



Equity, Equality, Diversity & Inclusion Sub-Committee

Date: THURSDAY, 20 NOVEMBER 2025
Time: 10.30 am
Venue: COMMITTEE ROOMS, WEST WING, GUILDHALL

Members: Deputy Caroline Haines (Chair)
Joanna Tufuo Abeyie
Alderman Sir Charles Bowman
Deputy Anne Corbett
Anthony David Fitzpatrick
Gregory Lawrence
Charles Edward Lord, OBE JP
Deputy Henry Pollard
Deputy James Thomson CBE
David Williams
Philip Woodhouse

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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. MINUTES

To agree the public minutes and non-public summary of the previous meeting held on 25 September 2025 as a correct record.

For Decision
(Pages 5 - 10)

4. PROPOSED AMENDMENTS TO THE SUB-COMMITTEE'S TERMS OF REFERENCE (DRAFT)

Report of the Town Clerk.

For Decision
(Pages 11 - 20)

5. CITY OF LONDON POLICE EDI STRATEGY

Report of Commissioner of Police.

For Information
(Pages 21 - 50)

6. SOCIAL MOBILITY EMPLOYER INDEX RESULTS

Report of the Chief Strategy Officer.

For Information
(Pages 51 - 88)

7. FAITH IN THE CITY

Director of Campaigns and Engagement to be heard.

For Information
(Verbal Report)

8. EEDI STRATEGIC FRAMEWORK

Equalities Director to be heard.

For Information
(Verbal Report)

9. CULTURE STRATEGY

Equalities Director to be heard.

For Information
(Verbal Report)

10. STATUES

Equalities Director to be heard.

For Information
(Verbal Report)

11. TTEAP - TRANSATLANTIC TRAFFIC OF ENSLAVED AFRICAN PEOPLE

Equalities Director to be heard.

For Information
(Verbal Report)

12. QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB COMMITTEE

13. ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT

14. 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

15. NON-PUBLIC MINUTES

To approve the non-public minutes of the meeting held on 25 September 2025.

For Decision
(Pages 89 - 92)

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

17. 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

18. CONFIDENTIAL MINUTES

To agree the previous minutes of the previous confidential session held on 25 September 2025 as a correct record.

For Decision
(To Follow)

19. REPORT OF ACTION TAKEN

Report of the Town Clerk.

For Information
(To Follow)

EQUITY, EQUALITY, DIVERSITY & INCLUSION SUB-COMMITTEE **Thursday, 25 September 2025**

Minutes of the meeting of the Equity, Equality, Diversity & Inclusion Sub-Committee
held at Committee Rooms, West Wing, Guildhall on Thursday, 25 September 2025
at 1.45 pm

Present

Members:

Deputy Caroline Haines (Chair)
Joanna Tufuo Abeyie (Deputy Chair)
Deputy Anne Corbett
Deputy Peter Dunphy
Anthony David Fitzpatrick
Charles Edward Lord, OBE JP
Deputy Henry Pollard
Deputy James Thomson CBE
David Williams

In attendance

Deputy Nighat Qureishi

Officers:

Michael Cogher	-	Comptroller & City Solicitor
Dionne Corradine	-	Chief Strategy Officer
Genine Whitehorne	-	Director of Commercial Change Portfolio Delivery
Polly Dunn	-	Assistant Town Clerk
Jerome Williams	-	Director of EDI (City Bridge Foundation)
Rachel Mackay	-	People Director (HR Specialist Services)
Sarah Guerra	-	Equalities Director
Emma Green	-	Barbican (EDI Lead)
Ben Dixon	-	Town Clerk's
Eloise Evans	-	Town Clerk's
Mark Gettleston	-	Town Clerk's
Helena Mattingley	-	Town Clerk's
Arfan Bhati	-	Town Clerk's
Rhys Campbell	-	Town Clerk's

1. APOLOGIES

Apologies were received from the Chief Commoner, Deputy Henry Pollard and Alderman Sir Charles Bowman in advance of this meeting.

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

There were no declarations.

3. **ELECTION OF A DEPUTY CHAIR**

In accordance with Standing Order 29, Joanna Abeyie being the only Member indicating their willingness to serve was duly declared to be Deputy Chair of the Equity, Equality, Diversity & Inclusion Sub-Committee for the ensuing year.

4. **MINUTES**

RESOLVED, that – public minutes and non-public summary of the previous meeting held on 5 February 2025 as a correct record.

Matters Arising

A Member asked if the discussion held in the public session of the previous inquorate meeting of the Sub-Committee could be received in the public session of this meeting, and for the public element of note of the inquorate meeting to be allowed for viewing in the public domain. After consultation with the Chair the Town Clerk agreed and would upload the public note of the Inquorate Meeting of the Equality, Diversity & Inclusion Sub-Committee held on 16 June 2025 as an addendum following this meeting.

