



Equality, Diversity & Inclusion Sub-Committee

Date: MONDAY, 16 JUNE 2025
Time: 10.00 am
Venue: COMMITTEE ROOMS, WEST WING, GUILDHALL

Members:

Deputy Caroline Haines (Chair)	Anthony David Fitzpatrick, Corporate Services Committee
Joanna Tufuo Abeyie	Charles Edward Lord, OBE JP, Corporate Services Committee
Alderman Sir Charles Bowman, General Purposes Committee of Aldermen	Deputy Henry Pollard
Deputy Anne Corbett, Community and Children's Services Committee	Deputy James Thomson CBE
Deputy Peter Dunphy	David Williams

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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

1. **APOLOGIES**

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

3. **ELECTION OF A DEPUTY CHAIR**

To elect a Deputy Chair in accordance with Standing Order 26(6).

For Decision

4. **MINUTES**

To approve the public minutes and non public summary of the meeting held on 5 February 2025.

For Decision
(Pages 5 - 10)

5. **EQUITY, EQUALITY, DIVERSITY AND INCLUSION REVIEW (PUBLIC UPDATE)**

Report of the Chief Strategy Officer.

For Information
(Pages 11 - 60)

6. **GENDER, ETHNICITY AND DISABILITY PAY GAPS**

Executive Director of Human Resources and Chief People Officer.

For Information
(Pages 61 - 88)

7. **SOCIAL MOBILITY REPORT**

Report of the Chief Strategy Officer.

For Information
(Pages 89 - 166)

8. **PRESENTATION - GUILDHALL SCHOOL OF MUSIC AND DRAMA**

A representative of the Guildhall School of Music and Drama to be heard.

For Information
(Verbal Report)

9. **WHOLESALE MARKETS ZERO TOLERANCE POLICY**

Report of the City Surveyor.

For Information
(Pages 167 - 178)

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 5 February 2025.

For Decision
(Pages 179 - 182)

14. **EQUITY, EQUALITY, DIVERSITY AND INCLUSION REVIEW (NON PUBLIC UPDATE)**

Report of the Chief Strategy Officer.

Note: Appendices are in a separate pack.

For Information
(Pages 183 - 190)

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

16. **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

17. EEDI STRATEGIC UPDATE AND FORWARD LOOK

Report of the Chief Strategy Officer.

For Information

EQUALITY, DIVERSITY & INCLUSION SUB-COMMITTEE **Wednesday, 5 February 2025**

Minutes of the meeting of the Equality, Diversity & Inclusion Sub-Committee held at Committee Rooms, West Wing, Guildhall on Wednesday, 5 February 2025 at 1.45 pm

Present

Members:

Deputy Andrien Meyers (Chair)
Deputy Randall Anderson
Deputy Peter Dunphy
Mary Durcan
Charles Edward Lord, OBE JP

Observing virtually:

Joanna Abeyie, Alderman Sir Charles Bowman, Caroline Haines, Judith Pleasance and Deputy Henry Pollard

Officers:

Dionne Corradine	- Chief Strategy Officer
Sarah Guerra	- Equalities Director
Alice Reeves	- Corporate Strategy & Performance
Sacha Than	- Corporate Strategy & Performance
Siobhan Harley	- Corporate Strategy & Performance
Tom Kennedy	- People and Human Resources
Kaye Saxton-Lea	- People and Human Resources
Cindy Vallance	- People and Human Resources
Omkar Chana	- Innovation & Growth
Fiona Hoban	- Remembrancer's Department
Kate Doidge	- Town Clerk's Department
Zoe Williams	- Town Clerk's Department

1. APOLOGIES

Apologies were received from Alderman Sir Charles Bowman and Caroline Haines.

Joanna Abeyie, Alderman Sir Charles Bowman, Caroline Haines, Judith Pleasance, and Deputy Henry Pollard observed the meeting virtually.

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

There were no declarations.

3. MINUTES

RESOLVED – That the public minutes and non-public summary of the meeting held on 22nd November 2024 be approved as an accurate record.

4. **EQUALITY INFORMATION REPORT 2024**

The Sub-Committee received a report of the Chief Strategy Officer, concerning the approval to publish the City of London Corporation's Equality Information Report 2024, to meet its responsibilities under the Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017.

The Sub-Committee raised queries relating to the intersectionality of data, which aligned with the People Strategy's work on attraction and recruitment, and collecting and analysing the intersectionality of data. Analysis of data had been expanded since the previous year, noting the challenge that if the data became too granular, this would have to be redacted from the Equality Information Report. With the improved data collection over the last year, more analysis of intersectionality of data could be reported in the future.

A Member queried whether there was confidence that the data was an accurate representation of the City Corporation's workforce. The Sub-Committee heard that, since the publication of the previous years' Equality Information Report, questions had been amended for clarity and the range of questions expanded, and therefore the data may change in the next years' report. There was assurance that the data reflected the workforce, however this linked with disclosure rates improving following ongoing communications to staff during 2024. This would enhance data quality, and achieve a higher confidence in the data.

RESOLVED – That Members of the Equality, Diversity & Inclusion Sub-Committee:

- Endorse the Equality Information Report 2024 provided at Appendix 1 for publication on the City Corporation's external website by 30 March 2025, thereby fulfilling our legislative responsibilities.
- Note the continued commitment to improving the quality of Equity, Equality, Diversity and Inclusion (EEDI) data employees and service users, and the progress made to date on encouraging employees to share their diversity data.

5. **EQUITY, EQUALITY, DIVERSITY AND INCLUSION REVIEW UPDATE**

The Sub-Committee received a report of the Chief Strategy Officer providing an update on the Equity, Equality, Diversity and Inclusion (EEDI) Review. The report set out activity taken by the consultants, Belonging Pioneers, since November 2024 including their data gathering work and with the Review due to conclude on 1 April 2025, the report set out next steps.

The Sub-Committee received a presentation from Belonging Pioneers, which included its framework; process of methodology; inputs and insights from their stakeholder engagement to date including a document review, the EEDI Review survey, interviews, listening circles and an upcoming workshop with senior leaders; extracts of data providing initial findings; examples of good practice; examples of challenges; emerging themes; and next steps. Members asked questions and made comments throughout the presentation, summarised below.

Members of the Sub-Committee noted and made queries on the response rate to the EEDI Review Survey, with particular interest around the City Corporation's Institutions. Members heard that the reasons behind low engagement with the survey varied, such as a parallel survey being run during the same period. The survey and engagement with it across the City Corporation had been picked up by the Town Clerk for further discussion with the Senior Leadership Team. Further discussion was held in non-public session.

Members noted emerging observations on the responses from staff in relation to Elected Members, which, generally, appeared to be unfavourable. A point was raised that much of the City Corporation's workforce would not encounter a Member during their daily work and suggested that future surveys should ask whether the respondents role involved engagement with Members. The Sub-Committee were reminded that although much of the workforce might not engage directly with Members, a perception did exist of Members who made political decisions on enabling functions that did directly affect a respondent's daily work.

It was noted that a final report setting out the baseline assessment, recommendations to drive change would be produced and received by the Sub-Committee at its June 2025 meeting.

RESOLVED – That Members:

- Note the report;
- Consider and comment on the baseline assessment and initial findings presentation provided by Belonging Pioneers at the February EDI Sub Committee meeting; and
- Endorse the proposal that the final report with recommendations and options for next steps be brought to the June EDI Sub Committee meeting for decision.

6. EMPLOYMENT RIGHTS BILL UPDATE AND HR POLICY FRAMEWORK

The Sub-Committee received a report of the Chief People Officer and Executive Director of HR, concerning an update on the Employment Rights Bill 2024, and its impact the comprehensive compliance and risk management audit of the City Corporation's HR policies. It also included an update on the current status of the Employee Handbook.

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

7. PEOPLE STRATEGY BI-ANNUAL PROGRESS REPORT 1: APRIL 2024 TO SEPTEMBER 2024

The Sub-Committee received a report of the Chief People Officer and Executive Director of HR, concerning the bi-annual progress report for the City Corporation's People Strategy, and an overview of and summary of actions following the City Corporation's 2024 Staff Survey.

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

8. **BECKFORD AND CASS STATUE PROJECT WEBPAGES**

The Sub-Committee received a report of the Head of Profession (Culture), concerning an update on the Beckford and Cass statue plaques project ('Revealing the City's Past'), and the defined content and previous of what would be published on the City Corporation's webpages as part of the 'Retain and Explain' approach. The Sub-Committee were receiving the report for discussion and to provide recommendations for onward consideration by the Culture, Heritage and Libraries Committee.

The Sub-Committee made comments in relation to the length of time the project had taken to implementation. Following a query on the date for the installation of the plaques, the Sub-Committee heard that, not pre-empting a decision from the Culture, Heritage and Libraries Committee, a provisional date had been identified. This was based on ability to gain access to the Great Hall, and to ensure attendance of the contributors. The Sub-Committee urged that, given the long delays, it did not wish to prolong installation any further and emphasised the need to maintain the provisional date.

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

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

There were no public questions.

10. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT**
Diversity Monitoring Form

The Sub-Committee were sighted on a draft proposal for a diversity monitoring form for Members and candidates for the upcoming Court of Common Council elections. Comments were sought from Members of the Sub-Committee, who were also invited to submit their comments separately.

The Sub-Committee commended the positive progress as it has been a long-standing recommendation. The form would be sent electronically and would be voluntary to complete. It would be anonymised for candidates but following the election it would be re-sent to Elected Members, at which point it would not be anonymised.

A Member suggested that given marriage or civil partnership statuses were rarely collected, that this be removed from the form.

Concerns were raised that if the data was anonymised, this would be a detraction from the City Corporation understanding individuals' requirements (such as access requirements, etc.). The Sub-Committee were reminded that there needed to be secure data governance owing to the granularity of the data, however, even if anonymised, responses would inform the City Corporation of what it needed to provide to candidates.

A Member asked if there would be any measures for success. The response was that this was based on how success was defined – in this instance, it

would be that the forms were completed, and not what was statistically significant.

11. 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 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.

12. NON-PUBLIC MINUTES

RESOLVED – That the non-public minutes of the previous meeting held on 22nd November 2024 be approved as an accurate record.

13. BECKFORD AND CASS STATUE PROJECT WEBPAGES

The Sub-Committee received a report of the Head of Profession (Culture), concerning an update on the Beckford and Cass statue plaques project ('Revealing the City's Past'), and the defined content and previous of what would be published on the City Corporation's webpages as part of the 'Retain and Explain' approach. The Sub-Committee discussed appendices 1 – 4, which were non-public.

14. EVENTS AND VENUE ACCESSIBILITY

The Sub-Committee received a report of the Remembrancer, concerning the overview of ongoing venue accessibility enhancements for event spaces.

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

Non-public questions were raised in relation to the EEDI Review.

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

There were no non-public items of urgent business.

The meeting ended at 3.33 pm

Chairman

Contact Officer: Kate Doidge
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City of London Corporation Committee Report

Committee: Equality, Diversity, and Inclusion Sub Committee – For information	Dated: 16/06/2025
Subject: Equity, Equality, Diversity and Inclusion Review Update	Public report: For Information
This proposal: <ul style="list-style-type: none"> • delivers Corporate Plan 2024-29 outcomes 	Equalities underpin all Corporate Plan 2024-29 outcomes Equality Objectives 2024-29 People Strategy 2024-29
Does this proposal require extra revenue and/or capital spending?	Yes
If so, how much?	£20,000
What is the source of Funding?	Funding met through 23-24 contingency
Has this Funding Source been agreed with the Chamberlain's Department?	Yes
Report of:	Dionne Corradine, Chief Strategy Officer
Report author:	Sacha Than, Head of CSO Policy and Projects, Corporate Strategy and Performance

Summary

This report provides an update on the completion of the Equity, Equality, Diversity and Inclusion (EEDI) Review, commissioned to assess the City of London Corporation's current position and future ambitions in the EEDI space. The Review was delivered by Belonging Pioneers between November 2024 and April 2025, following endorsement of the Terms of Reference by the EDI Sub Committee in September 2024.

The Review was structured around a phased methodology including document analysis, a staff and Member survey, stakeholder interviews, a listening circle¹, and a synthesis workshop. Belonging Pioneers used the evidence gathered from these interventions to identify key themes, gaps, and opportunities for embedding EEDI across the City Corporation mapping these against a maturity framework.

The final products comprise of eleven documents totalling 500 pages, including a 38-page summary report, a 113-page report with annexes, two standalone annexes

¹ A facilitated process to provide individuals an opportunity to share their perspective, to experience and give the experience of empathy and compassion of listening, and to contribute to a collective voice for developing positive solutions.

(Annex B and Annex I), two draft foundational toolkits, and four supporting spreadsheets with a guide to navigate them. These outputs collectively offer a baseline assessment, a suite of recommendations, and practical tools to support implementation and progress tracking.

The EEDI Team is currently reviewing these materials to extract actionable insights and align them with organisational priorities. The findings and recommendations provide a robust foundation for the next phase of strategic development. As the Review and associated findings cover a snapshot in time, a programme of engagement with colleagues including departmental and Institution EEDI Leads will take place to contextualise, fact-check and test relevance on any recommendations that are taken forward based on evidence gathered from the Review.

Recommendations

Members are asked to:

- note the final products;
- note the proposal to use the Review's findings as an input into the creation of a cross-Corporation strategic framework for EEDI²; and
- participate in a discussion on next steps facilitated by the Equalities Director

Background

1. In a confidential session at the December 2023 EDI Sub Committee, Members agreed to address the immediate challenges for the EEDI function through four priority areas:
 - a. Support to the EEDI Team
 - b. Ensure the Corporation is compliant in its equality duties and commitments
 - c. Take stock of and prioritise three political EEDI commitments (the Equality Objectives, Tackling Racism Taskforce recommendations, and address EEDI data gaps)
 - d. Scope and agree the Terms of Reference for an EEDI Review to take place and conclude by April 2025
2. Four stages were identified to establish key infrastructure for the Corporation's EEDI ambitions with associated workstreams. These are spread over a five-year period, from 2024-2029 aligned to aid delivery of the Corporate Plan, People Strategy and Equality Objectives all running during the same period. We are currently in the first stage, with the EEDI Team working with others to stabilise the function. The four stages are:
 - a. Stabilise
 - b. Strengthen
 - c. Sustain

² As part of the EEDI Review document review, other EEDI related reviews were considered and therefore, a cross-Corporation strategic framework will be cognisant of work either completed or ongoing elsewhere across the City of London Corporation including the Institutions and with our partner organisations.

d. Soar

3. Since November 2023, work has taken place at pace to stabilise the EEDI function. However, there is still a significant amount of work to fully realise ambitions³. The initial phase in 2024 made significant progress, including achieving compliance with the Equality Act 2010, mapping the EEDI officer governance function to identify key stakeholders and streamline collaboration, achieving a respectable result in this year's Social Mobility Employer Index (a jump of 29 places – from 87 to 58), and strengthening the team through recruitment of key roles including the Equalities Director.
4. At the September 2024 meeting of the EDI Sub Committee, Members endorsed the EEDI Review's Terms of Reference which provided:
 - a. Confirmation of scope
 - b. Inputs to inform and shape the Review
 - c. An outline of outputs upon completion
5. Members were informed at the November EDI Sub Committee meeting of the full tender exercise carried out across September and October to appoint consultants to lead the Review. Belonging Pioneers, a Small and Medium sized Enterprise (SME), ethnic minority, female owned business met all our requirements on responsible procurement and performed strongly across the technical exercises. Clearly setting out how they would enable us to baseline and probe our current and future ambitions in the EEDI space internally and externally. The contract was awarded to Belonging Pioneers to undertake the Review from 5 November 2024 until 1 April 2025.
6. To deliver this work within the timescales and budget, the Review was conducted through data gathering exercises, set out in the table below. Each stage was led by Belonging Pioneers and project managed by the EEDI Team.

November 2024	Document review to capture the starting state and aspirations
December 2024	Survey open to all staff and Members
December 2024	Interviews with key stakeholders
January 2025	Listening circle to better understand what works/could be better with respect to EEDI
February 2025	Workshop to synthesise findings from the work thus far into tangible outcomes
February 2025	Emerging headlines and themes to be shared with the Steering Group and Senior Leadership Team
February EDI Sub Committee Meeting	Baseline assessment presentation
March 2025	Draft report for consultation with Steering Group and presentation to EEDI Forum
April 2025	Final report of findings and recommendations

³ The Equalities Director has provided a report to the June EDI Sub Committee setting out in detail the work to date and proposed next steps for the function.

Document Review

7. Staff Network Co-Chairs and departmental and Institution EEDI Leads were invited to contribute to the document review. An online hub was created by City Corporation's IT team for Belonging Pioneers to synthesise. Close to 200 inputs were shared on this site which were both internal staff focussed and external service user related covering systems, governance, services, measurements, insights, resources, and processes.

Survey

8. A survey, open to all staff and Members of the Court of Common Council, was launched in early December and ran for three weeks with 850 responses received. The return for the Court of Common Council stood at 48% with 60 Members submitting a response.
9. Designed by Belonging Pioneers, with some minor customisation to align with the organisation's culture, operational context and language. The survey measured different aspects of the City Corporation's culture, inclusivity, and employee and Member experience. The survey covered key areas such as identity, career trajectory, organisational, managerial, collegial relationships and enquired into individual, institutional and structural factors.

Stakeholder engagement meetings

10. Several stakeholder engagement sessions took place in the form of interviews⁴, listening circle, and a workshop, 70 people from the following groups were invited to participate in these sessions⁵:

- EDI Sub Committee Chair, Deputy Chair, Chief Commoner
- EEDI Review Steering Group
- City of London Corporation Senior Leadership Team & Executive Leadership Board
- Staff Network Co-Chairs
- Staff Network Sponsors
- EEDI Leads from every department and Institution
- Trade Union Representatives from Unite and GMB
- City Belonging Team

11. Across February and March 2025, Belonging Pioneers presented emerging headlines and themes to the EDI Sub Committee, EEDI Review's Steering Group, the City of London Corporation's Senior Leadership Team, and the EEDI Forum. This provided an opportunity for Belonging Pioneers to gain insights on

⁴ The interviews were both internal staff and external service user related with participants chosen to provide a view on both elements.

⁵ Representatives from each Institution were invited to participate in the stakeholder engagement sessions to ensure their views were captured.

identified priorities, challenges, and next steps before creating their final products.

Current Position

Final products

12. To meet the tight timelines of the Review, it was agreed to phase the work. Phase 1 was funded to and concluded in April. The Review's Terms of Reference asked that the following products be provided upon conclusion of the Review:
 - a) a report of findings with insights and recommendations to drive positive change (including physical, environmental, and cultural)
 - b) a list of priorities and initial recommendations for moving forward
 - c) a documented toolkit for tracking readiness and progress towards achieving Brilliant Basics and progressing on the journey towards World Class
13. On completion of the Review, Belonging Pioneers provided the following eleven documents:
 - 38-page summary report of findings and recommendations
 - 113-page report of findings and recommendations with 7 annexes
 - A separate 163-page annex detailing pockets of good practice and detailed recommendations entitled Annex B
 - A separate 108-page annex detailing the document analysis entitled Annex I
 - Foundational EEDI Toolkit for practitioners
 - Foundational EEDI Toolkit for the City of London Corporation
 - Guide to navigating the spreadsheets
 - Spreadsheet 1: City of London Corporation Department Institutions EEDI Lens
 - Spreadsheet 2: EEDI Alignment to City of London Corporation Strategic Plan
 - Spreadsheet 3: Workshop Brown Paper Content
 - Spreadsheet 4: The Narrative Positioning with Key Themes aligned to the DEIB Framework
14. The 38-page report of findings and recommendations is appended to this report as Appendix 2. The additional documents are to be taken in closed session and can be found in the Non-Public section of the agenda⁶.
15. The EEDI Review identified eight overarching recommendations and over 150 possible initiatives that will need to be reviewed and prioritised. Since receipt of the final products, the EEDI Team have been working through the documents to review the findings and draw out the initiatives.

Proposals

⁶ These documents are to be considered in closed session due to the sensitive information they contain relating to business and financial affairs.

16. The Equalities Director is in the process of developing a strategic framework for EEDI for the City of London Corporation grounded in best practice. It is proposed that the findings from the EEDI Review will serve as one of several key inputs into the development of this framework.
17. As this work is still in its early stages, the Equalities Director will facilitate a discussion during the Non-Public session of the June meeting of the EDI Sub-Committee. Members will be invited to explore key themes in greater depth, helping to ensure that the development of the framework draws out the relevant nuance for the City Corporation and the subsequent prioritisation and sequencing focuses on the most relevant and impactful areas.
18. The discussion at this initial meeting will play a formative role in steering the priorities for the EEDI strategic framework. Insights and priorities shared by Members will support the direction of travel and content of the framework as it is worked up. Following this, the draft framework will be progressed through officer governance channels and wider stakeholder engagement, before being brought back to Members in September for formal consideration and decision.

Key Data

19. Data gathering was critical for effective delivery of the EEDI Review. The approach taken has been outlined in paragraphs 6-11 of this report. Data validation, alignment, testing assumptions and next steps were completed through the listening circle, workshop, and meetings with the Steering Group, Senior Leadership Team, and February meeting of the EDI Sub Committee.
20. However, the Review and associated findings cover a snapshot in time. Therefore, a programme of engagement with colleagues including departmental and Institution EEDI Leads will take place to contextualise, fact-check, and test relevance on any recommendations that are taken forward based on evidence gathered from the Review.

Corporate & Strategic Implications

Strategic implications – The approach and focus are to better understand, grip and address strategic EEDI priorities now and in the future with particular emphasis on delivering the Equality Objectives 2024-2029, Corporate Plan 2024-2029 and People Strategy 2024-2029.

Financial implications – Funding was required to carry out the Review. The ask was cognisant of the financial challenges facing the Corporation, balanced with delivering the political EEDI priorities and meeting our statutory obligations. Work took place with Chamberlains to review the policy budget, and funds of £20,000 were agreed. This budget of £20,000 was agreed with Belonging Pioneers for work to 1 April 2025. No additional resource or financial considerations were required. The next steps will be carried out by officers within the EEDI Team and wider Chief Strategy Officer Portfolio.

Resource implications – The Review was carried out by consultants with support from officers within the EEDI Team and wider Chief Strategy Officer Portfolio. Input from EEDI Officer governance through the EEDI Forum and other groups, as applicable e.g. corporate enablers, Trade Union Reps, and Staff Networks was sought. The next steps will be resourced from the existing EEDI and wider CSO Portfolio with corporate enablers asked to input where appropriate.

Legal implications – Where advice is needed for legal implications, this will be sought from the Comptrollers and City Solicitors Department.

Risk implications – The Review's findings seek to minimise negative impacts, identify and exploit opportunities and mitigate risks for City Corporation in relation to EEDI. Its input into a framework will strengthen our evidence base of strategic EEDI risks and inform associated mitigation measures.

Equalities implications – The work taking place seeks to improve and enhance City Corporation's EEDI offer. The findings from the Review will help move us from basic compliance to achieving brilliant basics and ultimately into becoming world class. This will help reduce inequalities in our internal and external EEDI operations and offerings.

Climate implications – none

Security implications – Ensuring City Corporation remains safe and secure from an EEDI perspective is one of the driving forces behind the work detailed throughout this report.

Conclusion

21. The EEDI Review has been delivered to budget, providing a foundational baseline for the next phase of strategic development. The Equalities Director is now leading the development of a strategic framework for EEDI, for which the Review's findings will serve as a key input.
22. The facilitated discussion at the June EDI Sub Committee will be a useful enabler in the development of the framework's direction, ensuring it reflects the City Corporation's values and addresses key themes. Through this collaborative approach, and with continued engagement from stakeholders across the organisation, the City Corporation aims to move from brilliant basics to world class. The framework will be further developed through officer governance channels and stakeholder engagement, with a draft version to be brought back to Members in September 2025 for formal consideration and decision.

Appendices

- Appendix 1 – EEDI Review – Terms of Reference
- Appendix 2 – 38-page summary report of findings and recommendations

Background Papers

EEDI Work and Priorities – 26 June 2024 report to EDI Sub Committee [Report - EEDI Work and Priorities](#)

EEDI Review – Terms of Reference, 4 September 2024 report to EDI Sub Committee [Report - EEDI Review Terms of Reference](#)

EEDI Review Update – 22 November 2024 [Report - EEDI Review Update.pdf](#)

EEDI Review Update – 5 February 2025 [Report - EEDI Review.pdf](#)

Sacha Than

Head of CSO Policies and Projects, Corporate Strategy and Performance

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Terms of Reference

Review of the City of London Corporation's Equity, Equality, Diversity, and Inclusion (EEDI) practices

1. Rationale

- 1.1 Our ambition is to be world-class, starting with building brilliant basics. Establishing this solid foundation is crucial for our success. The Review should provide recommendations on how to achieve and move beyond brilliant basics.
- 1.2 Getting EEDI right is integral to achieving both, explicitly through delivery of the Equality Objectives and implicitly through the Corporate Plan, People Strategy and wider transformation
- 1.3 We require a coherent, evidence-led approach that helps articulate our priorities and desired impact. Pockets of good practise exist but these are inconsistent, leading to criticisms re inequity and unfairness.

2. Scope:

- 2.1 We need to clarify and agree what exists, what we are seeking to achieve internally and externally, what should be prioritised, and where the gaps and risks are. Embedding EEDI throughout the culture of the organisation and creating opportunities for engagement needs to underpin this work.
- 2.2 At a granular level, the Review should assess and evaluate current practices, policies, and culture related to EEDI. We have a hub and spoke governance model; in some instances, the Institutions may have different priorities and urgencies to the corporate centre. The intention for the Review is to consider the mechanisms in place, areas of commonality and difference (with rationales) and how to facilitate greater collaboration. The Review must take into account that we are a Local, Port, and Police Authority and therefore have due regard for our functions and relevant legislation. It should have an internal and external lens, considering staff, Members, and service users.

2.3 Scope to include:

- Resources (people, money, materials)
- Policy & guidance (reflecting modern day society now and in the future)
- EEDI Learning & Development
- Infrastructure (processes, systems, governance, benchmarking)
- Services (advice, comms & engagement, tools, accessibility, equity)
- Data (measures, success criteria)

2.4 Out of scope to include:

- Pay, reward, and T&Cs
- Ambition 25 (e.g. EEDI career paths and or job families)
- HR policies
- Lord Mayor's Show and Lord Mayor's Programme
- Member / Committee governance
- Elections

3. Inputs/Insights

3.1 The following should be used to inform and shape the Review:

- To have due regard for our obligations under the Public Sector Equality Duty: <https://www.gov.uk/government/groups/review-of-public-sector-equality-duty-steering-group>
- The Equality Objectives 2024-2029: [Equality and inclusion - City of London](#)
- Your Voice Matters 2024 Staff Survey results
- Corporate Plan 2024-2029: [Our Corporate Plan 2024-29 - City of London](#)
- People Strategy 2024-2029: [Our People Strategy 2024-29 - City of London](#)
- Ambition 25: [What is Ambition 25? \(sharepoint.com\)](#)
- City Belonging: [The City Belonging Project](#)
- Institution EDI Strategies e.g. City of London Police: [City of London Police - Our People - Equity, Diversity and Inclusion Strategy 2024-2027](#)
- [Destination City Review](#)
- [Internal and external audits, consultations and surveys relating to, or recommendations on City Corporation EEDI activities and practises](#)

4. Deliverables

4.1 The Review should provide recommendations to drive positive change (physical, environmental and cultural) and set out approaches to ensure that the Corporation achieves its intended goals related to EEDI.

4.2 Outputs should be informed by and designed to sit alongside and complement relevant strategies such as the Corporate Plan and People Strategy 2024-29, and current workstreams such as City Belonging Project. Upon completion of the Review, we would expect:

4.3 Final Outputs:

- Produce a report with insights and recommendations e.g.
 - assessment of starting state (qualitative and quantitative)
 - suggested approaches and areas where the Corporation could lead, enable, sponsor/convene, deliver through others etc
 - success measures/criteria (quantitative and qualitative)
 - a methodology to prioritise EEDI activities to achieve maximum impact/ value
 - a maturity model that others can use to self-assess where they are and what steps could be taken to become more inclusive, equitable and actions moving forward
- Toolkit with templates and materials re good practise, benchmarking, sign-posting to suggested experts in the field on topics relevant to Corporation areas of interest and delivery

4.4 Activities to complement the outputs:

- Presentation of findings to relevant stakeholders, including:
 - Members via EDI Sub Committee, Policy and Resources Committee, Corporate Services Committee
 - Staff through the Senior Leadership Team, Executive Leadership Board, EEDI Forum (Departmental Equality Reps, Corporate enablers, Trade Unions, Staff Network Co-Chairs), Staff Networks (Sponsors and Co-Chairs)

- Training sessions, workshops and materials to support the implementation of recommended changes

5. Budget

5.1 £20,000 to fund the Review has been agreed with Chamberlain's.

6. Stakeholders

6.1 Decision making:

- Chief Strategy Officer – sponsor & SRO
- EDI Team (Sacha Than) Project manager
- EDI Sub Committee to approve the Terms of Reference, receive progress reports, and consider, discuss and approve next steps for recommendations.
- SLT
- ELB to receive a copy of the Terms of Reference via email for their input.

6.2 Proposed steering group:

- Chair and Deputy Chair of EDI Sub Committee
- Chief Commoner
- Chief Strategy Officer
- Representative from Comptrollers
- Service Delivery Chief Officer
- Representative from an Institution
- Representative from Remembrancers
- Representative from HR
- Governance Representative
- Neutral Representative / Critical friend (to provide an objective and critical perspective on discussions and decisions, ensuring balanced and thorough consideration of all viewpoints)

6.3 Reference group:

- EEDI Forum (Membership includes Trade Unions, Departmental Equality Reps, Staff Network Co-Chairs, and representatives from the Institutions).
- Staff Network Co-Chairs and Sponsors
- Institution Heads and/or their nominees
- People & Human Resources
- Comptrollers
- City Belonging
- Member Services

7 Timeline and approval

7.1 The timeline for the Review is as follows:

- August – October 2024: Mini tender exercise appointing a consultant with the Chair and Deputy Chair of EDI Sub as part of the panel
- September 2024: Terms of Reference to be endorsed by EDI Sub Committee
- September 2024: Discussion on the EEDI Review to take place at the EEDI Forum
- October-November 2024: EEDI Review contract awarded



- November 2024 (latest) – January 2025: Consultants conduct fact finding exercises
- November 2024: Update on appointment of consultants to EDI Sub Committee
- January – February 2025: Consultants to develop recommendations
 - Early findings shared with EDI Sub Committee (January)
 - Comments from Members invited by correspondence in advance of the pre-election period (February)
- March 2025: Chief Officer engagement on consultation recommendations
- April 2025: Implementation planning (2025 and beyond)
- May 2025: Agree recommendations and implementation plan with EDI Sub Committee and other relevant committees (Committee dates tbc at the time of writing)

Contact

- **Sacha Than, EDI Governance and Coordination Lead, Corporate Strategy & Performance Team**

EEDI Review for the City of London Corporation

This report presents the findings and recommendations of the EEDI Review for The City of London Corporation (CoLC), conducted by Belonging Pioneers between November 2024 and April 2025. The review was commissioned to assess the current state of EEDI across CoLC's diverse departments and institutions, evaluate progress against strategic objectives, and provide actionable recommendations to embed EEDI as a 'golden thread' throughout the organisation.

Report Prepared By:

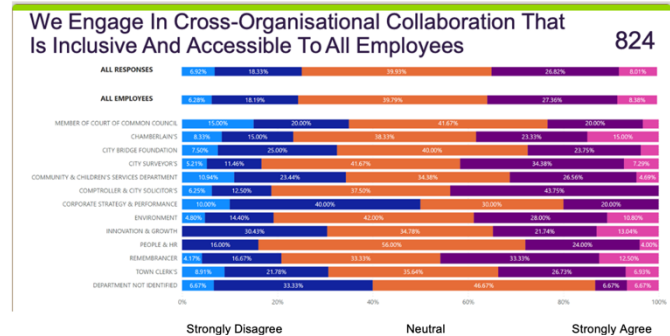
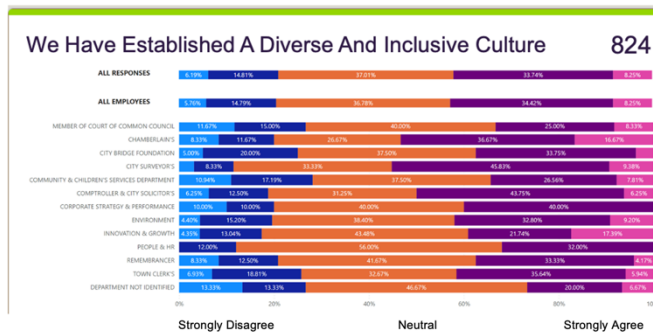
Ishreen Bradley, Chief Inspiration Officer, and
Charles Somorin, Executive Consultant, Local Government SME
Belonging Pioneers
14th April 2025

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Executive Summary

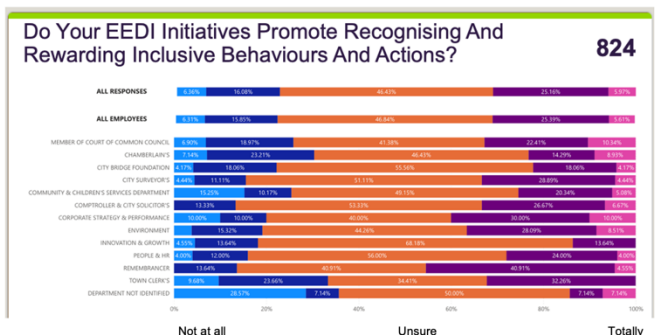
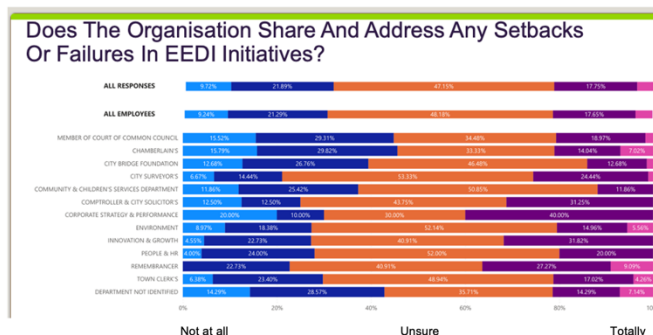
1. The City of London Corporation is at a pivotal crossroads in its EEDI journey—poised between compliance and true cultural transformation.

The organisation has made progress in collecting diversity data, launching inclusive initiatives, and aligning EEDI with its strategic plan. It is currently in a transitional phase: while some departments and institutions (like the Barbican, Guildhall School, City of London Police and City Bridge Foundation) are leading with advanced practices, others are still in compliance mode. This variation in EEDI maturity presents both a challenge and a remarkable opportunity for organisation-wide transformation.



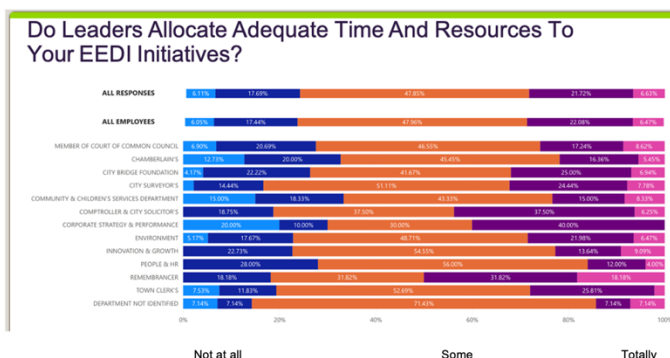
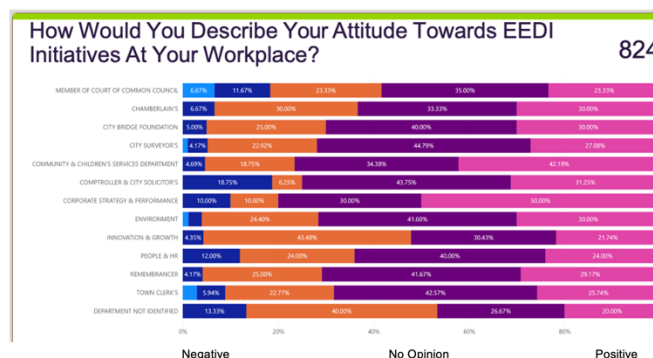
2. Cultural barriers and inconsistent engagement are holding back progress.

A deep-dive into the organisational culture reveals competing narratives—heritage and tradition sometimes clash with modern EEDI values, and rituals or symbols of inclusion are inconsistently embedded. Daily behaviours and psychological safety remain inconsistent. These cultural contradictions risk undermining The City of London Corporation's ambitions unless directly addressed.



3. Staff want to contribute to EEDI—but feel disconnected and undervalued.

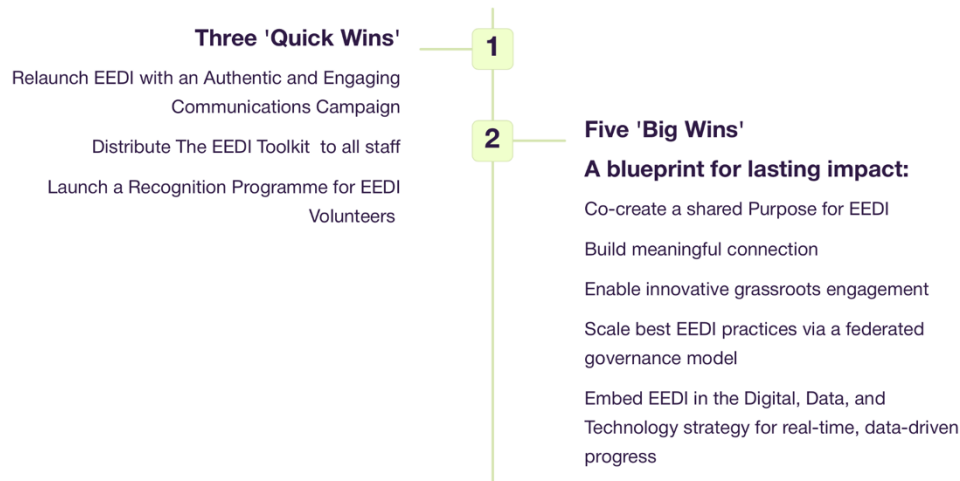
Survey data and listening circles highlight a strong appetite among staff, especially self-identified changemakers, to help shape and deliver EEDI. However, many feel excluded from decision-making or unrecognised for their volunteer efforts. This disconnect is most acute among mid-level staff, who view EEDI as compliance-driven and are sceptical about leadership's commitment. Harnessing this latent energy is key to unlocking sustainable change.



