
| <a href="#">Managing People Policy</a>  |
| <a href="#">Mental Health &amp; Wellbeing Policy</a>  |
| <a href="#">No Smoking Policy</a>   |
| <a href="#">Occupational Health &amp; Welfare Policy</a>                                      |
| <a href="#">Pay Progression &amp; Eligibility for Bonuses / Recognition Awards Policy</a>     |



|   |
|---|
| <a href="#"><u>Payment of Salary Policy</u></a>   |
| <a href="#"><u>Payment for Part-time Staff Policy</u></a>   |
| <a href="#"><u>Payment of Subscriptions to Professional Bodies</u></a>                                |
| <a href="#"><u>Pension Scheme</u></a>   |
| <a href="#"><u>Performance Development Framework &amp; Appraisal</u></a>                              |
| <a href="#"><u>Personal Injury Allowance Scheme</u></a>   |
| <a href="#"><u>Politically Restricted Posts Policy</u></a>  |
| <a href="#"><u>Recruitment &amp; Selection Policy</u></a>   |
| <a href="#"><u>Redeployment Policy</u></a>  |
| <a href="#"><u>Redundancy Policy</u></a>  |
| <a href="#"><u>Relocation Assistance on Appointment - Lodging, Travelling, Disturbance Scheme</u></a> |
| <a href="#"><u>Salary Scales &amp; London Weighting Allowance</u></a>                                 |
| <a href="#"><u>Season Ticket Loan Scheme</u></a>  |
| <a href="#"><u>Security Policy - People</u></a>   |
| <a href="#"><u>Selection Tests Policy</u></a>   |
| <a href="#"><u>Service Occupancy Policy</u></a>   |
| <a href="#"><u>Social Media Policy</u></a>  |
| <a href="#"><u>Travel &amp; Subsistence Allowance Scheme</u></a>                                      |
| <a href="#"><u>Workplace Attendance Policy</u></a>  |

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# Agenda Item 5

|  |  |
|--|--|
| <b>Committee(s):</b><br>Corporate Services Committee – For decision                                    | <b>Dated:</b><br>27/11/2024            |
| <b>Subject:</b> Speak Up Arrangements & System   | <b>Public</b>                          |
| <b>This proposal</b><br>a) provides statutory duties<br>b) provides business enabling functions        |  |
| <b>Does this proposal require extra revenue and/or capital spending?</b>                               | <b>N</b>                               |
| <b>If so, how much?</b>  |  |
| <b>What is the source of Funding?</b>  | <b>People &amp; HR Existing Budget</b> |
| <b>Has this Funding Source been agreed with the Chamberlain’s Department?</b>                          | <b>Y</b>                               |
| <b>Report of:</b> The Chamberlain and the Executive Director of Human Resources & Chief People Officer | <b>For Decision</b>                    |
| <b>Report author:</b> Chris Keesing, Counter Fraud and Investigations Manager                          |  |

## Summary

Internal Audit & Counter Fraud, and People and HR presented a paper to the City’s Senior Management Team setting out plans for updating our approach to receiving and managing employee concerns at the City of London Corporation and ensuring the correct application of whistleblowing protection where appropriate by investing in, and benefiting from, an electronic case management system.

A review of concerns received under the current Whistleblowing Policy shows that around 50% of the reports relate to matters that were subsequently investigated under the Grievance Policy.

The current Whistleblowing Policy is now dated, and if the electronic case management system is approved, can be updated in line with the arrangements for concerns to be raised, triaged and managed. As part of the policy updated, rename the Whistleblowing Policy, the Speak Up Policy to better reflect the concerns raised.

## Recommendation(s)

Members are asked to:

- Endorse the proposed enhancements to the various processes for handling concerns raised by staff.