5. **DESTINATION CITY**

The Sub-Committee received a report of the Deputy Town Clerk in respect of an update on the Destination City Programme following the independent review of Destination City by Paul Martin.

Officers advised the Committee of the progress made in relation to this programme and that following the review there has been more focus attributed to economic growth. The creation of the City Business and Investment unit was expected to help the City of London to become the destination for global business whilst ensuring that the City was an active destination on weekends particularly for the visitor economy.

The Sub-Committee asked whether data from the Community Toilet Scheme would be used in relation to toilet provisions within in the City and if further discussion on the subject had been undertaken with the Port Health and Environmental Services Committee. Officers noted that the subject of toilet provisions within the City had been discussed previously and stressed the importance of signage informing members of public of the location of toilets within the City, and work with managing agents and stakeholders would be undertaken to ensure this.

A Member asked how progress was being communicated to Members and Wards, and the Sub-Committee was advised that the Destination City Bulletin was the primary form of engagement with Members, as well as an update within the monthly Members' Briefing. Also, Members would be notified of any projects within their Ward funded via the Destination City Partnership fund.

Discrimination and racial profiling was mentioned, particularly in relation to the night-time economy, during the discussion and officers if discussions had taken place with stakeholders to mitigate the risk of targeting a particularly demographic of people. Officers acknowledged that further discussion would need to take place with City of London Police (CoLP) on this matter.

RESOLVED, that – the report was received, and its contents noted.

6. FAITH IN THE CITY

The Sub-Committee received a report of the Chief Strategy Officer which recommended that Faith in the City be adopted as an official project of the City of London Corporation: to make the Square Mile the most faith-friendly business district in the world.

Members were advised at the outset that the recommendation listed within the report had been amended to include further support of the work concerning the Faith in the City project, and to implement the Faith in the City Advisory Group.

Officers advised the Sub-Committee that faith needs within the Square Mile had undergone changes and whilst it was acknowledged that the number of people of no faith was increasing there was also an increase in young Londoners practicing religions other than Christianity. Within the City there were no formal faith leaders representing institutions, outside of Christianity and Judaism, and officers were aware that the City Corporation must fulfil its statutory duties under the Equality Act 2010 and provide a multi-faith provisions so to create a welcoming environment for all faiths.

The support for multi-faith provision within the City and the increased awareness of businesses supporting faith needs of their staff had been supported by the Policy and Resources Committee with a pilot test to be carried out once funding had been secured.

RESOLVED, that – the report was received, and its contents noted.

7. EQUITY, EQUALITY, DIVERSITY AND INCLUSION (EEDI) CHARTERS, MEMBERSHIPS AND PARTNERSHIPS

The Sub-Committee received a report of the Chief Strategy Officer in respect of the Equity, Equality, Diversity and Inclusion (EEDI) Charters, Memberships and Partnerships. This report presented an overview of memberships and partnerships held in relation to EEDI.

RESOLVED, that – the report was received, and its contents noted.

8. QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB COMMITTEE

There were no questions.

9. ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT

Members were made aware of the Sutton Trust Network event which had taken place on Wednesday, 24 September in which the Chair was in attendance. The event focus on social mobility within the arts, and the value of the creative sector within the City and the UK.

10. 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.

11. NON-PUBLIC MINUTES

RESOLVED, that – the non-public minutes of the previous meeting held on 5 February 2025 were agreed as a correct record.

12. NOTE OF THE INQUORATE MEETING OF THE EQUALITY, DIVERSITY & INCLUSION SUB-COMMITTEE

Members were asked to receive the note of the inquorate meeting held on 16 June 2025.

RESOLVED, that – the report was received, and its contents noted.

13. DRAFT EQUITY, EQUALITY, DIVERSITY & INCLUSION (EEDI) STRATEGIC FRAMEWORK

The Sub-Committee received a report of the Chief Strategy Officer in respect of the (Draft) Equity, Equality, Diversity & Inclusion (EEDI) Strategic Framework outlining the City of London Corporation's draft EEDI Strategic Framework shaped by the Corporate Plan 2024-2029, the People Strategy 2024-2029, the 2025 EEDI Review and political priorities.

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

There were non-public questions.

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

There was one item of urgent business.

16. NOTE OF THE CONFIDENTIAL SESSION OF THE EQUALITY, DIVERSITY & INCLUSION SUB-COMMITTEE

Members noted the confidential session of the previous inquorate meeting of the Equality, Diversity & Inclusion Sub-Committee held on 16 June 2025.

17. SUPREME COURT JUDGEMENT

Members received a report of the Comptroller & City Solicitor.

The meeting ended at 15:31pm.