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4. The review has identified a clear roadmap for rapid and strategic improvement, recommending three “quick wins” (a high-profile EEDI relaunch, distribution of a practical toolkit, and a recognition programme for EEDI volunteers) to build momentum. Five “big wins” offer a blueprint for lasting impact: co-creating a shared EEDI purpose, building authentic connections through open dialogue, empowering grassroots engagement, scaling best practices via a federated governance model, and embedding EEDI in the Digital, Data, and Technology strategy for real-time, data-driven progress.

Strategic Roadmap for EEDI Improvement



5. The stakes are high: bold action will build trust and world-class status—inaction risks stagnation, disengagement, and reputational harm.

If The City of London Corporation takes committed action, it can become a beacon of inclusive excellence, with stronger staff engagement, consistent standards, accelerated progress, and enhanced risk management. If it fails to act, it faces growing inequalities, legal and reputational risks, and missed opportunities for innovation and community impact.

Do You Think There Is Scope To Improve The Impact Of Your EEDI Initiatives On Your Organisation?



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Recommendations and Risk Mitigation

Three Quick Wins

1. Relaunch EEDI with a Communications and Engagement Campaign: Address the missing pillar of 'connection' by authentically communicating progress, acknowledging past gaps, and signalling renewed commitment—propitiously timed with the appointment of the new EEDI Director.
2. Distribute Part 1 of the EEDI Toolkit delivered with the EEDI review to all staff: Equip colleagues with practical tools and shared standards for inclusive behaviour, enabling active bystander intervention and a psychologically safe environment.
3. Launch a Recognition Programme for EEDI Volunteers: Value and celebrate the contributions of volunteer staff, fostering best practice sharing and increasing engagement.

Five Strategic 'Big Wins'

1. Develop a Shared Purpose for EEDI: Engage all staff and stakeholders in defining a unifying vision that resonates across the organisation, supporting inclusive collaboration and innovation.
2. Build Meaningful Connections: Facilitate open dialogue and authentic listening, ensuring all voices—especially those from under-represented groups—are heard and valued.
3. Innovative Grassroots Engagement: Empower change agents through agile, cross-departmental teams and short-term secondments, supported by senior leadership sponsorship.
4. Leverage Institutional Good Practice: Adapt and scale successful EEDI approaches from advanced institutions, considering a collaborative federated governance model to accelerate knowledge transfer and consistency.
5. Embed EEDI in the Digital, Data, and Technology (DDaT) Strategy: Centralise EEDI data, deploy dynamic EEDI dashboards, and use predictive analytics to drive equitable outcomes, supported by robust risk mitigation and compliance mechanisms.

Risks and Mitigation

If CoLC fails to act, it risks stagnation, widening inequalities, disengagement, legal and reputational exposure, and failure to achieve strategic goals. To mitigate these risks, the report recommends:

- Anonymous pulse surveys and peer-led listening sessions to rebuild trust.
- Staff networks and inclusive policy audits to ensure consistent implementation.
- External benchmarking and diverse decision panels to motivate data-driven action.
- Legal reviews, whistleblowing channels, and scenario planning to manage compliance risks.
- Cross-unit rotations and digital collaboration hubs to break down silos.
- 360-degree leadership reviews and external coaching to address cultural and leadership development.

CoLC stands at a pivotal moment in its EEDI journey. By building on existing strengths, addressing cultural and structural barriers, and embedding EEDI into every aspect of its operations, CoLC can realise its ambition to be a world-class, inclusive organisation. The recommended actions—both immediate and strategic—will enable CoLC to deliver more equitable outcomes for its workforce, service users, and the wider community, supporting its Corporate Plan 2024–2029 and enhancing trust, performance, and legal compliance.

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1. Background To The EEDI Review

CoLC's EEDI Journey: Building an Inclusive Square Mile

The City of London Corporation (CoLC), operating from the historic Guildhall, governs London's Square Mile—the financial and cultural heart of the capital. With a governance legacy predating Parliament itself, CoLC uniquely functions as a local authority, police authority, and port authority simultaneously.

Led by the Lord Mayor and the Court of Common Council, CoLC's remit extends beyond typical local governance. The Corporation has positioned Equity, Equality, Diversity, and Inclusion (EEDI) as a 'golden thread' woven through its Corporate Plan, People Strategy, and Equality Objectives, reflecting its commitment to creating systemic change.

This integrated approach aims to establish CoLC as a world-class organisation championing diversity and inclusion for all stakeholders, with ambitions reaching beyond internal operations to influence communities, services, and broader society.



EEDI Implementation: Challenges and Progress



Organisational Complexity

Multiple functions and regulatory requirements creating implementation challenges



Crucible Events

Incidents like 'The Barbican Stories' driving urgent EEDI attention



Leadership Engagement

Varying appetites among leaders affecting consistency of approach

The Corporation's unique structure introduces complexities for implementing EEDI principles consistently. External drivers such as diverse regulatory requirements alongside internal factors including varying leadership commitment have created implementation challenges.

Notably, specific incidents have accelerated progress in certain areas—for example, 'The Barbican Stories' publication prompted more serious EEDI engagement within The Barbican, ultimately establishing it as an internal EEDI leader.

Inside its commitment to ensuring that EEDI is successfully implemented, CoLC commissioned [Belonging Pioneers](#), a boutique consultancy specialising in successful EEDI strategy and implementation to conduct an EEDI Review from November 2024 to April 2025, following the EDI Sub-Committee's approval of the Terms of Reference in September 2024.

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The main report contains detailed EEDI Review findings and recommendations as follow:

1. Insights and recommendations, including:

- An assessment of the starting state (Annex I – Document Review Report)
- Suggested approaches and areas for EEDI initiatives that CoLC could focus on (Section 2 & Annex B)
- Success measures/criteria (Section 2) with more detailed narratives in Annex B)

2. Separate Annexes that supplement the report with background context and analysis

- Annex A An overview of the framework, methodology & approach adopted in conducting the review
- Annex B Pockets of good practice and detailed recommendations
- Annex C Analysis of what is required to transform the **culture** for EEDI to be the golden thread in achieving Brilliant Basics and World Class
- Annex D Summary of **survey findings** from a survey completed by over 850 CoLC employees
- Annex E Summary of **listening circle** output from a listening circle with 26 EEDI champions
- Annex F Senior Leadership Team and EEDI subject matter expert workshop Part 1 '**from the field**' output on what is required for EEDI to be the golden thread in achieving Brilliant Basics and World Class
- Annex G Senior Leadership Team and EEDI subject matter expert workshop Part 2 - **calibration** on the complexity of what workshop participants identified is required
- Annex H **External drivers** scan based on PESTELEDIT framework analysis
- Annex I **Document review** report mapping CoLC departments and institutions to the Belonging Pioneers' Cultural Readiness And Needs Awareness Framework [The Belonging Pioneers' Framework]

An executive overview of each Annex is provided in this summary report.

Toolkits are provided as 2 separate documents:

- Part 1 – This Toolkit file: 'EEDI Toolkit Part 1_2 City-of-London-Corporation-Foundational-EEDI-Toolkit.pdf' contains templates and materials regarding good practice, benchmarking and signposting to suggested experts in the field on topics relevant to CoLC areas of interest and delivery
- Part 2 – Tools For Practitioners which includes:
 - A maturity model that colleagues can use to self-assess where they are and what steps could be taken to become more inclusive and equitable, as well as actions they can take to move forward (Page 8)
 - A methodology to prioritise EEDI activities to achieve maximum impact/value (Page 11)

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1.1 EEDI In The Context Of CoLC's Strategic Framework

Aligned with its Corporate Plan 2024–2029, CoLC has set out six strategic objectives: Diverse Engaged Communities, Dynamic Economic Growth, Leading Sustainable Environment, Vibrant Thriving Destination, Providing Excellent Service, Flourishing Public Spaces. The Corporate Plan aims to achieve its strategic objectives in two stages: 'Brilliant Basics' and 'World Class'.

The Corporate Plan is supported by:

- The People Strategy 2024-2029, which has the following 5 themes: My Contribution, My Reward – Ambition 25, My Wellbeing and Belonging, Trustworthy Leadership, My Talent and Development, Building Brilliant Basics. The People Strategy elaborates further on plans to achieve Brilliant Basics in the next 2 years.
- The Equality Objectives: Inclusive and Trustworthy Leadership, Inclusive and Diverse Communities, Accessible and Excellent Services, Socio-Economic Diversity, Cross Cutting Activity: Evidence & Data.

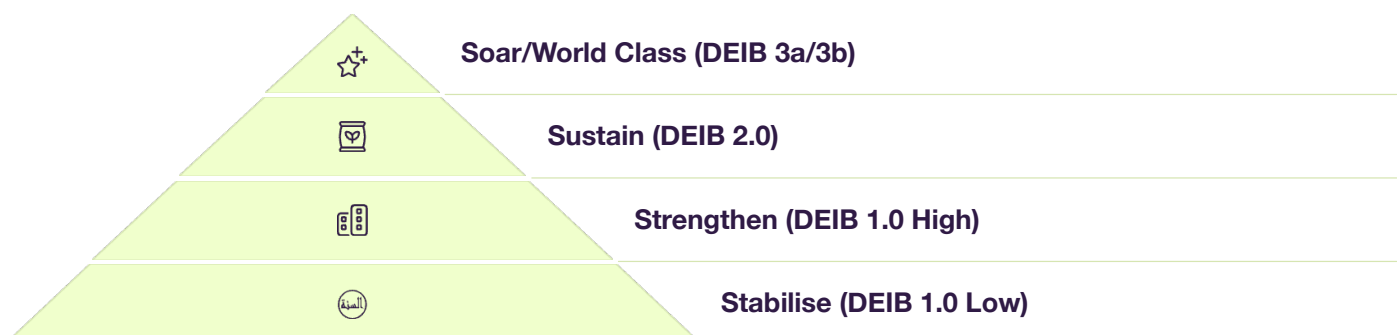
CoLC aims to embed EEDI principles across its departments and institutions through four key stages: 'Stabilise', 'Strengthen', 'Sustain' and 'Soar'.

During the SCAN Phase of the EEDI Review, high-level document analysis identified CoLC's linguistics related to EEDI and mapped them onto the Belonging Pioneers' Cultural Awareness and Needs Assessment Framework [\[The Belonging Pioneers' Framework\]](#) which Benchmarks organisations according to the following levels:

- Resistant (active opposition to DEIB initiatives),
- Stagnant (indifference and minimal effort),
- Fix & Compliance (reactive, legally driven) (DEIB 1.0)
- Strategic and Reliability (proactive, business-aligned – DEIB 2.0)
- Integral + Ownership (fully embedded in culture – DEIB 3.0a)
- Integral + Adaptable (dynamic – DEIB 3.0b)

EEDI In The Context of CoLC's Strategic Framework

The City of London Corporation has integrated EEDI principles into its strategic vision, establishing a progressive framework from 'Brilliant Basics' to 'World Class' excellence.



The EEDI developmental pathway aligns with CoLC's six strategic objectives, supported by the People Strategy's five themes and formal Equality Objectives. This integrated approach addresses both immediate 'Brilliant Basics' and aspirational 'World Class' standards.

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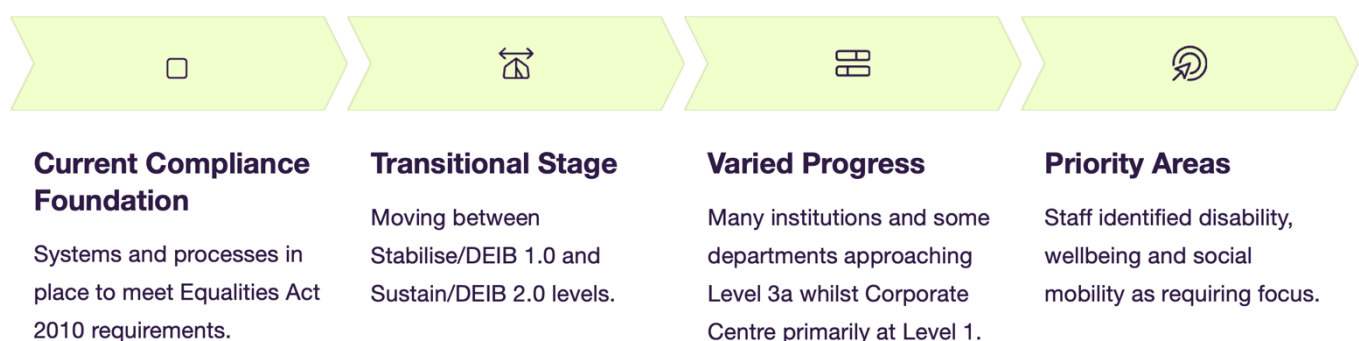
2.0 Key Findings and Recommendations

In reading the report of findings and recommendations, It should be noted that:

1. The analysis took place at a particular point in time. For example, the document review was based on documents received by 30th November 2024. As such, any developments since will not have been factored in.
2. The SCAN phase interventions were dependent on availability and engagement. As such there was an inherent imbalance of inputs from the different departments/institutions. This has impacted what was possible in the consistency of analysis and representation of all departments/institutions in a balanced way.
3. During the review, data was gathered from 5 interventions (a document review of over 300 documents, a survey completed by 850 staff across the organisation, 25 interviews with senior leaders, union representatives and functional content experts who have an EEDI brief, a listening circle with 26 active participants in EEDI across the organisation and a workshop with 20 senior leadership team members/ their nominated representatives and their senior EEDI content experts). The data corroborate, in the main, across the 5 interventions and hence validate the analysis and findings given that inputs were received from people who are in different roles, different grades and at different levels of engagement in EEDI across the organisation. The findings from the different interventions are evidenced in Annexes D to G and I. As such the following recommendations do not provide specific triangulation to analysis in the Annexes. A quick scan of the Annexes will validate what is provided in the recommendations. One pager overviews of each Annex is provided in this report.
4. The EEDI Review identified over 150 possible initiatives that will need to be reviewed, prioritised and actioned based on resource availability and potential impact. The Toolkit (Part 2) provides a methodology for assessing and prioritising the initiatives.
5. The CultureWeb analysis synthesised all inputs from an organisational context (control systems, organisational structures, power structures as well as the more subtle aspects of organisational narratives, symbols, routines and rituals). This work informed the 5 'Big Win' recommendations provided in this report.

EEDI Review: Current Position and Key Findings

The EEDI review reveals CoLC occupies a transitional position in its maturity journey, with the current leadership team working to bridge gaps following organisational stabilisation.



External initiatives like The City Belonging Project are creating more inclusive connections across the Square Mile, giving voice to 600,000+ city workers.

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2.1 Assessment of Starting State of EEDI in CoLC

The following recommendations are in the context of some challenging times CoLC faced prior to the current leadership team being appointed to their roles in the organisation and the consequent need to stabilise the organisation before it can realise the full potential of EEDI.

The review revealed that CoLC presently occupies a transitional position in its EEDI maturity journey with the current leadership progressing at pace to bridge the gaps and deliver on its ambitious plans for the future.

CoLC has the requisite systems and processes in place to comply with The Equalities Act 2010 and is also working to foster an equitable and inclusive environment for employees and service users alike. Discussions with staff that took place during the scan phase identified general Member behaviour as the principal experience of micro-aggressions and low-level disrespectful behaviours. Very little was said about gender or race specific issues. It is not clear whether this relatively low level of narrative about race/gender issues by people participating in the EEDI review interventions is due to these inequities having been resolved and no longer being an issue, or whether the level of psychological safety in the organisation is still insufficient for people from under-represented groups to speak up - even in a confidential space.

The main areas that CoLC staff identified as requiring focus were disability, wellbeing and social mobility. Pay gap performance is improving year on year. Substantial progress has been made in collecting diversity data and improving declaration rates for protected characteristics. CoLC is continuing efforts to align internal policies with external standards (e.g., GDPR compliance for sensitive data). It is also advancing initiatives that promote belonging and inclusion across diverse groups through internal efforts such as employee networks and inclusivity training and external efforts such as The City Belonging Project. The purpose of the City Belonging Project is to create a more inclusive and connected 'Square Mile' through a number of initiatives such as 'The City Belonging Networks' that connect diverse professionals working in City based organisations through specific 'networks of networks'. To date the City Belonging Project has launched: The City Muslim Network, The City Jewish Network, Latinos in The City, Women in The Square Mile, Veterans in The Square Mile and Social Mobility in The City. Initiatives like this are increasing CoLC's relevance to the 600,000+ workers who commute into London and creating mechanisms for them to have a voice in the running of the City they work in.

The review revealed that CoLC's EEDI approach currently operates between Stabilise and Strengthen/DEIB 1.0 (Fix & Compliance) and Sustain/DEIB 2.0 (Strategic & Reliable) on The Framework; with most institutions and some departments approaching Level 3a (Integral + Ownership). The Corporate Centre departments primarily operate at Level 1 with emerging movement towards Level 2, while cultural institutions, City Bridge Foundation, Family of Schools and City of London Police demonstrate more advanced strategies and practices around EEDI. In addition to the clearly articulated commitment and follow through from the leadership in these institutions, a number of external drivers have accelerated them to leadership positions in EEDI. Examples are the publication of Barbican Stories as mentioned previously and National Policing issues that had an impact on The City of London Police's progression in EEDI.

The review found that significant challenges exist across the organisation in terms of data collection, resource allocation, governance consistency, and embedding EEDI beyond compliance into organisational culture.

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The Three Pillars for EEDI Success

Successful EEDI initiatives require three foundational pillars identified by Belonging Pioneers. CoLC demonstrates strength in Vision and progress in Delivery but needs enhancement in Connection.

Vision	Connection	Delivery
Clear direction with strategic insight and measurable objectives.	Authentic engagement fostering trust, respect and belonging.	Translating commitments into tangible outcomes and accountability.

Analysis reveals strong SLT strategy but indicates a critical need to strengthen the Connection pillar. Organisational stabilisation efforts may contribute to this gap alongside EEDI-specific factors.

2.2 The Three Pillars for EEDI Success

- **Vision: Articulating a clear and ambitious direction for EEDI, grounded in evidence and strategic insight.** This involves defining and communicating a compelling vision for EEDI, setting measurable objectives and aligning them with organisational strategy. It ensures that EEDI ambitions are informed by data, best practice, and a thorough understanding of business context, providing a strong foundation for sustainable progress.
- **Connection: Fostering authentic engagement and shared commitment across the organisation.** This is about building meaningful connections by engaging colleagues, stakeholders, and communities in open dialogue, cultivating a culture of trust, respect, and belonging. Through active listening and inclusive collaboration, leaders ensure that diverse perspectives are valued and that everyone feels empowered to contribute to the EEDI journey.
- **Delivery: Translating vision and engagement into effective, measurable action.** The organisation drives tangible outcomes by implementing robust EEDI initiatives, embedding inclusive practices into operations, and holding people accountable for results. The focus is on delivering practical solutions, monitoring progress, and continuously improving to ensure that commitments lead to real, positive change.

Analysis of documents and conversations during the SCAN phase of the review identified that there is a robust strategy and Vision in the SLT, and results are starting to be delivered towards Brilliant Basics in terms of core infrastructure like the ERP system and the substantial task of updating the outdated HR Policies. However, insights from interventions during the scan phase of the review indicate a requirement to bring increased focus to the middle pillar, 'connection' as described above. This could be for multiple reasons and not solely due to EEDI. For example, the many initiatives underway to stabilise the organisation may be demanding additional time from colleagues who are struggling to keep up with their day jobs as well as contribute to stabilising and growing the organisation. However, as CoLC's strategic framework has EEDI as a golden thread that runs through The Corporate Plan, People Strategy and Equality Objectives, it would be prudent to consider that it is at least in part stemming from the need to improve aspects related to EEDI.

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Recommendations: Three Possible Quick Wins



Relaunch EEDI Across CoLC

Develop an organisation-wide communications campaign to strengthen the 'Connection' pillar and reposition EEDI efforts.



Share Part 1 of The Toolkit

Educate and empower colleagues with essential inclusive skills, establishing consistent standards for EEDI excellence.



Launch Recognition Programme

Acknowledge volunteer staff contributions to EEDI initiatives, addressing appreciation gaps whilst sharing best practices.

2.3 Recommendations

Three Possible Quick Wins

1. Relaunch EEDI Across CoLC

Design and launch a communications and engagement campaign across the whole organisation to reposition EEDI. The missing pillar in EEDI implementation at CoLC is 'Connection.' Through an 'honest and authentic' relaunch, CoLC can deliver a communication programme that acknowledges what has been lacking with EEDI in the past, inform colleagues of the good work that is underway and what is planned to evolve a more equitable and inclusive organisation going forward. The appointment of the new EEDI Director provides propitious timing for such a communication programme and the opportunity to signal a genuine commitment to change.

2. Share Part 1 of The Toolkit With All Colleagues As A Part Of The Relaunch

By using the Toolkit that is provided with this review (as a part of the engagement process in Quick Win 1) to educate and empower all colleagues in some of the critical skills for being more inclusive, the organisation will begin to create a consistent standard for what 'good' looks like around here' when it

Toolkit Menu

Inclusive Leadership & Action Planning Tools

EEDI Action Plans, EEDI SWOT and Risk Assessments, Regular Pulse Surveys, Checklists and key questions to ask yourself

Psychological Safety

Psychological safety communication sheets, guides for staff and managers, Key Scenarios and responses, crisis communication protocol, tip sheets

Active Bystander Toolkit

Why be an Active Bystander
How to be an Active Bystander
What can get in the way and how to overcome challenges

Intersectionality

Intersectionality Managing Conflicts Between People With Different Protected Characteristics

Disability & Neuro-Inclusion

Why this is important. Apparent and hidden conditions. Able privilege - how to recognise and steward it in yourself and others/

Communications & Events

Communication tools
EEDI Vocabulary guide
Inclusive Event Planning,

Signposting To Experts

Contact details for organisations specialising in EEDI-related services such as diversity audits, accessibility assessments, and community engagement.

By providing this toolkit, The City of London Corporation aims to empower its departments and institutions to take meaningful steps towards achieving world-class standards in EEDI. This is not just a guide but a call to action—to work collaboratively in creating a City that is inclusive for all now and into the future.

Click on the boxes above to navigate to the relevant section
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comes to EEDI. It will also provide colleagues with a shared tool through which they can be active bystanders and allies in contributing to a more psychologically safe environment.

Note: It is essential that this toolkit is shared sensitively and in person rather than as a general email distribution. For example, a 'Lunch and Learns' might have a more positive impact and address potential resistance. The topics in the toolkit have been selected to raise

EEDI awareness and address behavioural gaps identified during the EEDI Review. The Toolkit Menu above illustrates the key areas addressed.

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3. Launch A Recognition Programme For Volunteers Who Have Contributed To EEDI Across CoLC

Many volunteer staff make a significant contribution to the success of EEDI at CoLC. However, the SCAN phase identified that they do not experience being appreciated for their efforts. A recognition programme across the organisation will not only address this issue but also enable best practice to be shared in the process.






Interventions during the EEDI review such as the survey and listening circle identified that colleagues who work on EEDI at CoLC outside their day job experience that their contribution is not valued, attributed or recognised. Quick Win 3 is essential to keeping current contributors engaged and re-energising their involvement. It is important to make the recognition programme organisation wide

At its simplest, the recognition programme could be an announcement about the intention to recognise contributions to EEDI by people for whom it is not their day job, with an invitation to nominate colleagues online for their contribution to EEDI. If time and resources in the EEDI team permit, this could be supplemented by an EEDI credits model through which colleagues vote on the acknowledgements posted in the online page, leading to quarterly rewards such as experience days, time for additional training on a topic they want to develop themselves in, time away from their day jobs to develop good work, certificates and monetary or time-based rewards. An easy quick win would be to acknowledge everyone who has contributed to EEDI for whom it is not their day job - as a part of the engagement communications suggested in Quick Win 1, perhaps through an online 'wall of fame', with a communication about how the acknowledgement concept will be developed further.

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Five Possible Big Wins

Addressing middle management doubts and engaging changemakers requires strategic initiatives that strengthen organisational commitment to EEDI whilst recognising volunteer contributions.

 Develop Shared Purpose Create an inclusive 'why' that resonates across CoLC despite diverse services and regulatory models.	 Build Meaningful Connections Engage all stakeholders in open dialogue using an integral approach to EEDI	 Cross-Departmental Project Teams Establish agile teams with SLT sponsors to solve business challenges whilst developing EEDI awareness.
 Collaborative Federated Model Leverage institutional expertise through structured knowledge-sharing and co-created standards.	 EEDI-Integrated Technology Strategy Align Digital, Data and Technology capabilities to deliver transparent EEDI outcomes and insights.	

Five Possible Big Wins

Whilst the SLT are actively championing EEDI, the survey analysis (Annex D, Recommendation 4) illustrates that middle manager grades are doubtful about the organisation's commitment to EEDI. The survey data also illustrates that many colleagues who see themselves as changemakers want to contribute to/help shape EEDI but feel they are not given the opportunity. On the other hand, the listening circle and workshop conversations illustrated that a number of regular volunteers feel the organisation is using their labour, goodwill and enthusiasm to deliver EEDI work without valuing and recognising their contribution. The following EEDI initiatives will address these issues, increase engagement and energise EEDI at CoLC:

1. **Develop an increased sense of shared Purpose for EEDI with all staff and Stakeholders.**
What's the 'why' that will resonate with all colleagues, Members and service users to evolve an integrated approach to EEDI at CoLC? Achieving the level of inclusive collaboration required will be challenging and complex given the diversity of services, regulatory and funding models. However, the process of reaching this shared purpose alone will start to shift the culture in the organisation and enable increases in productivity, innovation and stakeholder engagement. The art here is to develop a purpose at a level that the full population can engage with in some way. It will require an innovative and perhaps groundbreaking approach in terms of where EEDI is at today.
2. Find ways to **build meaningful connections** by engaging all colleagues, stakeholders, and communities in an open dialogue about what this shared purpose might look like, cultivating a culture of trust, respect, and belonging. The key here will be a level of listening that goes beyond personal views and objectives to truly hear what's been said – irrespective of whether they are from an under-represented group or from those who are considered to have privilege. This will require a win-win approach using integral EEDI tools such as those Belonging Pioneers are currently evolving through its Pioneers Movement community.
3. Consider innovative and cost-effective approaches to engaging stakeholders in the progression of EEDI. For example, the change agents identified in the survey who want to contribute to shaping and implementing EEDI will appreciate the opportunity to step up. One approach would be to set up a project structure that involves **agile, cross departmental/institutional teams** focused on solving a business relevant issue that they are interested in working on. This would enable them to develop themselves, increase their visibility and at the same time enable CoLC to gather input to

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the development of a shared purpose. The appointment of SLT members as sponsors to these teams will also open up the opportunity of mentoring/reverse mentoring – thereby mutually developing awareness and capability. Operating this initiative through short term secondments (for example) will address the challenge of people having to work unpaid extra time to contribute to EEDI. The cross-organisational nature of this approach will also help to build relationships and trust between different parts of the organisation. The approach suggested here is conceptual in design. Its purpose is to illustrate how a number of different recommendations could be combined to have a positive impact not only on EEDI, but also on organisational performance.

4. Given that many of the institutions are ahead in their implementation of EEDI, the centre can gain significant benefit and accelerate implementation of EEDI from the experience and wisdom of colleagues in the institutions. There are many pockets of good practice that can be adapted either as a shared solution across the whole organisation or used to increase capability to accelerate becoming World Class in a specific sector such as the cultural sector. However, the current hub and spoke operating model makes it challenging for those leading in EEDI outside the centre to share expertise. One approach would be to consider a slightly different operating model for EEDI - a collaborative federated operating model.

Key Differences Between A Collaborative Federated Model and a Hub and Spoke Model:

A collaborative federated operating model blends the autonomy and agility of a federated approach with intentional, structured collaboration and knowledge-sharing across units. This is distinct from both a purely federated model (where units operate independently) and a hub and spoke model (where the hub sets direction and the spokes follow). The table below identifies how this model differs and what the pros and cons are when the spokes are ahead of the hub in EEDI:

Aspect	Collaborative Federated Model	Hub and Spoke Model
Structure	Decentralised, but with active, structured collaboration and shared governance	Central hub sets strategy, spokes adapt and implement
Decision Making	Local units retain autonomy but co-create standards, share best practice, and align on priorities	Hub leads, spokes follow and feed back
Knowledge Sharing	Systematic sharing and scaling of innovations across all units	Hub disseminates knowledge, spokes may have less input
Alignment	Achieved through consensus, shared frameworks, and regular cross-unit engagement	Achieved through central mandates and governance
Resource Pooling	Resources, tools, and expertise are pooled and targeted collaboratively	Hub provides resources, spokes consume

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Pros when local units are ahead of the Centre in EEDI, this model:

- **Scales Best Practice Quickly:** Advanced spokes can lead communities of practice, mentor others, and help co-create EEDI frameworks that are adopted across the federation, accelerating overall progress.
- **Empowers Local Innovation:** Spokes retain the freedom to innovate and adapt EEDI approaches to their context, while still contributing to collective learning and improvement.
- **Builds Collective Ownership:** Shared decision-making and mutual support foster a sense of ownership and accountability for EEDI outcomes across all units, not just the hub.
- **Reduces Duplication:** Collaboration helps avoid redundant efforts and enables pooling of resources, tools, and data for greater efficiency.
- **Enhances Consistency:** While local autonomy is preserved, regular collaboration and shared frameworks help maintain a baseline of consistency in EEDI standards and reporting.

Challenges of implementing collaborative, federated governance for EEDI

- **Complex Governance:** Requires robust, inclusive governance structures to coordinate collaboration, resolve conflicts, and ensure accountability without stifling local initiative.
- **Potential for Slower Consensus:** Achieving agreement across diverse, autonomous units can take time, especially if some are more advanced than others.
- **Risk of Uneven Progress:** Less advanced units may struggle to keep pace, and without strong facilitation, the benefits of leading spokes may not be fully realised.
- **Resource Demands:** Effective collaboration needs investment in facilitation, communication platforms, and shared learning infrastructure.
- **Data and Process Inconsistency:** Without careful management, differences in data definitions, processes, or reporting can persist, complicating organisation-wide measurement and benchmarking.

The key to success in a collaborative federated model is strong, inclusive governance and a culture of open collaboration, ensuring that innovation is harnessed for the benefit of the whole organisation, not just individual units

5. **Including an EEDI view in the Digital, Data, and Technology Strategy.** The DDaT Strategy is central to achieving CoLC's EEDI objectives under the Corporate Plan 2024–2029. By aligning data infrastructure, predictive analytics, and risk mitigation, the strategy ensures robust, actionable insights to drive equitable outcomes across services, workforce, and communities. Below are the critical technological steps and recommendations to accelerate progress. The following steps will enable robust, data-driven, and transparent progress on EEDI objectives, ensuring that technology directly supports equitable outcomes across all CoLC services, workforce, and communities

a) EEDI Data Integration for Transparent Reporting

All departments and institutions have critical data requirements to fulfil statutory, regulatory and business needs. The adoption of a shared technology roadmap estate for the whole of CoLC, including the City of London Police, Barbican Centre, Guildhall School of Music and Drama and the Schools, does mean that:

- The DDaT Strategy's '**Brilliant Basics**' approach centralises EEDI metrics (e.g., disability disclosure rates, pay gaps) into a unified Corporate Data Platform for all. The OneLake is a start in the right direction, though there is a need for urgency as the business interaction between stakeholder, users, workers and visitors will create a complex mix of technology demands on the Centre.
- Consolidate EEDI metrics (e.g., disability disclosure rates, pay gaps) into a single source of truth.

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b) Technology Convergence for Effectiveness – Progressing from Data to Information to Insight and Knowledge

It is hoped when the new ERP system goes live, the organisation will be able to:

- ✦ Deploy dynamic dashboards to track workforce diversity, service accessibility, and community engagement metrics.
- ✦ Integrate automated accessibility checkers into the DDaT user centered design workflow

c) Predictive Analytics to Support Effective Decision Making in EEDI

To enable the EEDI journey from Brilliant Basics to World-Class, the DDaT governance framework aims to use predictive analytics to support the following:

- ✦ Forecast policy impact for services, underrepresented groups, staff and protected characteristics.
- ✦ Ability to analyse community feedback from the CoLC's stakeholder's (including user, groups, customers, visitors, officers and members) prioritising seldom-heard voices.
- ✦ Identify social mobility barriers using Intersectionality data

d) Strategic Risk Mitigation

The DDaT Strategy if implemented fully will assist CoLC to reduce legal and operational risk by:

- ✦ Partnering with UKRI to adopt the social mobility index methodology for workforce analytics.
- ✦ Ensuring PSED compliance through granular, real-time EEDI disclosures.
- ✦ Aligning with ISO 30415:2021 (EDI in HR)
- ✦ Integrating with the Shared Technology Roadmap to align EEDI targets with procurement processes.

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What Would Be Possible If CoLC Gets This Right?

Successful implementation of EEDI and Digital strategies would transform CoLC into an exemplar organisation, creating tangible benefits for staff, stakeholders and communities.



Stronger organisational fabric

Authentic engagement fostering connection, trust and belonging across all CoLC entities.



Culture of inclusion

Consistent standards empowering staff as active allies with psychological safety.



Data-driven progress

Integrated metrics and predictive analytics enabling proactive equality interventions.



Operational excellence

Streamlined processes reducing duplication whilst strengthening PSED compliance.



Community impact

Enhanced service delivery promoting social mobility throughout the Square Mile.

These outcomes would position CoLC as an emerging world-class leader in embedding EEDI principles across public service delivery.



What Would Be Possible If CoLC Gets This Right?

If CoLC successfully implements the recommended EEDI initiatives and the Digital, Data, and Technology (DDaT) Strategy as outlined, several significant positive outcomes would be possible:

1. Stronger Organisational Connection and Engagement

By relaunching EEDI with a focused communications and engagement campaign, CoLC would foster a shared sense of purpose and connection among all staff, members, and stakeholders. This would increase authentic engagement, build trust, and cultivate a culture of respect and belonging across the diverse organisation and its service users. Empowered colleagues would feel valued and motivated to contribute actively to EEDI efforts, thereby improving overall organisational cohesion and productivity.

2. Consistent and Inclusive Standards of Behaviour

Sharing an EEDI Toolkit with all colleagues and encouraging its use would establish a consistent standard for inclusive behaviours and psychological safety. This would assist staff in being confident and effective as active bystanders and allies, contributing to a more supportive and inclusive environment. Recognition programmes for volunteers would further reinforce positive contributions and encourage widespread participation in EEDI initiatives.

3. Accelerated and Data-Driven EEDI Progress

Through DDaT Strategy including an EEDI lens, CoLC would centralise and integrate EEDI data across all departments and institutions into a unified Corporate Data Platform. This would provide a single source of truth for metrics like disability disclosure rates and pay gaps, supported by dynamic dashboards for real-time monitoring of workforce diversity, service accessibility, and community engagement. Predictive analytics would enable forecasting of policy impacts and identification of social mobility barriers, helping the organisation to proactively address inequities.

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4. Enhanced Organisational Efficiency and Risk Management

Technology convergence via a new ERP system and a shared technology roadmap would streamline data management and reporting processes, reducing duplication and improving efficiency. Strategic risk mitigation would be strengthened by ensuring compliance with legal obligations such as the Public Sector Equality Duty (PSED) and alignment with standards like ISO 30415:2021. This would reduce legal and operational risks associated with EEDI.

5. Collaborative and Innovative EEDI Governance

Adopting a collaborative federated operating model would enable CoLC's institutions and departments to share best practices, innovate locally, and co-create EEDI standards while maintaining autonomy. This approach would accelerate scaling of good practice, foster collective ownership, and enhance consistency across the organisation, ultimately driving CoLC towards becoming a world-class leader in EEDI.

6. Improved Stakeholder and Community Outcomes

By prioritising seldom-heard voices and engaging diverse stakeholders in open dialogue, CoLC would better understand and meet the needs of its communities. This inclusive approach would enhance service delivery, promote social mobility, and strengthen the organisation's reputation as a fair and equitable public body.

In summary, getting these elements right would enable CoLC to embed EEDI deeply into its culture and operations, making it a more inclusive, innovative, and resilient organisation that delivers equitable outcomes for its workforce, service users, and the wider community. This would also support CoLC's broader strategic goals under its Corporate Plan 2024–2029, enhancing organisational performance, stakeholder trust, and legal compliance.

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What Would Happen If CoLC Gets It Wrong When Implementing These EEDI Review Recommendations?

If CoLC gets its EEDI efforts wrong, several negative consequences could arise:

1. Erosion of Trust and Engagement

Failure to build a shared sense of purpose and connection around EEDI could deepen scepticism, especially among middle managers and changemakers who want to contribute but feel excluded. Volunteers and staff may feel undervalued and exploited, leading to disengagement, lower morale, and reduced participation in EEDI initiatives. This would undermine organisational cohesion and the culture of inclusion CoLC seeks to foster.

Mitigation Strategies:

- **Anonymous Pulse Surveys:** Regularly deploy short, anonymous surveys to gauge morale and gather candid feedback on EEDI efforts. Act on findings and communicate changes made as a result.
- **Peer-Led Listening Sessions:** Facilitate peer-led, small-group listening sessions (not management-led) to create psychologically safe spaces for honest dialogue, especially for those who may feel excluded or undervalued.
- **Transparent Failure Sharing:** Publicly acknowledge where EEDI efforts have fallen short and outline corrective actions, demonstrating humility and a commitment to learning.

2. Inconsistent and Ineffective EEDI Implementation

Without consistent tools, training, and recognition, standards for inclusive behaviour will remain unclear, resulting in uneven application of EEDI principles across departments and institutions. This inconsistency risks perpetuating unconscious bias, psychologically unsafe environments, and barriers for underrepresented groups, limiting progress toward a truly inclusive workplace.