## Main Report

## Background

1. The City's current Whistleblowing Policy and arrangements have been in place for over ten years, with only minor amendments made since. Although the current Policy and processes still maintain some effectiveness, the arrangements for raising concerns, triaging and managing concerns are now outdated and have limited effectiveness. The current arrangements for raising concerns include the following channels maintained by Internal Audit:
  - Via an online form
  - Via a dedicated email address or by email to the Head of Internal Audit
  - By phone to nominated contacts or via a telephone (voicemail) hotline
  - By post to the Head of Internal Audit
2. Concerns can also be raised through the Grievance (Complaint) Procedure which provides a process for both informal and formal resolution, and is managed by People and HR.
3. The City's Senior Leadership Team received a report from the Assistant Director of People and HR - Operational Services and the Head of Internal Audit in July 2024, where they endorsed their support for new and improved arrangements for raising and managing concerns.
4. For those concerns received by Internal Audit that do not relate to suspected fraud or irregularity, the current arrangements for triaging and managing concerns relies upon excel spreadsheets to record and maintain a record of all concerns received, along with the outcomes of resulting investigations – this has now been identified as ineffective as a tool for managing all concerns raised as it does not capture those concerns raised direct to People and HR.
5. Triaging of concerns raised via the Internal Audit channels is currently managed by the Head of Internal Audit and the Counter Fraud & Investigations Manager. Review of concerns received via the current channels shows that the majority of these cases were actually referred to People and HR colleagues and management to be investigated under alternative policies, such as the Grievance Policy, as they did not meet the standard of a whistleblowing concern under the Public Interest Disclosure Act 1998.
6. There is a lack of clarity for staff across the organisation as to when the Whistleblowing Policy becomes relevant, specifically, colleagues have displayed a tendency to refer to their concerns as whistleblowing referrals.
7. The following points should be noted in relation to whistleblowing:
  - Formally, whistleblowing relates to employees - a worker who reports certain types of wrongdoing, often, although not always something seen at work.
  - The wrongdoing must be in the public interest – basically, it must affect others/the public.

- Whistleblowers are protected by law – they should not be treated unfairly or lose their job because they have ‘blown the whistle’.
  - Concerns can be raised at any time about an incident that happened in the past, is happening now, or that the individual believes will happen in the near future.
  - A confidentiality clause or ‘gagging clause’ in a settlement agreement is not valid if someone is a whistleblower.
8. Complaints or concerns are considered as whistleblowing and an employee is protected by law where any of the following criteria are present:
- It relates to a criminal offence, for example fraud.
  - Someone’s health and safety is in danger.
  - There is risk or actual damage to the environment.
  - It relates to a miscarriage of justice.
  - The employing organisation is breaking the law.
  - They believe someone is covering up wrongdoing.

### **Current Position**

9. People and HR have been working together with Internal Audit and Counter Fraud to identify improvements to the process for staff to raise concerns and to improve the consistency with which they are managed. An important part of this work is to also improve understanding in relation to whistleblowing and the application of this policy.
10. The Internal Audit and Counter Fraud Service operates a case management system for dealing with fraud referrals and investigations. It has been established that existing functionality can be extended to incorporate all categories of employee concern and support consistent case management through a secure and confidential system. Soft market testing has been carried out to explore the available system solutions for case management. The current INCASE system has been identified as the most suitable tool for the needs of the City of London Corporation as this can be easily extended to incorporate all manner of employee concern. An additional twelve licences can be purchased at low cost and within existing budget which will allow for HR Management and HR Business Partners to access to INCASE and to manage the lifecycle of concerns raised under the proposed new arrangements.
11. Discussions have been held with stakeholders on the ERP/ SAP implementation project and it has been agreed that the proposed solution is currently out of scope of the SAP product due to the required functionality, costs and implementation requirements. Integration capabilities will be explored as appropriate.
12. This report sets out proposed amendments to this process for the consideration of Corporate Services Committee with options in terms of a way forward.

13. The Trade Unions have been engaged with on the proposals and are supportive of the recommendations.
14. External Audit for City Fund have noted in their recent report that the City of London Corporation is currently reviewing its arrangements for whistleblowing.
15. If approved, the Whistleblowing Policy will be amended to reflect the updated arrangements and case management system. It is proposed that the policy will be renamed the Speak Up Policy to better reflect the concerns raised.