Chairman

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City of London Corporation Committee Report

Committee(s): Equity, Equality, Diversity & Inclusion Sub-Committee	Dated: 20 November 2025
Subject: Proposed Amendments to the Sub-Committee's Terms of Reference (Draft)	Public report: For Decision
This proposal: <ul style="list-style-type: none"> • delivers Corporate Plan 2024-29 outcomes • provides statutory duties 	Providing Excellent Services. Diverse Engaged Communities.
Does this proposal require extra revenue and/or capital spending?	N/A
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:	Town Clerk
Report author:	Rhys Campbell, Governance Officer

Summary

The Equity, Equality, Diversity and Inclusion (EEDI) Sub-Committee are to review its Terms of Reference to certify that they are in line with the City of London Corporation's EEDI mission to ensure that the City is the best place in the world to live, work, learn, and explore.

The proposed changes to the Terms of Reference for the EEDI Sub-Committee are attached at Appendix 1.

Recommendation

Members are asked to:

- Agree to the proposed changes to the terms of reference of the Equity, Equality, Diversity and Inclusion Sub-Committee for onward submission to the Policy and Resources Committee for its approval at its next meeting.

Main Report

Background

1. In November 2023 the Corporate Strategy officer added 'Equity' to the officer portfolio when assuming responsibility for Equality, Diversity and Inclusion since a gap had been identified which didn't reflect best practice in this area.
2. The Sub-Committee agreed to this as part of the proposed new direction of travel for Equity, Equality, Diversity & Inclusion across the City Corporation to better align with the Corporate Plan 2024-2029 under the stewardship of the Chief Strategy Officer in early 2024.

Current Position

3. Approval was granted by the Policy & Resources Committee on 18 September 2025 to change the name of this Sub-committee from the Equality, Diversity & Inclusion Sub-Committee to the Equity, Equality, Diversity & Inclusion Sub-Committee. However, the Terms of Reference in its current state does not reflect the inclusion of the term 'equity', along with its implications, and any works in relation to EEDI across the City Corporation and its institutions.
4. The proposed version of the EEDI Sub-Committee's Terms of Reference can be found at appendix 1 attached to this report. Members are to review and approve these Terms of Reference for onward submission to the Policy and Resources Committee for its approval. The request for approval is sought to ensure consistency with the EEDI work which is already underway and to show visible demonstration that this Sub-Committee is aligned with all developments in the realm of EEDI.

Options

5. Option 1 – Retain the Current Terms of Reference

Members may decide to retain the current Terms of Reference listed in appendix 2. However, these are outdated and are not correctly aligned with the work of the Sub-Committee and does not properly reflect its work or other work(s) in relation to EEDI across the City Corporation and its institutions.

6. Option 2 – Agree to the Sub-Committee's Proposed Changes to the Terms of Reference

Agree to the proposed changes to the Terms of Reference listed in appendix 1 to ensure consistency with the EEDI work which is already underway and to show visible demonstration that this Sub-Committee is aligned with all developments in the realm of EEDI.

Proposals

7. Members are asked there for asked to agree to Option 2, to approve the proposed changes to the Terms of Reference for the EEDI Sub-Committee listed in appendix.

Corporate & Strategic Implications

Financial implications – None

Resource implications - None

Legal implications - None

Risk implications - None

Equalities implications – All public bodies have a duty to ensure that when exercising their functions they have due regard to the need of advance equality of opportunity between people who share a protected characteristic and to take steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people and encourage people with certain protected characteristics to participate in public life or in other activities where their participation is disproportionately low. The proposals contained within this report do not have any potential negative impact on a particular group of people based on their protected characteristics.

Climate implications – The proposals included in this paper do not carry any significant implications for the Climate Action programme.

Security implications – None.

Conclusion

8. Members are therefore asked to consider all available options and agree with the recommended approach (Option 2) which is to agree to the proposed changes to the Sub-Committee's Terms of Reference as listed in appendix 1 of this report.

Appendices

- Appendix 1 – Equity, Equality, Diversity and Inclusion Sub Committee – Proposed Changes to the Sub-Committee's Terms of Reference (Draft)
- Appendix 2 - Equity, Equality, Diversity and Inclusion Sub Committee – Current Terms of Reference

Rhys Campbell

Governance Officer, Town Clerk's Department

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Equity, Equality, Diversity and Inclusion Sub Committee

Composition

- The Chair of the Policy and Resources Committee or their nominee
- The Chair of the Corporate Services Committee or their nominee
- The Chair of the General Purpose Committee of the Court of Alderman or their nominee
- The Chief Commoner
- The Immediate past Chief Commoner*
- Two Members of the Policy and Resources Committee
- Two Members of the Corporate Services Committee
- Two Court of Common Council Members appointed by the Court
- Together with co-option by the Sub Committee of up to two external people (with no voting rights)

* for part of the year and then the Chief Commoner Designate for the remainder of the year (elected in October each year).