Mitigation Strategies:

- **Staff Networks:** Give staff networks autonomy and resources to advocate for their needs and drive grassroots consistency across the organisation.
- **Inclusive Policy Audits:** Conduct regular, external audits of policies and procedures to identify and address inconsistencies or bias, ensuring uniformity in EEDI standards.
- **Blind Process Reviews:** Use blind CV screening and anonymised decision-making in recruitment and promotions to reduce unconscious bias and standardise inclusive practices.

Risk Mitigation: Avoiding EEDI Implementation Pitfalls

Erosion of Trust

Staff disengagement and volunteer exploitation would undermine CoLC's inclusive culture.

- Deploy anonymous pulse surveys
- Facilitate peer-led listening sessions
- Share failures transparently

Inconsistent Implementation

Unclear standards perpetuate unconscious bias and create psychologically unsafe environments.

- Empower autonomous staff networks
- Conduct inclusive policy audits
- Implement blind process reviews

Missed Opportunities

Failing to identify and address systemic inequities, social mobility barriers, and community needs through lack of predictive analytics and real time reporting.

- External Benchmarking
- Diverse Decision Panels
- Real time data dashboards



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3. Missed Opportunities and Poor Decision Making

Inadequate use of data and technology to integrate, analyse, and act on EEDI metrics will reduce transparency and hinder evidence-based decision making. Without predictive analytics and real-time reporting, CoLC risks failing to identify and address systemic inequities, social mobility barriers, and community needs. This can lead to ineffective policies and services that do not meet diverse stakeholder expectations.

Mitigation Strategies:

- **External Benchmarking:** Routinely benchmark EEDI data and practices against similar organisations to spot gaps and best practice you might otherwise miss.
- **Diverse Decision Panels:** Require diverse panels for all major decisions (hiring, policy, procurement), ensuring a range of perspectives and reducing the risk of groupthink.
- **Real-Time Data Dashboards:** Implement real-time, public-facing dashboards for key EEDI metrics, increasing transparency and enabling rapid course correction

4. Increased Legal and Operational Risks

Failure to comply with Public Sector Equality Duty (PSED) and relevant standards (e.g., ISO 30415:2021) due to poor data governance and risk mitigation could expose CoLC to legal challenges and reputational damage. Weak alignment between EEDI targets and procurement or HR processes may compound these risks, resulting in costly consequences and loss of public confidence.

Mitigation Strategies:

- **External Legal Reviews:** Schedule periodic external legal reviews of EEDI policies and data governance to ensure compliance with evolving regulations and standards.
- **Whistleblowing Channels:** Establish confidential, well-publicised whistleblowing channels specifically for EEDI concerns, with guaranteed non-retaliation and clear follow-up processes.
- **Scenario Planning:** Conduct scenario planning exercises (such as mock audits or discrimination claims) to test and strengthen risk mitigation processes.

Risk Mitigation: Avoiding EEDI Implementation Pitfalls

Increased Legal and Operational Risks

Exposure to legal challenges and reputational damage through failure to comply

- External Legal Reviews
- Whistleblowing channels
- Scenario planning

Cultural Leadership Failings

Failure to implement strong leadership and accountability leads to disengagement and reputational harm

- 360-Degree leadership reviews
- External EEDI Coaching
- Leadership shadowing

Governance Fragmentation

Siloed approaches prevent knowledge-sharing and create uneven progress.

- Establish cross-unit rotations
- Create digital collaboration hubs
- Pilot federated governance models



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5. Fragmented Governance and Slower Progress

Maintaining a hub-and-spoke model without effective collaboration risks isolating advanced units and preventing the sharing of best practices. This could lead to uneven progress, duplication of effort, and inefficiencies. Without strong, inclusive governance and a culture of open collaboration, innovation may be stifled and organisational ownership of EEDI diluted.

Mitigation Strategies:

- **Cross-Unit Rotations:** Create temporary cross-departmental secondments or project teams so staff can share knowledge and best practice, breaking down silos.
- **Shared Digital Collaboration Hubs:** Launch a digital collaboration platform (for example, an internal wiki or Slack channel) dedicated to EEDI, where teams can share resources, innovations, and updates in real time.
- **Federated Governance Pilots:** Pilot a federated governance model in select areas, evaluate its impact, and scale up based on lessons learned, rather than a wholesale shift all at once.

6. Cultural and Leadership Failings

If CoLC does not implement EEDI recommendations effectively—with strong leadership, accountability, and a genuine commitment to culture change, the organisation could face a toxic workplace, disengaged staff, reputational harm, and ultimately fail to achieve its EEDI and strategic goals. This includes addressing discriminatory behaviours and challenging exclusionary practices such as bullying, harassment, and marginalising those who speak up or hold different views.

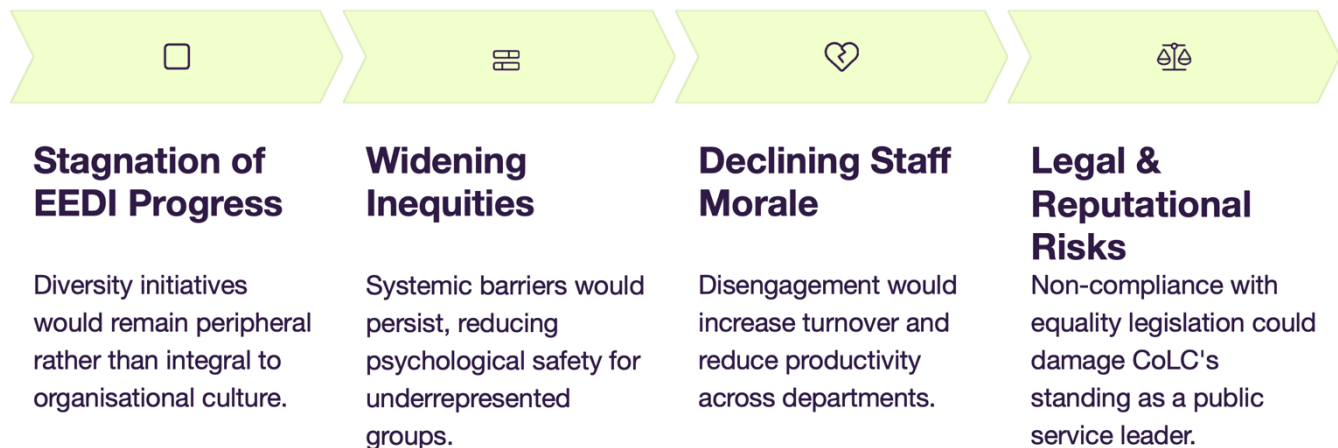
Mitigation Strategies:

- **360-Degree Leadership Reviews:** Implement 360-degree feedback for all leaders, including EEDI-specific competencies, with results tied to performance reviews and development plans.
- **External EEDI Coaching:** Provide external coaching or mentoring for leaders (not just internal training), focusing on inclusive leadership and accountability.
- **Leadership Shadowing:** Arrange for senior leaders to shadow staff from different backgrounds and levels, fostering empathy and first-hand understanding of inclusion challenges.

By embedding these tangible mitigation strategies, CoLC can proactively address the root causes of each risk, increase resilience, and ensure EEDI progress is authentic, sustainable, and widely supported.

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What Would Happen If CoLC Did Nothing With The EEDI Review Recommendations?



Inaction would ultimately undermine CoLC's strategic ambitions for 2024-2029, eroding community trust and hindering service delivery throughout the Square Mile.

What Would Happen If CoLC Did Nothing With The EEDI Review Recommendations?

If CoLC chooses to do nothing in response to the recommendations outlined, several adverse outcomes could occur:

1. Stagnation of EEDI Progress

Without relaunching EEDI initiatives, sharing tools, or fostering connection, the organisation risks stagnating in its diversity and inclusion efforts. The consequent lack of momentum could lead to a culture where EEDI remains peripheral rather than integral, making meaningful change unlikely and perpetuating existing inequalities.

2. Widening Inequities and Exclusion

Failure to develop a shared purpose, engage staff, or recognise volunteers' contributions could deepen feelings of disconnect and marginalisation among underrepresented groups and allies. This could reinforce systemic barriers, reduce psychological safety, and hinder efforts to create an inclusive environment.

3. Reduced Staff Engagement and Morale

Ignoring the need for active communication, recognition, and connection can lead to disengagement, dissatisfaction, and a decline in morale among staff and volunteers. This can increase turnover, reduce productivity, and undermine efforts to foster a positive workplace culture.

4. Missed Opportunities for Organisational Improvement

By not leveraging good practices, insights from advanced institutions, or innovative engagement methods, CoLC would miss opportunities to accelerate progress. The organisation would likely continue to operate with inefficient, reactive, and siloed approaches rather than proactive, collaborative, and strategic ones.

5. Increased Legal and Reputational Risks

Neglecting the importance of continuous measurement, accountability, and embedding EEDI into organisational culture could lead to non-compliance with legal obligations, such as anti-discrimination laws. This increases the risk of legal challenges, fines, and reputational damage, especially if inequalities persist or worsen.

6. Failure to Achieve Strategic Goals

Without a committed, connected, and well-supported approach, CoLC would struggle to meet its strategic objectives related to EEDI, including becoming a 'world-class' organisation. This would undermine its reputation as a fair, inclusive, and innovative leader within the public sector.

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7. Impact on Community and Stakeholder Trust

Inaction could erode trust among communities, service users, and stakeholders who expect the organisation to uphold principles of fairness and inclusion. This could diminish the organisation's legitimacy and effectiveness in delivering equitable services.

Choosing not to act on these recommendations would likely result in stagnation, increased inequalities, organisational disengagement, legal risks, and reputational damage. It would hinder CoLC's ability to foster a truly inclusive environment, deliver equitable outcomes, and meet its strategic ambitions for 2024–2029 and beyond.

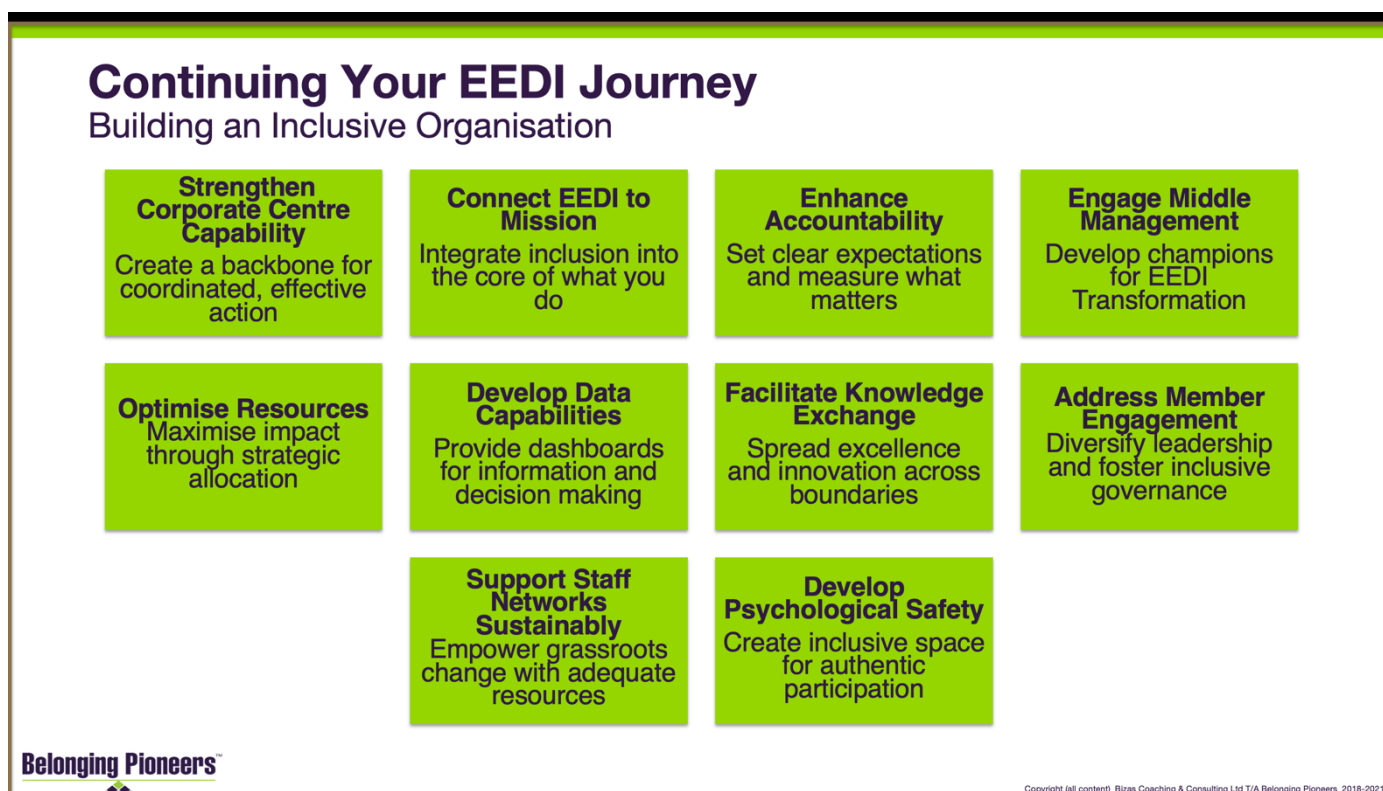
Summary:

The 3 Quick Win' recommendations in this report are designed to enable rapid follow through to the momentum and engagement created through the EEDI Review process. This will ensure continuity at minimum cost.

The 5 'Big Win' recommendations in this report are what the review analysis identified as having the potential for most impact based on Belonging Pioneers' experience of EEDI implementation. They will enable a foundation for sustainable change.

Annexes B-G and I of the main report contain specific and detailed recommendations. For example, the Tables in Annex B highlight key findings from the review and provide recommendations in relation to resources, policy and guidance, EEDI learning and development, infrastructure, services and data. It covers pockets of good practice as well as what is required to achieve Brilliant Basics and World Class.

All recommendations fall into one of 10 core themes as illustrated in the diagram below.



In total the review identified in the region of 150 potential initiatives, some of which are more challenging and complex, others of which are simple to implement and clear. The Toolkit Part 2 (Page 11) provides a methodology for prioritising all recommendations and will support the development of an implementation plan for Phase 2 of the EEDI Review.

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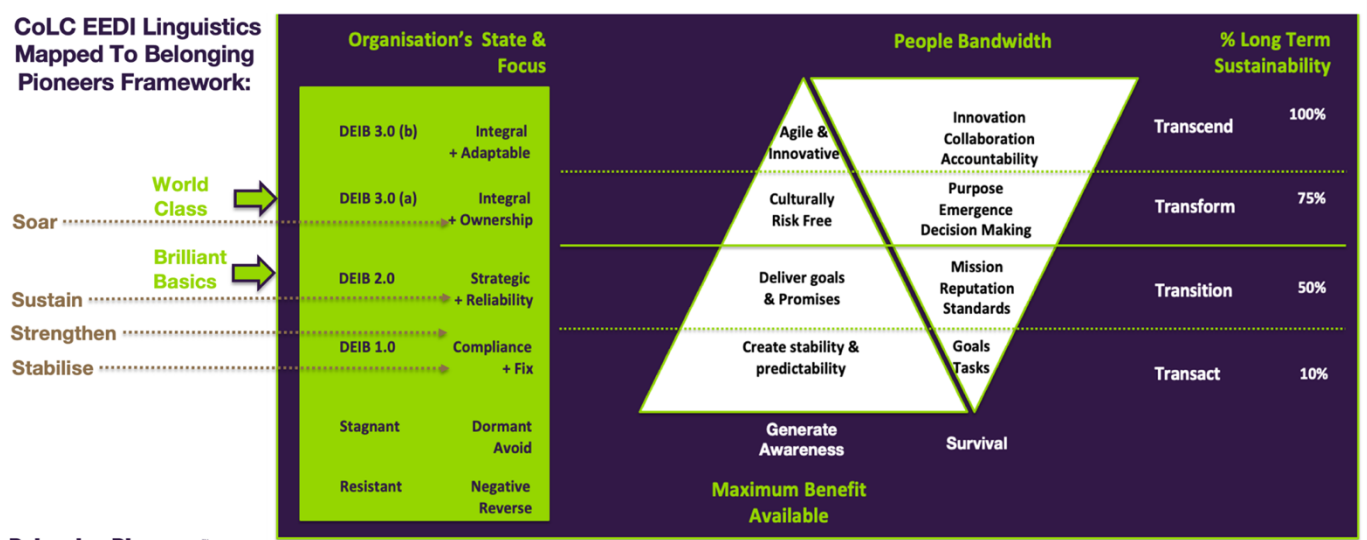
Executive Overview of Framework, Methodology and Approach (Annex A of Main Report)

Framework Overview

The Belonging Pioneers' Framework evaluates organisational EEDI maturity across a spectrum from resistant and stagnant attitudes, through compliance and strategic alignment, to fully integrated and adaptive practices. The levels range from:

- **Resistant** (active opposition to DEIB initiatives),
- **Stagnant** (indifference and minimal effort),
- **Fix & Compliance** (reactive, legally driven),
- **Strategic and Reliability** (proactive, business-aligned),
- **Integral + Ownership** (fully embedded in culture),
- **Integral + Adaptable** (dynamic, evolving, and a core part of organisational DNA).

This framework was used to map CoLC's strategic EEDI benchmarks as illustrated below.



Methodology

The review followed the Belonging Pioneers' Scan-Focus-Act methodology:

- **Scan Phase:** Analysed CoLC's language and definitions around EEDI, including key concepts such as 'World Class' (excellence and leadership across all strategic outcomes) and 'Brilliant Basics' (operational excellence and robust foundations) as well as the four key phases of EEDI maturity in CoLC's model: Stabilise, Strengthen, Sustain, and Soar.
The review mapped these definitions onto the framework and identified
 - **DEIB 1.0 (Low)** = **Stabilise:** Address immediate compliance and governance needs.
 - **DEIB 1.0 (High)** = **Strengthen:** Build robust systems and align with strategic priorities.
 - **DEIB 2.0 (Low)** = **Sustain:** Embed EEDI practices for long-term consistency.
 - **DEIB 3.0** = **Soar:** Achieve leadership & innovation in EEDI. Set benchmarks for others.
- **Focus Phase:** Incorporated insights from a Senior Leadership Team (SLT) workshop, where over 20 colleagues, including EEDI experts, contributed practical perspectives on achieving 'Brilliant Basics' and 'World Class' standards across three service user communities: London as a destination, Services, and Culture and Learning.
- **Act Phase:** Used the Cynefin 4-Point Framework (Clear, Complicated, Complex, Chaotic) to categorise and prioritise the narratives and challenges identified, enabling the organisation to address issues according to their complexity and impact.

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Executive Overview: Pockets Of Good Practice And Detailed Recommendations (Annex B)

This Annex provides a comprehensive review of CoLC's current strengths, challenges, providing actionable recommendations for advancing EEDI across its operations, in alignment with its Corporate Plan, People Strategy, and Equality Objectives for 2024–2029.

Note: The Author intended to distil the information in this document to make it more readable, but project timelines did not permit. This document contains ideas for CoLC to stand out in Brilliant Basics and World Class. The recommendation is to review the content in detail using the prioritisation tool provided in the Toolkit that accompanies the review in order to mine the value in this document.

Key Findings

❖ **Policy and Guidance:**

CoLC's policies are aligned with national frameworks such as the Equality Act 2010 and show an emerging focus on intersectionality and inclusive procurement. However, translating high-level commitments into actionable, intersectional policies remains a challenge. There is a risk of policies being too generic or compliance-driven, rather than innovative and tailored to the complex needs of diverse communities.

❖ **Balancing Global and Local Priorities:**

As both a global financial centre and a local authority, CoLC faces challenges in harmonising global ambitions with local equity needs. Initiatives like the Socio-Economic Diversity Taskforce and City Belonging Project exemplify efforts to bridge these priorities, but more cohesive frameworks are needed to prevent fragmentation and ensure equitable outcomes for all stakeholders.

❖ **Learning and Development:**

There is a strong foundation in inclusive leadership development – particularly at City of London Police, with targeted coaching, training, and maturity models in place. Yet, leadership teams require enhanced and ongoing cultural competency training to embed inclusive practices and drive systemic change.

Strategic Recommendations

❖ **Funding and Resource Allocation:**

Prioritise cross-departmental collaboration, transparency in EEDI funding, and expansion of external partnerships. Embed equity-focused budgets and collaborative funding models across institutions to ensure sustainability and impact.

❖ **Leadership Development:**

Mandate accountability for EEDI in leadership appraisals, strengthen governance structures, and foster cross-departmental collaboration. Invest in advanced, immersive cultural competency training and reverse mentoring to build leadership capacity and drive innovation.

❖ **Policy Modernisation:**

Develop intersectional policy toolkits, embed intersectionality and equity analysis into all strategic frameworks, and co-design policies with marginalised communities. Leverage data dashboards and participatory approaches to ensure policies are evidence-based and responsive to diverse needs.

❖ **Balancing Compliance and Innovation:**

Shift from a compliance-driven to an innovation-focused mindset by piloting EEDI innovation labs, integrating equity into digital and climate strategies, and reframing compliance as a catalyst for proactive change.

❖ **Global-Local Alignment:**

Embed local equity clauses in global economic strategies, align sustainability initiatives with community benefits, and establish advisory panels and equity funds to ensure that global growth uplifts local communities.

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(An Edited Extract Of The Content In Annex B)

What CoLC is doing well:	Issues and challenges CoLC has to overcome to achieve Brilliant Basics in the context of its Corporate Plan, People Strategy, and Equality Objectives	Issues and challenges CoLC has to overcome to achieve World Class in the context of its Corporate Plan, People Strategy, and Equality Objectives
1.2 Resources: People, Funding, and Materials – Leadership Capacity		
<p>Leadership capacity Pockets of Good Practice:</p> <p>1. Guildhall School of Music & Drama (GSMD): Transformational Feedback and Leadership Development. Training for more than 80 staff members in Critical Response Process (CRP) and coaching methodologies, to develop leadership skills that enhance trust, resilience, and reflective practice.</p> <p>2. Barbican Centre: Inclusive Leadership Coaching for Diversity Network Co-Chairs</p> <p>3. City of London Police - Embedding EDI into Leadership Accountability - establishment of the Equality & Inclusion Strategic Board, chaired by the Assistant Commissioner, where leaders must demonstrate progress in embedding EEDI into their operations.</p>	<p>Leadership capacity gaps There is a need to strengthen leadership buy-in and expertise to champion EEDI effectively, ensuring leaders role-model inclusive behaviours and drive systemic change across the organisation.</p> <p>1. Corporate Strategy and Performance Team (CSPT): Mandatory EEDI Leadership Training Issue: Only 27% of staff believe leaders demonstrate EEDI values, and leadership buy-in is inconsistent. Action:</p> <ul style="list-style-type: none"> • Implement mandatory EEDI leadership training for all senior leaders. • Use insights from the EEDI Review to tailor training content to address specific gaps identified in leadership practices. • Align training outcomes with performance reviews, requiring leaders to demonstrate how they have applied EEDI principles in strategic decisions (e.g., budget allocations, policy design). 	<p>Leadership capacity gaps must be addressed with a more strategic and visionary approach. Leaders must demonstrate the ability to innovate and drive transformational change and actively champion EEDI as an essential enabler of organisational success.</p> <p>Examples of what CoLC can do: Nominate one of the Institutions currently leading in EEDI to establish a collaborative leadership forum. For example, City Bridge Foundation (given it already has expertise of significant partnership work, and is one of the leaders in EEDI at CoLC) could create a Collaborative EEDI Leadership Forum that brings together leaders from CoLC institutions to share best practices and co-develop innovative solutions for systemic challenges. This forum could:</p> <ul style="list-style-type: none"> • Focus on leveraging lived experiences within leadership teams to shape policies and practices that resonate globally. • Use pooled resources from partner organisations to fund large-scale leadership development initiatives targeting socio-economic equity across London. <p>Data point: Survey data and qualitative feedback highlight that staff in City Bridge Foundation report higher engagement, a stronger sense of inclusion, and a more collaborative culture compared to some other parts of CoLC</p>
<p>Strategic Alignment:</p> <ul style="list-style-type: none"> • Corporate Plan 2024–2029: 'Exemplary services that meet the needs of all communities.' • Equality Objectives 2024–2029: 'Leaders role-modelling inclusive behaviours and driving systemic change.' 		

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Executive Overview of What Needs To Change For A Culture That Supports EEDI To Emerge (Annex C)

The CultureWeb Report offers a concise analysis of how organisational culture within CoLC and its institutions shapes the progress and maturity of EEDI. Using the Johnson and Scholes CultureWeb framework, the report examines six elements—stories and myths, rituals and routines, symbols, power structures, organisational structures, and control systems—to identify both enablers and barriers to EEDI.

Key Findings:

- **Transitional Culture:** CoLC is moving from compliance-led to more strategic EEDI approaches. Maturity varies widely, with the institutions such and some departments leading in EEDI integration.
- **Competing Narratives:** The organisation's historic identity can both support and slow EEDI progress. While heritage is used to justify EEDI, it can also legitimise resistance. The image of the Square Mile as a global hub does not always match the experiences of underrepresented groups.
- **Inconsistent Rituals:** While rituals exist, their impact is uneven. Advanced areas have regular governance and reporting, but daily behaviours and psychological safety remain inconsistent.
- **Symbolic Tensions:** Historic buildings and symbols reflect tensions between tradition and modern values. Some departments promote diversity, but overall commitment is inconsistent.
- **Power and Resources:** Formal structures support EEDI, but informal influence and resource allocation are variable. Staff networks are active, but progress is hampered by resource constraints and traditional hierarchies.
- **Structural Silos:** EEDI implementation is fragmented, with limited cross-departmental collaboration and knowledge sharing, leading to inefficiencies.
- **Accountability:** Performance measurement varies; some departments have clear KPIs, others lack defined metrics, making progress difficult to sustain.

Patterns and Contradictions:

- There is a gap between EEDI commitments and actual resources or implementation.
- Positive attitudes are not always matched by action.
- The institutions are generally more advanced than administrative departments. Opportunities for knowledge transfer and sharing of best practice is currently limited by the hub and spoke operating model.
- Middle management doubts about investment in EEDI and compliance-driven attitudes hinder EEDI's spread.

Recommendations:

1. **Bridge Central Paradigms:** Explicitly align EEDI with departmental missions using relevant approaches.
2. **Accelerate Change:** Challenge slow-progress narratives and use change management to boost engagement.
3. **Evolve Rituals:** Expand leadership coaching, inclusive training, and psychological safety initiatives; review traditional practices for exclusion.
4. **Transform Power Structures:** Establish succession planning, targeted development, and minimum EEDI resourcing.
5. **Redesign Structures:** Consider a collaborative federated governance model to facilitate sharing and implementation of best practice.
6. **Strengthen Governance:** Standardise data collection, reporting, and embed EEDI in performance reviews.

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Executive Overview Of What 850 Staff Say About EEDI At CoLC (Annex D)

The EEDI Survey Analysis Report presents a comprehensive review of CoLC's EEDI landscape, based on extensive staff survey data and correlation analysis. The findings reveal an organisation with a solid foundation in EEDI but with significant opportunities for improvement, particularly in engagement, leadership accountability, communication, and addressing socioeconomic barriers.

Key Findings

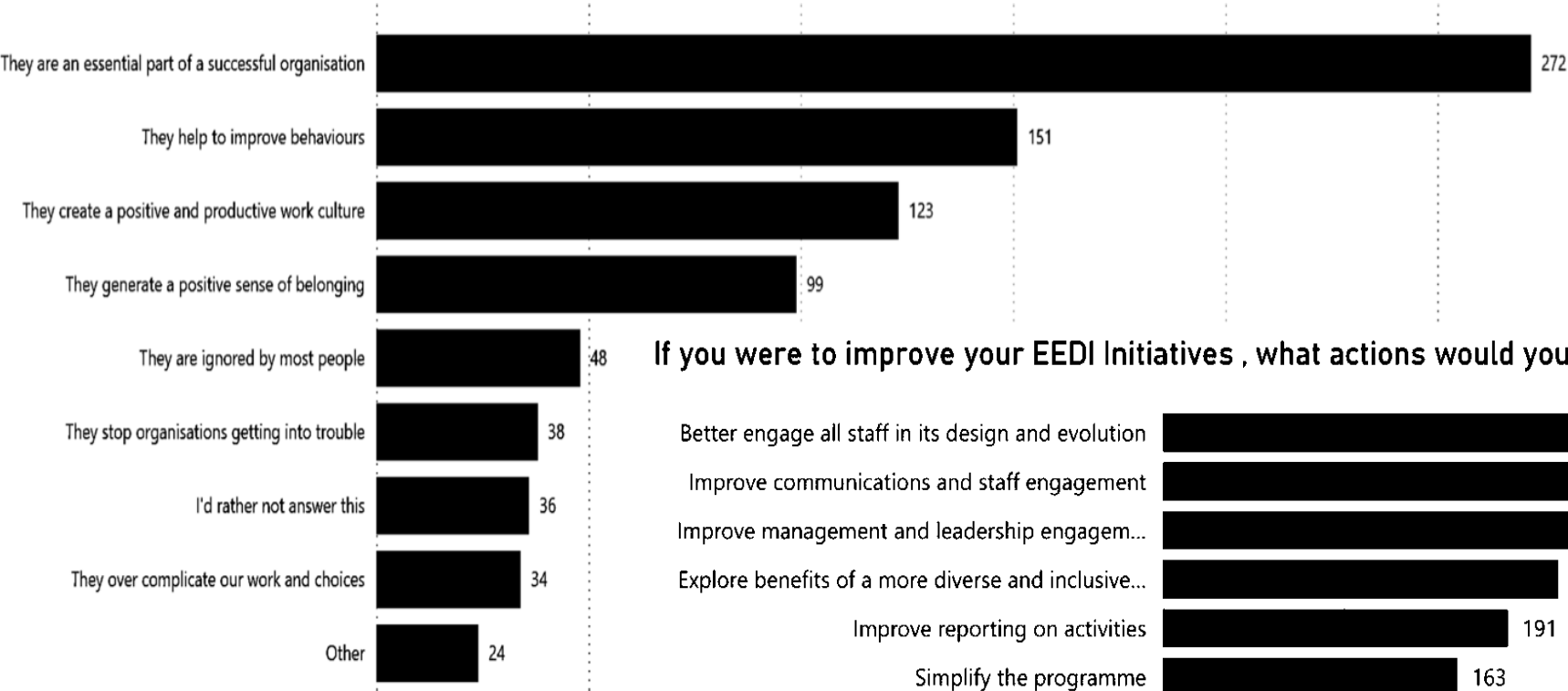
- **Engagement Gaps:** While most staff recognise the value of EEDI, engagement levels vary considerably across departments and grades. The feeling of disconnection is most pronounced among mid-level staff (Grades D-G), with 30% viewing EEDI as primarily compliance-driven and 31% expressing scepticism about resource allocation.
- **Leadership and Accountability:** There is a strong correlation between leadership engagement and organisational EEDI effectiveness. Senior leaders demonstrate high personal commitment, but this is not always cascaded effectively throughout their teams.
- **Knowledge and Communication:** Widespread knowledge gaps about EEDI initiatives exist, especially among mid-level staff. This highlights the need for a more comprehensive and accessible communications strategy.
- **Socioeconomic Diversity:** Respondents identified socioeconomic exclusion as a significant gap, calling for a review of recruitment and promotion practices and a reconsideration of what constitutes 'professionalism' within the organisation.
- **Trust Deficit:** Privacy concerns and doubts about leadership commitment to EEDI implementation indicate a trust deficit, particularly among non-participants who provided feedback for non-participation in the survey.
- **Change Orientation:** There is a strong positive correlation between willingness to lead or promote change and high EEDI engagement, regardless of demographic background.

Recommendations

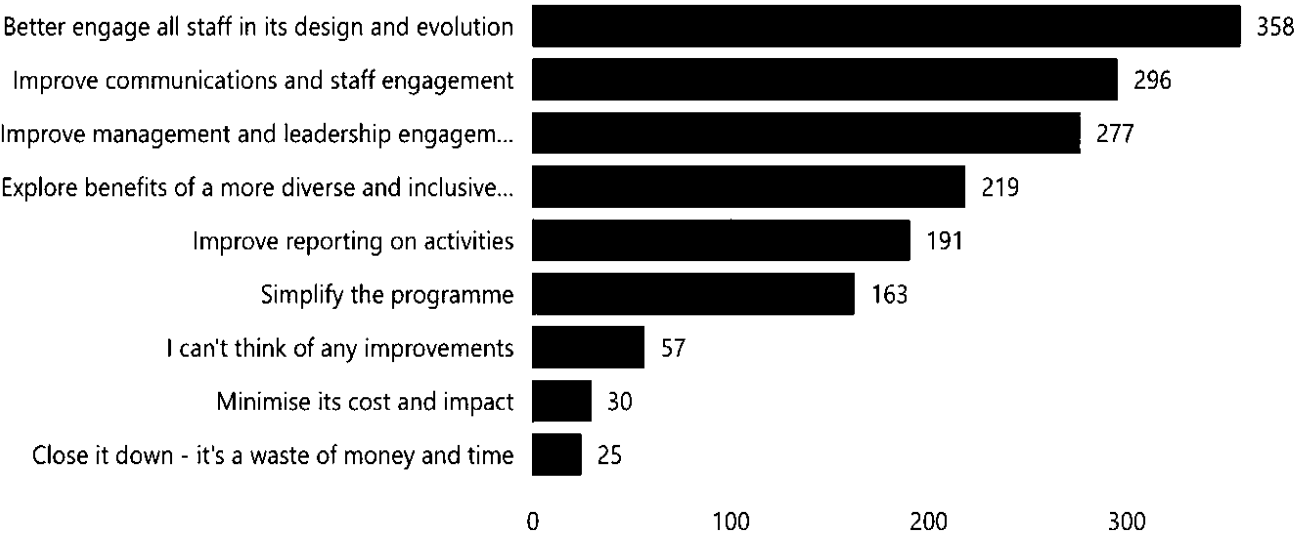
1. **Better Engage All Staff in EEDI Design and Evolution:** Move from a top-down approach to a collaborative, staff-led model. Establish cross-grade working groups, regular feedback mechanisms, and recognition for staff contributions to foster ownership and connection.
2. **Enhance Leadership Accountability:** Implement formal EEDI objectives for all senior leaders and department heads, with transparent reporting and measurable goals in performance reviews. Celebrate exemplary leadership and address non-compliance.
3. **Improve Communications and Staff Engagement:** Develop a comprehensive EEDI communications strategy that goes beyond information sharing to build genuine understanding. Regularly share updates, success stories, and progress metrics across multiple channels.
4. **Provide Targeted Support for Grades D-G:** Offer specialised training, peer learning groups, and recognition programmes to transform this critical middle layer from being compliance-focused to becoming EEDI champions.
5. **Address Socioeconomic Diversity and Class Barriers:** Review recruitment and promotion practices and reconsider definitions of professionalism to ensure pathways for those from less affluent backgrounds.
6. **Implement Agile Cross-Departmental EEDI Project Teams:** Empower EEDI champions across departments to lead initiatives, share best practice, and build a sustainable network of advocates.
7. **Develop Trust-Building Measures:** Increase transparency through clear data usage policies, honest acknowledgment of challenges, and regular progress reporting. Create safe channels for feedback to rebuild confidence.
8. **Integrate Change Management Principles:** Apply change management techniques to EEDI implementation, articulating a compelling case for change and empowering early adopters.
9. **Establish Mechanisms for Psychological Safety:** Train managers to facilitate difficult conversations, model vulnerability, and recognise courage in sharing perspectives, thereby fostering an environment where diversity leads to innovation.