### **Proposed Approach**

16. Extend the use of current system used by Internal Audit and Counter Fraud for fraud referrals and investigations to enable staff to raise all types of concerns with the ability for them to be triaged, monitored and managed by the appropriate team.
17. Revise the Whistleblowing Policy to ensure the policy is clear for all staff, particularly the conditions that must typically be present for whistleblowing protection to apply. If approved, the policy will be amended to reflect the updated arrangements and renamed the Speak Up Policy to better reflect the concerns raised
18. Work with the Communications department to improve the current communications around how to raise a concern, process flows and what to expect in terms of how your concern will be handled (including how and when whistleblowing applies).

### **Proposals**

19. If approved by Corporate Services Committee, the following key documents will be reviewed and revised between People and HR and Internal Audit & Counter Fraud. This will follow the proposed policy review process, including Union engagement and EQIA.
  - Speak Up Policy (replacing the current Whistleblowing Policy)
  - Employee Handbook Guidance (linking to the Speak Up Policy)
  - Managers Guidance (linking to the Speak Up Policy)
20. We will rename the current Policy from a Whistleblowing Policy to a Speak Up Policy to better reflect the nature of the concerns raised through these channels, and to ensure we capture any concerns employees may raise. As our new arrangements will enhance our ability to triage more effectively in partnership between Internal Audit and Counter Fraud and Corporate HR, along with being able to manage the lifecycle of whistleblowing and grievance investigations effectively within the INCASE case management system this ensures that we enhance our responsiveness.

21. The case management system will make reporting concerns far easier for employees and far more effective for the organisation – a new online form, linking directly to workflow within INCASE, will ensure that we are able to respond to, and triage, concerns in a timelier manner. Functionality will allow for employees to raise concerns anonymously whilst offering a solution to enable those responsible for managing concerns raised through these channels, to maintain a two-way correspondence with employees wishing to remain anonymous – this is expected to improve our ability to investigate anonymous concerns more effectively, where under current arrangements many anonymous concerns cannot be effectively investigated owing to lack of information, we will likewise be able to provide feedback on the outcome of our investigations using this solution.
22. A full case management suite within INCASE will ensure that any concerns raised under the new arrangements are swiftly and effectively progressed and recorded. This will allow for enhanced management allocations, oversight and information of investigations.
23. The software providers will provide a full training package for all new users of INCASE as part of the proposed procurement.
24. A comprehensive communications strategy has been discussed with, and will be implemented with, Corporate Communications colleagues to ensure that the revised arrangements are communicated effectively across the entirety of the City of London Corporation.

### Key Data

25. An analysis of the concerns received under the current arrangements during the current year to date and over the past two full reporting years can be found below.

| <b>Concerns Received Under Current Arrangements (excluding formal grievances raised direct to Corporate HR, and/or Management)</b> |                                 |                                     |                                 |
|--|---------------------------------|-------------------------------------|---------------------------------|
| <b>Year</b>  | <b>No. of concerns received</b> | <b>No. of irregularity concerns</b> | <b>No of grievance concerns</b> |
| 22/23  | 2                               | 2                                   | 0                               |
| 23/24  | 9                               | 4                                   | 5                               |
| 24/25 YTD  | 6                               | 4                                   | 2                               |

26. The analysis shows that 58% of the concerns received were classified as an irregularity, and 42% classified as grievance complaints.
27. In addition to the concerns received by Internal Audit and Counter Fraud under current arrangements, People and HR have received up to 20 formal grievances per year since 2022.

### Strategic Implications

28. Effective arrangements for managing concerns, supported by a clear, easy to navigate Speak Up Policy, is essential for the City of London Corporation to ensure that employees have confidence in raising concerns of wrongdoing or health and safety concerns, fraud and criminality, or similar. It also provides assurance to the organisation that effective arrangements are operational and that confidential channels exist allowing employees to report concerns outside of their management structure where appropriate.