Terms of Reference

As a sub-committee reporting to the Policy and Resources Committee, being responsible for:

- a) Supporting the City of London Corporation's Equity, Equality, Diversity and Inclusion (EEDI) mission;
- b) Providing assurance to the Policy and Resources Committee that the City of London Corporation are discharging their statutory responsibilities in regard to the Equality Act 2010 and other relevant legislation;
- c) Working with service committees to provide input into the City of London Corporation's policies, practices and programmes in respect of equity, equality, diversity and inclusion;
- d) approving EEDI strategies and Equality Objectives and monitoring progress where responsibility otherwise does not rest with any other service committee;
- e) approving (where responsibility otherwise does not rest with another committee) and monitoring EEDI aspirational targets and agreed metrics to help the delivery of the City of London Corporation's ambition as an inclusive employer, landlord, service provider and global thought leader;
- f) supporting the EEDI corporate function to enable scrutiny and review of cross-cutting strategies, programmes and portfolios across the City Corporation through the lens of

EEDI, ensuring that inclusion is embedded as standard practice and there is alignment with EEDI ambitions and equitable impact and value;

- g) supporting the development and delivery of strategic initiatives by championing EEDI principles, fostering a culture of continuous improvement, and holding relevant programmes to account for their impact on inclusion;
- h) Scrutinising the City of London Corporation's activities in tackling prejudice in all its forms and instruct further action to promote economic, educational and social inclusion to ensure that the lived experiences of diverse communities and stakeholders is reflected in the work of the City of London Corporation;
- i) Reviewing the annual equalities data prior to releasing the annual equalities report.
- j) Escalating matters and make recommendations to the Policy and Resources Committee when their input is needed and to refer matters to the relevant service committees, where considered necessary.

Quorum

The quorum consists of any three Members.

Meetings

The Equity, Equality, Diversity and Inclusion Sub-Committee will meet quarterly.

Equality, Diversity & Inclusion Sub-Committee

Composition

- The Chairman of the Policy and Resources Committee or their nominee;
- The Chairman of the Corporate Services Committee or their nominee;
- The Chairman of the General Purposes Committee of the Court of Aldermen, or their nominee
- The Chairman of Community and Children's Services Committee, or their nominee
- The Chief Commoner
- The Immediate past Chief Commoner*
- Two Members of the Policy & Resources Committee
- Two Members of the Corporate Services Committee
- Two Court of Common Council Members appointed by the Court
- Together with co-option by the Sub-Committee of up to two external people (with no voting rights).

**For part of the year and then the Chief Commoner Designate for the remainder of the year (elected in October each year)*

Terms of Reference

As a sub-committee reporting to Policy & Resources Committee and Corporate Services Committee responsible for:-

- a. Oversight and effectiveness of the City of London Corporation's policies and practices in respect of Equality Diversity & Inclusion including the implementation of the Equality Act 2010 and other relevant legislation and regulations.
- b. To consider matters of policy and strategic importance to the City of London Corporation in so far as these relate to the Equality, Diversity & Inclusion function.
- c. To monitor and scrutinise EDI activities and outcomes against agreed Equality, Diversity & Inclusion objectives across all the activities of the City of London Corporation.
- d. To be responsible for the creation and implementation an Equality Diversity & Inclusion officer governance structure across the City of London Corporation, including its services and its institutions.
- e. To assess what the City of London Corporation does to tackle prejudice in all its forms and assess any further action that can be undertaken to promote economic, educational, and social inclusion.
- f. To be responsible for making recommendations to help promote the merits of standing for office as an Alderman or Common Councilman, to enhance the diversity of the Court of Common Council.
- g. To be responsible for providing guidance and challenge on the development of the City of London Corporation's Equality, Diversity & Inclusion principles, Strategy, business plans and associated action plan.

- h. To have oversight of steps taken by the City of London Corporation to comply with the 9 protected characteristics as defined by the Equality Act 2010, Chapter 1.

Reporting and Monitoring

- i. To oversee updates to key Human Resources policies and procedures relating to Equality, Diversity & Inclusion.
- j. To provide guidance to officers that will ensure that the City Corporation is recognised as a world-class leader in the UK and internationally, ensuring Equality, Diversity & Inclusion is business and outcome focused
- k. To act as representatives for the City of London Corporation on Equality, Diversity & Inclusion related activities it undertakes as an employer, service provider and global leader in the Financial and Professional Services sector
- l. To consider new areas of work where the City of London Corporation can provide thought leadership in the Equality, Diversity & Inclusion sector.

Targets, Data and Metrics

- m. To approve and monitor Equality, Diversity & Inclusion aspirational targets and agreed metrics to help deliver the City of London Corporation's ambition as an inclusive employer, landlord, service provider and a global thought leader.
- n. To review and provide feedback on the annual equalities data prior to releasing the annual equalities report on the City of London Corporations external website.

Socio-Economic Diversity

- o. To oversee the implementation of the City of London Corporation's Social Mobility Strategy 2018 to 2028 using the Five-point pathway recommended by the Socio-economic Taskforce in the Breaking the class barrier report, 2022.