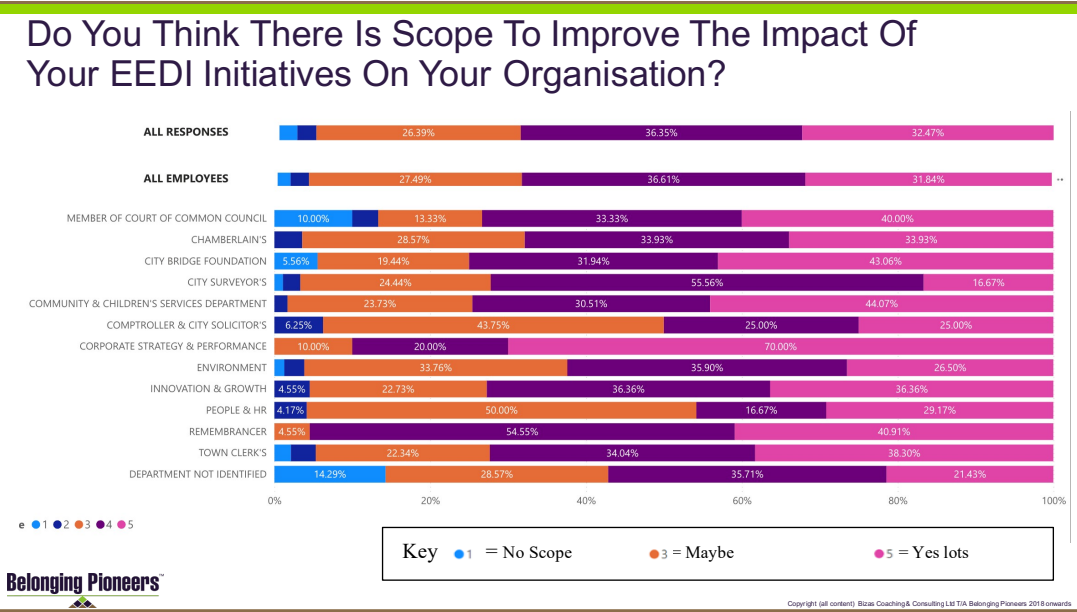
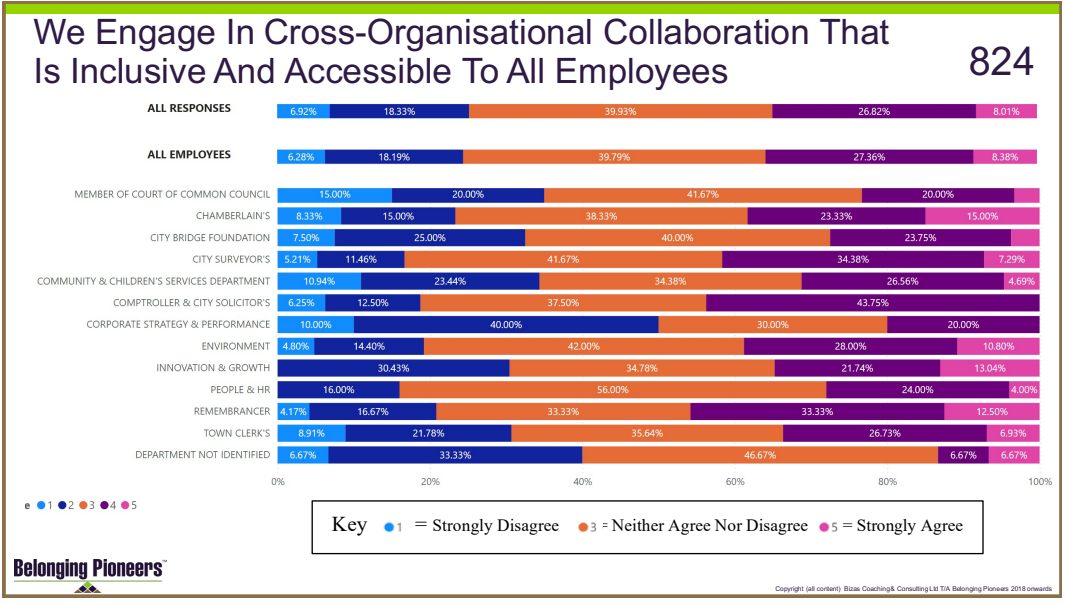
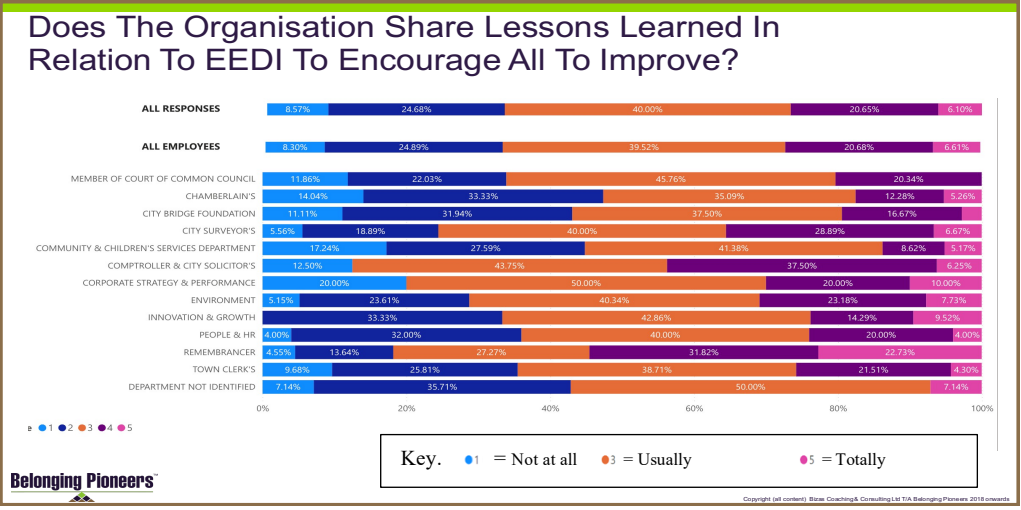
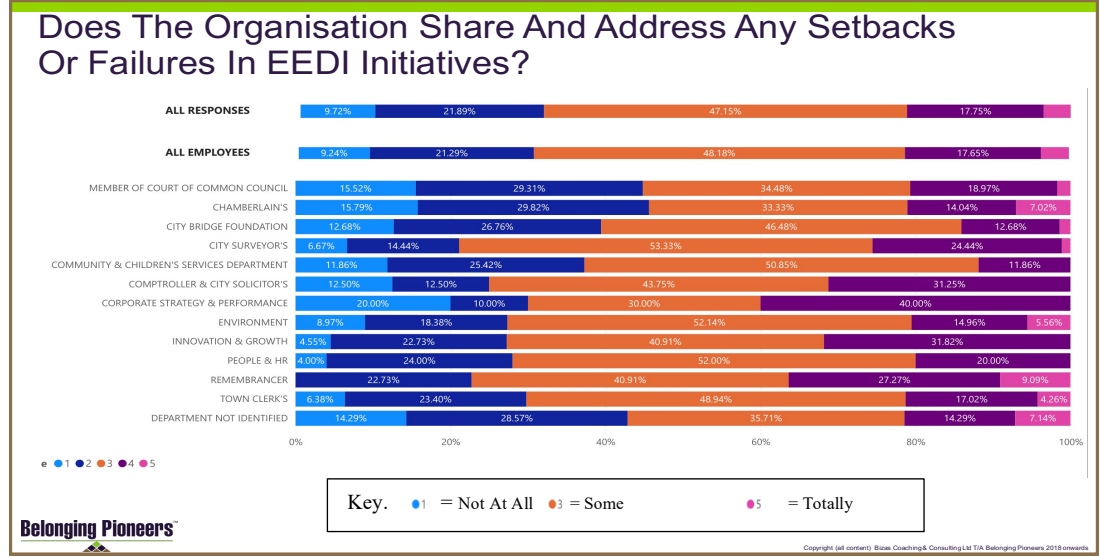
Selected Graphs From Annex D

My Views About EEDI In General



If you were to improve your EEDI Initiatives , what actions would you suggest?





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What Staff Network Co-Chairs And Departmental EEDI Leads Say About EEDI Priorities at CoLC (Annex E)

This report summarises the key findings from a listening circle held with 26 EEDI Champions at CoLC. Participants identified areas that CoLC needs to focus on to progress EEDI through an open, free text question on Menti. The submitted areas were then voted on and participants worked in small groups on the top 4 themes selected through the vote: member behaviour and diversity, systemic inequality, accountability standards, and the embedding and resourcing of EEDI beyond volunteer efforts. The report also includes Menti feedback, capturing candid staff perspectives on inclusion and exclusion within the organisation.

Key Themes and Insights

1. Member Behaviour and Diversity

Participants highlighted a persistent disconnect between members and staff, with members often failing to recognise or accept feedback regarding their behaviour. The homogeneity of the membership, rooted in longstanding institutional traditions, was seen as a fundamental barrier to cultural change and diversity. While member induction and training present opportunities for improvement, progress remains slow, and there are doubts about senior leadership's willingness to address problematic member conduct. Ongoing awareness training and consistent modelling of inclusive behaviours were identified as necessary steps.

2. Systemic Inequality Within the Organisation

CoLC's historical legacy and deep ties to the financial sector were identified as significant challenges when addressing equality. Recent organisational decisions—such as those regarding statues linked to the slave trade—were viewed as balancing public relations with genuine attempts to address legacy issues. The slow pace of institutional response was seen as problematic, causing frustration and embarrassment among staff. There were concerns about the effectiveness of staff networks and the EEDI forum in driving real change, given that key decisions remain with senior leadership and Members.

3. Accountability Standards for Members and Staff

Inconsistent management training and a lack of clearly articulated values have led to uneven accountability for staff behaviour. The Code of Conduct is not prominently featured, and diversity networks are often relied upon to resolve institutional issues without adequate support. There is a high tolerance for low-level disrespectful behaviours, and insufficient tools or guidance for addressing everyday workplace problems. The group called for a shift from consultation to concrete action and for greater clarity and accessibility of organisational standards.

4. Embedding and Resourcing EEDI Beyond Volunteer Efforts

There was widespread frustration over the lack of tangible progress despite repeated discussions. Responsibility for EEDI is often left to volunteers and staff networks, with insufficient organisational ownership or resourcing. The absence of a comprehensive EEDI plan with clear priorities and responsibilities was noted, as was the tendency for the organisation to take credit for volunteer-led initiatives rather than making genuine, institution-wide commitments.

Menti Feedback

Staff identified several areas requiring urgent attention for CoLC to become truly inclusive, including:

- ▶ Addressing member behaviour and increasing diversity among members
- ▶ Acknowledging and tackling systemic inequality and historical legacies
- ▶ Setting and upholding clear behavioural standards for all
- ▶ Investing in well-resourced, organisation-wide EEDI programmes rather than relying on volunteers
- ▶ Improving data collection and transparency to inform inclusive governance and communications
- ▶ Providing more effective manager training and fostering cultural competence across all levels

Among factors that help staff feel included are: supportive line managers, staff networks, recognition, clear communication, and a sense of being listened to and valued. Conversely, experiences of exclusion are driven by poor communication, lack of transparency, resistance to change, unfriendly behaviours, siloed working, and a lack of recognition and support for development.

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Executive Overview of The Senior Leadership Team Workshop Part 1 (Annex F) What Good Looks Like and What Needs To Be Managed For Successful EEDI Implementation At CoLC

This report presents the collective insights and recommendations from a Senior Leadership Team (SLT) and EEDI Subject Matter Expert (SME) workshop, focused on embedding EEDI as a 'golden thread' throughout CoLC. The workshop explored what constitutes 'Brilliant Basics' and 'World Class' standards for EEDI across Culture & Learning, Service Delivery, and London As A Destination.

Vision for EEDI Excellence

Participants defined 'Brilliant Basics' as an environment where all staff feel comfortable, valued, and engaged, with accessible and welcoming spaces, equitable experiences, and EEDI integrated into everyday decision-making. 'World Class' was described as an organisation where everyone feels they belong, the workforce and leadership are truly diverse, and CoLC sets a benchmark for best practice in diversity and inclusion.

Key Areas for Change and Improvement

Culture and Learning:

- Foster openness, active listening, and psychological safety, enabling staff to share ideas and challenge constructively.
- Empower both top-down and ground-up engagement, ensuring all voices are heard.
- Provide tools, time, and training for staff and leaders to develop EEDI skills, including tailored learning programmes and regular feedback mechanisms.
- Encourage a culture of reciprocal learning, breaking down silos through events and collaborative activities.

London as a Destination:

- Ensure services and leadership reflect the diversity of the communities served.
- Integrate EEDI into business planning, recruitment, and project delivery from the outset.
- Embed measurable objectives for senior leaders and improve representation at all levels.
- Secure dedicated resources and funding for EEDI initiatives, both centrally and locally.

Services:

- Deliver accessible, inclusive services that meet the needs of all stakeholders and communities.
- Make EEDI visible in all policies, processes, and systems, with clear, jargon-free language.
- Establish transparent reporting and feedback mechanisms and monitor service user diversity.
- Promote ongoing learning and development for all staff, including bitesize and role-specific training.

Priorities for Stakeholder Groups

- **Members:** Develop greater diversity of thought, embrace change, improve understanding of EEDI's benefits, and commit to behavioural codes and ongoing learning.
- **Staff:** Build accountability, foster a growth mindset, diversify the workforce (especially at senior levels), and ensure clear expectations and support for professional development.
- **Service Users:** Encourage co-creation of services, ensure fair treatment and inclusive experiences, and provide regular opportunities for feedback and representation.

Enablers and Barriers

To achieve EEDI as a golden thread, the organisation must:

- Decrease defensiveness and increase understanding between staff and members.
- Move from consultation to genuine collaboration and co-design.
- Address resource limitations transparently and prioritise transformation projects.
- Ensure policies and processes are accessible, up-to-date, and designed with input from diverse staff networks.

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Executive Overview of The Senior Leadership Team Workshop Part 2 (Annex G) Exploring Complexity At CoLC To Support Prioritisation Of EEDI Initiatives

This report synthesises outcomes from Part 2 of the workshop, exploring the complexity of embedding EEDI across CoLC, focusing on Culture & Learning, Service Delivery, and London As A Destination. The findings are presented using a complexity matrix—clear, complicated, complex, and chaotic—highlighting the varying levels of challenge and opportunity in advancing EEDI.

Culture and Learning

The analysis reveals that while some aspects of EEDI can be addressed with clear actions—such as ensuring staff voices are heard, providing useful continuing professional development (CPD), and setting clear expectations—many areas require more nuanced approaches. Complicated issues include equipping senior leaders with the necessary skills, prioritising transformation projects, and ensuring transparency and fairness in staff treatment. Complex challenges involve fostering a growth mindset, embracing change, and building a genuinely inclusive experience for both staff and service users. Chaotic elements, such as maintaining stability during change and advocating for coherent staff development, require adaptive leadership and resilience.

A recurring theme is the need for both top-down and ground-up engagement, with a strong emphasis on reciprocal learning, active listening, and breaking down silos. There is a call for more inclusive and accessible policies, a unified diversity calendar, and better data systems for tracking and informing decision-making. The importance of psychological safety, a sense of belonging, and a healthy workplace culture are highlighted as essential for EEDI to thrive.

London as a Destination

The report identifies the necessity for CoLC to be a leader in EEDI, not only internally but also as a model for other local authorities. Clear actions include reverse mentoring, representative recruitment at events, and embedding EEDI in all service delivery. Complicated and complex areas involve co-designing work with staff, standardising behavioural measures for recruitment, and ensuring staff retention through inclusive practices. Chaotic factors include adapting to diverse needs and creating a truly reflective and representative workforce.

There is a strong emphasis on engaging departments and institutions in meaningful decision making, building empowered networks, and ensuring that EEDI is considered from the outset of all projects. The need for reliable reporting mechanisms, standardised data capture, and accessible IT tools to support neurodiversity is also underlined.

Services

For service delivery, the report calls for accessible information and sites, safeguarding for all communities, and services that are flexible and responsive to the needs of diverse users. Staff are encouraged to adopt appreciative enquiry, build partnerships, and engage with networks to support the EEDI strategy. Consistent language, up-to-date policies, and a baseline expectation of EEDI groups with real influence are highlighted as necessary foundations. Complex challenges include meeting the individual needs of every person, fostering a culture where staff feel safe to make mistakes, and ensuring everyone is empowered and trusted. Chaotic elements, such as building trust and openness to critical feedback, are recognised as essential for cultural transformation.

Overarching Insights

Across all areas, the report stresses the importance of:

- Clear and accessible policies and processes
- Ongoing, inclusive learning and development for all staff
- Effective data collection and analysis to inform action
- Strong governance, accountability, and leadership
- Embedding EEDI in business planning and resource allocation
- Creating psychologically safe, welcoming, and adaptable environments

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Executive Overview of External Environmental Drivers Impacting EEDI (Annex H)

This report analyses the key external trends influencing CoLC's EEDI initiatives, using the comprehensive PESTELEDIT framework. This approach examines eleven dimensions—Political, Economic, Social, Technological, Environmental, Legal, Ethical, Demographic, Ecological, Intercultural, and Time—highlighting both the challenges and opportunities facing CoLC as it seeks to advance EEDI maturity.

Key Findings

- **Political and Legal Pressures:** CoLC faces increasing regulatory scrutiny and must align with national and international EEDI standards, including the Equality Act 2010 and its forthcoming amendments. There is a growing expectation for demonstrable progress, not just compliance, and a need to proactively address new legal duties such as preventing sexual harassment.
- **Economic and Social Factors:** Persistent pay gaps and underrepresentation of certain groups remain entrenched, despite the proven economic benefits of diversity and inclusion. Societal expectations are shifting rapidly, with greater awareness of intersectionality and rising demands for diverse leadership and visible progress on EEDI.
- **Technological and Digital Inclusion:** Advances in data analytics and artificial intelligence offer new tools for tracking EEDI progress, but also present risks of perpetuating bias, especially in automated recruitment. Ensuring accessible and inclusive digital platforms is increasingly important, particularly in the context of remote and hybrid working.
- **Environmental and Ecological Integration:** There is a growing emphasis on integrating EEDI with sustainability and climate action, recognising that environmental factors can disproportionately impact marginalised communities. CoLC has an opportunity to lead by ensuring equitable access to environmental benefits and green jobs.
- **Ethical and Intercultural Considerations:** Ethical leadership, transparent reporting, and balancing freedom of expression with protection from discrimination are now central to EEDI practice. As a global city, CoLC must also enhance intercultural competence and ensure its public spaces and cultural offerings are truly inclusive.
- **Demographic and Time Factors:** London's population is increasingly diverse, yet progress towards proportional representation in leadership—especially for Black professionals—remains slow, with some estimates suggesting a 50-year timeline. Accelerating progress and regularly updating EEDI policies to reflect societal change are essential.

Critical Insights

- The business case for EEDI is strong, but there is a risk that economic arguments may overshadow the fundamental moral imperative for equality.
- Much of CoLC's current activity remains reactive and compliance-driven; genuine transformation requires deeper integration of EEDI into the organisation's core values and practices.
- Data quality and ethical use must be prioritised to avoid reinforcing existing biases.
- Accelerating timelines for representation and embedding environmental justice are crucial

Recommendations

Short-term (1–2 years):

- Develop robust data strategy for evidence-based decision making, addressing privacy+ bias risks.
- Establish clear accountability frameworks with transparent metrics and regular reporting.
- Audit and improve the accessibility of all digital platforms and services.
- Update EEDI frameworks to explicitly address intersectionality.
- Create clear ethical guidelines for EEDI, particularly regarding AI and balancing competing rights.

Medium-term (2–5 years):

- Set ambitious targets to accelerate proportional representation, especially in leadership.
- Integrate EEDI and sustainability strategies to ensure equitable outcomes.
- Build intercultural competence across the workforce.
- Reform recruitment, progression, and retention processes to tackle structural barriers.
- Create mechanisms for sharing best practice across departments and institutions.

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Executive Overview Of The Document Analysis Report (Annex I)

The Document Analysis Report provides a comprehensive review of CoLC's progress and maturity in EEDI across its departments and institutions. The EEDI Review assessed how EEDI is embedded in CoLC's culture, governance, and operations, and identifies both strengths and areas for improvement as the organisation seeks to deliver on its Corporate Plan 2024–2029 and associated People Strategy and Equality Objectives.

Methodology

The review utilised the Belonging Pioneers' Framework, which assesses organisational EEDI maturity from resistance and compliance through to strategic, integral, and adaptive practice. Over 300 documents from across CoLC were scrutinised, with narrative and discourse analysis applied to map current practice, identify trends, and highlight both shared solutions and areas of divergence.

Key Findings

- **EEDI Maturity Levels:** Most departments and institutions are positioned at the 'Strategic and Reliability' stage (DEIB 2.0), with some, such as the City Bridge Foundation and Guildhall School of Music and Drama, demonstrating advanced integration (DEIB 3.0). However, many areas remain at a developing stage, with progress often siloed and inconsistent.
- **Shared Solutions and Good Practice:** Examples of effective EEDI practice include the consolidation of data systems (e.g., OneLake), public reporting of pay gaps, targeted recruitment and reverse mentoring, and collaborative initiatives such as the Propel Programme and City Belonging Project.
- **Improvement Over Time:** Departments show evidence of moving from compliance to more strategic approaches, with improvements in data collection, training, and inclusive policy development. However, gaps remain in intersectional data, consistent application of Equality Impact Assessments, and leadership accountability.
- **Systems and Processes:** While many departments have established frameworks and policies, integration of EEDI into operational workflows and performance management is often incomplete. Data collection is improving but lacks depth in areas such as intersectionality.
- **Trends and Patterns:** There is a growing emphasis on inclusive communication, staff networks, and community engagement. However, challenges persist in resource allocation, data quality, and the embedding of EEDI into decision-making and governance.
- **Governance and Accountability:** The creation of EEDI Leads and an EEDI Forum has improved coordination, but the voluntary nature of some roles and uneven adoption across departments limit overall impact. Formal governance structures are still being established.

Strategic Recommendations

- **Enhance Data Systems:** Develop intersectional analytics and mandate socio-economic data disclosure to enable more nuanced understanding and action.
- **Embed Accountability:** Link a proportion of senior leaders' performance to EEDI outcomes and expand cross-departmental key performance indicators.
- **Foster Cultural Change:** Launch grassroots ambassador programmes, expand staff training, and align procurement and recruitment with EEDI objectives.
- **Standardise Processes:** Ensure consistent application of Equality Impact Assessments and inclusive practices across all departments.
- **Strengthen Governance:** Formalise EEDI governance structures and ensure dedicated, paid resources for EEDI leads and networks.

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Sample Table 1 From Annex I: Department vs The Framework Maturity Level Mapping From Document Review

Department/Institution	Maturity Level
City of London Corporation	DEIB 1.0(Fix and Compliance) moving to DEIB 2.0 (Strategic and Reliability), with elements of progress to
Barbican Centre	DEIB 2.0(Strategic & Reliability) moving to-DEIB 3.0 (a)(Integral & Ownership)
Children's and Community Services	DEIB 2.0(Strategic & Reliability)-with elements of DEIB 3.0(a) (Integral and Ownership)
Chief Strategy Officer Department	DEIB 2.0 (Strategic & Reliability)
Town Clerk Department	DEIB 2.0 (Strategic and Reliability)
Chamberlain Department	DEIB 2.0 (Strategic and Reliability) moving to DEIB 3.0(a) (Integral and Ownership)
City of London Police	DEIB 2.0 (Strategic and Reliability) moving to DEIB 3.0(a) (Integral and Ownership)
Environment Department	DEIB 2.0 (Strategic & Reliability)
City of London "Family of Schools"	DEIB 2.0 (Strategic & Reliability) with elements of DEIB 3.0(a) (Integral & Ownership)
Innovation and Growth Department	DEIB 2.0 (Strategic and Reliability) with elements of DEIB 3.0(a) (Integral and Ownership)
City Surveyors Department	DEIB 2.0 (Strategic and Reliability)
People & HR Department	DEIB 1.0(Fix and Compliance) moving to DEIB 2.0 (Strategic and Reliability)
Remembrancer Department	DEIB 2.0(Strategic & Reliability)-with elements of DEIB 3.0(a) (Integral and Ownership)
City Bridge Foundation	DEIB 3.0(a) (Integral and Ownership)
Comptroller and City Solicitors Department	DEIB 1.0(Fix and Compliance) moving to DEIB 2.0 (Strategic and Reliability)
London Archives	DEIB 2.0 (Strategic & Reliability)
Guildhall School of Music & Drama	DEIB 2.0(Strategic & Reliability) moving to-DEIB 3.0(a) (Integral & Ownership)

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Appendix - About Belonging Pioneers

Belonging Pioneers, founded by Ishreen Bradley over 20 years ago, is a leading boutique consultancy dedicated to advancing inclusion and belonging for all within organisations.

With its clear Purpose of ensuring **every** individual has the opportunity to thrive at work, Belonging Pioneers partners with visionary CEOs, C-suite and people leaders who are committed to driving meaningful cultural transformation. Through research-led strategy and implementation advisory, coaching, consulting and training services, Belonging Pioneers empowers organisations to build inclusive environments where all employees—regardless of background—can succeed.

Their innovative **Win-Win** approach ensures that colleagues from both underrepresented and majority groups benefit from inclusion and belonging efforts, resulting in enhanced psychological safety, increased productivity, and alignment with social purpose goals.

Why CEOs Choose Belonging Pioneers:

- ▶ **Strategic Expertise:** Offering tailored advice and development programmes that address organisational challenges and unlock potential.
- ▶ **Proven Impact:** Delivering measurable results through evidence-based methodologies that foster inclusivity and drive business growth.
- ▶ **Collaborative Leadership:** Guiding senior leaders to implement transformational strategies with clarity, courage, and confidence.

Successful projects have been delivered for clients in financial services, construction, technology and the cultural sector as well as local Government. Belonging Pioneers' work in culture transformation for inclusion and belonging began with transforming the culture of one of London's premier art galleries by coaching leadership teams, empowering diverse talent, and implementing breakthrough initiatives. This resulted in a psychologically safe workplace that attracted diverse staff while achieving record audience engagement and visitor numbers.

Belonging Pioneers also spearheads the groundbreaking **Pioneers Movement For Belonging** — a collaborative network of forward-thinking leaders committed to evolving advanced methodologies for inclusion and belonging for all. By engaging with this movement, leaders can influence industry-wide change while ensuring their organisations remain competitive in today's rapidly shifting societal landscape.

What Sets Belonging Pioneers Apart:

- A deeply human approach rooted in authentic leadership.
- Decades of experience enabling global leaders to navigate complex challenges.
- A commitment to creating sustainable cultural transformation that delivers triple bottom-line results.

Partnering with Belonging Pioneers is an opportunity for CEOs to lead their organisations into the future—building cultures that attract top talent, foster innovation, and achieve lasting success.

Belonging Pioneers Contact Details and Resources:

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E: equitychampions@belongingpioneers.com

W: www.belongingpioneers.com

Podcast: *The Privilege Eruption Podcast*

Blog: *The Privilege Conundrum Newsletter* (LinkedIn)

Committee(s)	Dated:
Equality, Diversity & Inclusion Sub-Committee Corporate Services Committee	16 June 2025 18 June 2025
Subject: Gender, Ethnicity and Disability Pay Gaps (March 2024 Snapshot)	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	<ul style="list-style-type: none"> • Providing Excellent Services • Diverse Engaged Community
Does this proposal require extra revenue and/or capital spending?	No
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: Alison Littlewood, Executive Director of Human Resources and Chief People Officer	For information
Report authors: Chris Fagan, Head of Reward & Benefits	

1. Summary

- 1.1. The City of London Corporation is committed to promoting equity, equality, diversity and inclusion (EEDI) across all areas of our operations, and we believe that pay should be based on the skills, experience, and responsibilities of our employees.
- 1.2. The report (appendix 1) provides the City Corporation's Gender, Ethnicity and Disability Pay Gaps as of March 2024.
- 1.3. The City Corporation has little to no gender pay gap across its workforce and the long-term direction of travel in other measures remains broadly positive.
- 1.4. Overall, the pay gap figures reported remain broadly consistent with those from previous years, with some small shifts compared to March 2023. Although the median disability pay gap has reduced to zero (from 7.1%).
- 1.5. Overall, these shifts seem to be indicative of a continued longer-term positive trend in all pay gap figures generally. However, due to the nature of the calculation method there will always be a natural mathematical variation in the workforce numbers included within the snapshot and therefore some deviation due to these measures used that are unrelated to pay practice.
- 1.6. The levels of non-disclosure observed highlights the continued need to actively work with the workforce to improve our data, especially the levels of disclosure on protected characteristics across employees and casual workforce. Better data, will make reporting more robust and allow us to report on other pay gaps, including social mobility. We will continue to monitor our progress and report on our results annually.

Recommendation(s)

Members are asked to note the report for information.

Main Report

2. Background & Context

2.1. Through the Corporate Plan 2024-29 and the People Strategy 2024-29, a clear vision, strategy and action plan has been established to ensure we continuously improve our culture, ethos and approaches to support our current and prospective workforce to feel that they belong and fit, and are actively engaged with the City Corporation, its ambitions and priorities.

2.2. In addition, our Equality Objectives 2024-29 are a dynamic framework advancing our commitment to equity, equality, diversity and inclusion as a leader, employer and service provider. These are owned across all departments and institutions. There are already a range of projects and measures underway to ensure we deliver that commitment. Including:

- A fundamental review of our pay and reward approach through the Ambition 25 project. Through this process we will ensure that we provide flexible, sustainable, fair, equitable and transparent reward and recognition opportunities for our people.
- A holistic review of our employee benefits offer to help us better attract and retain a diverse array of excellent people to work for the City Corporation.
- Promoting equity, equality, diversity and inclusion in career development through the implementation of job families that inform a variety of career pathways to ensure career progression opportunities are available to all eligible employees, regardless of job type.
- Work to develop leadership capacity and capability across all aspects of EEDI. For example, by widening the range of access and participation in working groups and meetings, actively listening to understand lived experience, and considering who is in the room and who has a voice.
- Creating a comprehensive EEDI training offering with a focus on awareness-raising, skills-building and the development of an inclusive culture, including coaching and embedding EEDI in general training.
- Through our approach to 'Brilliant Basics' we will be undertaking a programmatic approach to policy development, reviewing HR policies as required due to legislative, regulatory, and internal and external changes, embedding EEDI principles throughout.
- Continue to improve data and insights, including improving data gathering through extensive and sustained communications in partnership with EEDI and communications teams.

- Development of dashboards provision and reporting on all protected characteristics, along with social mobility. Breakdown by identity data will also be undertaken where possible.
- 2.3. In accordance with the Gender Pay Gap Regulations City Corporation has been required to publish and report its Gender Pay Gap (GPG) by 30 March annually since 2017. This is published on both the City Corporation and UK Government websites. Alongside the GPG, the City Corporation has also voluntarily elected to calculate both the Ethnicity Pay Gap (EPG) and Disability Pay Gap (DPG) annually.
- 2.4. This pay gap analysis is calculated in line with the government's standard methodology and reporting requirements for Gender Pay Gaps, which compares the median and mean hourly pay rates and bonuses of employee groups. It also examines the proportion of these groups within each quartile of our pay distribution. It is difficult to compare to our grades consistently as the quartile boundaries will often fall within a grade range, and regular additional payments might raise some groups of staff above others in the grade, as a rough guide:
- Upper quartile: Grade G and above
 - Upper middle quartile: Grade E to F
 - Lower middle quartile: Grade C to D
 - Lower quartile: Grade A to B
- 2.5. Pay relates to the 'snapshot date' of 31 March 2024, and includes all workers paid on that date across the City Corporation and its Institutions, this includes employees and Casual Workers, and all professions except Police Officers. This means the data reported here may vary from other reports, due to the nature of the snapshot. The mean and median pay gap calculation is based on the total pay: this includes basic pay and additional payments, for example responsibility allowance in schools, unsocial hours payments and Market Forces Supplements (MFS) used for specific recruitment and retention purposes.
- 2.6. The 'bonus gap' relates to the 12-month period which ends on the snapshot date. Bonus payments include Recognition Awards for employees at the top of Grades A-C and honoraria payments. Contribution Payments, discretionary bonuses paid to employees at the top of Grades D-J and SMG who have demonstrated a high level of performance that would normally be included, were not paid in the 12-month period of this report. So the numbers of bonus payments are very low proportionally, making it difficult to draw any strong conclusions from the analysis and headline figures.
- 2.7. For the purposes of the analysis:
- a. Reference made in respect of employees in the report includes employees and casual workers (who are not employees) unless otherwise stated.
 - b. Pay gap data reports the difference in the average pay between groups across a whole organisation. This is entirely different to equal pay, which deals with the pay differences between different groups (i.e. men and women)

who carry out the same jobs, similar jobs or work of equal value. A large pay gap does not indicate the existence of equal pay issues.

- c. Demographic information is drawn from payroll and HR information system data. Additional sensitive information is added on a voluntary basis by employees through the employee self-service facility on the HR information system. This information is collected in line with the nine protected characteristics identified in the Equality Act 2010.
- d. The government gender pay gap regulations compare the pay of female and male employees, and do not address how employers should make their gender pay gap calculation if they have employees who do not identify as either male or female (e.g. non-binary). As per the City Corporation's approach to data collection outlined above, data is collected on the sex of employees, in line with the protected characteristics of the Equality Act 2010. This data is held on 100% of the workforce and has been used in the calculation of the gender pay gap.
- e. On ethnic origin, employees are asked to provide data using the standard classifications on the HR Information System. The level of non-disclosure for ethnic origin is 18.3% (compared to 17.0% the previous snapshot date). A large majority of this non-disclosure is amongst the lower quartile of roles and is likely to be due to a large number of casual workers included in the snapshot.
- f. Employees are asked to indicate whether they have a disability on the HR information system. Therefore, this indicator does not accurately measure whether an employee meets the definition of "disability" under the Equality Act 2010.
- g. In accordance with the General Data Protection Regulations and the Data Protection Act 2018, all employees are provided with a privacy notice, signposted in the contract of employment, and contained within the Employee Handbook. The [privacy notice](#) describes how the City Corporation as a data controller collects and uses personal information during and after employment with the City Corporation. The privacy notice outlines that employees are not required to provide all personal and sensitive information. As such, not all the categories include 100% data capture. This includes cases where the employee has specifically recorded 'not stated' or 'declined to specify' on employee self-service.

3. Analysis

- 3.1. The City Corporation's gender, ethnicity and disability pay gaps as at the snapshot date of 31 March 2024 are presented in full at Appendix 1 of this report, which also includes further analysis and benchmarking.
- 3.2. The total headcount used for the mean and median pay gaps was 5,212 (this excludes police officers), noting that there has been an increase from 4,988 in the previous year because of organisational change and the numbers of casuals engaged at the time of the snapshot.
- 3.3. The key Pay Gap headlines are:
(Note: Bracketed figures represent the 2023, 2022, 2021 and 2020 reported figures)

Gender Pay Gap

- **Median Pay Gap is 0.0%** (0.0%; 2.7%; 2.2%; 0.0%); and
- **Mean Pay Gap is 5.1%** (4.5%; 4.5%; 7.1%; 5.6%).

3.4. Ethnicity Pay Gap – Binary:

- **Median Pay Gap 9.7%** (13.2%; 14.7%; 15.7%; 17.1%);
- **Mean Pay Gap 15.2%** (16.7%; 17.4%; 16.8%; 19.1%).
- **Level of non-disclosure 18.3%** (17.0%).

3.5. Ethnicity Pay Gap – Aggregated Category:

- **Median Pay Gap 0.0% to 16.1%**

Ethnic Category	Black	Asian	Mixed	OEG
White	16.1%	7.2%	7.4%	16.1%
Black		-9.0%	-8.8%	0.0%
Asian			0.23%	9.0%
Mixed				8.8%

- **Mean Pay Gap -0.4% to 25.8%**

Ethnic Category	Black	Asian	Mixed	OEG
White	19.2%	15.1%	10.9%	25.8%
Black		-4.2%	-8.4%	6.6%
Asian			-4.3%	10.8%
Mixed				15.0%

OEG = Other Ethnic Groups, not contained within the aggregated categories.

Note: Analysis at the aggregated level results in 10 ethnicity pay gap figures. Positive figures in the table reflect that the pay gap is in the favour of the ethnic category on the left of the table. Negative figures indicate a pay gap in favour of the ethnic category at the top of the table.

3.6. Disability Pay Gap

- **Median Pay Gap is 0.0%** (7.1%; 2.4%; 7.1%; 8.9%);
- **Mean Pay Gap is 6.8%** (6.9%; 8.8%; 8.9%; 10.3%).
- **Level of non-disclosure 28.09%** (25.2%).

4. Corporate and Strategic Implications

- 4.1. **Strategic Implications:** Ensuring that our employment practices and procedures are fair and free from bias will support the City Corporation to recruit, retain and most importantly engage a high calibre and diverse workforce, capable of high performance and delivering the organisations strategic ambitions. This work ties in with Corporate Equalities Objectives 2024-29 and activity to improve our data so better insights into the workforce can be provided to achieve EEDI ambitions.
- 4.2. **Financial Implications:** No direct financial implications.
- 4.3. **Resource Implications:** None related explicitly to this report.
- 4.4. **Legal Implications:** None
- 4.5. **Risk Implications:** None
- 4.6. **Equalities Implications:** This report forms part of our package of work to continuously review our performance on specific metrics to help inform the wider EDI activity.
- 4.7. **Climate Implications:** None
- 4.8. **Security Implications:** None

5. Conclusions and Next Steps

- 5.1. Overall, the pay gap figures reported remain broadly consistent with those from previous years, with some small shifts compared to March 2023. The only exception being the median disability pay gap, which has reduced to zero (from 7.1%).
- 5.2. Overall, these shifts seem to be indicative of a continued longer-term positive trend in all pay gap figures generally. However, due to the nature of the calculation method there will be a natural mathematical variation in the workforce numbers included within the snapshot and therefore some deviation due to these measures used that are unrelated to pay practice.
- 5.3. The levels of non-disclosure observed highlights the continued need to actively work with the workforce to improve our data, especially the levels of disclosure on protected characteristics across employees and casual workforce. This will enable stronger analysis and greater insight.
- 5.4. As part of the work to support promoting and delivering our Equalities Objectives and People Strategy, we are addressing data quality and improving levels of disclosure with a campaign to increase disclosures undertaken.
- 5.5. City Corporation is committed to equal opportunities and equal treatment for all employees. Although many of the pay gap measurements are either already relatively small, or larger but moving in a positive direction, there will always be more that we can do to improve our culture, policy, process

and practices to ensure a truly bias free work environment for all employees. Our aim is to create an environment, in which people irrespective of their background can expect to develop, progress, flourish and perform and be remunerated fairly for the work that they do.

- 5.6. To support our EDI commitments, we will look to reduce any perceived barriers to engagement and progression and work towards greater pay equity. This will include:
- Guaranteeing the robustness of our job evaluation scheme and policy, to ensure that we have equal pay for work of equal value, which provides protection against claims of equal pay. This forms a key element of the Ambition 25 programme.
 - Reviewing our pay structure and reward practices to ensure that these support fair and equal remuneration, and that any additional payments are minimised and where they remain necessary, actively monitored and moderated.
 - Ensuring our work and engagement practices do not preclude or discourage capable individuals, from applying to, being appointed and progressing within the organisation (e.g. recruitment activities; where we advertise; the benefits we offer; our support for flexible working).

Appendices

1. City of London Corporation Pay Gap Report: Snapshot Date: 31 March 2024

Background Papers

None

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City of London Corporation

Pay Gap Report 2025

Snapshot Date: 31 March 2024



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Introduction

In accordance with the Gender Pay Gap Regulations the City of London Corporation (“City Corporation”) has been required to publish and report its Gender Pay Gap (GPG) by 30 March annually since 2017. This is published on both the City Corporation and UK Government websites, and covers the following:

- Mean and median gender pay gap in hourly pay.
- Mean and median bonus gender pay gap.
- Proportion of men and women receiving a bonus payment.
- Proportion of men and women in each pay quartile.

Alongside the GPG, the City Corporation has also voluntarily elected to publish both the Ethnicity Pay Gap (EPG) and Disability Pay Gap (DPG) annually to the same requirements. There is ongoing consultation on whether these wider pay gaps should also become statutory requirements.