#### People Strategy

29. Our proposed arrangements align to the City of London Corporation's People Strategy by ensuring that employees know they are respected, safe, included, and heard, and feel empowered by providing responsibility and accountability. The arrangements also meet the objective to have robust, easy-to-use automated systems. If successful, People and HR will consider further rollout of the system to assist with Employee Relations case management, in order to continue to meet the People Strategy objectives.

#### Financial Implications

30. The proposed additional INCASE system licences for managing concerns is affordable within existing budgets. and is expected to deliver value for money through enhanced arrangements for receiving, managing and responding to concerns raised through the Speak Up channels.

#### Legal implications

31. The Comptroller and City Solicitor has committed to reviewing the legal definition of a protected disclosure, for inclusion in the new Speak Up Policy.

#### Resource implications

32. None

#### Risk implications

33. Failure to ensure that effective arrangements for employees to raise concerns and for management to act swiftly on these may result in wrongdoing or criminality etc going unreported, or not being appropriately investigated and dealt with. This could result in legal, financial and reputational risks for the City of London Corporation.

#### Equalities implications

34. The new arrangements are designed to allow all employees, regardless of any protected characteristic to raise their concerns, whilst employees will be encouraged to provide their contact details, the functionality within INCASE will allow for ongoing two-way communication for anonymous concerns raised.

#### Climate implications

35. None

#### Security implications

36. None



## Conclusion

37. The proposed case management system will allow for more effective reporting, triaging, investigation and management oversight for concerns received. It will also allow investigators to maintain a two-way communication with employees wishing to remain anonymous by utilising the technology now available through the case management software.
38. A new Speak Up Policy aligned to the proposed case management system will ensure that the City of London Corporation retains an effective and up to date response to ensuring that employee concerns can be raised in confidence, where staff feel unable to raise concerns via their management chain.
39. The City's Senior Management Team have endorsed the proposed arrangements for updating our response to whistleblowing at the City Corporation.