Accessibility

- p. To oversee and ensure that the City of London Corporation understands the criteria for accessibility set by the government and ensure that it works towards the government's accessibility accreditation scheme

Budget and Resources

- q. To oversee the mapping exercise of resources available for Equality Diversity & Inclusion work across the City of London, its services and institutions and suggest priorities within those.

Quorum

- The quorum consists of any three Members

Meetings

- The Equality, Diversity & Inclusion Sub-Committee will meet quarterly.

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City of London Corporation Committee Report

Committee(s): Equity, Equality, Diversity & Inclusion Sub-Committee	Dated: 20 th November
Subject: Update from City of London Police on EDI Strategy	Public report: For Information
This proposal: <ul style="list-style-type: none"> • delivers Corporate Plan 2024-29 outcomes 	People are safe and feel safe
Does this proposal require extra revenue and/or capital spending?	No
Report of:	Commissioner of Police
Report author:	Det Supt Kate MacLeod

Summary

This paper provides EEDI Sub-Committee members with an update on the work being led by the City of London Police 'Inclusivity, Culture and Organisational Development' (ICOD) team since the launch of their Forcewide Equity, Diversity and Inclusion (EDI) Strategy in July 2024. This team provide quarterly updates as part of their submissions to Professionalism & Trust Committee, this paper aims to summarise key achievements and challenges, providing members with an annual update as previously agreed.

Main Report

Background

The City of London Police Equity, Diversity and Inclusion (EDI) Strategy 2024-2027 was launched in July 2024 following extensive consultation. It makes a series of commitment statements to run over the next 3 years under 4 key themes:-

1. **Our People**- increasing diverse representation, improving our standards and ethics, driving inclusive leadership and individual accountability, creating an equitable working culture and delivering zero tolerance on behaviours which compromise this.
2. **Our Policies and Processes**- ensuring they are equitable, accessible, inclusive and informed through diverse representation of our police and by independent scrutiny.
3. **Our Public**- building and sustaining authentic engagement with our communities to ensure their confidence in our policing.
4. **Our Partners**- leading by example in building inclusive relationships and fostering innovative collaboration.

The Strategy acknowledges that delivery against these commitments in the City of London Police is not new; on the contrary, the document outlines the progress we have already made in this field. It enhances this further by creating a structure around what currently exists (under the '4P headings), along with defining our future direction and how we will measure success.

Our Approach

We have worked with our internal stakeholders (including our Staff Networks and Associations) along with external partners (including EDI specialists such as Business Disability Forum and Inclusive Employers), to help inform our priorities for our first year. This resulted in an extensive plan of work with 76 individual actions across the '4P' areas, some of which have been completed and all of which are now in progress. As a 3-year plan, it is ambitious. However, we have prioritised them in to 'high', 'medium' and 'low' categories and aligned our annual plans to this. As a result, 28 of the 76 actions have become priorities we will progress in 2025/6.

Although it is widely acknowledged that EDI is 'everyone's business' within CoLP and we need to ensure a forcewide approach to many of the tasks, we also appreciate that much of the activity and co-ordination will be driven by the ICOD team.