The analysis of pay gaps is not the measurement of equal pay. Pay gaps measure the differences between the average pay of male and female employees, irrespective of job role or seniority, whereas equal pay concerns pay differences between employees performing the same or similar work, or work of equal value.

The City of London Corporation is committed to promoting equity, equality, diversity, and inclusion (EEDI) across all areas of our operations, and we believe that pay should be based on the skills, experience, and responsibilities of our employees.

The City Corporation’s Equality Objectives 2024-2029 are a dynamic framework advancing this commitment to equity, equality, diversity, and inclusion (EEDI) as a leader, employer and service provider. The Objectives are owned across all departments and institutions.

Our Equality Objectives are:

- Inclusive and Trustworthy Leadership
- Inclusive and Diverse Community
- Accessible and Excellent Services
- Socio-Economic Diversity
- Cross-cutting activity: Evidence and Data

Our Equality Objectives are integral to the effective delivery of our Corporate Plan 2024-29, People Strategy 2024-29 and other elements that shape and drive the organisation over the next five years and beyond. They have been developed through internal and external consultation, providing a direction of travel, not a destination, with progress regularly reviewed.

One of the five key themes of the People Strategy 2024-29 is centred on ‘My Contribution, My Reward – Ambition 25’. Our measure of success is that we will provide flexible, sustainable, fair, equitable and transparent reward and recognition opportunities for our people, beginning with the Ambition 25 project. These will help us attract a diverse array of excellent people. We will increase the clarity and transparency of our roles and how they work together. We will provide assurance that pay and grading is fair. We will support employees to undertake fulfilling and meaningful work that creates organisational success. And we will provide career support to enable progression and improve retention.

Our employees will feel empowered by this greater access to information and opportunities. As a result, we will see reductions in disengagement and resignations due to insufficient role clarity, or pay, reward and opportunity issues. Our people will take responsibility for their individual contributions and be given the tools to learn and gain expertise. With this in mind, we are committed to continuing to reduce pay gaps wherever they exist.

Scope & Methodology

This report reflects payroll data at the snapshot date of 31 March 2024, reported one year in arrears. Its scope, which may differ from other reports, includes:

- All full-time employees and casual workers.
- All departments of the City Corporation and its Institutions¹.
- All professions except for police officers employed by the City of London Police.

Given this, the total headcount used across this report is 5,212 employees. The headcount at the previous snapshot date was 4,988. The increase is due to organisational change and the numbers of casuals engaged at the time of the snapshot.

This pay gap analysis is calculated in line with the government's standard methodology and reporting requirements for Gender Pay Gaps, which compares the median and mean hourly pay rates and bonuses of employee groups. Where possible, these have been applied to the analysis of Ethnicity and Disability Pay Gaps.

These are defined as:

- **Mean Hourly Rate:** the percentage difference between the mean average hourly rate of pay.
- **Median Hourly Rate:** the percentage difference between the midpoints in the ranges of pay.
- **Mean Bonus Payment:** the percentage difference between the mean average bonus payments made in the 12 months prior to the snapshot date.
- **Median Bonus Payment:** the percentage difference between the midpoints in the ranges of bonus payments made in the 12 months prior to the snapshot date.

The mean and median pay gap calculation is based on the total pay: this includes basic pay and additional payments, for example responsibility allowance in schools, unsocial hours pay and Market Forces Supplements (MFS) used for specific recruitment and retention purposes.

This report also examines the proportion of these groups within each quartile of our pay distribution. It is difficult to compare to our grades consistently as the quartile boundaries will often fall within a grade range, and regular additional payments might raise some groups of staff above others in the grade, as a rough guide:

- Upper quartile: Grade G and above
- Upper middle quartile: Grade E to F
- Lower middle quartile: Grade C to D
- Lower quartile: Grade A to B

Demographic information used in the pay gap calculations is drawn from the City Corporation's payroll and HR information system data. Whilst some fields are mandatory, additional sensitive information is added on a voluntary basis by employees through the employee self-service facility on the HR information system. This information is collected in line with the nine protected characteristics identified in the Equality Act 2010.

In accordance with the General Data Protection Regulations and the Data Protection Act 2018, all employees have been sent a privacy notice describing how the City Corporation as a data controller collects and uses personal information during and after employment with the City Corporation. This privacy notice outlines that employees are not required to provide all personal and sensitive information. As such, not all the categories include 100% data capture.

¹ The Institutions of the City of London Corporation refers to the Barbican Centre, the City Bridge Foundation, the City of London Police, the Guildhall School of Music & Drama, and the independent schools that the City Corporation supports - City of London Freeman's School, City of London School, City of London School for Girls, and the City Junior School.

This includes cases where the employee has specifically recorded 'not stated' or 'declined to specify' on employee self-service.

Where relevant, contextual data about the UK population and workforce has been provided. Unless otherwise specified, the sources for these contextual datasets are:

- 2021 Census of England and Wales: [Census - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)
- Gov.uk Gender Pay Gap Data Service: [Find and compare gender pay gap data - GOV.UK \(www.gov.uk\)](https://www.gov.uk)
- Office for National Statistics UK Labour Survey: [A08: Labour market status of disabled people - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)

Gender Pay Gap

Definition

The UK Government Gender Pay Gap regulations compare the pay of female and male employees, and do not address how employers should make their Gender Pay Gap calculation if they have employees who do not identify as either male or female (e.g. non-binary).

In accordance with this, and the City Corporation’s approach to demographic data collection outlined above, all calculations have been made utilising data on the sex of employees as either “female” or “male”, as defined as a protected characteristic of the Equality Act 2010. This data is held on 100% of the workforce and has been used in the calculation of the GPG.

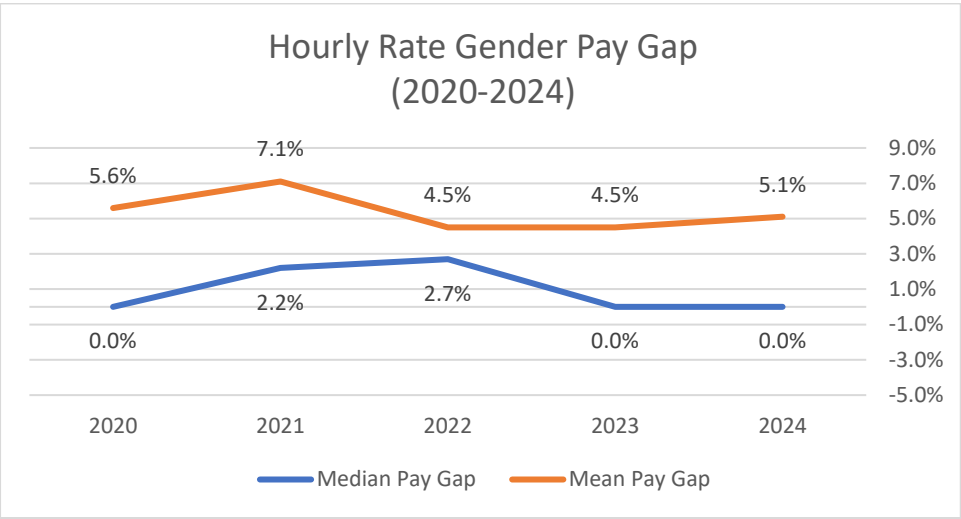
Hourly Rate

The City of London Corporation’s hourly rate Gender Pay Gap at the snapshot date of 31 March 2024 is as follows:

Table 1: City of London Corporation Gender Pay Gap 2024

	2020	2021	2022	2023	2024
Median Pay Gap	0.0%	2.2%	2.7%	0.0%	0.0%
Mean Pay Gap	5.6%	7.1%	4.5%	4.5%	5.1%

Figure 1: City of London Corporation Gender Pay Gap Trend 2020-2024



The median hourly rate GPG stood at 0.0% on 31 March 2024. This is consistent with previous years showing that the City Corporation has a minimal median hourly rate GPG². This indicates that, on average, women and men in our organisation are paid similarly based on average hourly pay rates.

The GPG for mean hourly pay rates was 5.1% on 31 March 2024. This is a slightly increased from the previous year, but only minimally, and lower than snapshot dates in 2020 and 2021.

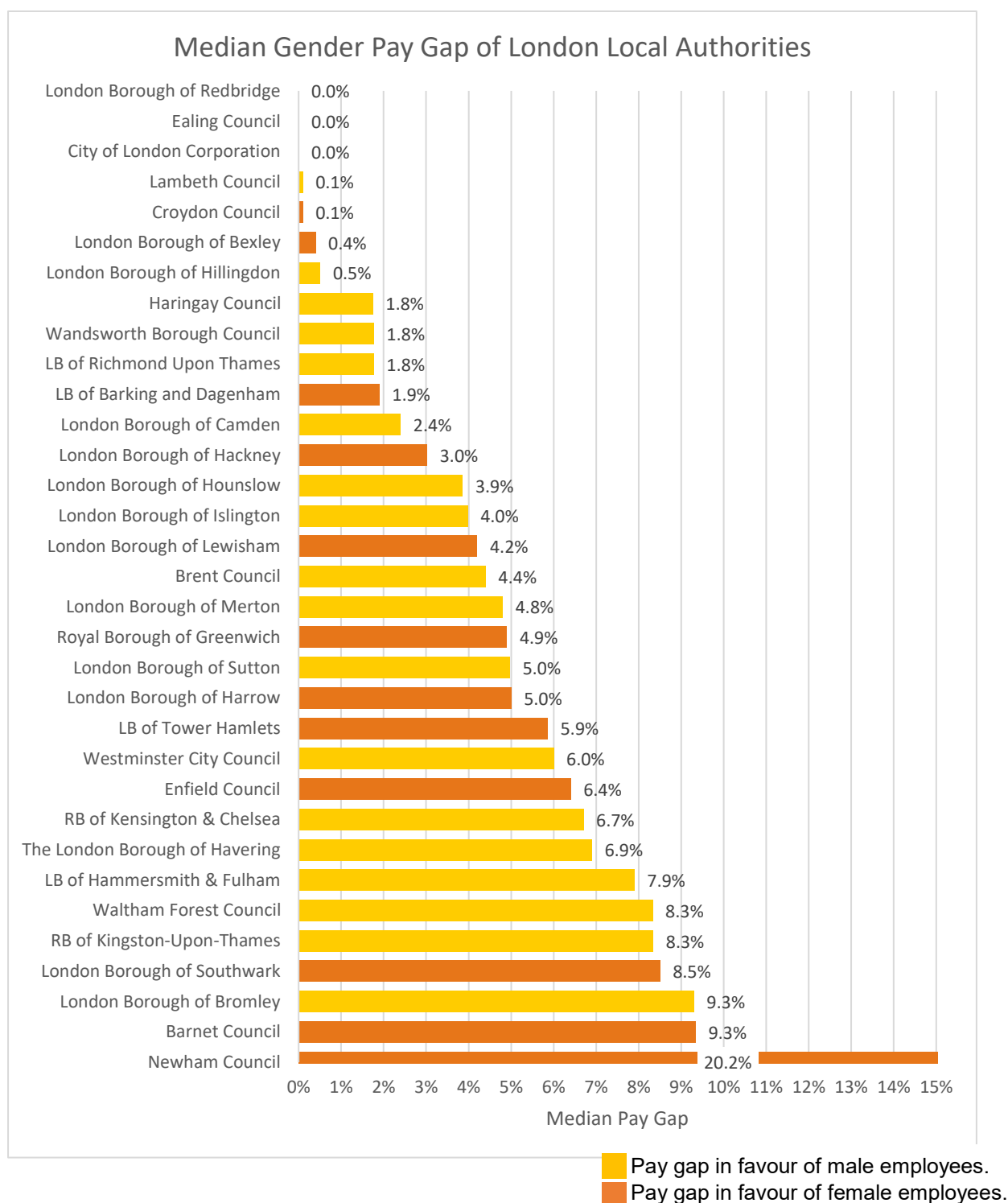
² 2.7% is equivalent to an increment on the City Corporation’s pay scale. Fluctuations in the median hourly rate of this order are therefore not indicative of any wider trend. Mathematically speaking, small changes in workforce composition can move the median by a single increment, creating the increase/decrease in calculated pay gaps.

Benchmarking

The City of London Corporation has a smaller GPG than national benchmarks; the median hourly rate GPG for all reporting companies in for the snapshot date of 31 March 2024 was 8.6% (down from 9.0% in 2023).

We also compare quite favourably to the local government London Boroughs, the City Corporation was one of three London local authorities reporting no median GPG for the snapshot date of 31 March 2024 (5 in 2023). The majority of London Boroughs report a pay gap figure of less than 5% towards men or women (20 out of 33), with only 3 reporting a figure larger than the UK average (8.6%).

Figure 2: Comparison of Median Gender Pay Gap to London Local Authorities 2024



Looking at industrial sectors as a whole, there is a variation in overall pay gaps reported by each sector, with both Finance and Construction sectors reporting gaps of more than 20%, while Facilities & Security; Hospitality; Local Government; and Not for Profit have gaps less than 2%.

Table 2: Comparison of Median Gender Pay Gap by Industrial Sector 2024

Industry	Median gender pay gap
Agriculture and forestry	2.7%
Central government	7.4%
Chemicals, pharmaceuticals and oil	6.1%
Facilities, security and support services	0.3%
Construction	22.7%
Electricity, gas and water	10.5%
Engineering and metals	10.3%
Finance	21.0%
Food, drink and tobacco	3.8%
Hotels, catering and leisure	0.9%
Information and communication	14.9%
Local government	1.5%
General manufacturing	8.0%
Not for profit	1.8%
Paper and printing	10.7%
Professional and business services	10.8%
Public education	19.9%
Public health	5.8%
Public safety	11.3%
Retail and wholesale	5.0%
Transport and storage	6.3%

Source: Brightmine – [Gender Pay Gap: Findings from 2024 reporting](#) (07/04/25)

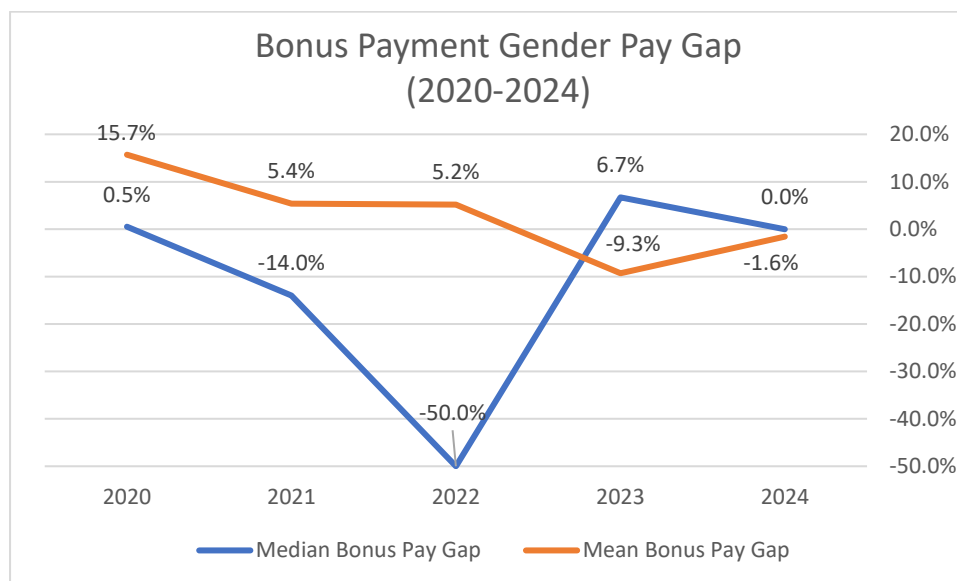
Bonus Payments

The City of London Corporation's bonus payment Gender Pay Gap for the twelve months from 1 April 2023 to 31 March 2024 is as follows:

Table 3: City of London Corporation Gender Bonus Pay Gap 2024

	2020	2021	2022	2023	2024
Median Bonus Pay Gap	0.5%	-14.0%	-50.0%	6.7%	0.0%
Mean Bonus Pay Gap	15.7%	5.4%	5.2%	-9.3%	-1.6%

Figure 3: City of London Corporation Gender Bonus Pay Gap Trend 2020-2024



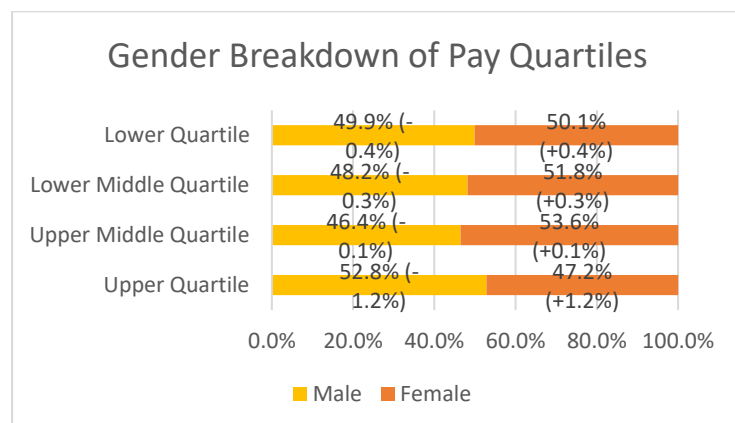
Bonuses were received by 5.8% (5.4%; 9.0%; 26.0%; 13.1%) of women and 4.7% (5.4%; 11.1%; 34.5%; 14.1%) of men. This continues the reduced percentages of bonuses awarded in recent years reflecting the period when contribution pay was not operated. The Contribution Pay awards made for October 2024 will appear in the March 2025 snapshot.

The reduced number of bonus payments means that rates are more likely to fluctuate due to the reduced numbers being compared. This has can be seen in the level of fluctuation in recent years in the graph above. As such while both median and mean bonus gender pay gap measures have shown a potentially positive shift towards the zero mark this year, with the low level of awards of bonuses, it is not possible to draw any strong conclusions. The slightly higher proportion of females receiving a bonus compared to males is a minor change, from an equal level of awards last year.

Pay Quartiles

The distribution of female and male employees across pay quartiles in the City of London Corporation is presented in the below chart (snapshot date 31 March 2024, with change on the previous year):

Figure 4: City of London Corporation Gender Breakdown of Pay Quartiles (2024)



Except for the Upper Quartile, most changes from last year are minimal (less than 0.4% shift). The upper quartile did move just over a percentage point (1.2%) closer to an equal split, this builds on the 2.2% shift in the same direction seen in the previous year.

Overall, the proportion of men and women within our workforce are broadly a 50:50% ratio. The ratio of female to male employees within all quartiles remains broadly equal across the four quartiles. The two higher quartiles (UQ and UMQ) show the largest variance from an equal split, being 2.8% and 3.6% respectively.

Ethnicity Pay Gap

Definition

In April 2023, the UK Government published guidance for those employers who want to report their Ethnicity Pay Gap (EPG) voluntarily. The aim is to develop a consistent, methodological approach to EPG reporting. A key suggestion is not to aggregate ethnicity categories where possible. Since the 2023 snapshot, we have chosen to breakdown to aggregated categories (see below), to expand our pay gap analysis.

At present, there is no standard format on how to present this information, and consultation is currently underway to determine if such reporting should be statutory. We will continue to review our approach and look at examples elsewhere on how we can meaningfully present a more detailed analysis. We also continue to undertake “binary analysis” between the largest group and others, as per our previous methodology, to allow historic comparison until we have a fully refined approach on aggregated categories. Two different forms of EPG analysis are presented:

1. A binary analysis, comparing the gap between our largest category of employees, those identifying as white, to all other ethnic groups, as a proportion of white employees pay.
2. An aggregated category analysis, comparing the gap between each aggregated category. The six aggregated categories used are as follows:

Asian: Asian – Bangladeshi; Asian – British; Asian – Indian; Asian – Pakistani; Asian – Any other Asian background; Chinese.

Black: Black – African; Black – British; Black – Caribbean; Black – Any other Black background.

Mixed: Mixed – Asian & White; Mixed – White & Black African; Mixed – White & Black Caribbean; Mixed – Any other Mixed background.

Other Ethnic Groups: Arab; Any other ethnic group.

White: White – British; White – EU; White – Other European; White – Any other White background; Irish; Gypsy; Irish Traveller.

Not Known: Not Known; No information provided.

Employees are requested to provide data on their ethnicity via the HR information system, using the standard UK government classifications outlined above. There is no requirement for disclosure, with 18.3% having not disclosed. This is up slightly from 17.0% for the 31 March 2023 snapshot. Accurate analysis is hampered by the level of non-disclosure. Improved disclosure rates could alter the conclusions drawn in this report, particularly aggregated category analysis, as a reallocation to some of the smaller categories could shift their proportional share significantly.

Binary EPG Analysis

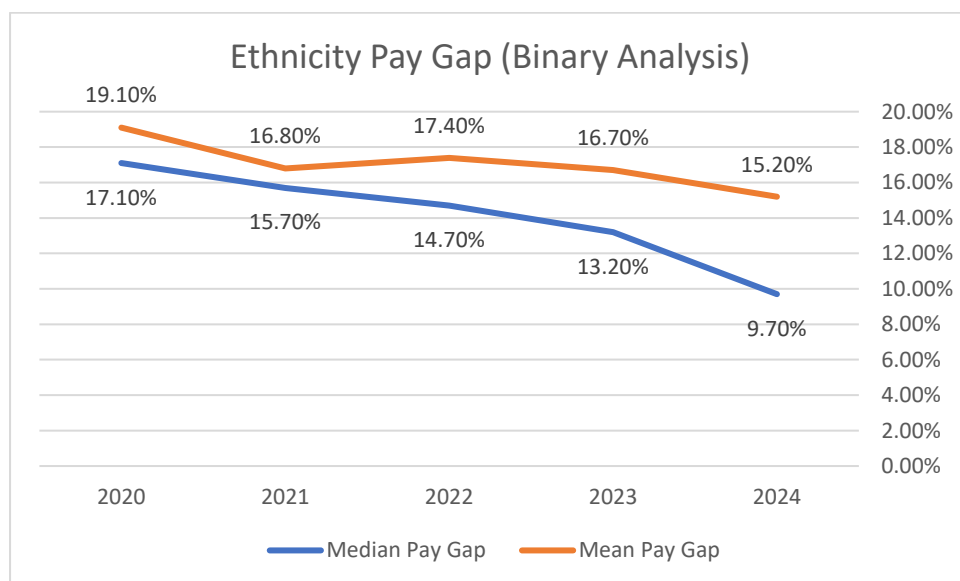
Hourly Rate

The City of London Corporation's hourly rate Ethnicity Pay Gap at the snapshot date of 31 March 2024, using binary analysis, is as follows:

Table 4: City of London Corporation Ethnicity Pay Gap 2024

	2020	2021	2022	2023	2024
Median Pay Gap	17.1%	15.7%	14.7%	13.2%	9.7%
Mean Pay Gap	19.1%	16.8%	17.4%	16.7%	15.2%

Figure 5: City of London Corporation Ethnicity Pay Gap Trend 2020-2024



The EPG for median hourly rate was 9.7% and the mean hourly pay rates 15.2% on 31 March 2024. Both measures are a reduction on the previous year and continue the improving trend of recent years, with the median and mean EPG narrowing by 7.4% and 3.9% respectively since 2020.

This means that, on average, employees identifying as Black, Asian, Mixed, or other Ethnic Groups (OEG) in our corporation earn less than employees identifying as White based on median and mean hourly pay rates. This translates to £4.51 less an hour for the mean rate, and £2.47 less an hour for the median rate, across the whole workforce.

The gap is not related to pay for the same job, rather, the data shows that this is reflection of the differing distribution of the two ethnicity categories across the four quartiles of the workforce. There is a substantial drop in the proportion of 'white' in the lower quartile (48% compared to c.65-70% in the other three quartiles) and similarly a large reduction in the proportion of 'OEG' in the upper quartile (9% compared to c.19-24% in the other three quartiles). At the same time, it is noted that both the upper and lower quartiles currently have the highest levels of undeclared ethnicity and that this may affect the accuracy of these figures (in either direction).

Table 5: City of London Corporation Ethnicity Pay Gap – Breakdown by Quartiles

Quartile	White	OEG	Not Known	Median White Hourly Rate	Median OEG Hourly Rate	EPG Median Hourly Rate%	Mean White Hourly Rate	Mean OEG Hourly Rate	EPG Mean Hourly Rate%
Upper	69.7%	8.9%	21.4%	£44.63	£42.30	5.22%	£46.37	£46.02	0.75%
Upper Middle	71.6%	18.6%	9.8%	£28.21	£27.57	2.27%	£28.70	£28.42	1.00%
Lower Middle	64.3%	24.3%	11.4%	£22.27	£21.90	1.64%	£22.33	£22.29	0.16%
Lower	48.2%	21.2%	30.6%	£16.83	£16.83	0.00%	£16.53	£16.65	-0.71%
Totals	63.5%	18.3%	18.3%	£25.45	£22.98	9.71%	£29.62	£25.11	15.23%

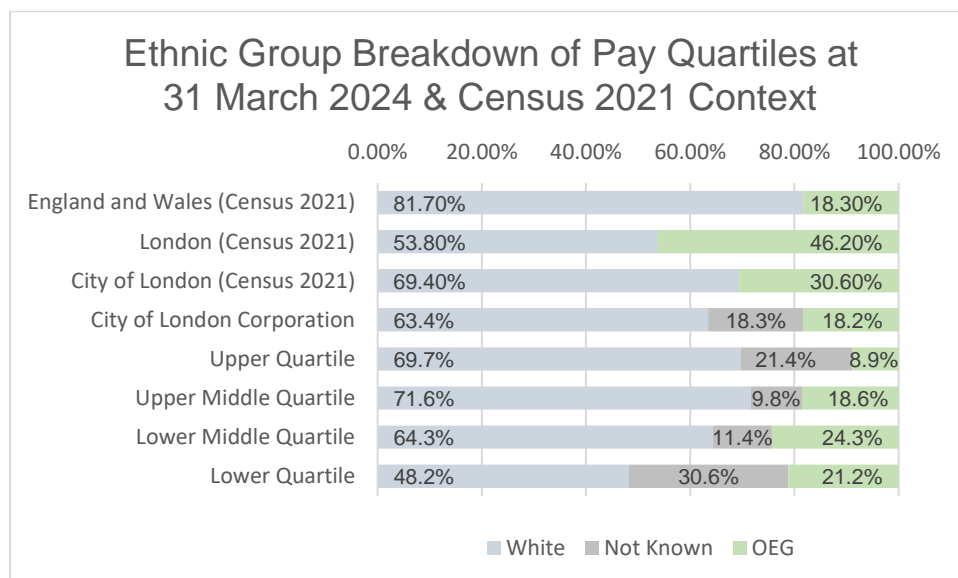
OEG = employees identifying as Black, Asian, Mixed, or other Ethnic Groups.

The levels of non-disclosure and the differences in proportions seen both warrant further analysis and investigation to understand if there are actions we should be taking to support our EEDI principles across our workforce and employee lifecycle.

Pay Quartiles

The distribution of employees by ethnic group across pay quartiles in the City of London Corporation is presented in the below chart (snapshot date 31 March 2024, alongside contextual data taken from the 2021 Census).

Figure 6: City of London Corporation Ethnicity Breakdown of Pay Quartiles (2024)



The data shows that while proportions of Black, Asian, Mixed, or other Ethnic Group employees at the overall Corporation level (18.2%) and in three of the pay quartiles (18.6%-24.3%) are comparable to or exceed the England and Wales census (18.3%), they are all substantially below proportions reported in the Census 2021 for both 'London' (46.2%) and 'City of London' (30.6%). The lower level seen in the upper quartile is clearly below all three Census 2021 benchmarks.

The proportion of white employees is below the England and Wales census 2021 benchmark (81.7%) overall and at all quartiles, but well below that of the London Census 2021 benchmark (53.8%; except for the Lower Quartile 48.2%). The proportion overall, and at three of the four quartiles are relatively close to the City of London Census benchmark (69.4%), varying by no more than 6% from the benchmark. However, the same is not true at the lower quartile, being 21.2% below the City of London Census 2021 benchmark.

Accurate analysis is hampered by the lack of disclosure across all quartiles. Improving disclosure rates could significantly shift the conclusions drawn in this report. This is particularly the case for the Lower Quartile, where 30.6% of employees in this bracket do not disclose their ethnicity. As part of our Equality Objectives, we are committed to Improving the robustness of equalities data to inform an evidenced based approach to advancing equality, equality, diversity and inclusion. This includes improving our current declaration rates.

Benchmarking

As Ethnicity Pay Gap reporting continues to be voluntary for employers, there is no statutory instrument, or national database for benchmarking. This reflects the complexity of analysing a multi-faceted category such as ethnicity, and/or the issue of representing these fairly using a binary measure.

As a measure of comparison, it is possible to look to Camden Council, which has publicly reported their binary EPG since 2015/16. For the snapshot date of 31 March 2024 Camden reported a median hourly EPG of 12.0% (11.2% in 2023) and a mean hourly EPG of 12.0% (13.3%)³.

Bonus Payments

The City of London Corporation's bonus payment Ethnicity Pay Gap for the twelve months from 1 April 2023 to 31 March 2024, using binary analysis, is as follows:

Table 5: City of London Corporation Ethnicity Bonus Pay Gap (2024)

	2020	2021	2022	2023	2024
Median Bonus Gap	31.9%	49.9%	40.0%	-60.0%	14.5%
Mean Bonus Gap	23.1%	22.2%	24.4%	-0.7%	6.2%

The City Corporation's median ethnicity bonus pay gap continues to fluctuate, being 14.5% (more for White employees), from the previous year's -60.0% (more for Black, Asian, Mixed, or other Ethnic Group employees). The percentage difference is however lower than any of the previous four years. The mean ethnicity bonus gap, increased to 6.2%, from a minimal -0.7% in 2023.

As previously highlighted, Contribution Pay, a performance related scheme for those at the top of the grade was not operated in the data snapshot period. As such the level of bonus payments made were minimal, with 5.65% of employees identifying as white receiving a bonus, compared to 6.52% of employees identifying as Black, Asian, Mixed, or other Ethnic Group. The relatively low proportion of employees receiving bonus payments, means individual cases are mathematically more liable to have a greater influence or fluctuation on the calculation of the gap analysis.

³ [London Borough of Camden pay gap report 2022-23 | Open Data Portal](#)

Aggregated Category EPG Analysis

Hourly Rate

The City of London Corporation's hourly rate of pay at the snapshot date of 31 March 2024, broken down into aggregated ethnicity categories, is as follows:

Table 6: City of London Corporation Ethnicity Aggregated Analysis: Median Pay Gap (2024)

Ethnic Category	Black	Asian	Mixed	OEG
White	16.1%	7.2%	7.4%	16.1%
Black		-9.0%	-8.8%	0.0%
Asian			0.23%	9.0%
Mixed				8.8%

OEG = Other Ethnic Groups, not contained within the aggregated categories.

Table 7: City of London Corporation Ethnicity Aggregated Analysis: Mean Pay Gap (2024)

Ethnic Category	Black	Asian	Mixed	OEG
White	19.2%	15.1%	10.9%	25.8%
Black		-4.2%	-8.4%	6.6%
Asian			-4.3%	10.8%
Mixed				15.0%

OEG = Other Ethnic Groups, not contained within the aggregated categories.

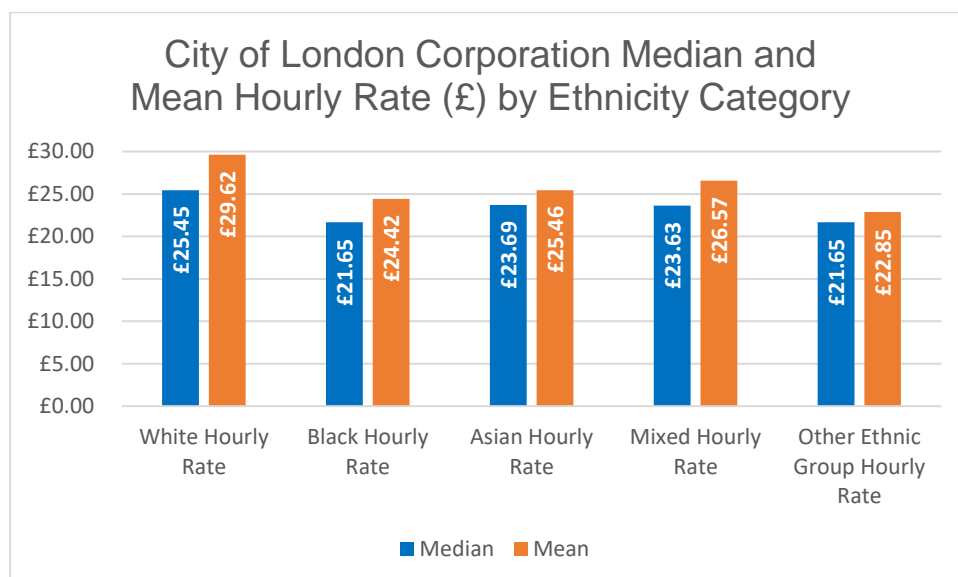
Analysis at the aggregated level results in 10 ethnicity pay gap figures to report on for each of the median and mean analysis. This provides some greater insight into the aggregated ethnic categories, although at the same time providing a more complex data set to interpret. Positive figures in the table reflect that the pay gap is in the favour of the ethnic category on the left of the table. For example, at the corporate level, employees identifying as white receive 16.1% (median pay gap) more than employees identifying as black. Negative figures indicate a pay gap in favour of the ethnic category at the top of the table. So, employees identifying as Asian receive 4.2% (median pay gap) more than employees identifying as black.

Overall, there is a large range in the ethnicity pay gaps observed, from minimal to large. The largest being 25.8% (Mean Pay Gap: White category compared to Other Ethnic Groups category). There are some clear patterns at the overall corporate level, with the White category receiving a higher rate of pay compared to all other groupings, and the Other Ethnic Groups category receiving a lower rate of pay compared to all others (except median pay gap with black category – where there is no gap). This is confirmed by the median and mean hourly rates for each category.

Table 8: Ethnicity Aggregated Analysis - Median and Mean Hourly Rates

	White Hourly Rate	Black Hourly Rate	Asian Hourly Rate	Mixed Hourly Rate	Other Ethnic Group Hourly Rate
Median	£25.45	£21.65	£23.69	£23.63	£21.65
Mean	£29.62	£24.42	£25.46	£26.57	£22.85

Figure 7: City of London Corporation Median and Mean Hourly Rate by Ethnicity (2024)



Employees identifying as White have the highest median and mean hourly rates of pay. Employees from all other ethnicity categories are paid less. For median pay, this ranges from £1.77 less for employees identifying as from an Asian background, to £3.80 less for employees identifying as black or other ethnic background. For mean pay, the differences are larger, with the lowest being £3.05 less for employees identifying as from a Mixed background, to £6.76 less for employees from an Other Ethnic group category.

Pay Quartiles

The distribution of employees by ethnic group across pay quartiles in the City of London Corporation is presented in the below chart and table (snapshot date 31 March 2024, alongside contextual data taken from the 2021 Census)

Table 9: Ethnicity Aggregated Analysis – Pay Quartile Distribution and Benchmarking

	White	Black	Asian	Mixed	OEG	Not Known
Upper Quartile	69.66%	2.61%	2.92%	3.00%	0.38%	21.43%
Upper Middle Quartile	71.60%	6.29%	8.29%	2.84%	1.15%	9.82%
Lower Middle Quartile	64.31%	9.29%	9.13%	4.37%	1.53%	11.36%
Lower Quartile	48.24%	8.90%	6.52%	3.83%	1.92%	30.60%
City of London Corporation Total	63.45%	6.77%	6.72%	3.51%	1.25%	18.30%
England and Wales (Census 2021)	81.70%	4.00%	9.30%	2.90%	2.10%	0.00%
London (Census 2021)	53.80%	13.50%	20.70%	5.70%	6.30%	0.00%
City of London (Census 2021)	69.40%	2.70%	16.80%	5.50%	5.60%	0.00%

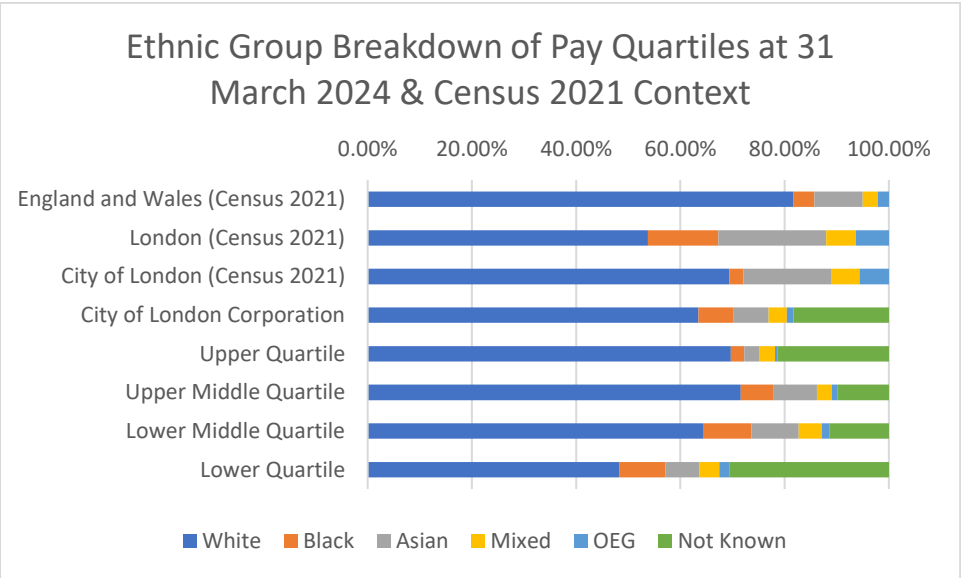
Looking at the split of the different Ethnic Groups across the quartiles, helps to highlight the potential source of the pay gaps identified. Across all categories, except for white and mixed, there is a much smaller proportion of employee in the upper quartile than in the other three quartiles and compared to total proportion. Both Black and Asian categories fall to lower than three percent (2.6% and 2.9% respectively), compared to making up just less than 7 percent of the overall workforce.