## Appendices

- Appendix 1 – Process for Dealing with Employee Concerns

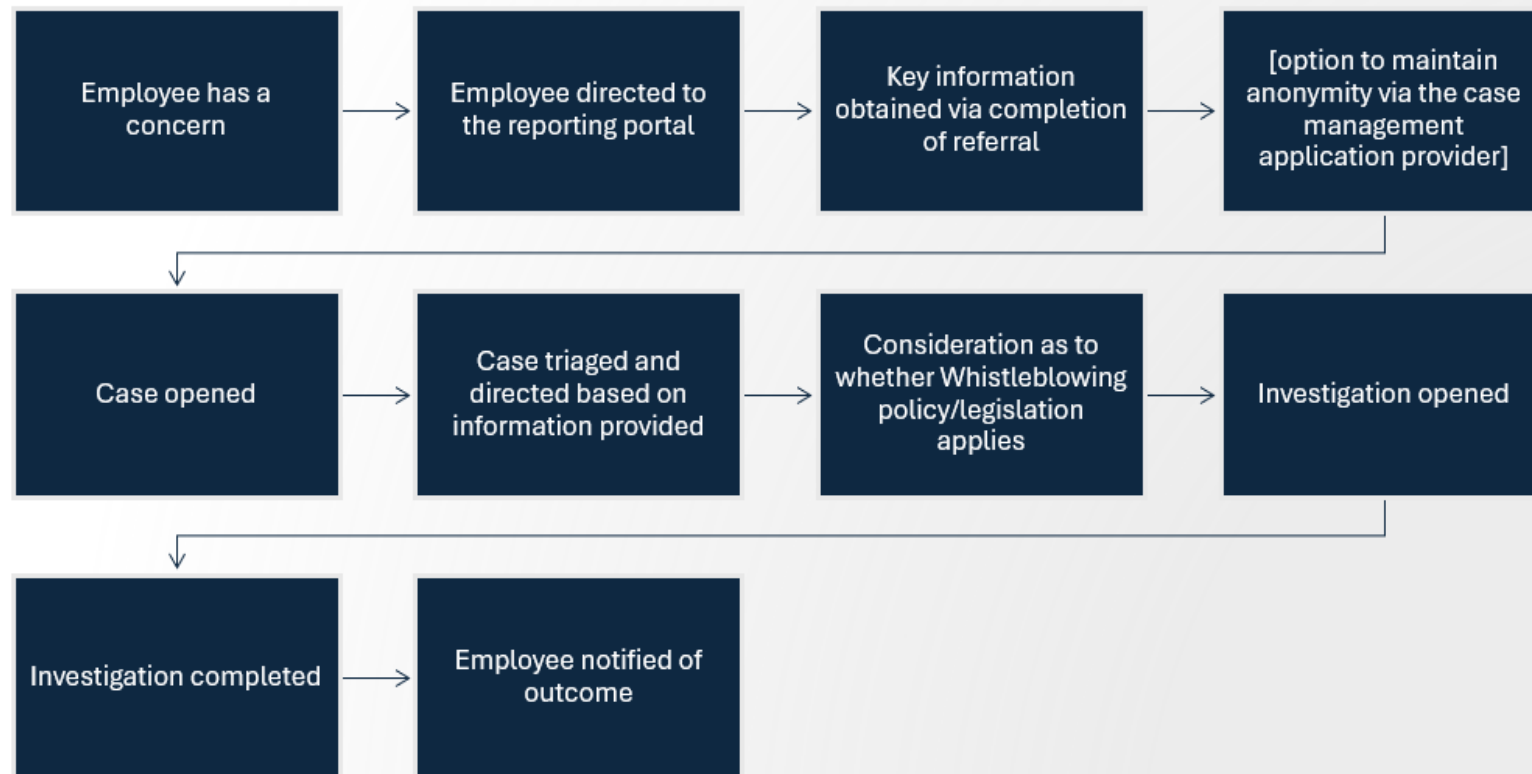
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# Process for Dealing with Employee Concerns



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# Agenda Item 7

|   |                                  |
|---|----------------------------------|
| <b>Committee(s):</b><br>Corporate Services Committee  | <b>Date:</b><br>27 November 2024 |
| <b>Subject: Health &amp; Safety Update</b>  | <b>Public</b>                    |
| <b>Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?</b> | <b>1,2,3,4,5,8,9,10,11,12</b>    |
| <b>Does this proposal require extra revenue and/or capital spending?</b>                                  | <b>No</b>                        |
| <b>If so, how much?</b>   | <b>N/A</b>                       |
| <b>What is the source of Funding?</b>   | <b>N/A</b>                       |
| <b>Has this Funding Source been agreed with the Chamberlain's Department?</b>                             | <b>N/A</b>                       |
| <b>Report of:</b> Greg Moore, Deputy Town Clerk   | <b>For information</b>           |
| <b>Report author:</b> Oliver Sanandres, Director of Health & Safety and Head of Profession                |                                  |

## Summary

This report provides the Corporate Services Committee with a regular health and safety update.

A more comprehensive report is scheduled for your January meeting which will detail the outcomes and relevant implications of the recent Grenfell Tower Inquiry. Much activity has been undertaken over the recent period to understand the findings and the relevant steps that the City Corporation should take to apply learning to its own arrangements.

The report also draws Members' attention to progress made in closing the Quadriga independent review recommendations, highlights key elements of forthcoming activity, and provides updates of note which Members will wish to be aware of.

## Recommendation(s)

Note the report for information only.