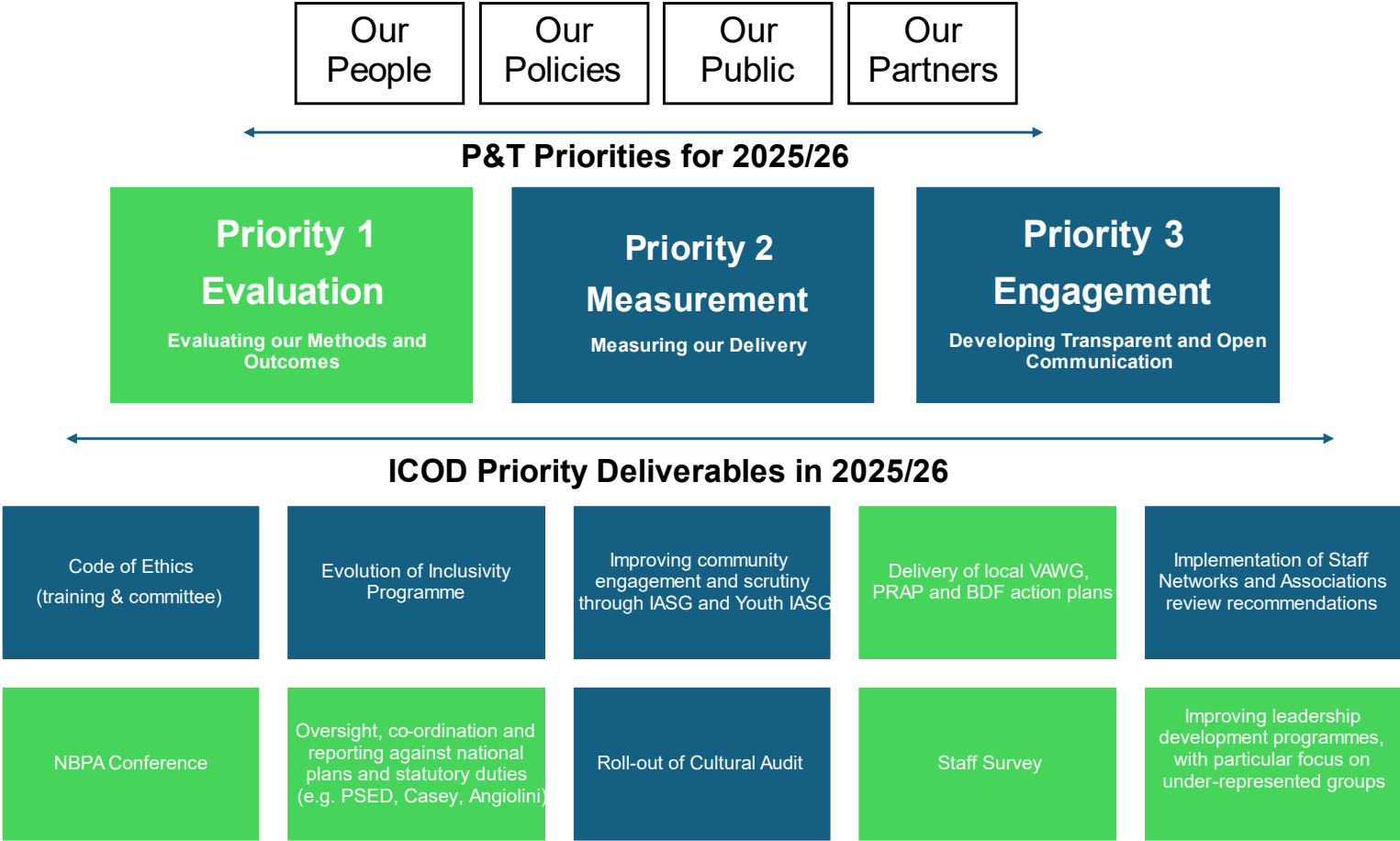
Our Priorities

Our wider EDI workplan is ambitious; we believe that to achieve our EDI ambitions, it absolutely needs to be. However, we recognise the impact that the dynamic nature of the portfolio and the resourcing and capability gaps which exist in the team have on capacity, which means that we need to prioritise our efforts over the next 3 years to meet our aims.

As part of our ongoing accreditation journey, Inclusive Employers estimate that the journey to progress from 'Silver' to 'Gold' can take anywhere from 3 to 5 years. This requires that we lay down some solid foundations in areas which have previously been overlooked due to the pace and speed of progress, bringing us to our 3 thematic priorities.

The diagram overleaf outlines those priorities and key deliverables we would want to progress and deliver to place CoLP in the best position to make meaningful progress towards our EDI ambitions. However, when reflecting on the resources gap, along with new portfolio responsibilities and emergent issues (for example, the recent Supreme Court ruling), these priorities and key deliverables have been further refined to reflect the actual capacity within the team to deliver them. The impact of this refinement is reflected in the diagram, with those tabled in green as being priorities for our first year and those in blue for later in 2026.

CoLP EDI Ambition ~~To~~ **be one of the most inclusive and trusted police services in the**



Our Progress

Over a year since our EDI Strategy launch and key achievements include:-

- Ongoing delivery and evaluation of our 'Our People' Inclusivity Programme (mandatory 2 modules per year for all staff).
- Review of our Staff Networks and Associations, including governance and dedicated time.
- 'Silver' accreditation awarded by 'Inclusive Employers' following our submission, no Police Force achieved higher in 2024.
- Maintaining our statutory duties, including publication of our Public Sector Equality Duty.
- Refresh of our Youth Independent Advisory Scrutiny Group (YIASG) and ongoing delivery of our Adult IASG.
- Co-ordination of our forcewide Police Race Action Plan and Violence Against Women and Girls Action Plan.
- Roll out of 'cultural audits' and creation of a forcewide cultural audit toolkit.
- Review of some of our key policies, identifying and addressing gaps in our Equality Impact Assessments.
- Delivery of our Positive Action Learning Sets scheme to ethnic minority staff and officers.
- Delivery of EDI training to our Senior Leadership Team (via Exeter University)
- Hosting the National Black Police Association Conference in October 2025 for over 400 delegates.

Challenges and Mitigation

Evaluation: We are aware that we need to invest more time over the next 12 months on evaluation, we are strong at delivering product but acknowledge that the resultant behaviour change is difficult to measure. We have a new Organisational Development Practitioner joining the team so will be in a position to dedicate resource to this from December 2025. In the interim, we have started to include more 'level 2' data (showing knowledge gain alongside reactionary 'level 1' data), we need to focus future efforts on better understanding our impact.

Measurement: We have started reporting against some of the metrics listed within the EDI Strategy, including the make-up of our workforce and promotion / retention detail. Unfortunately, we do have some data gaps with many of our recording systems requiring manual trawl; we continue to raise and address these through our EDI Strategic and Delivery Boards.