There is no consistent pattern across the aggregated categories: the proportion of employees identifying as Black is more heavily weighted towards the two lowest quartiles; whereas employees identifying as Asian have higher proportions in the two middle quartiles; the

proportions of employees identifying as mixed are relatively consistent across all quartiles; while Other Ethnic Groups proportions are small overall, there is a small increase in proportion with reducing quartile. Figures for White and Not Known were presented in the binary analysis.

As previously outlined, accurate analysis of both the representative nature of the City Corporation is hampered by the lack of disclosure across all quartiles, particularly the Lower and Upper Quartiles. A more comprehensive data set, may result in a shift in overall proportions.

Figure 8: City of London Corporation Ethnicity Breakdown of Pay Quartiles (2024)



Disability Pay Gap

Definition

There are currently no UK Government requirements or guidelines for the calculation of the Disability Pay Gap, nor any statutory instrument or national database for benchmarking. As such, the City of London Corporation chooses to voluntarily calculate its Disability Pay Gap using data that employees are asked to voluntarily self-certify as “Disabled” or “Not Disabled”. It is therefore important note that his indicator does not accurately measure whether an employee meets the definition of “disability” under the Equality Act 2010.

For the snapshot date of 31 March 2024, the non-disclosure rate for disability data for all City Corporation employees is 28.1% (25.2% in 2023).⁴

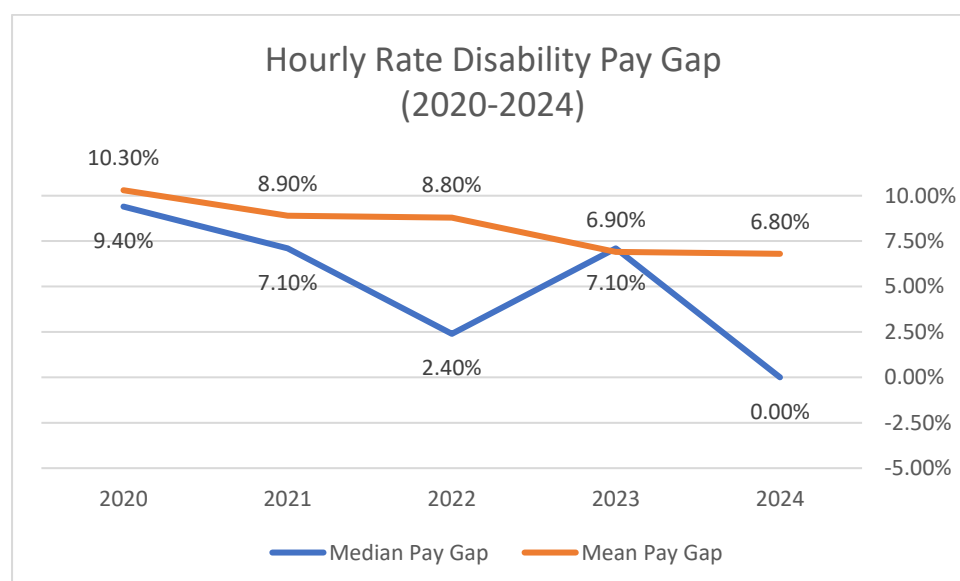
Hourly Rate

The City of London Corporation’s hourly rate Disability Pay Gap at the snapshot date of 31 March 2024 is as follows:

Table 10: City of London Corporation Disability Pay Gap 2024

	2020	2021	2022	2022	2024
Median Pay Gap	9.4%	7.1%	2.4%	2.4%	0.0%
Mean Pay Gap	10.3%	8.9%	8.8%	8.8%	6.8%

Figure 9: City of London Corporation Disability Pay Gap Trend 2020-2024



The DPG for mean hourly pay rates stood at 6.8% on 31 March 2024. This is a minimal decrease on the previous year (6.9%), but continues the downward trend of recent years, with the mean DPG narrowing by 3.5% since 2020. The mean pay data therefore indicates that employees who identify as disabled are on average paid less than employees who identify as not disabled.

⁴ This is an aggregate of employees providing data under the category “Declined to specify” and those who leave the field blank.

The median hourly rate DPG stood at 0.0% on 31 March 2024. This is a reduction from the previous year (7.1%) and is the first time no differential has been reported between those identifying as Disabled and Not Disabled on this measure.

Table 11: City of London Corporation Disability Pay Gap - Breakdown by Quartiles 2024

Quartile	Not Disabled	Disabled	Not Known	Median Not Disabled Hourly Rate	Median Disabled Hourly Rate	DPG Median Hourly Rate%	Mean Not Disabled Hourly Rate	Mean Disabled Hourly Rate	DPG Mean Hourly Rate%
Upper	69.97%	4.84%	25.19%	£44.38	£42.00	5.4%	£46.68	£44.10	5.5%
Upper Middle	69.76%	6.98%	23.25%	£28.21	£27.57	2.3%	£28.83	£28.18	2.3%
Lower Middle	66.92%	6.37%	26.71%	£21.85	£22.65	-3.7%	£22.25	£22.36	-0.5%
Lower	57.44%	5.37%	37.19%	£16.69	£16.83	-0.8%	£16.45	£16.45	0.0%
Totals	66.02%	5.89%	28.09%	£25.21	£25.21	0.0%	£29.19	£27.20	6.8%

Looking at the proportion of employees across the quartiles, the numbers are broadly consistent, however the high rates of non-disclosure at all quartiles hampering any useful analysis.

Bonus Payments Disability Pay Gap

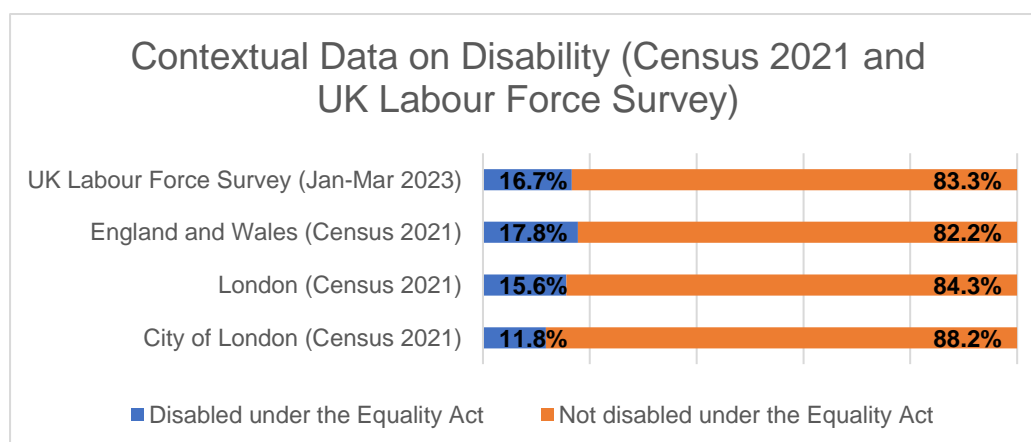
The City of London Corporation's bonus payment Disability Pay Gap for the twelve months from 1 April 2023 to 31 March 2024 is as follows:

Table 12: City of London Corporation Disability Bonus Pay Gap 2024

	2020	2021	2022	2023	2024
Median Bonus Gap	3.9%	16.8%	-35.3%	-4.0%	0.0%
Mean Bonus Gap	-14.8%	-4.3%	-31.4%	32.6%	-40.1%

The median bonus DPG sits at 0.0% for the first time. The mean bonus payment DPG has with the exception of 2023, generally being in favour of those identifying as disabled. The mean disability bonus gap figure for 2024 (-40.1%) is the largest disparity in recent years.

Only 16 (5.21%) of employees who identify as disabled received a bonus in the snapshot period, compared to 233 (6.77%) of employees who do not identify as disabled. With such very small numbers in the Disabled Category receiving a bonus, because of the low proportion of all staff receiving bonus payments in the snapshot period, it is difficult to take any strong inferences from the data.



Conclusion and Next Steps

Overall, the pay gap figures reported remain broadly consistent with those from previous years, with some small shifts compared to March 2023. The only exception being the median disability pay gap, which has reduced to zero (from 7.1%).

Overall, these shifts seem to be indicative of a longer-term positive trend in all pay gap figures. However, due to the nature of the calculation method there will be a natural mathematical variation in the workforce numbers included within the snapshot each year and therefore some deviation due to these measures used that are unrelated to pay practice.

The levels of non-disclosure observed highlights the continued need to actively work with the workforce to improve our data, especially the levels of disclosure on protected characteristics across employees and our casual workforce. This will enable stronger analysis and greater insight.

The City of London Corporation is committed to equal opportunities and equal treatment for all employees. Although many of the pay gap measurements are either already relatively small, or larger but moving in a positive direction, there will always be more that we can do to improve our culture, policy, process, and practices to ensure a truly bias free work environment for all employees. Our aim is to create an environment, in which people irrespective of their background can expect to develop, progress, flourish and perform and be remunerated fairly for the work that they do.

To support our EDI commitments, reduce any perceived barriers to engagement and progression and work towards greater pay equity. This will include:

- Guarantee the robustness of our job evaluation scheme and policy, to ensure that we have equal pay for work of equal value, which provides protection against claims of equal pay. This forms a key element of the Ambition 25 programme.
- Review of our pay structure and reward practices to ensure that these support fair and equal remuneration, and that any additional payments are minimised, and where they remain necessary, are actively monitored and moderated.
- Ensure our work and engagement practices do not preclude or discourage capable individuals from applying to, be appointed, and progressing within the organisation (e.g. recruitment activities; where we advertise; the benefits we offer; our support for flexible working).

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City of London Corporation Committee Report

Committee(s): Equality, Diversity and Inclusion Sub-Committee	Dated: 16/06/2025
Subject: Social Mobility Report	Public report: For Information
This proposal: <ul style="list-style-type: none"> • delivers Corporate Plan 2024-29 outcomes • provides business enabling functions 	Diverse Engaged Communities Dynamic Economic Growth Vibrant Thriving Destination Flourishing Public Spaces Providing Excellent Services Leading Sustainable Environment
Does this proposal require extra revenue and/or capital spending?	No
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:	Dionne Corradine, Chief Strategy Officer
Report author:	Helena Mattingley, Senior Equity, Equality, Diversity & Inclusion (EEDI) Change Partner Sarah Guerra, Equalities Director

Summary

Improving social mobility is a core pillar of the City Corporation's Equality Objectives 2024–29 and is embedded within the Corporate Plan and People Strategy. Participating in the Social Mobility Employer Index (SMEI) provides a valuable benchmarking tool to assess and enhance our efforts in this area. Executive Leadership Board endorsed moving to a three-year accreditation pattern, commencing after 2025 submission.

The City Corporation's 2025 submission (Annex 1) outlines a wide range of internal and external facing activities supporting social mobility. This was submitted to the Social Mobility Foundation ahead of the deadline of 6 June 2025.

Recommendations

Members are asked to:

- Note the contents of this report.
- Note the appended 2025 Social Mobility Employer Index submission.

Main Report

Background

1. Socio-economic diversity is visible in our Mission¹, Corporate Plan 2024-2029 and echoed in the People Strategy 2024-2029. City Corporation is working hard to create an “exceptional work environment where employees have the skills, recognition and motivation to deliver our ambitious Corporate Plan”. To achieve this, we recognise skills and talent from every socio-economic background, enabling our staff to perform at their best. When people come together from different backgrounds, we increase innovation, improve services, and strengthen employer engagement. We also demonstrate that the experience for our staff reflects the vision for social mobility we articulate for the Square Mile.
2. Socio-economic diversity is core to how we operate internally and externally. This has been true for hundreds of years, in the foundation of Gresham College, the livery companies’ role in establishing City and Guild Apprenticeships, City Corporations’ convening role in Social Mobility Taskforce, leading to Progress Together as a leading membership body for social mobility. Most recently, the City Bridge Foundation announced its ten-year funding policy which prioritises (among three other themes) economic inequality. All show a recognition that ‘talent is everywhere, opportunity isn’t’, and are leading the way to changing this at national, regional and local levels.
3. City Corporation has dedicated one of the published Equality Objectives (2024-29) solely on socio-economic diversity as we believe that “someone’s socio-economic background should not limit their potential to flourish”. This ambition is underpinned by our socio-economic diversity aims:
 - Continue to use our influence to advance socio-economic diversity across the City, building on the success of the Socio-Economic Diversity Taskforce report and its recommendations.
 - Collaborate with a variety of communities to enable opportunities for those from diverse socio-economic backgrounds to get in, get on, and belong in the City Corporation.
 - Continue to measure our performance as an employer across the eight areas set out in the Social Mobility Index.

¹ [Our Corporate Plan 2024-29 - City of London](#): The City of London Corporation is the governing body of the Square Mile dedicated to a vibrant and thriving City, supporting a diverse and sustainable London within a globally-successful UK.

- Closer working across the City of London Corporation family to tackle barriers collectively and holistically for underrepresented groups.

Current Position – Social Mobility Employer Index

4. The City Corporation has participated in the Social Mobility Employer Index (SMEI) since 2017. The SMEI is the leading annual benchmarking and assessment tool for employer led social mobility.
5. City Corporation's rankings in the SMEI have varied since 2018 (Table 1), with a significant improvement in 2024 due to a more collaborative and feedback-informed approach. The number of competitors entering the SMEI changes each year, with a high of over 200 entries in 2021.

Table 1: City Corporation's SMEI Rankings

Year	2018	2019	2020	2021	2022	2023	2024
Result	66	56	50	40	67	87	58
# Entries	106	125	119	203	149	143	150

6. In 2025, the EEDI team engaged colleagues across the organisation to compile the SMEI submission. Since 2024, City Corporation has:
 - Continued to prioritise Social Economic Background (SEB) on par with protected characteristics in Equality Impact Analysis (EQIA)
 - Increased declaration rates for SEB, through engagement with Executive Leadership Board, Senior Leadership Team, internal comms teams, all staff networks and all staff events, moving from 16% to 29% for SEB
 - Engaged Executive Leadership Board in their Away Day to jump start our Theory of Change for Social Mobility
 - Trained EEDI Practitioners in facilitating Theory of Change
 - Collected SEB data from our Candidates, the first local authority in England to do so
 - Strengthened EEDI leadership through appointment of Equalities Director
 - Recruited dedicated senior EEDI professional for Social Mobility portfolio
 - Launched 'Social Mobility in the City', one of the City Belonging Networks open to all businesses in the Square Mile
 - Transformed the Free School Meals (FSM) process at Aldgate School by incorporating paper systems onto digital platforms, enabling automation of online checks for change of circumstance, instant decisions and higher accuracy and uptake of FSM
 - Supported City Corporation's Social Mobility Network to profile their news, e.g. participation in the Lord Mayor's Parade; promoting Listening Circles

e.g. Education, and Accent Bias

7. The SMEI narrative reflects a snapshot of key activities and signals our strategic direction. Highlights include:
 - Continued impact of Progress Together
 - Launch of 'Social Mobility in the City' with Accenture
 - City Bridge Trust's 10-year policy, *Standing with Londoners*, which prioritises tackling economic inequality
 - Ongoing development of a Theory of Change and Action Plan,
 - Investment in staff capacity, confidence and capability around change management, deepening cross working relationships between HR, EEDI practitioners in Institutions and Departments and Staff Network leads in City Corporation
 - Potential transformative impact of Project Sapphire and incoming ERP system
8. City of London Corporation received targeted feedback from the SMEI in 2024:
 - Calculate and publish class pay gap with targets
 - Take a comprehensive approach to contextual recruitment
 - Design and implement an inclusive decisions process
9. City Corporation is making progress to collecting sufficient socio-economic data to calculate the Class Pay Gap, increasing disclosure rates 16% to 29% for Social Economic Background (SEB). Recruitment improvements will be actioned with the development and implementation of Project Sapphire, the incoming Enterprise Resource Planning (ERP) system. An inclusive decisions process (Equality Impact Assessments) was launched and will meet the expectations for socio-economic inclusion for SMEI.
10. To meet the 6 June deadline, the full SMEI application was shared to the incoming Chair, previous Chair and Deputy Chair of the EDI Sub Committee. A draft has been circulated to all contributors and shared with the Executive Leadership Board. Our full submission (see Annex 1) includes extensive information on social mobility activity across City Corporation.

Proposals - Future Focus

11. City Corporation will look to measure socio-economic diversity outcomes of 'getting in' by collecting and analysing recruitment and selection trends, 'getting on' through analysing staff progression, and belonging through staff experience measures. Externally, City Corporation will anticipate the needs of all socio-economic groups in providing excellent services and in engaging diverse communities, and challenging all businesses within the Square Mile to champion socio-economic diversity as a path for dynamic economic growth.

12. Areas of future focus have been informed by previous feedback from this committee and emerging through the collation of evidence for this SMEI submission. These areas will be validated through the SMEI feedback (likely October).

13. Our future activity may centre on

- Continually increasing staff SEB disclosure, and analysing and publishing it when it is robust enough to do so
- Producing 'Class Pay Gap', similar to the statutory Gender Pay Gap report, equipping City Corporation to consciously close any class gap through targeted activity, leading to a more engaged staff community who are recognised for their contributions
- Articulating measures for socio-economic diversity in (e.g.) recruitment, progression, leadership roles, training uptake so that socio-economic background has no negative impact on internal progression rates or retention
- Reviewing the end-to-end recruitment process, implementing contextual shortlisting, offering opt-in support for candidates from lower socio-economic backgrounds, and training on accent bias for recruiting managers, enabling access across all socio-economic groups so City Corporation benefits from the full range of skills and talents
- Clearer targeting / focus support for social mobility, in contrast to open and inclusive support which is available to all

Sharing case studies on our best practice

Proposals – Action Plan and Theory of Change

14. A Social Mobility Action Plan and Theory of Change is in development. A Theory of Change is a roadmap that visualises how specific activities lead to outputs, and how the outputs will lead to the intended outcomes.

15. The Social Mobility Action Plan uses:

- 2024 feedback
- our insights gained from collating this year's submission
- voices from our critical friends
- external leaders

as a basis for how to progress in socio-economic diversity internally and champion social mobility externally.

Social Mobility Working Group

16. After submission, a Social Mobility Working Group, will use the Action Plan and Theory of Change to oversee and deliver the activities across the organisation. The activities of the group will reflect the full span of our Equality Objective for socio-economic diversity: our influence externally in the City; community outreach

to enable opportunities to 'get in', 'get on' and belong in City Corporation; closer working across the City of London family to tackle barriers for underrepresented groups. We will use the SMEI as a way to measure our progress.

Corporate & Strategic Implications

- Strategic implications – All Corporate Plan 2024-29 Outcomes are impacted (directly and indirectly) by this work, as well as outcomes in the People Strategy and Equality Objectives. The SMEI developing Theory of Change and Action Plan will develop activities that enable delivery of our wider equality objectives,
- Financial implications - £1200+VAT covered by the EEDI budget.
- Resource implications – Led by EEDI team, contributions and activity dispersed throughout City Corporation
- Legal implications – none
- Risk implications – Potential reputational risk of being perceived as excluding specific socio-economic groups mitigated by the actions in train.
- Equalities implications – This proposal is a core part of our commitment to equality; it supports City Corporation's commitment to be an organisation where people feel respected, and they belong - going beyond the protected characteristics (as set at the Equality Act 2010) to include social mobility.
- Climate implications – none
- Security implications - none

Conclusion

17. The 2025 SMEI submission reflects extensive cross-organisational collaboration and a deepening commitment to social mobility. Feedback and rankings are expected in October 2025.

Appendices

Appendix 1 –2025 City Corporation Social Mobility Employer Index Submission

Helena Mattingley

Senior Equity, Equality, Diversity & Inclusion (EEDI) Change Partner
E: CSPT.EDI@cityoflondon.gov.uk

Social Mobility Employer Index 2025

Please note that we only accept online submission via our portal.
Some wording may differ from this document.

Organisation information.....	3
Section 1: Pre-18 outreach and work with young people	11
Section 2: Attraction and post-18 outreach.....	25
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Section 4: Routes into the employer	38
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Section 7: Culture and internal advocacy	56
Section 8: External advocacy	62

Please note that this document is only for reference – all Index submissions must be submitted through the online portal.

Your name: *	Helena Mattingley
Job title: *	Senior EEDI Practitioner
Email address: *	Helena.mattingley@cityoflondon.gov.uk
Telephone number *	07814254942
Organisation: *	City of London Corporation
<input checked="" type="checkbox"/>	We are aware that there is a £1200 +VAT charge to enter the 2025 Employer Index* *Charities and employers with 49 or fewer employees are exempt.

Organisation information

1. What is your organisation's address?

Guildhall, PO Box 270 London, EC2P 2EJ

[This contact will only be used if your organisation is eligible to pay the entrant fee and is paying via invoice]

2a. What is the name of your finance contact?

Nikki Jago

[This contact will only be used if your organisation is eligible to pay the entrant fee and is paying via invoice]

2b. What is the email address of your finance contact?

CityProc.AP@cityoflondon.gov.uk

[To enable us to share the communications pack and collect your logo please share:]

2c. Name of your communications contact

Lorraine McLennan

[To enable us to share the communications pack and collect your logo please share:]

2d. Email address of your communications contact

Lorraine.mclennan@cityoflondon.gov.uk

3a. Is your organisation in the:

- ☐ Private sector
-
- ☒ Public sector
-
- ☐ Third sector, including charities, social enterprises, and not-for-profit organisations
-

[If 3a = 'Private sector']

3b. Please select the main sector your organisations:

- | | |
|-------------------------------------------------|-------------------------------------------------|
| <input type="checkbox"/> Arts and entertainment | <input type="checkbox"/> Management consultancy |
|-------------------------------------------------|-------------------------------------------------|
-

<input type="checkbox"/> Automotive	<input type="checkbox"/> Marketing
<input type="checkbox"/> Banking, financial services and	<input type="checkbox"/> Media
<input type="checkbox"/> Broadcasting	<input type="checkbox"/> Pharmaceuticals
<input type="checkbox"/> Construction	<input type="checkbox"/> Product design
<input type="checkbox"/> Energy, water or utility	<input type="checkbox"/> Professional services
<input type="checkbox"/> Engineering or industrial	<input type="checkbox"/> Public relations and communications
<input type="checkbox"/> Facilities management	<input type="checkbox"/> Publishing
<input type="checkbox"/> Fast-moving consumer goods	<input type="checkbox"/> Real Estate
<input type="checkbox"/> Gaming	<input type="checkbox"/> Retail
<input type="checkbox"/> Hospitality	<input type="checkbox"/> Recruitment
<input type="checkbox"/> Housing	<input type="checkbox"/> Social and market research
<input type="checkbox"/> Law	<input type="checkbox"/> Technology, software and computer
<input type="checkbox"/> Leisure, tourism and sport	<input type="checkbox"/> Telecommunications
<input type="checkbox"/> Life Sciences	<input type="checkbox"/> Transport and logistics
<input type="checkbox"/> Other, please specify	Click or tap here to enter text.

[If 3a = 'Public sector']

3c. What type of public sector organisation is it?

<input type="checkbox"/> Central government
<input checked="" type="checkbox"/> Local government
<input type="checkbox"/> A health authority or NHS trust
<input type="checkbox"/> Other - please specify in comments box below

4. Total number of UK employees:

4475

5. Please confirm if you are submitting data for:

<input checked="" type="checkbox"/> The whole UK workforce	
<input type="checkbox"/> A section of the UK workforce (please give details):	Click or tap here to enter text.

6. Please indicate below which regions and or nations of the UK your organisation has offices in:

(Please click all that apply)

<input checked="" type="checkbox"/> East of England	<input checked="" type="checkbox"/> South East
<input type="checkbox"/> East Midlands	<input type="checkbox"/> South West
<input checked="" type="checkbox"/> London	<input type="checkbox"/> Yorkshire and the Humber
<input type="checkbox"/> North East	<input type="checkbox"/> Wales
<input type="checkbox"/> North West	<input type="checkbox"/> West Midlands
<input type="checkbox"/> Northern Ireland	<input type="checkbox"/> No Central Office
<input type="checkbox"/> Scotland	

7a. Do you have workforce based outside the UK?

☒ Yes ☐ No

[If 7a = 'Yes']

7b. If yes, which of the following best describes your organisation

☒ We already collect data on some or all of our workforce outside of the UK

☐ We are considering how we might collect data from our workforce outside of the UK

☐ We are not considering how data might be collected from this population

8. Employers are required to use a 12-month reporting period for the data submitted to the Index - please indicate below which you are using:

☐ Calendar year (Jan 2024 – Dec 2024)

☐ Academic year (Sept 2023 – Sept 2024)

☒ Financial year (please specify dates): April 2024- March 2025

9. Does your organisation want to submit to the Employer Index anonymously?

Once you have received your ranking in the Index, we will contact you to confirm if you wish to remain anonymous or not.

☐ Yes ☒ No

10a. Has your organisation submitted to the Employer Index previously?

☒ Yes ☐ No

[If 10a = 'Yes']

10b. Please select all years that apply:

<input checked="" type="checkbox"/> 2024	<input checked="" type="checkbox"/> 2020
<input checked="" type="checkbox"/> 2023	<input checked="" type="checkbox"/> 2019
<input checked="" type="checkbox"/> 2023	<input checked="" type="checkbox"/> 2018
<input checked="" type="checkbox"/> 2021	<input checked="" type="checkbox"/> 2017

11. If you entered the Index in 2024, please provide a short summary of any changes you have made to your practices because of the advice we provided in your feedback report. [1189 / 1200 characters max]

We have

- Published Social Mobility as an Equality Objective
- Prioritised Social Economic Background (SEB) on par with protected characteristics in Equality Impact Analysis (EQIA), so inclusive decisions processes recognise all SEB
- Increased declaration rates for SEB, through engagement with Executive Leadership Board, (ELB) Senior Leadership Team, internal comms teams, staff networks and all staff events, moving from 16% to 29% for SEB
- Engaged City Corporation's ELB at their Away Day to jump start our Theory of Change for Social Mobility
- Trained EEDI Practitioners in facilitating Theory of Change
- Collected SEB data from our Candidates, the first local authority in England to do so
- Strengthened EEDI leadership through appointment of Equalities Director
- Recruited dedicated senior EEDI professional for Social Mobility portfolio
- Launched 'Social Mobility in the City', one of our Networks open to all businesses in the Square Mile
- Transformed the Free School Meals (FSM) process at Aldgate School by incorporating paper systems onto digital platforms, enabling automation of online checks for change of circumstance, instant decisions and higher accuracy and uptake of FSM

- Supported City Corporation's Social Mobility Network to profile their news, e.g. participation in the Lord Mayor's Parade; promoting Listening Circles e.g. Education, and Accent Bias

12. How did your organisation first hear about the Employer Index.

(Please click all that apply)

- ☒ Through your organisation's work with the Social Mobility Foundation on one of our student Programmes
- ☐ Through direct contact from a Social Mobility Foundation employee (not related to your organisation's work on one of our Programmes)
- ☐ Through your organisation's engagement with our advocacy and campaigning work
- ☐ Via the Social Mobility Foundation's social media
- ☐ From another employer who had previously submitted to the Social Mobility Employer Index
- ☐ Through a trade association, please state which:
- ☐ Through a professional body: please state which:
- ☐ Through a diversity & inclusion consultancy, please state which:
- ☐ Through a regulatory body, please state which:
- ☐ At a webinar or event, please state which:
- ☒ Your organisation's own research
- ☐ Somewhere else, please write in:
- ☐ Don't know

13. Why did you decide to enter the Index in 2025?

(Tick all that apply)

- ☒ To help meet our diversity goals
- ☐ The feedback helps to improve our organisation
- ☐ We use our ranking in our publicity

<input type="checkbox"/>	We use our ranking to win business or contracts
<input checked="" type="checkbox"/>	Other: Commitment to socio-economic diversity is a core corporate objective in it's own right; this will help us improve what we do

14. Are there ways in which you operate as an employer that feel distinct, and which are helpful for us to understand as we consider the information you have shared? This might include, for example, organisational ownership (in the private sector), leadership structures, recent mergers/acquisitions, information about the clients or communities that you serve. (6366 / 2000 characters)

The City of London Corporation is the governing body for the City of London ('the City' or 'Square Mile') on behalf of all who live, study, work, and visit. We provide modern, efficient, and high-quality local services and policing for all. This includes education, social care, housing and environmental services, as well as our service offer to the organisations who are based in the Square Mile. We provide services and the environment for the City, enabling 678,000 workers to generate £109bn in economic output each year, predominantly in the Financial and Professional Services (FPS) sector. We provide a dedicated police force for the City, with national responsibilities for fraud and cyber crime.

The City is the birthplace of London with a unique and diverse offer: unrivalled history and heritage, world-class arts and culture, and outstanding restaurants, cafes, hotels, pubs and bars. The reach and responsibilities of City Corporation is unlike any other organisation. We deliver the functions of a local authority for our residents (8,600), and we hold multiple other responsibilities for our worker population (678,000), businesses (24,000), and the 100 livery companies and guilds who have made the City their home.

The residents, workers and businesses are represented by independent and non-partisan political voices of 125 elected Members, Aldermen and Alderwomen. Our Lord Mayor, alongside Sheriffs and with elected Members, has huge convening power to promote the interests of people and organisations in the City, across London, and in the UK, playing a valued role on the world stage. Unlike other local elections, businesses and other organisations registered in the Square Mile can nominate voters to City elections, so that, alongside registered residents, they can have a say in on the way City Corporation is run. For the first time in our history, and the first UK local authority to do so, we have collected socio-economic background data for Candidates standing for election.

Our Elected Members are supported by 4,475 staff officers, who are employed by the City of London Corporation. Our staff lead, manage and delivery our services, such as management of green spaces in and outside the capital as well as City streets, providing libraries and schools, and managing port health and animal reception centres. Cultural institutions such as the Barbican Centre, Guildhall Gallery and five famous London Bridges are managed under the City of London Corporation's umbrella. Our staff are based in the City, in our green spaces, cultural institutions and represent 650 different role profiles.

We support our communities through responsible business, charitable giving, improving the environment and air quality, and providing education, training and skills for young people and providing social care and affordable housing across London.

City Corporation has a highly influential role within the UK's Financial and Professional Services sector (FPS), as the Square Mile is the heart of the UK's FPS district. Consequently, City Corporation has a role in advocating and promoting FPS, driving economic growth, with our Lord Mayor acting as a global ambassador for the City as the international hub for FPS. Our Lord Mayors have a mayoral theme for their tenure, including:

‘Growth Unleashed’ 2024/25, especially unlocking growth and prosperity through unlocking talent through social mobility , and

‘People and Purpose’ 2021/22, focusing on driving social mobility at all levels.

These Mayoral campaigns gave local, regional, national and global prominence to the impact of socio-economic diversity on innovation and business growth.

The City of London Corporation has sizeable and significant institutions under a shared City Corporation banner. These are within the governance and management of the City of London Corporation, although have distinct identities:

- Barbican Centre
- London Archives
- City Bridge Foundation
- City of London Police
- The Old Bailey
- Guildhall School of Music and Drama
- City of London Freeman's School
- City of London School for Girls
- City of London School

As well as the three schools above, City Corporation have strong relationships with other schools as part of the ‘City of London Family of Schools’. We have one maintained primary school, eleven sponsored academies as part of the City of London Academy Trust, and the three independent schools listed above.

City Corporation is closely linked to the livery companies, through a shared passion for education and charitable work, by election of key City of London officials (e.g. Lord Mayor and Sheriffs), and through pageantry and shared heritage. The City of London's Court of Aldermen have an element of control over the livery companies, and the livery companies have a role in electing the Lord Mayor. These are the same Liveries and Guilds who originally set up ‘City and Guilds’ in 1878, to provide quality training which supports individuals and businesses through technical education.

Since our 2024 SMEI application, we have strengthened our EEDI capability internally by

- Recruiting an Equalities Director to champion socio-economic diversity
- Appointing a Senior EEDI Practitioner dedicated to Social Mobility portfolio

- Commissioning external EDI consultants to conduct an independent EEDI Review, including social mobility
- Connecting SMEI data requirements to the incoming Enterprise Resource Planning (HR and Finance) system
- Launching a City-wide Social Mobility Network, open to all businesses within the Square Mile
- Provided a briefing to elected Members detailing EDI and socio-economic diversity to convey our responsibilities as a public sector body

Externally, we have continued to influence social mobility at a regional and national level by

- Providing evidence for House of Lords Select Committee on Social Mobility
- Leading City response to Financial Conduct Authority and Bank of England's consultation on EDI regulations, including recommendations to include socio-economic background to be included in regulations
- Supporting the launch of City Bridge Trust's 10-year funding policy. City Bridge Foundation (whose sole trustee is City Corporation) has unveiled 'Standing with Londoners', which focuses on four key roots of disadvantage: climate justice, access to justice, racial injustice, and economic inequality.

Section 1:

Pre-18 outreach and work with young people

Please note, when we refer to schools in this section, this also includes colleges.

■ **Please indicate if your organisation will be submitting answers to Section 1**

☒ Yes - we will be submitting answers to Section 1

☐ No - we will not be submitting answers to Section 1

■ **If no, please state the reason why you are not submitting answers to this section:**

(1,200 characters)

1. Do you have a written plan for your outreach work, showing what outcomes or impact you want to achieve with each activity and how you will achieve it? *This is sometimes called a 'theory of change', which is a document that you write before planning your outreach work. It details what outcomes you expect to achieve from the outreach work, and how you will achieve it.*

☒ Yes

☐ No

2. If yes, please submit a PDF of this plan. *If you have multiple plans/ theories of change for different outreach work, please combine these as one PDF and send. PDFs should be saved in the format: 'EMPLOYER NAME_Section1TOC'*

- Education Strategy PDF
- Guildhall School of Music and Drama's Access and Participation Plan p 7 -16 for strategy, Theory of Change (p48)

<https://www.gsmd.ac.uk/about-guildhall/corporate-financial-documents/policies>

3. In total, in how many schools or colleges did you undertake face-to-face outreach activities with during the 2025 Index reporting period? *Face-to-face outreach can be done online or in-person, but always involves a real-time interaction with a person. It can take the form of talks & presentations, mentoring, visits to or from schools, skills delivery etc.*

<input type="checkbox"/>	None
<input type="checkbox"/>	50 or fewer
<input type="checkbox"/>	51 – 100
<input checked="" type="checkbox"/>	101 - 200
<input type="checkbox"/>	201 – 300
<input type="checkbox"/>	301 - 500
<input type="checkbox"/>	500+

4. If you have a virtual or digital outreach offering, how many young people did you reach with this? *Virtual or digital outreach is not delivered by a person, but instead takes the form of online courses/videos/Massive Open Online Course (MOOC) or virtual work experience (where there is no human interaction)*

<input type="checkbox"/>	<1000
<input type="checkbox"/>	1001 - 5000
<input type="checkbox"/>	5001 – 10,000
<input checked="" type="checkbox"/>	10,000+
<input type="checkbox"/>	We don't have a virtual outreach offering
<input type="checkbox"/>	We have virtual outreach but we don't track engagement

5. Do you use the Careers and Enterprise Employer Standards Framework?

Only select yes if you already use the [Employer Standards Framework](#).

☒ Yes

☐ No, we are aware of it but don't use it

☐ No, we're not aware of it

6. What are the aims of the outreach work that you deliver in-person, and for roughly how many hours per school in a year do you deliver it (on average)?

Aims	Total hours ESU + Archives
<input checked="" type="checkbox"/> Aspiration raising activities	30 + 20 = 50
<input checked="" type="checkbox"/> Attainment raising activities	40 + 20 = 60
<input checked="" type="checkbox"/> Study skills or soft skills support	35 + 20 = 55
<input checked="" type="checkbox"/> Increase students knowledge of sector/jobs	35 + 20 = 55
<input checked="" type="checkbox"/> Increase teacher's knowledge	20 + 20 = 40
<input type="checkbox"/> We don't have specific aims of the activities	
<input checked="" type="checkbox"/> Other – Free text entry	
<input checked="" type="checkbox"/> Recruitment activities	20

7. If other, please specify the aims (1724 / no specified limit)

One of the aims of our Outreach work is increased recruitment activity, as our London Careers Fair is both an outreach activity and a platform for recruitment. We are aware of the Careers and Enterprise Employer Standards Framework, and have adapted this alongside other sector frameworks to form our own internal standards.

The London Archives run sessions for primary and secondary schools throughout the year, typically each event involves multiple classes. These events aim to connect students to their City's history, while aligning with history curriculum. Through engaging with real historical sources connected to London, we want to raise students' aspirations and academic ambitions higher.

Guildhall School of Music and Drama have identified two additional barriers due to their specialist higher education role and are investing over £1,970,000 over 4

years to widen access to underserved and underrepresented groups, predominantly prioritised by SEB, care experienced status, disability and ethnicity:

Barrier One - There is inequitable access to the performing art provision that supports the attainment and skill development required for access to the School. GSMD outreach aims to overcome the inequitable access, e.g. funded supported application scheme, Guildhall Young Artist bursaries, Originate, Get Backstage and specific bootcamps. More details later in this section.

Barrier Two – There are cost pressures in attending university, which can have impacts on mental health, wellbeing and engagement in studies. GSMD outreach includes Access Bursaries, Start-up Funds, one-day Transition to GSMD events, and access to Access and Participation staff on a drop in basis. More details later in this section.

8. What are the aims of the outreach work that you deliver via your digital platform/virtual outreach? *Tick the aims that most closely resemble the type of outreach work that you deliver through your virtual outreach.*

<input checked="" type="checkbox"/>	Aspiration raising activities
<input type="checkbox"/>	N/A
<input type="checkbox"/>	Attainment raising activities
<input checked="" type="checkbox"/>	Study skills or soft skills support
<input checked="" type="checkbox"/>	Increase students knowledge of sector/jobs
<input checked="" type="checkbox"/>	Increase teacher's knowledge
<input type="checkbox"/>	We don't have specific aims of the activities
<input type="checkbox"/>	Other – Free text entry
<input checked="" type="checkbox"/>	Recruitment activities

9. If other, please specify the aims

One of the aims of our Outreach work is increased recruitment activity, as our London Careers Fair is both an outreach activity and a platform for recruitment.