## Main Report

### Background

1. Since December 2023, following an external review by Quadriga of our Health & Safety arrangements, the Corporate Services Committee has received an update at each meeting outlining key areas of activity and progress made in addressing gaps identified through the review.
2. The report delivered 25 recommendations. To date 16 of the recommendation have been closed, that's 64%. Four major recommendations, core structural processes will be closed by the approval of our Health & Safety framework, this will bring us to 80% completion. They are:
  - i. For the higher risk areas of the Corporation, including the Barbican and Markets, a minimum standard in terms of numbers and qualifications of health and safety advisers should be established
  - ii. The IOSH (Institution of Occupational Safety and Health) approved Managing Safely training introduced for managers needs to also relate to the Corporation's policies and procedures. It is recommended that the current programme is extended by at least half a day to provide a session on these aspects.
  - iii. A programme of relevant health and safety training both for Members and Senior Management and Directors should be introduced. For Senior Management and Directors, the one-day IOSH approved Safety for Executives and Directors would be appropriate. For Members, either this course or a bespoke two-to-three-hour programme would be appropriate.
  - iv. A centrally based software system which can allow the recording and monitoring for risk assessments, the monitoring of close out of actions on risk assessments, employee health and safety training records so that outstanding training can be identified, and accident reporting should be introduced.
3. The remaining 20% (four) recommendations: two are HR linked i.e. Ambition25 and Occupational Health resource review. The remaining two include a review of Contractor Management and Construction (Design Management) Regulations 2015 procedures, and a review of the property management processes across the City of London Corporation. Once these have been closed own Quadriga will be brought back in to do a further external assurance review. These are on track to be delivered by April.

### Health & Safety Framework

4. The new framework document will apply to all Departments and Institutions of the City of London Corporation. It clearly sets out the mechanisms for which we are centrally responsible for and gives clear direction to Departments & Institutions as to what is required Locally. By way of example: Our Health & Safety Policy expects that locally departments will implement 'Local Arrangements' for the Management of Safety. One of these key arrangements is setting roles & responsibilities. Data from our Safe365 assessment shows that only 48% of areas assessed had clearly documented roles & responsibilities for the management of health & safety, see Table 1 below.

**Table 1**

| MODULE                            | ELEMENT                  | COL Average |
|-----------------------------------|--------------------------|-------------|
| Health & Safety Management System | Roles & Responsibilities | 48.0%       |

5. More than 50% of departments assessed were non-compliant with this requirement of our own policy. This framework will drive the good practice set into our Corporate Health & Safety Policy creating a clear standard to be achieved by each Department & Institution. With regards to how it will close this gap it sets a requirement for a 'local health & safety charter', a document within which roles and responsibilities will be clearly documented at each Departmental and Institutional level. The frameworks resources offer a template and the corporate assurance framework will track the action completion during the new annual audit cycle established by our assurance audits.
6. Leadership is not just about managing tasks; it's about shaping culture. At the heart of any thriving organisation lies a commitment to its people. This safety framework stands as a vital component of that commitment made in our People Strategy. As leaders, the responsibility to foster this culture is ours to own. Leaders must understand the expectations, embody the values and actively champion the principles that support the well-being of our teams. Safety isn't just a checklist or a policy; it's a reflection of the care and diligence we apply in every decision and action. To 'kick start' this culture we have identified and aligned a new training program under the HR PMP (People Managers Programme). ESM (Everyday Safety Management) course will be mandated for all people leaders below ELB. By integrating health and safety into our leadership practices through clear expectations, proper training, and mutual accountability we will cultivate an environment where trust, collaboration and excellence can flourish. Tone starts at the top, and by the day of your committee meeting on the 27<sup>th</sup> of November we will have also trained all our Executive Leadership Board in how to lead on this key organisational risk.
7. On the 9<sup>th</sup> of December the Health & Safety Team will hold a launch event to create more awareness, engagement and understanding and signal the start of a proactive approach to Health & Safety.