Responding to Events: Although we now have a clear plan of action to complete in order to deliver against our EDI Strategy ambitions, this can be challenged when the need arises to respond to events outside of our control, such as the Supreme Court ruling on gender definition or recent anti-immigration protests. While we complete a 'PESTELO' analysis, much of our work in this area is difficult to predict.

Appendices

- Appendix 1- EDI Strategy

Kate MacLeod

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OUR PEOPLE

Equity, Diversity and Inclusion Strategy
2024-2027



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OUR PEOPLE

Equity, Diversity and Inclusion Strategy 2024-2027



“The City of London Police will be one of the most inclusive and trusted police services in the country”

The City of London Police has a unique position, in that we are a local service, keeping those who live and work in the square mile safe, with a national role, to protect the United Kingdom from fraud, economic and cyber crime.

COMMISSIONER'S FOREWORD



“We are passionate about our duty to keep everyone safe. We know equity, diversity and inclusion are essential for us to do that. Ensuring our people – meaning our staff, our public and our partners know how much we value them; and that our policies and processes are equitable and accessible will lead to us delivering the most inclusive police service possible.

Embedding this strategy at the core of all we do will mean that we truly serve to the highest standards of professionalism, compassion and integrity.

T/Commissioner of the City of London Police
Pete O'Doherty





“Equity, diversity and inclusion means I can be trusted to help, no matter who you are.”



OUR ACKNOWLEDGEMENT

There have been widely-publicised policing challenges and failings that have damaged the public's confidence in our police service.

We have been shocked and horrified by the wholly unacceptable incidents that have occurred across policing, nationally and locally, and recognise there has been insufficient progress to meet the size of the challenge and address these failings.

Our police officers and staff embrace the task ahead and remain committed to providing a service driven by integrity and a service that can be trusted to behave appropriately. We are determined to lead by example and deliver policing with legitimacy and trust.

Specifically, we will tackle local challenges head-on, including any disproportionate use of force and stop and search, improving the victim experience and continuing to create a psychologically safe, equitable and inclusive working environment for all who work with us. We will proactively continue to increase the diversity of those working with us at all levels and focus efforts to retain and promote those from underrepresented backgrounds, so that our colleagues reflect the diversity of the communities we serve.



“We value the expertise of our external and independent partners, and will ensure that we work effectively with them to address and confront issues that compromise our service's ability to deliver value-driven policing.”

OUR ALIGNMENT AND COLLABORATION WITH NATIONAL POLICE RESPONSES

The City of London Police is driving behaviours and processes that deliver on the recommendations required of all police forces nationally, with particular focus on those detailed below.

- Baroness Louise Casey's Review, Part 1 of the Lady Angiolini Inquiry, and Operation Hottan have highlighted the need for all forces to improve upon their internal culture, professionalism, handling of complaints and misconduct cases, vetting procedures, support to victims and community relationships.
- The new Code of Ethics focuses on police services 'doing the right things, in the right way, for the right reasons'. This includes the Duty of Candour, requiring policing to openly acknowledge when mistakes have been made and to act in the interests of the public.
- The National Police Chiefs' Council (NPCC) and the College of Policing will implement a new Culture and Inclusion Strategy, to which we will ensure alignment of our own EDI strategic plans.
- We are also committed to delivering our local action under the National Police Race Action Plan, Violence Against Women and Girls National Framework and upholding the Equality Act 2010.



WHAT DO WE WANT OUR STRATEGY FOR EQUITY, DIVERSITY, AND INCLUSION (EDI) TO ACHIEVE FOR OUR POLICE SERVICE?

Specifically, equity, diversity, and inclusion will be significant in our ability to:

- put the victim at the heart of our policing;
- ensure our people have the resources to do their jobs effectively and efficiently;
- enable us to operate with integrity, compassion, and professionalism;
- earn the trust of diverse communities and partners through honesty and legitimacy;
- cultivate a culture of inclusion to ensure our diverse police service can do its best work and attract and retain all talent, to build and maintain strong, engaging relationships with all communities; and
- effectively embrace new technologies, where relevant, to fight crime robustly and engage with our communities.

WHAT IS DIFFERENT IN OUR 2024-2027 STRATEGIC PLAN?

- We will improve transparency, sharing failings, learnings and improvements to be proactive in building trust.
- We will provide yearly objectives and report on their progress.
- We will be collaborative: our people and public will consistently be part of our policing response.
- We will be accountable, measured, and open: our quantitative and qualitative data will tell the story.
- We will responsibly partner with industry-wide organisations to ensure effective and measurable outcomes for our service, public and communities.

WHAT YOU SHOULD KNOW ABOUT OUR QUALITATIVE AND QUANTITATIVE DATA

Over the past three years, we have used metrics to measure the impact our actions have had on our public, policies and processes, partners and people.