10. What ages do you deliver your outreach (in-person and virtual/digital) to? Select all that apply

- ☒ Early years (<5)
- ☒ Ages 5 – 10
- ☒ Ages 11 – 13
- ☒ Ages 14 – 16 (KS4 or Nationals)
- ☒ Ages 16 – 18 (KS5 or Advanced Highers)

11. Do you collaborate with other organisations to deliver outreach (tick all that apply)? *Collaborations are where you work together to deliver outreach - this can take the form of another organisation acting on your behalf, or multiple organisations working together to deliver a joined-up approach to outreach*

- ☒ Yes - we collaborate with other employers in our sector to target different schools
- ☒ Yes - we collaborate with other employers in our sector to develop materials
- ☐ No, we don't collaborate
- ☒ Yes - we collaborate with a third-sector organisation who delivers outreach on our behalf
- ☒ Yes we collaborate with universities to deliver outreach in schools

GSMD note: GSMD collaborates with RADA, Leeds Conservatoire on Acting and other external organisations on projects for young people – not via schools/colleges, as each individual applies directly to the projects.

www.gsmd.ac.uk/originate and www.gsmd.ac.uk/monologue-bootcamp.

Guildhall School does deliver outreach in Schools, e.g. Satellite Collective and Music Education Islington, meaning we work with universities to deliver outreach in schools.

12. Are you a Careers Enterprise Company Cornerstone Employer?

Cornerstone Employers work with their Careers Hub

☐ Yes

☒ No

13. Do you cover costs of your outreach?

☒ Yes, we cover all costs for individual participants and/or schools

☐ We cover some of the costs for individual participants and/or schools

☐ We don't cover any costs

14. Do you work with schools according to a target criteria? Only select yes if you approach schools based on targeting criteria (such as Free School Meals % or geographical location). If you approach schools based on anything else (such as employer contacts or local schools) select no.

☒ Yes

☐ No

15. If yes, what criteria do you use to select schools to work with? Only select criteria that you use to target schools - we are not asking whether you work with any of these schools, instead we are interested in how you choose which schools to work with.

☒ Above average % of students in receipt of Free School Meals

☒ TUNDRA or POLAR

☒ Index of Multiple Deprivation or Income Deprivation Affecting Children Index

☒ Non-Selective state school

☒ Other – please specify – Guildhall School of Music and Drama target schools that offer creative subjects, especially performing arts
Barbican – target based on location, state schools,

16. Do you work with any of the following to deliver your outreach?

☒ Careers Hub

<input checked="" type="checkbox"/>	Careers and Enterprise Company
<input type="checkbox"/>	Enterprise Advisor
<input type="checkbox"/>	Careers Wales
<input type="checkbox"/>	Skills Development Scotland
<input type="checkbox"/>	None of these
<input checked="" type="checkbox"/>	Apprenticeship Ambassador Network

17. What percentage of students that engage with your outreach work are eligible for Free School Meals?

<input type="checkbox"/>	We don't collect this
<input type="checkbox"/>	<10%
<input type="checkbox"/>	11 – 50%
<input checked="" type="checkbox"/>	51-75%
<input type="checkbox"/>	76-100%

Guildhall School of Music and Drama do not capture FSM data robustly, as potential students might apply under a different criteria. They GSMD use Index of Multiple Deprivation alongside other indices used by Universities.

18. Do you plan how you evaluate your outreach work before you start the activities?

<input checked="" type="checkbox"/>	Yes
<input type="checkbox"/>	No
<input type="checkbox"/>	We don't evaluate our outreach

19. Select the outcomes that you evaluate for. *Only select the outcomes that you specifically evaluate your outreach activities for. There is an option of 'other', and if you do not evaluate based on outcomes then you can select that option.*

<input checked="" type="checkbox"/>	Attendance at an activity
<input checked="" type="checkbox"/>	Enjoyment of an activity

<input checked="" type="checkbox"/>	Whether they would participate again
<input checked="" type="checkbox"/>	Increased communication skills
<input checked="" type="checkbox"/>	Increased knowledge of career options
<input checked="" type="checkbox"/>	Increased knowledge of future options
<input checked="" type="checkbox"/>	Increased capacity to make informed decisions about their future
<input checked="" type="checkbox"/>	Increased intention to work in sector
<input checked="" type="checkbox"/>	Increased knowledge of application pathways
<input checked="" type="checkbox"/>	Increased knowledge of financial support
<input checked="" type="checkbox"/>	Increased social self-efficacy
<input checked="" type="checkbox"/>	Increased well-being
<input checked="" type="checkbox"/>	Increased motivation
<input type="checkbox"/>	Our evaluation doesn't examine outcomes
<input checked="" type="checkbox"/>	Other –

20. Do you have an internal process to review the results of your evaluations and make changes if necessary?

<input checked="" type="checkbox"/>	Yes
<input type="checkbox"/>	No

21. Do you share the results of your evaluation with other employers?

<input checked="" type="checkbox"/>	Yes
<input type="checkbox"/>	No

22. Do you offer work experience to young people under the age of 16?

[For a definition of work experience please refer to the government website here.](#)

<input checked="" type="checkbox"/>	Yes
<input type="checkbox"/>	Yes, and we ring-fence opportunities for young people from lower socioeconomic backgrounds
<input type="checkbox"/>	No

23. Do you cover any costs of your work experience?

[For a definition of work experience please refer to the government website here.](#)

☐ No

☒ Expenses (e.g. travel, food)

☐ Paid at National Minimum Wage or higher

24. If you'd like to tell us about any other work that you do that you feel is relevant to this Section but not covered by the questions, please do so here [10848 / 2000 characters max]

The City of London Corporation embeds socio-economic diversity across its institutions, putting our Socio-Economic Diversity objective into action as part of organisation-wide Equality Objectives. Our decentralised model enables tailored, purposeful initiatives across education, culture, and community services, reaching far beyond our geographic boundaries. A sample of our activities are outlined here, and our devolved nature poses challenges for central data capture.

We are aware of the service offer from Careers Enterprise Company Cornerstone Employer, and are open to exploring this further. The framework aligns to a significant extend to the framework we already use. We are keen on understanding the benefits of partnering with CECCE.

Education & Young People

Department of Community and Children's Services (DCCS) are responsible for the education and care for children and young people, including extremely disadvantaged children.

- 100% of 16–18-year-old residents are in education, employment, or training.
- Children's Social Care rated 'Outstanding' by Ofsted
- Zero children in care experiencing three or more placements in the past year.
- All care leavers are in permanent housing by age 25, supported by our recognition of care experience as a protected characteristic.

Virtual School

- The City of London Virtual School, promotes and supports the education of children who have or have previously had a social worker, those who have been adopted or live with kinship carers, or are care leavers aged 18-25 years.
- The Virtual School regularly supports up to 90 children, within its changing cohorts, many are unaccompanied asylum seekers.
- The Virtual School provides bespoke education pathways in partnership with schools, colleges, universities and careers partners.
- The Virtual School provides information, advice and guidance, holiday workshops and enrichment programmes, online and face to face tuition and provides educational resources.
- The Virtual school celebrates the achievements of its children and young people at an annual ceremony in The Guildhall.
- Five City of London apprenticeship positions are supported within the Virtual School and delivered together with Partnership for Young London and the Adult Education and Skills service.

London Careers Festival (LCF)

- 10,367 learners engaged in February 2025, 5657 of which were in person (96% increase in in-person attendance).
- 111 schools participated; ~20% had >60% Pupil Premium, more than two thirds had Pupil Premium of over 30%.
- Supports Gatsby Benchmarks and connects students with employers, Livery Companies, and City Corporation careers.
- Tailored to primary, secondary, post-16 education and apprentices

Targeted Funding & Innovation

City Premium Grant

The City Corporation manage the City Premium Grant, open to our Family of Schools to apply for innovation funding. Successful CPG projects must align with the Education Strategy's vision: Helping learners to flourish in a rapidly changing world by championing outstanding education, encouraging lifelong learning and driving increased social mobility.

There are three funding streams within CPG:

1. Disadvantaged Pupils Grant (£1,458,000)

2. Partnership Grant, which must involve at least one state school partner (£384,000)

3. Strategic Grant (£384,000)

- 117 projects funded, reaching 3,500 underserved learners.
- Impact tracked via the ImpactEd portal.

Examples:

- City of London Academy Hackney (Pupil Premium 59%)

A teaching and learning coach helped two teacher participants who were new to post, focus on long term curriculum development and impact on KS4 results. As a result, the number of students achieving a grade 7 or better at GCSE rose from 46% to 88% in one subject. In the other subject, the number of students achieving a grade 4 pass increased from 61% to 76%.

- City of London Academy Highbury Grove (Pupil Premium 53%)

This project helped hundreds of students without equal access have the opportunity to learn a musical instrument. Many positive outcomes were reported including all students in years 7, 8 and 9 learning to play an instrument, 100% of Music A-Level students who previously participated achieving an A or B grade, and amongst a number of performance opportunities the chance to perform alongside Andrew Lloyd Webber and the Kennuh-Mason family on stage at the Theatre Royal.

- Highbury Grove, part of City of London Academy Trust (Pupil Premium 53%)

Activities week – providing financial support to the academic and their students to offer a broader range of enriching opportunities that would otherwise be inaccessible due to their socio-economic status. Students choose from a range of residential activities reflecting a range of creative, sport or outdoor activities.

- Aldgate School (Pupil Premium 22%)

Transformed the Free School Meals (FSM) process at Aldgate School by incorporating paper systems onto digital platforms, enabling automation of online checks for change of circumstance, instant decisions and higher accuracy and increased uptake of FSM.

City of London School

- 15% of students receive 110% bursaries; target is 20% by 2030.

Freemen's School

- Refugee Buddy Club has 30 members, paired with 25 refugee children and 8 parents/carers, fostering integration and peer support.
- Freeman's School began a new partnership with two Star Academy Schools in the northwest of England: Bay Leadership Academy and The Valley Leadership Academy. These are level 1 and 3 on the Multiple Index of Deprivation, and the schools have 50% and 43% Pupil Premium respectively. A second partnership with Eastside Young Leaders Academic (level 2 on the Multiple Index of Deprivation). Since September 2024, as a result of these partnerships, 2 students from each partnership began boarding education as a Year 12 pupil at Freeman's School
- All receive full coverage of fees and additional expenses, wraparound support and access to the Future Pathways Programme.

Arts, Culture & Access

Guildhall School of Music and Drama

Guildhall School has a regulatory commitment to deliver Access and Participation provision that supports underrepresented applicants and students to access, and succeed on, its prestigious degree programmes, as well as widening access to performing arts opportunities for young people from low-income backgrounds.

- Supported Application Scheme: 650+ applicants supported by free application, audition/interview travel bursary, skills workshops, skills and support, £400 start up fund; 10% enrolled. 45% from outside of Greater London, 56% who had an IMD Quintile 1 or Quintile 2 postcode, and 23% who had a POLAR4 Quintile 1 or Quintile 2 postcode. 10% of participants have enrolled at the School.
- Originate: a multi-organisation 8 month training programme for 18 young actors. 35% of participants enrolled prestigious drama schools.
- Get Backstage: four-days of specialised technical workshops, exclusive industry visits and theatre trips, and Q&As with students, teachers and theatre professionals. The project works with up state-educated, low income young people in years 11 and 12 each year, this is having a tangible impact on applications to GSMD.
- The Guildhall Young Artists (GYA) programme, is national network of six centres (three in London, two regional and one online) provide world-class performing arts training to 1900 under 18s, with bursaries supporting 30% of participants. In

2023/24, this supported 85 Guildhall Young Artists.

- Get Ready for Guildhall, which has for the last two years introduced a third of offer-holders to the student support services that are integral to student success, supporting successful transition to the School's undergraduate degree programmes, and the Access Bursary which financially supports low-income students throughout their studies.

Barbican Centre

Inspiring Young Londoners

IYL is a partnership between The London Centre and the Barbican Centre, curating four activity days based on 'inspire, mentor, access and skills', with the aim of engaging children from disadvantaged backgrounds in creative careers in the built environment industry. 220 students took part, many of which had never left their home borough, and for 80% of participants this was their first time in the City of London. As a result, the attendees reported feeling inspired to take up creative careers in the built environment. IYL also provided a platform for young voices to influence built environment professionals, through creative workshops and mentoring.

Barbican Creative Education programme

The Barbican Creative Collaboration department has worked with 42 schools and 1,258 students over the year to date.

Barbican Communities programmes

Our current Barbican Communities programmes that we have been working on over the last year has been the 'City of London Imagine Fund' and the 'Creative Communities' programme.

This programme was a collaborative effort with partners across the city to strengthen connections with and between neighbours and the culture on their doorstep through community grant-making, family-friendly play resources and events, and peer learning for local creative and community leaders.

Coordinated by the Barbican's Creative Neighbourhood team from August 2021 to the present and finishing in August 2025, the programme had three main strands of activity. It has developed and created with partners:

The Imagine Fund

The Imagine Fund is a community grant-making & support scheme in which decisions about funding are made by the community themselves. The fund exists to support exciting new ideas and projects to help the local community to thrive. Over 65 projects and initiatives have been supported, and the fund has distributed over 100K in grants.

The Community Impact Collective (CIC)

CIC is a collective of leaders working with communities in the City of London. The collective is dedicated to strengthening and advocating for values-led community work in the local area and is supported to develop their practice over an eight-week peer learning course. Learning and exchange events have attracted over 200 people from the creative and community sectors to the Barbican.

Play: Our Street

An annual programme of creative activities, events, and resources, co-produced with local people and the City's cultural organisations. Activities are accessible to all, inviting people to get creative at home and in their neighbourhoods. Over 14,500 Play Packs have been distributed to families and through partners, and the Barbican's permanent digital family resource has had over 10,000 unique views.

Our street play event called 'Our Street' have attracted over 20,816 visitors, of which 44% were new audiences to the Barbican. The audience profile has been representative of the diversity of London which is exceptional for most arts institutions.

Section 2:

Attraction and post-18 outreach

- Please indicate if your organisation will be submitting answers to Section 2: Attraction and post-18 outreach

- ☒ Yes - we will be submitting answers to Section 2: Attraction and post-18 outreach
-
- ☐ No - we will not be submitting answers to Section 2: Attraction and post-18 outreach
-

- If no, please state the reason why you are not submitting answers to this section: (1,200 characters)

[Click or tap here to enter text.](#)

1. Does your organisation conduct outreach to post-18 people either in-person or virtually, to raise awareness of employment opportunities (including apprenticeships)?

(tick all that apply)

- ☒ In person
-
- ☐ Virtually (direct engagement with specific universities)
-
- ☒ We undertake outreach in partnership with a third-party organisation
-
- ☐ No
-

2. Do you target any of your outreach work specifically at those from lower socioeconomic backgrounds?

- ☐ Yes, we only do recruitment/outreach work with people from lower socioeconomic backgrounds
-
- ☒ Yes, some of our opportunities are only available to people from lower socioeconomic backgrounds
-
- ☐ No, all of our events/outreach work is available to all students
-

3. In total, how many universities and apprenticeship providers did you conduct direct outreach with (virtually or in person – and not including reaching institutions through general social media messaging) in the 2024 reporting period?

INSERT NUMBER OF UNIVERSITIES 3

INSERT NUMBER OF APPRENTICESHIP PROVIDERS 19

4. Do you target your outreach work to specific universities/apprenticeship providers? *Only select 'yes' (and the method) if you *only* work with particular universities and/or apprenticeship providers because they meet the target criteria. Don't retrospectively look at whether or not the universities and colleges that you worked with also align with this criteria.*

Criteria	Criteria used?
Providers with an above average proportion of students from a low participation neighbourhood	<input type="checkbox"/>
Providers with a high proportion of IMD Q1 students	<input type="checkbox"/>
Non- Russell group universities	<input type="checkbox"/>
Providers with a high proportion of FSM students	<input type="checkbox"/>
No, we don't target based on any of these but we work with all that are relevant to our roles	<input type="checkbox"/>
No, we don't target based on any of these	<input checked="" type="checkbox"/>

5. Does your organisation partner with any widening participation and/or careers teams at any university (this might include joint planning of programmes or shared approaches to targeting young people)?

- ☐ Yes, we offer ring-fenced internships for LSEB students via the university careers/WP team

- ☐ Yes, we offer mentoring opportunities for LSEB students via the university careers/WP team
-
- ☐ Yes, we offer opportunities other than mentoring/work experience or internships for LSEB students via the careers/WP team
-
- ☒ No, we don't
-

6. Does your organisation partner with any third-sector organisations to deliver outreach opportunities to post-18 young people?

- ☒ Yes, list here (647 / 1,200 characters max)

Apprenticeships
 We support post-18 individuals in securing apprenticeships by collaborating with The King's Trust and Bankside Open Spaces Trust. King's Trust has a specific focus on supporting disadvantaged young people who are not in education or employment, reaching 73,000 young people in 2024. Bankside Open Spaces Trust provides career paths into gardening and horticulture, with 73% of the cohort moving to employment or further training. Through these partnerships, we offer apprenticeship opportunities in administration and environmental sectors, providing young people with valuable opportunities as part of a cross organisation cohort.

- ☐ No
-

7. If you offer direct outreach opportunities (e.g. mentoring, events, talks etc) please select which of the following steps you take to ensure they are accessible to LSEB students

- ☒ N/A
-

- ☐ We offer them at different times of the day and also in the evening
- ☐ We reimburse travel costs
- ☐ We reimburse lost earnings
- ☐ We offer ringfenced opportunities for LSEB students
- ☐ If they are in-person, we also offer a live-stream version

8. Do you partner with other employers to deliver collaborative work with post-18 young people?

- ☐ Yes, we collaborate with others in the sector
- ☐ Yes, we collaborate with others outside the sector
- ☒ No, we don't collaborate

12. Does your organisation operate any initiatives/partnerships to attract applications and/or increase the success rate of applicants from lower socioeconomic backgrounds into your recruitment pipeline?

- ☒ Yes
- ☐ No

If yes, please link to examples:

City Corporation offer a wide range of apprenticeships for new / existing employees. We encourage colleagues from lower socio-economic groups to apply for apprenticeships. Apprenticeships are ringfenced for applicants with GCSE and lower levels of qualifications, in exceptional cases up to A level as a maximum.

We offer a broad range of apprenticeships, e.g. technical creative roles, outdoor and public space roles, as well as office roles. We are proud of the New Spitalfields Markets apprenticeships offering a path to professional recognition in food safety roles, operations roles, business administration roles and management – reaching applicants who may not have considered apprenticeships as a route into these careers.

13. If you'd like to tell us about any other work that you do that you feel is relevant to this Section but not covered by the questions, please do so here [1799 / 2,000 characters max]

Apprentices recruited and managed by the City of London Corporation can be placed in teams within our departments (e.g. New Spitalfields Market), Institutions (e.g. Barbican Centre) and with external partners (e.g. Standard Bank). We offer a vast range of careers and working environments to our Apprentices, and the ongoing support to enable their success.

City Corporation includes the Heathrow Animal Reception Centre (HARC). HARC is a specialist site, and provides lectures and tours of HARC to specialist educational institutions. It hosts 3rd year Veterinary students, and specialist staff guest lecture at several Further and Higher Education institutions, providing insights into a specialist career.

To recognise and celebrate interns and the impact of internships, we hosted the Internships Work Conference at Guildhall. The event brought together the Rt Hon Sir Stephen Timms MP, Minister for Social Security and Disability, Catherine McKinnell MP, Minister for Schools and Cllr Ian Edward, Leader of Hillingdon Council and London Councils Executive Member for Children and Young People, celebrating the success of supported internships and the valuable opportunities they offer young people with special educational needs and disabilities.

The Town Clerk is sponsoring a mentoring programme to support care-experienced young people and those with special educational needs and disabilities (SEND) across London. The programme will enhance employability, career readiness and personal development by providing transformative mentoring relationships with City-linked professionals. The service will launch in the summer, bringing around 100 of the capital's most underserved young people into the Square Mile in the next three years to engage with the many opportunities the City offers.

Section 3:

Recruitment and selection

- Please indicate if your organisation will be submitting answers to Section 3: Recruitment and selection

☒ Yes - we will be submitting answers to Section 3: Recruitment and selection

☐ No - we will not be submitting answers to Section 3: Recruitment and selection

- If no, please state the reason why you are not submitting answers to this section: (1,200 characters)

[Click or tap here to enter text.](#)

- Where your organisation uses external recruitment agencies, are they given a brief specifically asking to seek a diverse range of candidates based on socioeconomic background?

☒ Yes

☐ No

☐ We don't use external agencies

1. Are those involved in the recruitment process trained on accent bias?

☐ Yes, all interviewers are trained on accent bias

☐ Yes, some employees are trained on accent bias

☒ No

2. Do you use AI when sifting application?

☐ Yes

☒ No

3. If yes, do you explore the impact of this on the number of candidates from lower socioeconomic backgrounds who progress to the next stage in the application process?

☐ Yes

☒ No

4. If yes, please share these findings (1,200 characters max)

■ **Do you ensure that the pay range for every role is clearly stated in all job adverts?**

☒ Yes ☐ No

5. If no, why not? (1,200 characters max)

FREE TEXT

6. Do you ask candidates applying for roles within your organisation what their current salary is?

☒ Yes ☐ No

7. Does your organisation offer financial incentives to employees that recommend a candidate who is then hired?

☐ Yes ☒ No

8. Do you analyse referral success rates by socioeconomic background?

☐ Yes ☒ No

9. Do any of your entry routes have minimum academic requirements?

For levels where your organisation does not have minimum grade requirements, please write 'none' in the minimum grade requirements column.

	Yes	No	Sometimes	We do not offer these
Level 6 & 7 apprenticeship	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Apprentice (level 5/ SCQF 8 and below)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
School leaver	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Graduate	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Experienced hires	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

10. Please detail below the average minimum academic requirements for roles at your organisation (where relevant) and the rationale behind them. Please specify whether the rationale has been set by you as the employer, the training provider, a regulator, or elsewhere:

For levels where your organisation does not have minimum grade requirements, please write 'none' in the minimum grade requirements column.

Role	Minimum grade requirements	Rationale
Degree apprentice	3 A Levels	To meet training provider / ESFA requirements
Apprentice (level 5/ SCQF 8 and below)	1 A level Click or tap here to enter text.	To meet training provider / ESFA requirements
School leaver	GSCE English and Maths	To focus on the new apprenticeship skills, knowledge and behaviours.
Graduate	Minimum of 2.2 undergraduate degree	Conditions set by the Local Government Association – who lead scheme

Experienced hires	No minimum grade stated unless it is a legal requirement for the role	To ensure the role is open to a wide range of candidates
--------------------------	-----------------------------------------------------------------------	----------------------------------------------------------

- **Do you collect data on the number of successful applicants meeting/exceeding your minimum grade requirements?**

☐ Yes ☒ No

11. Do you contextualise applications?

☐ Yes

☒ No

12. If yes, what information is flagged and/or contextualised?

☐ Parental occupation

☐ Eligibility for FSM

☐ Applicant attended a state-school

☐ Applicant attended a non-selective state schools

☐ First in family to attend higher-education

☐ Care experienced

☐ Applicant lives in IMD Decile 1 or 2

☐ We don't know exactly because we use an external agency

☐ Other - Please specify

19. What aspects of your recruitment process are contextualised and which are not?

☐ We contextualise applicant's academic grades

☐ We don't look at academic grades so we don't need to contextualise

☒ We look at grades but we don't contextualise

☐ We contextualise applicant's personal statement/cover letter/CV

☐ We don't look at the personal statement/cover letter or CV so we don't need to contextualise this

- ☒ We look at the personal statement/cover letter CV but we don't contextualise
-
- ☐ We contextualise applicant's test scores (e.g. for aptitude tests)
-
- ☐ We don't look at test scores so we don't need to contextualise
-
- ☒ We look at test scores but we don't contextualise
-

20. Please indicate below if the following information is visible to the hiring manager/panel considering the application at any stage of the recruitment process.

Please select yes only if the information is visible to the hiring manager/panel. If this information is visible to others such as those in HR, but not the hiring manager/panel, please select No.

	Yes	No
Candidates' names	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Candidates' school / college attended for the majority of key stage 4 and key stage 5/5 studies	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Candidates' grades	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Candidates' university	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Candidates' hometown or region	<input checked="" type="checkbox"/>	<input type="checkbox"/>

21. Do you offer any of the following to support applicants from LSEB or low-income backgrounds? *Select this if you offer this support to LSEB candidates. You do not need to give the support to all LSEB candidates, as we know that many may not want or need it.*

Coaching/practice for interview or other in-person elements of your recruitment process [no]

Access to online application support resources (only select if these are not available to all candidates) [no]

Mentoring or buddying [no]

Coaching/practice for any application tests [no]

22. Does your organisation operate any system of taking a 'second- look' at candidates from lower socioeconomic backgrounds if they are set to be rejected after the initial sift?

☐ Yes ☒ No

23. Where an applicant is required to travel to appear in person (e.g. interview, assessment centre) do you...

☐ Account for travel time, starting later or finishing earlier to enable people to travel at reasonable times if they are not based near the office

☐ Provide accommodation for those who do not live locally

☐ Pay for relevant travel costs up front

☐ Provide financial reimbursement for loss of earnings or any additional costs

☐ N/A - No in person element

☐ Reimburse travel expenses afterwards

<input checked="" type="checkbox"/> Other - please specify:	Candidates can pick their preferred interview time from a selection of interview slots
-------------------------------------------------------------	----------------------------------------------------------------------------------------

24. For a set of job interviews (i.e. for the same role, interviewing at the same time) do you use a standard set of interview questions?

☒ Yes ☐ No

25. Does your organisation ask applicants for feedback on the recruitment process?

☐ Yes, successful applicants

☐ Yes, unsuccessful applicants

☒ No

26. Do you analyse the feedback by socioeconomic background?

☐ Yes, successful applicants

☐ Yes, unsuccessful applicants

☒ No

27. Does your organisation provide feedback to unsuccessful applicants?

☒ Yes ☐ No

28. Does your organisation monitor its recruitment process to identify whether there are stages of the recruitment process where there are unequal rates of success by socioeconomic background?

☐ Yes ☒ No

29. Do you analyse whether gender and/or ethnicity intersections with socioeconomic backgrounds to affect success rates in your recruitment process?

☐ Yes ☒ No

30. If you'd like to tell us about any other work that you do that you feel is relevant to this Section but not covered by the questions, please do so here (1873 / 2,000 characters max)

We're actively transforming our recruitment approach at the City of London Corporation to attract and support a more diverse and talented workforce.

In 2024/25, we began embedding socio-economic background (SEB) tracking as a standard practice when working with executive search agencies. This is already being applied in high-profile campaigns, such as the recruitment of the new CEO for the Barbican Centre. We're also transitioning to new suppliers for agency workers, with a clear focus on embedding EEDI data tracking and prioritising social mobility from the outset.

Internally, our recruitment processes already include SEB data collection as part of our diversity monitoring. However, our current HR system, which is over 20 years old, limits our ability to analyse candidate progression through the recruitment stages. To address this, we're implementing a new Enterprise Resource Planning (ERP) system, with a phased rollout of the recruitment module starting in June 2025.

This new system will significantly enhance our capabilities. It will support anonymised applications, leverage AI to reduce bias in job advert language, and provide powerful reporting tools to visualise success rates across different SEB

groups. It will also enable us to gather real-time candidate feedback throughout the recruitment journey, helping us continuously improve the experience.

Looking ahead, our People Strategy 2024–2029 includes a comprehensive overhaul of our recruitment and assessment processes. This will focus on inclusive talent identification and acquisition, ensuring greater access and accessibility for individuals from all socio-economic backgrounds and intersecting characteristics.

Our Social Mobility Network, alongside other staff networks, will play a key role in shaping these improvements, contributing insights and feedback at critical stages of the journey.

Section 4:

Routes into the employer

- Please indicate if your organisation will be submitting answers to Section 4: Routes into the employer

☒ Yes - we will be submitting answers to Section 4: Routes into the employer

☐ No - we will not be submitting answers to Section 4: Routes into the employer

- If no, please state the reason why you are not submitting answers to this section: (1,200 characters max)

Click or tap here to enter text.

- Does your organisation offer internships? Please only tick yes if you offer internships, NOT work experience. To understand the difference between the two, please click [here](#).

☐ Yes

☒ No

1. How many paid and unpaid internships were offered in the 2025 reporting period? The Real Living Wage is calculated by the Living Wage Foundation and is higher than the statutory National Living Wage.

	Number of interns
Total number of interns appointed	Click or tap here to enter text.
Unpaid	Click or tap here to enter text.
Paid expenses only	Click or tap here to enter text.
Paid National Minimum Wage only	Click or tap here to enter text.
Paid Real Living Wage or higher	Click or tap here to enter text.

2. Please select the statements that best describe the selection process for your internships:

- ☐ All our internships are advertised externally with clear information about the timeframe, pay and role description.
-
- ☐ Our internships all have a rigorous, consistently applied selection process
-
- ☐ Some of our internships have a rigorous selection process and some are offered informally (such as to family and friends of employees or clients / stakeholders)
-
- ☐ All our internships are offered informally (such as to family and friends of employees or clients / stakeholders)
-

3. Are any of your internships ring-fenced for candidates from lower socioeconomic backgrounds? *Only select 'yes' if you specifically ring-fence positions for LSEB candidates. For example, if you offer positions through the 10,000 Black Interns scheme, this would not be applicable to lower socioeconomic background and so you should select 'No'.*

☐ Yes ☐ No

4. Please provide details on ring-fenced internship(s) (e.g. name of programme, whether it is run with a charity partner, whether it is publicly advertised as ring-fenced for those from lower socioeconomic backgrounds, how many places, the age group, length):

(1,200 characters max)

5. Are your internships structured to help develop the skills and knowledge of your interns?

☐ Yes ☐ No

6. Are interns provided with a reference following their internship?

☐ Yes ☐ No

7. Did you offer apprenticeships in the Index 2025 reporting period?

☒ Yes ☐ No

8. Do you offer any of the following apprenticeships? If yes, please complete the number of apprenticeships in each category for the 2025 Index reporting period.

Apprenticeship type	Number of apprenticeships
Level 2	14
Level 3	52
Level 4,5,6	3
Level 7	<input checked="" type="checkbox"/>

9. Please tell us the wage that you pay your apprentices.

Please only select an option if all apprentices are paid at that level. Otherwise, select the lowest wage that you apprentices are paid. The Real Living Wage is calculated by the Living Wage Foundation and is higher than the statutory National Living Wage.

- ☐ Paid National Minimum Wage (apprentice rate in year 1, NMW after if over 19)
- ☐ Paid National Minimum Wage (standard rate)
- ☐ Paid Real Living Wage (apprentice rate)
- ☐ Paid Real Living Wage (standard rate) or higher
- ☒ Higher than the Real Living Wage

10. Does your organisation offer a school leaver programme in the 2025 Index reporting period?

- ☐ Yes ☒ No

11. Please tell us the wage that you pay your school leavers

- ☐ Paid National Minimum Wage only
- ☐ Paid Real Living Wage or higher

☒ N/A- we do not offer school leaver programmes

12. Does your organisation offer a graduate scheme?

☒ Yes ☐ No

13. Does your organisation accept degrees from any UK university offering the relevant subjects for your graduate scheme?

☒ Yes ☐ No

▪ **How many different UK universities were represented in the following graduate intakes?**

6 universities

▪ **Please list the universities that are most frequently represented in your graduate intake.**

The scheme is in partnership with the LGA Local Government Authority, and the graduate intake is open for all universities across the England. For the 2024-25 cohort of 6 graduates, 66% were from Russell group universities (Leeds, LSE, Queen Mary, Manchester) and 33% were from non-Russell group universities (Lancaster, Nottingham Trent).

14. If you'd like to tell us about any other work that you do that you feel is relevant to this Section but not covered by the questions, please do so here (1730 / 2,000 characters max)

The City of London Corporation is committed to advancing social mobility through inclusive employment practices and meaningful career development. Our diverse range of workplaces—from New Spitalfields Market to Barbican, and from Epping Forest to corporate offices—enables us to offer Apprenticeships that open up pathways into professional roles in food safety, logistics, and trading, helping to elevate positions perceived as lower skilled.

We actively support our Apprentices through a dedicated Apprenticeship Network, which fosters peer support, career exploration, and visibility of progression routes. Recent activities include a behind-the-scenes tour of Mansion House, offering insight into civic leadership and the City's heritage.

Our Apprentices, like all staff, benefit from a robust learning and development offer that includes mentoring, coaching, and access to both in-house and external training. This is a key part of our strategy to support upward mobility and long-term career success.

We also champion inclusion through a range of staff networks, including the Apprentice Network, Social Mobility Network, and the pan-square mile City Belonging Networks such as Social Mobility in the City. These networks provide spaces for dialogue, support, and advocacy, and play a vital role in shaping our policies and practices.

Our broader employee offer includes volunteering days, discounted language courses, subsidised or free wellbeing activities, and annual engagement events—all designed to support personal growth and community connection.

These initiatives reflect our deep commitment to creating a workplace where individuals from all backgrounds can thrive, progress, and contribute meaningfully to public life.

Section 5:

Data collection

- Please indicate if your organisation will be submitting answers to Section 5: Data collection

☒ Yes - we will be submitting answers to Section 5: Data collection

☐ No - we will not be submitting answers to Section 5: Data collection

- If no, please state the reason why you are not submitting answers to this section: (1,200 characters max)

Click or tap here to enter text.

- Does the data you are submitting for Section 5 relate to the whole of your UK workforce?

Please only submit data relating to employees (not contractors).

☒ Yes ☐ No ☐ Don't know

1. Does your organisation administer an annual or regular diversity survey?

☒ Yes ☐ No

2. Is response to the survey compulsory (always with an option for “prefer not to say” and “I do not know”)?

☐ Yes ☒ No

3. Where data is collected, please provide the percentage completion rate for each question for the 2025 reporting period *Your completion rates should include people who have answered ‘prefer not to say’. Please only provide data for employees, and do not include contractors*

- Type of school attended - 29.92% (16.5% in 2024)
- Occupation of parent/guardian aged 14 – 29.13% (16% in 2024)
- Eligibility for FSM - 29.45% (16% in 2024)

- Parental education (**first in their family to attend university**) - 29.37% (17% in 2024)

4. If you have plans to introduce new questions to your EDI survey relating to socioeconomic background, please detail these here (1187 / 1,200 characters max)

In 2024, the City Corporation strengthened its approach to social mobility data. We refreshed our Diversity Monitoring question set in February, aligning with best practice for SEB data collection. These updated questions were used in our all-staff survey in April 2024, helping to build a clearer picture of our workforce.

In May 2025, we launched a full Diversity Monitoring kit, sharing standard question sets and guidance for consistent use across our highly devolved organisation. This kit lays the foundation for future integration with our new People and Finance system, currently in development..

This work has created a shared internal standard for SEB data collection, enabling less mature areas to access targeted resources and enabling best practice across the organisation. It also complements the rollout of our new Equality Impact Assessment materials, empowering teams to use diversity data confidently and responsibly.

We're proud of the Barbican Centre's leadership in the arts sector. Through a post-visit survey, the Barbican now collects *current* socio-economic status data, enabling targeted outreach to underrepresented groups and widening access to the creative arts.

5. Do you measure the socioeconomic make-up of your UK Board/Management Committee?

☒ Yes ☐ No

6. Please indicate the % of your board with each characteristic

% that are from a lower socioeconomic background (based on parental/guardian occupation aged 14	% that attended a state school	% that attended a non-selective state school	% eligible for free school meals/pupil premium	% that were the first generation in their family to attend university
17.4%	30.4%	n/a ,we don't collect this data	13%	26.1%

7. Does your workforce data show any differences in different parts of the organisation or job roles by socioeconomic background? Where this is the case, what action have you taken in response to this?

☐ Yes ☐ No ☒ We haven't analysed this

8. If yes, have you taken steps/are you planning to take steps to address this?

☒ Yes ☐ No

9. If yes, please detail these plans (1032 / no specified limit)

The City of London Corporation is expanding its capacity to analyse workforce data by socio-economic background (SEB) through the rollout of a new People and Finance ERP system. This system will support the development of internal dashboards to track SEB and other diversity trends by grade, organisational unit, and—once the Ambition 25 job family framework is fully implemented—by role type. These dashboards will enable us to benchmark progress and identify areas for targeted action.

In January 2025, the Barbican Centre led a successful data disclosure campaign, significantly increasing staff EDI data completion, with 65% of staff disclosing SEB data. Building on this momentum, the Barbican is now working with City Corporation HR to integrate this data into a shared EDI dashboard, ensuring insights are accessible and actionable across the organisation.

These initiatives reflect our commitment to embedding social mobility into our systems and culture, using data to drive inclusive decision-making and measurable progress.

10. Do you review data on the socioeconomic profile of your workforce against national benchmarks, and against peer organisations where possible – e.g. through a sector consortium focused on socioeconomic background?

☐ Yes ☒ No

11. Is data on the socioeconomic profile of your workforce published externally?

☐ Yes ☒ No

12. Please indicate below which data points are published:

- ☐ % that are from a lower socioeconomic background (based on parental/guardian occupation)
- ☐ % that attended a state school
- ☐ % that attended a non-selective state school
- ☐ % eligible for free school meals/pupil premium
- ☐ % that were the first generation in their family to attend university

13. Please submit a link to the webpage where we can find this information

14. Is your socioeconomic background data presented to your UK Board/Management Committee?

☐ Yes ☒ No

- **If you'd like to tell us about any other work that you do that you feel is relevant to this Section but not covered by the questions, please do so here (1610 / 2,000 characters max)**

Over the past year, the City of London Corporation has focused on increasing staff disclosure rates for socio-economic background (SEB) data—doubling participation and strengthening our evidence base to inform future action.

In February 2024, we became the first local authority in England to collect SEB data from election candidates. Results showed 18% from working-class, 18% from intermediate, and 64% from professional backgrounds (vs. UK benchmarks of 37%, 24%, and 39%). Additionally, 7% were eligible for free school meals, compared to the 15% UK benchmark. This data provides valuable insight into who stands for election and will help us support more diverse candidates in future. We are yet to process the elected Members data, and look forward to the insights this provides.

Institutions like the Barbican and Guildhall School of Music & Drama also conduct annual staff surveys. The Barbican's People Survey includes casual staff and breaks down responses by SEB, with insights shared at quarterly EDI Forums to drive improvement.