#### **Updates of note**

8. **Building Safety Case**  
All three towers on the Barbican Estate (Lauderdale, Shakespeare and Cromwell) have been submitted to the building safety regulator. All were done before the statutory deadline, and we have since held our first ever resident engagement strategy focus group at the Barbican. This took place on the 5<sup>th</sup> of November which was well attended and received. DCCS has a timeline for completion of all other blocks ending in Summer 2025 for the Barbican Estate.
9. **Organisational Behaviour**  
One of the cornerstone behaviours of a good culture is engagement and reporting, last week during a standard clean-up operation a team from City Gardens noticed a large slab of concrete cladding from the West Wing was not sat correctly. The gardening team communicated this through the correct channels and enabled an immediate response from the City Surveyors. The location was not on the public highway/street, but in an area to the rear of west wing (grass and tree) and adjacent to the Member Car Park. This area has now been cordoned off. City Surveyor officers prioritised works and brought structural engineers to attend the site. They will also do a proactive and preventative survey of other West Wing areas. As the west wing is a High Risk Building under the new Building Safety Act, we will be notifying the Building Safety Regulator and was reported to Corporate H&S as per the new procedure.
10. **LFB visit to Estates**  
Last week a routine, but unplanned inspection was made by LFB to our York Way Estate. Unfortunately, the officer they met on site did not facilitate the LFB as expected and as such a complaint was registered with our team. We have immediately sent round

information locally to all custodians of our properties to ensure that our approach of openness and collaboration with the enforcement authorities is followed. The Corporate H&S team has also identified an opportunity for establishing this knowledge better and have proposed the addition of a video on this topic to the Corporate Health & Safety Induction.

### **Corporate & Strategic Implications**

- 11. **Strategic implications** – None at this stage.
- 12. **Financial implications** – None at this stage.
- 13. **Resource implications** – None at this stage.
- 14. **Legal implications** – None at this stage.
- 15. **Risk implications** – None at this stage.
- 16. **Equalities implications** – None at this stage.
- 17. **Climate implications** – None at this stage.
- 18. **Security implications** – None at this stage.

### **Conclusion**

- 19. Significant progress has been made since the Quadriga review, with 64% of recommendations closed and a clear path to achieving 80% completion upon approval of the Health & Safety Framework. We remain on track to close the remaining recommendations of the Quadriga review by April and will invite Quadriga for an external assurance review on completion of the work. Cultural tone starts at the top, and with the current momentum, we are set to achieve sustainable improvements in health and safety across the organisation.

### **Recommendation(s)**

- 20. Note the report for information only.

**Oli Sanandres**

Director of Health & Safety

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**CORPORATE SERVICES COMMITTEE FORWARD PLAN**

|   | <b>27 November-24</b>  | <b>8 January-25<br/>Provisional</b>  | <b>12 February-25<br/>Provisional</b>                                     | <b>7 May-25<br/>Provisional</b>  | <b>18 June-25<br/>Provisional</b>             | <b>10 September-25<br/>Provisional</b>    | <b>22 October-25<br/>Provisional</b>      |
|---|--|--|---|--|---|---|---|
| <b>Standing Annual Items</b>                                | CSC Forward Agenda<br><br>Health & Safety  | CSC Forward Agenda<br><br>Health & Safety<br><br>Pay Policy Statement  | CSC Forward Agenda<br><br>Health & Safety<br><br>SMG Register of Interest | CSC Forward Agenda<br><br>Health & Safety<br><br>Annual Workforce Report | CSC Forward Agenda<br><br>Health & Safety     | CSC Forward Agenda<br><br>Health & Safety | CSC Forward Agenda<br><br>Health & Safety |
| <b>HR Department Reports</b>                                | Employment Rights Bill Update and HR Policy Framework<br><br>Volunteering<br><br>Pay Award 2024/25<br><br><br><br>Confidential Report<br><br>Confidential Verbal Update on Ambition 25 – post workshop | Ambition 25<br><br>People Strategy –Bi-annual Update – For Information<br><br>Benefits Refresh<br><br>ET Cases and Settlement Agreements<br><br>ERP Update | Ambition 25   | Ambition 25<br><br>Agency Workers Guidance for Managers                  | Ambition 25<br><br>People Strategy –Bi-annual |   |   |
| <b>Other Department Reports e.g. MFS, Restructures etc.</b> | Whistleblowing policy<br><br>TUPE implications   |  |   |  |   |   |   |

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

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