To build confidence and capability in using SEB data, we are part way through procuring a specialist organisation to partner with us for social mobility, and have launched Theory of Change training for EEDI practitioners across the Corporation. This work is grounded in both quantitative and qualitative data and will shape our long-term social mobility strategy.

Our strengthened City Corporation EEDI team brings deeper data skills, and has made progress in bringing together EEDI practitioners from across departments and institutions to share knowledge and expertise.

Section 6:

Pay, progression and retention

- Please indicate if your organisation will be submitting answers to Section 6: Pay, progression and retention.

- ☒ Yes - we will be submitting answers to Section 6: Pay, progression and retention
-
- ☐ No - we will not be submitting answers to Section 6: Pay, progression and retention
-

- If no, please state the reason why you are not submitting answers to this section: (1,200 characters max)

Click or tap here to enter text.

1. Do you measure your Class Pay Gap?

- ☐ Yes, and we follow the Social Mobility Foundation guidance published in October 2023
-
- ☐ Yes, but we take a different approach compared with the SMF recommended one
-
- ☒ No
-
- ☐ No, but we intend to in the next year
-

2. If yes, do you publish your findings?

- ☐ Yes (please provide a link):
-
- ☐ No
-

6. Do you have a strategy for closing your Class Pay gap?

- ☒ No
-
- ☐ N/A, we measure our class pay gap and we don't have a gap to close
-
- ☐ Yes
-

7. Is this strategy published externally?

- ☐ Yes [if yes, please submit URL]
-

☐ No

15. Do you have targets for closing your Class Pay gap?

☒ No

☐ N/A, we measure our class pay gap and we don't have a gap to close

☐ Yes

9. Are these published externally?

☐ Yes [if yes, please submit URL]

☒ No [if no, please explain why not (1,200 characters max)]

13. Does your organisation routinely offer variable pay depending on individual or collective performance?

☒ Yes ☐ No

14. Please explain which roles have variable pay depending on individual or collective performance and the rationale for this.

(795 / 1,200 characters max)

Within in grade band, pay increments are given automatically, unless clear performance issues exist. In addition, honorarium payments exist to recognise one-off exceptional work.

We are currently reviewing our pay practice through a wide-reaching programme called 'Ambition 25'. This will determine our approach to progression and performance pay. Ambition 25 will also look to align job descriptions into outcome focused role profiles, as part of the adoption of a job family approach. The outcomes are likely to involve a new pay structure and job evaluation system that simplifies regrading and promotional processes to acknowledge job growth, performance and exceptional contribution in more equitable ways. This is a significant programme of work which will cross submission year boundaries.

15. Does your organisation analyse the below data by socioeconomic background?

	Yes	No	NA
Retention	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Progression	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Appraisal grades (Performance)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Professional exams/qualifications	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Take up of training	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Work allocation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Bonus allocation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Take up of flexible working options	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Take up of hybrid working	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Employee job satisfaction	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Take up of mentoring	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

16. Please outline what your data on retention by socioeconomic background shows and what actions you have taken to address the findings and the difference any changes made if any:

(2023 / 1,200 characters max)

We are actively building a stronger foundation for social mobility insight at the City of London Corporation. While our current SEB data completion rate stands at 29%, we've already doubled disclosure rates from 2023/24 to 2024/25—thanks to a focused, collaborative campaign led by our Communications, EEDI, and HR teams. This momentum reflects our commitment to transparency, inclusion, and data-driven action.

Our goal is to achieve over 60% completion across all diversity monitoring categories. This will enable us to confidently introduce targeted interventions, such as social mobility pay gap reporting, and ensure our strategies are grounded in robust evidence.

Our leadership discussed social mobility and SEB data completion at both Senior Leadership Team (SLT) and in Executive Leadership Board (ELB) in April 2025. There was a strong commitment to learn from internal and external exemplars in data disclosure campaigns, e.g. knowledge sharing from the successful internal campaign led by the Barbican Centre that achieved an impressive 65% SEB data disclosure rate—demonstrating what’s possible with creative, inclusive engagement.

The conversation was driven forward at ELB away day, where ELB provided the foundations for an organisation-wide Theory of Change, sharing insights, visions and goals for social mobility within City Corporation. These foundations were further strengthened as part of a Theory of Change activity alongside EDI Practitioners across the organisation. Our collective capability around Theory of Change is deeper, and a high level socio-economic diversity Theory of Change is in development.

Meanwhile, the first phase of our new ERP system is capturing learning and development data. Over time, it will provide rich insights into outcomes by SEB and other characteristics, strengthening our ability to measure impact.

By continuing to invest in awareness, trust, and visibility around data collection, we are laying the groundwork for meaningful, measurable progress in social mobility.

- **Does your organisation specifically offer any of the following tailored support for those from lower socioeconomic groups? Please select all that apply.** Only select activities that are **not** routinely available to all staff

	Yes	No	2024 details
Buddying/mentoring/sponsorship scheme	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Qualification support	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Workshops and training	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Employee network	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Social Mobility Network
Leadership programmes	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Reverse mentoring	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Other (please specify)	Free text		

16. Describe the impact of these schemes (452 / 1,200 characters max)

The Staff Mobility Network launched in 2024 and has advocated and empowered employees from lower socio-economic backgrounds. One of the lead roles within the network amplifies and shares City Corporations training offers to members of the network – ensuring that network members spot the development opportunities within the organisation. They have had several events in the last year, e.g. participating in the Lord Mayor’s Show and listening circles.

17. Do you have processes in place to ensure that work allocation and distribution is based as objectively as possible on skills and competence?

☒ Yes ☐ No ☐ NA

18. Please explain these processes and how they achieve outcomes that guard against disadvantaging those from lower socioeconomic backgrounds (1196 / 1,200 characters max)

Work allocation / distribution is led by Chief Officers and operationalised by management teams within business planning processes. Outcomes are tied to the Corporate Plan, People Strategy etc, and feed into the annual appraisal cycle. This includes end and mid-financial year review meetings, objective setting and development all of which will be captured in the new system in May 2025.

Managers are expected to enable their staff’s short- and medium-term development as well longer-term career planning. Staff are encouraged to attend training, join working groups, undertake stretching secondments, engage in diversity network roles, and apply for internal and external opportunities.

Ambition 25 will introduce: a new job evaluation process; job families; consolidating 2,500 job descriptions to 650 role profiles; new pay & grading structures. It will provide more transparent understanding of our structure for work allocation based on roles and responsibilities.

A later phase of the People Strategy will create a new performance management framework, including support to deliver career development and progression opportunities along with understanding skills and competencies to progress.

19. Do you have a long-term strategy in place for improving outcomes for employees from under-represented socioeconomic backgrounds?

- ☒ Yes ☐ No, but we have ad-hoc solutions/actions ☐ No, we don't have a strategy and we don't currently do intentional ad-hoc actions
-

20. Please provide a copy or summary of this strategy [pdf upload]

Social Mobility Strategy 2018 – 2028

21. Upon completion of a school leaver programme/apprenticeship, can these employees progress at the same rate as a graduate hire?

- ☒ Yes ☐ No ☐ NA
-

22. If someone is required to pass sponsored exams, do you pay for retakes?

- ☒ Yes ☐ No ☐ NA
-

23. If no, at what point do they pay?

- ☐ At first retake ☐ At second retake
-

24. Is it clear in recruitment materials that employees are required to for retakes?

- ☐ Yes ☐ No
-

- **Do you monitor drop-out rates by socioeconomic background of apprenticeship/graduate/school leaver schemes?**

	Yes	No	NA
Apprenticeship	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Graduate	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
School leavers	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

25. Does your organisation implement exit fees for graduates, apprentices, and school leavers who do not complete their scheme or role with you?

	Yes	No	NA
Apprenticeship	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Graduate	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
School leavers	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

26. Is it clear in recruitment materials that employees are required to pay exit fees?

☐ Yes ☐ No

27. Why do you implement this practice?

☐ To recover training costs

☐ To deter employees from leaving

☐ Other (please state)

28. Do you offer retention bonuses to employees?

☐ Yes ☒ No

29. [if yes] Have you explored the proportion of employees receiving retention bonuses who are from a lower socioeconomic background?

☒ N/A ☐ No

30. [if yes] What actions have you taken, if any?

N/A

31. Do you (or a third-party on your behalf) conduct exit interviews with employees when they leave the organisation?

☒ Yes ☐ No

32. Do you analyse the findings from your exit interviews by socioeconomic background?

☐ Yes ☒ No

33. If you'd like to tell us about any other work that you do that you feel is relevant to this Section but not covered by the questions, please do so here (1004 / 2,000 characters max)

Turnover in the organisation is at 11.4% in 2024/25 compared to 12% in 2023/24. All leavers are invited to complete an exit survey within the current HR system, which prompts exit interviews to be undertaken by HR Business Partners at the request of leavers. Analysis of limited data available given data and reporting challenges in the current system has not included trend analysis relevant to EEDI status. However, we acknowledge findings and trends obtained by leavers would benefit from EEDI scrutiny. The continuing communications campaign in the coming year to increased EEDI data disclosure data will help us to consider inter-connections with leavers and socio-economic status. The new HR and Finance system will offer exit interview functionality and improved data analysis and reporting functionality. Work is also underway to encourage recognition of the benefit of prioritising the analysis of exit data, including socio-economic status and intersectionality with other EEDI characteristics.

Section 7:

Culture and internal advocacy

- Please indicate if your organisation will be submitting answers to Section 7: Culture and internal advocacy

☒ Yes - we will be submitting answers to Section 7: Culture and internal advocacy

☐ No - we will not be submitting answers to Section 7: Culture and internal advocacy

- If no, please state the reason why you are not submitting answers to this section: (1,200 characters)

Click or tap here to enter text.

1. What steps have you taken to explore whether employees from lower socioeconomic backgrounds feel that the culture of your workplace is welcoming to them?

☐ We have conducted a survey specifically relating to socioeconomic background.

☐ We have conducted a general diversity survey and analysed the results by socioeconomic background.

☒ Other, please specify:

In 2024, we conducted an all-staff survey across all areas of the organisation, the first since 2022. In contrast to previous surveys, this all-staff survey integrated collection of EEDI data for the first time, including asking questions about socio-economic background (SEB) and enabling analysis of survey data by SEB and EDI groups.

While SEB disclosure rates were too low to analyse and draw conclusions from within the staff survey, this step marked a starting point to better understand and support our workforce. Recognising the opportunity to strengthen our EEDI data, City Corporation launched a campaign to increase EEDI data including SEB data completion — demonstrating our commitment to building a more inclusive and evidence-informed organisation. EEDI completion rates have increased significantly. However, there are still

high numbers of individuals choosing 'prefer not to say' for individual questions.
Encouraging full disclosure continues to be an important area of focus for the organisation.

- ☐ We have not yet taken steps to explore whether employees from lower socioeconomic backgrounds feel that our culture is welcoming.
-

3. Please give details of your findings and the actions you have taken as a result of these (1912 / 1200 characters max)

At the City of London Corporation, our culture is shaped by a clear and visible leadership commitment to inclusion—anchored in the belief that we can be the beating heart of human decency. This ethos is embedded in our Equality Objectives, including our published commitment to socio-economic diversity, and is fully aligned with our Corporate Plan and People Strategy. Under the leadership of our new Director of Equalities, these objectives are being brought to life through bold and evolving EEDI initiatives.

We recognise that meaningful change requires strong system enablers. That's why we've invested in a new Enterprise Resource Planning (ERP) system that will transform how we capture, visualise, and act on staff experience data. This long-term investment will significantly enhance the quality, accessibility, and trust in our data—laying the groundwork for smarter, more inclusive decision-making.

In 2024, we conducted our first all-staff survey to include comprehensive EEDI data, including socio-economic background (SEB). While initial SEB disclosure was modest, it marked a vital starting point. In response, we launched a targeted campaign to boost SEB disclosure—demonstrating our commitment to building an inclusive, evidence-informed organisation.

Looking ahead, EEDI characteristics will be more deeply embedded in future staff surveys. We are also in the process of procuring a strategic partner to co-create a new set of organisation-wide values and behaviours, building on those already in place across our institutions. This work, launching in summer 2025, is a cornerstone of our cultural transformation and will place EEDI at its core.

Once established, these values will be embedded across the entire employee lifecycle—from attraction and recruitment to development, recognition, and retention—ensuring our culture of inclusion is not only aspirational but felt by colleagues every day.

4. Does your organisation offer diversity awareness training with a particular focus on social mobility? *We're looking here for training specifically focused on diversity of socioeconomic background.*

☐ No training

☐ Mandatory training for manager level or above

☐ Mandatory training for all employees

☒ Other (please specify) –

5. Please give details of this training, including what's covered and who it's delivered by (1,200 characters max)

Our Equality Impact Assessments for inclusive decisions include social mobility prompts and considerations as part of the training, resources and guidance materials. This was launched in May 2025, and no data is yet available.

6. What percentage of managers and above have participated in this training?

n/a

7. Do you have a specific member of staff who is responsible for your organisation's approach to social mobility?

☒ Yes ☐ No

8. Please enter their job title

Job title: Senior EEDI Practitioner

9. Does your organisation have a staff network specifically focused on social mobility/socioeconomic background?

☒ Yes ☐ No

10.If yes, do it:

- ☒ Have a budget
- ☐ Contribute to the social mobility strategy of your organisation
- ☒ Have senior-level sponsorship

11.Excluding any Class Pay Gap targets, does your organisation have any targets relating to social mobility/socioeconomic background?

☐ Yes ☒ No

12. If yes, please click the area(s) these targets relate to:

- ☐ Application rates
- ☐ Application success rate
- ☐ Overall workforce
- ☐ Occupational areas
- ☐ Seniority
- ☐ Progression
- ☐ Other (please specify)

13. Are these targets monitored at Board level?

☐ Yes ☐ No

14. Are your targets published externally?

☐ Yes, please provide a link:

☒ No

17.Are targets relating to socioeconomic diversity and inclusion being considered?

☒ Yes ☐ No

18. Do you actively take steps to ensure that all strategic decisions are inclusive for those from a lower socioeconomic background?

☒ Yes ☐ No

19. Please tell us about these steps (1167 / 1,200 characters max)

City Corporation has recently strengthened our Equality Impact Assessments (EQIA). While EQIA are a public sector duty, we extend the same high EQIA standard across all decisions and not only public sector services. Our EQIA provides specific prompts and requires deep consideration of impacts on different socio-economic groups due to new or changing policies, processes, or practices, to the same standard as for protected characteristics.

The newly released toolkit contains

- EQIA online training
 - EQIA template
 - EQIA guidance
 - EQIA managers' guidance

The EEDI team provide specialist support through surgeries. There is a feedback loop for continual improvement of the resources. We are looking to reach members of staff in our training, equip champions from all departments and institutions, and have insight into the number of EQIA which lead to paused proposals, or carry adverse impacts for specific groups in relation to the total EQIAs completed.

The Barbican Centre has similar EQIA resources. Within the Barbican Centre, a completed EQIA is a mandatory requirement for all papers requiring Director approval and for sub-committees of the Barbican Board.

20. If you'd like to tell us about any other work that you do that you feel is relevant to this Section but not covered by the questions, please do so here (1849 / 2,000 characters max)

At the City of London Corporation, inclusion is a leadership-driven priority that shapes our culture and ambition. Guided by our Equality Objectives—including a published commitment to socio-economic diversity—we are embedding EEDI at the heart of our organisation. These objectives align with our Corporate Plan and

People Strategy and are being brought to life through strategic initiatives led by our new Equalities Director.

Our leaders lead by example. One senior manager, who did not attend university, recently completed an apprenticeship and now champions the programme across their team of 80—supporting 20% of their staff to progress through apprenticeships. This demonstrates how inclusive leadership creates real pathways for growth and development.

We also offer unique opportunities for staff and apprentices to engage in civic life. From volunteering at ward mote and election counts to attending high-profile events like Sir Lenny Henry's Freedom of the City ceremony, our people are part of a living tradition of public service. At the ceremony, Sir Lenny spoke powerfully about social justice, poverty, and the importance of uplifting underrepresented voices.

Our Social Mobility Network continues to thrive, supported by senior sponsor who sits our Executive Leadership Board. With a permanent internal platform, the network shares news, events, and resources, and has hosted impactful listening and learning circles on education, careers, and accent bias. Their presence in the Lord Mayor's Show and ongoing engagement with EEDI leadership reflect their growing influence.

Following the March 2025 elections, Members received a comprehensive EEDI briefing, reinforcing our commitment to treating socio-economic diversity on par with protected characteristics—ensuring inclusive, values-driven decision-making across the Corporation.

Section 8:

External advocacy

- Please indicate if your organisation will be submitting answers to Section 8: External advocacy

☒ Yes - we will be submitting answers to Section 8: External advocacy

☐ No - we will not be submitting answers to Section 8: External advocacy

- If no, please state the reason why you are not submitting answers to this section: (1,200 characters max)

[Click or tap here to enter text.](#)

1. Have clients or other organisations that you work with demanded action on improving the diversity of your workforce in relation to:

The word 'clients' can be used synonymously with customers, recipients or service users

☒ Gender

☒ Race

☒ Socioeconomic background

☒ Other (please fill in): Disability

☐ Our clients have never demanded action

2. Do you work with any clients to improve their approach to employer-led social mobility?

☐ No

☐ We add social-mobility related clauses into client contracts

☒ We hold talks/events with clients to raise awareness of social mobility actions

☒ We work with others in the sector to lobby clients to improve social mobility actions

☒ Other (please fill in): Social Mobility in the City Network across the Square Mile
City Bridge Trust charitable work

6. Please give details below including any actions your clients have taken in relation to social mobility as a result of your work together and the difference they have made (2820 / 1,200 characters max)

In March 2025, we launched the Social Mobility in the City network with a joint event alongside Accenture and Progress Together, as part of the City Belonging Networks. This initiative connects City-based organisations committed to advancing socio-economic diversity, and is part of a wider effort to build a more inclusive and connected Square Mile. With just under 50% of the top 75 SMEI entrants from 2024 based in the City of London, it's a powerful space to share best practice, resources and support to a receptive audience.

The City of London Corporation has played a pivotal role in advancing socio-economic diversity across the UK's financial and professional services sector. Between 2020 and 2022, we were commissioned by HM Treasury and BEIS to lead the Socio-Economic Diversity Taskforce, convening over 80 organisations. This resulted in the first sector-wide SEB data collection, a compelling business case for diversity at senior levels, and a set of actionable recommendations for employers, regulators, and government.

A key outcome was the creation of Progress Together (PT), an independent membership body co-founded by the City Corporation. As one of 12 founding partners, we continue to provide strategic leadership, funding, and in-kind support, and sit on its advisory board. Today, PT represents over a third of the UK financial services sector (364,000 employees) and is driving measurable progress toward greater socio-economic parity at senior levels. PT published the first sector wide impact report on socio-economic diversity at senior levels, and provide practical tools and guidance to help FPS to build inclusive cultures and track progress. City Corporation's funding has delivered a series of workshops and events for Progress Together members, contributing to the percentage of senior leaders from LSEB increasing from 26% in 2023 to 28% in 2024.

We will mark a reinvigoration moment in November 2025, showcasing sector progress toward the Taskforce's 50% target and sharing best practice across the network.

Our influence extends into higher education through the Guildhall School of Music & Drama, whose Head of Access and Participation has led the HELOA London Committee for six years. Their leadership has accelerated access initiatives across London universities and ensured that the needs of specialist arts institutions are recognised in national policy.

Our procurement practices (outlined in later question) connect to our Corporate Plan and People Strategy, aligning resources with meeting our organisation's goals. We weight social impact of potential suppliers in the procurement assessments, with 15% of the score based on social impact.

Together, these efforts reflect the City Corporation's enduring commitment to systemic change, sector leadership, and inclusive growth.

7. Do you encourage your suppliers to take any actions regarding social mobility?

<input type="checkbox"/>	No
<input type="checkbox"/>	We add social-mobility related clauses into client contracts
<input type="checkbox"/>	We hold talks/events with clients to raise awareness of social mobility actions
<input type="checkbox"/>	We work with others in the sector to lobby clients to improve social mobility actions
<input checked="" type="checkbox"/>	Other (please fill in): Yes - expanded in next answer.

8. If yes, please give details below including any actions your suppliers have taken in relation to social mobility as a result of your work together and the difference they have made (1765 / 1,200 characters max)

City Corporation is committed to driving equity and opportunity not only within our organisation but across our entire supply chain. There is a golden thread between our Corporate Plan and People Strategy, our management of resources, and our procurement practices.

Through Responsible Procurement, we actively champion social mobility and inclusive economic growth by setting clear expectations and using platforms where suppliers can share their social value work through drop down list. All contracts over £100,000 must allocate at least 15% of the tender weighting to responsible procurement, reinforcing our commitment to inclusive outcomes. Our

procurement process also integrates EQIA tools, including socio-economic background considerations, as a standard part of planning and evaluation.

We:

- Actively engage with Diverse-Owned Enterprises and SMEs through direct contracts, partnerships, and performance monitoring
- Embed equity, diversity, and inclusion (EEDI) into every stage of the procurement process, prioritising suppliers who demonstrate a strong commitment to advancing inclusion within their own organisations and industries
- Create meaningful, targeted work-related opportunities through contracts—designed to support social mobility and open doors for underrepresented groups
- Deliver social value aligned with organisational and community priorities, through collaboration with stakeholders and suppliers

To ensure accountability and transparency, we publish an annual Responsible Procurement Impact Report each June, showcasing the collective impact of our procurement practices.

Additionally, all suppliers must pay the Living Wage Foundation rate for contracts involving more than two hours of work—ensuring fair pay across our supply chain.

■ **Does your organisation take part in any social mobility initiatives across your sector or industry?**

<input type="checkbox"/>	No
<input checked="" type="checkbox"/>	We participate in events/conferences relating to social mobility
<input checked="" type="checkbox"/>	We hold talks/events with clients to raise awareness of social mobility actions
<input checked="" type="checkbox"/>	We are part of a sector lobby group
<input checked="" type="checkbox"/>	<div>Other (please fill in):</div> <div> <p>In 2024, the City Corporation supported the launch of Progress Together's toolkit, helping members advance socio-economic diversity. The Lord Mayor also spoke at the recent launch of their latest report.</p> <p>As members of New Financial—a cross-sector think tank driving progress in EDI—we gain valuable insights into workforce diversity challenges. The City Corporation actively engages with, amplifies, and benefits from their research and best practices.</p> </div>
<input checked="" type="checkbox"/>	We are part of a sector working group
<input checked="" type="checkbox"/>	We undertake or fund research into social mobility within our industry
<input type="checkbox"/>	We buddy/support another organisation to improve social mobility

9. Excluding work with young people covered in other sections, if you do any work with charitable organisations to improve social mobility please outline this here (2053 / 1,200 characters max)

City Bridge Foundation (CBF) is responsible for five Thames crossings and is London's biggest, independent charity funder. The City of London Corporation is the sole trustee of CBF, who launched its ambitious 10-year funding policy in March 2025, shaped by a wide-ranging consultation, stakeholder engagement and research. Engaging over 230 stakeholders, surveying 1,000+ Londoners, and hosting multiple workshops, CBF ensured its new funding policy directly responds to the most pressing social challenges facing the capital.

A cornerstone of this policy is a bold commitment to tackling economic inequality and advancing social mobility, with millions in funding projected over the next decade to support impactful, community-led initiatives.

To support continuous learning and impact, CBF will implement robust frameworks to define goals, outcomes, and data collection methods across the work. For example, in economic justice, CBF may fund strategic collaborations to influence policy and business practices on issues such as low pay, pay gaps, and housing affordability.

City Bridge Trust's impact is visible citywide, for the past 30 years CBF have been the capital's biggest independent charity funder, awarding over £840m to amazing projects across the capital.

Another standout example is City Harvest, a food redistribution charity that rescues surplus food and delivers it to over 130,000 people weekly. Since 2020, City Harvest has operated a food rescue hub at New Spitalfields Market, where 150 traders, supported by the City Corporation, donate high-quality surplus produce. This initiative benefits communities across Waltham Forest, Redbridge, Newham, Tower Hamlets, Hackney, and Dagenham.

Further amplifying this impact, the Livery Companies, who are connected to City Corporation, funded a 7.5-tonne food rescue truck. This vehicle enables the collection of surplus food from a wider radius, rescuing an additional 520 tonnes annually—equivalent to over 1.2 million meals—a powerful example of civic partnership driving systemic change.

10. Does your organisation share the changes it has made to improve socioeconomic diversity and inclusion with other organisations – including evidence of impact?

☒ Yes ☐ No

11. Who do you share it with?

☒ Other employers

☐ Local government

☐ Devolved government

☐ UK government

☐ Social Mobility Commission

☐ Media

☐ Other (Please state)

12. Please give examples of work that you have shared, and where relevant any impact that this has had (870 / 1,200 characters max)

The City of London Corporation uses strategic communications to promote EEDI across education, civic life, and business. Through targeted social media and outreach, we engage students, apprentices, educators, parents, policymakers, and the public. The London Careers Festival exemplifies this, combining digital campaigns with direct school engagement to widen access to career opportunities.

We publish our progress on Equality Objectives, the People Strategy, and Corporate Plan—ensuring transparency and accountability to Members, residents, businesses, and communities. This enables our elected Members, their constituents, and the general public to scrutinise and challenge us on our commitments.

Our annual staff equality insights report benchmarks progress and will be expanded to include impact case studies, trend analysis, and a refreshed vision for inclusion.

13.If you'd like to tell us about any other work that you do that you feel is relevant to this Section but not covered by the questions, please do so here (3471 / 2,000 characters max)

The City of London Corporation leverages its cross-sector reach to drive systemic change. Through the Remembrancer's Department, we contributed expert policy advice to the House of Lords Select Committee on Social Mobility, highlighting the

critical role of socio-economic diversity in boosting innovation and competitiveness in Financial and Professional Services (FPS). Our memorandum championed cross-sector collaboration and spotlighted the work of Progress Together, a pioneering membership body representing over 30% of the UK FPS workforce. Their practical toolkit supports employers in embedding socio-economic diversity—from data collection to mentoring and progression.

The City of London Corporation actively supports social mobility through the Community Infrastructure Levy Neighbourhood Fund (CILNF)—a strategic programme that reinvests 15% of developer funds into local communities. Since 2020, over £9.7 million has been committed to projects that enhance infrastructure, wellbeing, and opportunity across the Square Mile.


While not exclusively focused on social mobility, the CILNF plays a vital role in enabling it. By funding initiatives that improve access to education, culture, and community spaces and services, the fund helps reduce barriers for underrepresented groups and fosters inclusive growth. CILNF funds must meet priorities set through community consultation addressing the needs of people from disadvantaged backgrounds, minoritised communities, older people, disabled people, LGBTQIA+ people and those living in poverty.

As an example, Care to Dance received £22,500 to provide a 12-month programme of weekly dance classes and celebratory finale performance specifically for the City of London’s young people with a social worker, care experienced young people, young people who have SEND needs, young carers and unaccompanied asylum-seeking children (UASC) to build skills, confidence and community.

Similarly, SocietyLinks has received £90,238 funding over 18 months to provide a tailored sports programme including training in gym, swimming and football for young people living in the City of London run Golden Lane and Mansell Street estates with the potential for participants to achieve accreditation through the ASDAN Sports and Fitness Short Course. Mansell Street Estate is in Portsoken Ward which is amongst the top 20% of wards in the country for levels of deprivation and has the highest level of child poverty in the City, yet is also where the City’s youngest population is fastest growing.

CILNF is overseen by elected Members and an Officer Panel, ensuring transparency, accountability, and alignment with the City Corporation’s broader commitment to equity and inclusion. Through the CILNF, the Corporation demonstrates how place-based investment can drive long-term, systemic change.

In higher education, the Guildhall School's Head of Access and Participation played a national leadership role through HELOA for six years, chairing HELOA for three years. They are now part of the management group for the Forum for Access and Continuing Education, which brings together those working in educational equity across the UK, and endeavours to influence social mobility policy. Recent initiatives include hosting the FACE Summit with 60 senior HE delegates, delivering sector-wide training, and contributing thought leadership through articles, panels, and podcasts—all focused on advancing equity for underrepresented learners.



Please contact employerindex@socialmobility.org.uk if you have any queries regarding the Index or your feedback

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Agenda Item 9

Committee(s): Markets Board Equality, Diversity & Inclusion Sub-Committee	Dated: 03rd October 2024 16th June 2025
Subject: Wholesale Markets Zero Tolerance Policy Introduction	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	Launch the Zero Tolerance framework at the City's wholesale markets
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: Ben Milligan, Markets Director	For Information
Report author: Ali Sajedi, Head of Legacy & Engagement	

Summary

This paper is to request approval from the Markets Board regarding:

- The introduction of a zero-tolerance policy aimed at ensuring compliance, improving safety and culture, and promoting appropriate, professional behaviour within the City of London Corporation's wholesale markets.

Recommendation(s)

Members are asked to:

- Approve the introduction and implementation of the zero-tolerance policy across all three City of London Corporation wholesale markets.
- Note the allocation of resources for monitoring, enforcement, and compliance training to support the policy's effective execution.
- Note the regular reviews of policy outcomes to ensure alignment with operational goals and stakeholder expectations.

Main Report

1. Rationale

The wholesale markets, operated by the City of London Corporation, serve as critical hubs in London's food distribution network. They are a thriving and lively environment full of diversity and culture. There are, however, incidences of anti-social behaviour, discrimination, or verbal/physical abuse reported from time to time. These incidents not only disrupt market operations but also pose risks to public/staff safety and the markets' reputation.

This zero-tolerance policy is necessary to address these challenges and reinforce the City of London Corporation's commitment to maintaining high standards of conduct, safety, and operational integrity across its wholesale markets. This policy will underpin a culture setting endeavour where acceptance, understanding and compassion are held up as guiding values. This policy will be the first step in articulating a strong, collaborative, inclusive and equitable culture across our markets.

2. Objectives

The overarching goal of the zero-tolerance policy is to instil a culture of compliance, respect, and safety at the City of London Corporation's wholesale markets. The key objectives include:

- **Promoting a Safe and Professional Environment:** Ensuring that all participants—whether market employees, traders, or customers—adhere to high standards of conduct, with a focus on respect, safety, and professionalism.
- **Enforcing Compliance with Regulations:** Ensuring that all health, safety, and operational regulations are strictly followed, with non-compliance resulting in immediate action.
- **Improving Public Perception:** Reinforcing the market's reputation as a leading wholesale hub by demonstrating a commitment to equality, equity, inclusion, fairness, and ethical practices.

3. Key Components

The zero-tolerance policy will apply to all market participants—traders, employees, suppliers, and customers. It will be implemented through the following steps:

- **Clear Communication of Expectations:** All stakeholders will be informed about the standards of behaviour expected and the penalties for violations. Detailed guidelines will be issued covering health and safety, trading practices, and behavioural expectations.
- **Enforcement Mechanisms:** Violations of the policy will result in immediate disciplinary action, which may include warnings, fines, suspension of market trading rights, or termination of market licenses, depending on the severity of the breach.
- **Regular Monitoring and Auditing:** The City of London Corporation will regularly monitor market activities to ensure compliance. Market wardens will be empowered to act swiftly and decisively against any infractions.
- **Support and Training for Compliance:** Training programs on market regulations, health and safety standards, and respectful conduct will be made available to traders and employees to encourage voluntary compliance.

Conclusion

The implementation of this zero-tolerance policy at the City of London Corporation's wholesale markets is crucial for setting the right market culture, addressing current challenges, and enhancing the overall market environment. By adopting this policy, the Corporation will reinforce its commitment to equality, equity and inclusion, safety, professional conduct, and the long-term success of these vital food distribution hubs. The policy is expected to have a positive impact on market operations and public perception, ensuring the continued prosperity and reputation of these historic markets.

Appendices

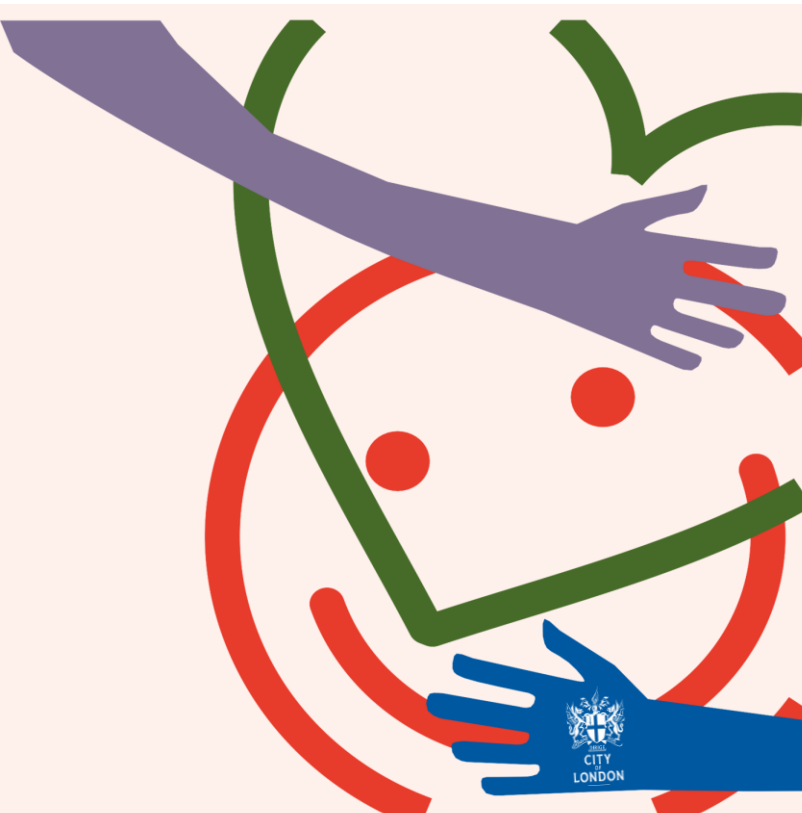
- Appendix A - 1. Zero Tolerance - COLc Wholesale Markets FINAL
- Appendix B - 2. Zero Tolerance - One Pager FINAL



Zero Tolerance at our wholesale markets

May 2024

Zero Tolerance at our Wholesale Markets



The City of London Corporation's wholesale markets provide products from all over the world, to satisfy the demand of a uniquely cosmopolitan community. We want our wholesale markets to be at a place of safety and respect for everyone who works at, uses, or visits our historic sites.

We want to be clear about the culture of our markets, what you can expect from everyone at the Wholesale Markets, and our expectations of you.

All protected characteristics according to the Equality Act 2010 will be taken into consideration and supported.

What is Zero-Tolerance?



Zero tolerance means that any violation or offense, no matter how minor, will result in the appropriate consequences, ensuring fairness and accountability for all. It is a policy designed to maintain strict adherence to rules or standards without exceptions.

Zero Tolerance Statement

The City of London's Wholesale Markets maintain a strict zero-tolerance policy against discrimination, harassment, and misconduct. We are committed to ensuring a safe, respectful, and inclusive environment for all individuals within our premises.

Any behaviour that violates this principle will not be tolerated within our premises or in any interactions associated with our Wholesale Markets. This includes, but is not limited to:

1. Verbal, physical, or written harassment.
2. Discriminatory actions or comments.
3. Bullying or intimidation tactics.
4. Retaliation against those who report misconduct.
5. Any other behaviour that creates a hostile or unwelcoming environment.

Any policy violation will result in immediate and decisive action, including potential termination of employment or business relationships. We encourage reporting any concerns or incidents to the appropriate authorities for prompt investigation and resolution.

Routes to Resolution

When we talk about resolving, we mean the behaviour that breaches zero-tolerance stops.

We will always look for the timeliest and fairest resolution option to achieve that aim and expect everyone to participate in our processes when asked.

These informal routes to resolution apply to everyone who works, visits, or performs here, regardless of employer or any other status.

See pages 6 and 7 for the relevant routes to resolution for employees and our stakeholders (market tenants, members of the public, and others) who experience discrimination, bullying, or harassment:

Routes to Resolution

1

Inform your line manager, constabulary, or senior member of staff in the first instance.

We can all make mistakes. Sometimes behaviours are unintended. This doesn't make them right, but on a human level, with some caveats (unless something is extremely serious) we should all get an opportunity to make amends.

If we are the ones receiving feedback, we should do our best not to be defensive, we should listen, ask questions to clarify understanding, and work together to agree on behaviour changes.

2

If this does not bring the resolution needed, It is important for everyone involved that conflicts are resolved in a timely and fair manner, so we ask that you always seek the route of resolution that enables this. Employees can speak to the People & HR Team, your union rep, or the Dignity at Work Advisers who can signpost, provide options, and help in resolving the problem – they all can help you explore the options available to you. Stakeholders can raise complaints, suggestions, or comments via the link on the last slide.

Routes to Resolution Continued

3

If you are an employee or a stakeholder and your concern is about a member of the public, tenant or member of their staff, contact the Security Manager or General Manager - they will keep the situation safe for everyone. The individual may receive a ban from our markets (temporary or permanent). The outcome should be communicated to you by whoever investigates.

4

If you feel as though these routes have not resolved your issue, you can raise a formal complaint under the grievance procedure or the bullying & harassment procedure – please refer to the links on the last slide.



More Information

For City of London Corporation Employees:

- [Bullying and Harassment Policy Infographic \(sharepoint.com\)](#)
- [Dignity at Work Advisers Scheme \(sharepoint.com\)](#)
- [Whistleblowing Policy \(sharepoint.com\)](#)
- [CityWell Employee Health & Wellbeing Hub \(sharepoint.com\)](#)
- [Employee Handbook \(sharepoint.com\)](#)
- [EmployeeHandbook-Grievance-Complaint-Procedure.pdf \(sharepoint.com\)](#)






For Stakeholders:

- [Comments, Complaints and Suggestions Link: Feedback - City of London](#)

Zero Tolerance at our wholesale markets



We operate a **ZERO TOLERANCE APPROACH** to the following behaviours on and around our sites:

-  Offensive or careless language
-  Bullying, harassment or intimidation
-  Threatening behaviour or violence
-  Prejudice or discrimination
-  Any act of violence or abusive behaviour



If you experience or witness any of these behaviours, please inform a member of staff immediately.

THINK BEFORE YOU ACT

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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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By virtue of paragraph(s) 2, 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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