However, we recognise that we need to build on and improve how we measure the impact of some of the action and progress we have made. In some instances, we need more time to be able to properly evaluate, others need a meaningful indicator of progress or regression, or to put in place a measuring tool and metric.

While we do have some indicative data, both qualitative and quantitative, that provides insight into the police service we are today, we still need to build on our ability to capture relevant data and baselines and will do this as this strategy evolves.

We have included this in our yearly priorities and will provide updates to our public, partners and people as we implement the commitments in this plan.



“It’s not about ticking boxes or fulfilling quotas.”



WHERE WOULD WE LIKE TO BE IN 2027?

We want our service to be ranked, at a minimum, ‘integrated’ on the Inclusive Employers Maturity Index, which would define the City of London Police as being ‘inclusive leaders and role models in our approach to business, our behaviour and our policies.’

Equally, we want to increase trust and confidence among the public we serve, and will use our victim satisfaction surveys, Independent Advisory and Scrutiny Groups, use of force and stop and search data, and partner feedback to measure our relationship with our public and partners.

Our ambitions will be achieved through our people, partners, public and policies (our four Ps). The detail provided under each ‘P’ will be the focus of our efforts between 2024 and 2027.



THROUGH PRIORITISING OUR PEOPLE WE WILL:

increase diverse representation, improve our standards and ethics, drive inclusive leadership and individual accountability, create an equitable working culture and deliver zero tolerance of any behaviours that compromise this.



THROUGH STRENGTHENING OUR POLICIES AND PROCESSES WE WILL:

ensure our policies and processes are equitable, accessible, inclusive and informed by the diverse representation of our police service and independent scrutiny and key decision-making bodies. Our policies and processes will enable inclusive leadership, accountability and deliver commitment to continuous learning and fairness for our people, public and partners.



BY COLLABORATING WITH OUR PUBLIC WE WILL:

build and sustain authentic engagement and relationships with all communities, to ensure their confidence in our policing and improve our standards in response to crime, by placing victims at the heart of our policing.



THROUGH WORKING WITH OUR PARTNERS WE WILL:

- lead by example by building inclusive relationships with professionals to provide enhanced services for our communities, foster innovative collaboration and establish partnerships that empower our service to deliver our EDI commitments.
- ensure accountability and independent scrutiny of our commitment to become one of the most inclusive police services in the country, we are externally audited by Inclusive Employers. Our 2020 Inclusive Employers benchmark placed us at the ‘compliant’ stage within the Inclusion Maturity Model. This defined our approach to diversity and inclusion, as: ‘we pay lip service to diversity and inclusion, doing the minimum to be legally compliant’. We are disappointed by this scoring and over the last three years we feel we have made significant efforts in progressing into the police service we aspire to be.



“It’s about being able to access everything without needing to ask.”



THE DETAIL:

OUR PEOPLE



Through our **PEOPLE** we will increase representation, improve our standards, drive inclusive leadership and individual accountability, and create an equitable working culture for our diverse police service, through zero tolerance to behaviours that compromise these obligations.

Our people will reflect the diversity of the City of London, will be well resourced to work effectively and efficiently in a healthy working environment, enabling them to work inclusively and collaboratively with colleagues, partners and our public.

WHERE ARE WE TODAY?

We have a police service populated with a diverse range of skilled and talented people. Nationally, we employ the fifth largest percentage of ethnic minority police officers (10 percent) and the third highest percentage of ethnic minority police staff (24 percent). Additionally, 60 percent of our police staff are female. Disappointingly however, we have one of the lowest representations of female police officers nationally (24 percent).

Of our employees, 3.1 percent disclosed that they have a disability and 3.9 percent disclosed that they were LGBTQ+. We recognise our data does not reflect all identities and excludes those protected characteristics within the Equality Act, care leavers, or those from socio-economically diverse backgrounds. Furthermore, it doesn't provide insight into the intersectionality of our police officers and police staff. We want to report accurately on the entirety of our employee population, so we can ensure an equitable and inclusive working culture and service.

This data only includes the detail of those comfortable with sharing their personal information. We must address how we can improve and increase confidence in sharing these details with us.

Our outreach team will continue their focused efforts on increasing interest in our service, through proactive engagement with schools and education centres with high proportions of ethnic minorities, socio-economically diverse people and those of varying religions and faith.

While having a diverse workforce is valuable, we recognise that accessibility and equity - everyone having what they need to be successful and feeling included - is what will drive innovative, effective and efficient policing. To measure this, we ask our staff, through our people survey, to share how true this feels for them. In February 2024, 57 percent of our workforce shared their views and 87 percent of those believed their manager treats them with respect, 86 percent confirmed they felt accepted and respected within their team, and 70 percent agreed that poor behaviour is always addressed quickly. Our latest EDI score was disappointing, with 64 percent of respondents disagreeing with the comment, 'COLP delivers on its commitment to promoting diversity, equity, and inclusion'.

REPRESENTATION

Our approach to inclusive and equitable recruitment processes will continue to ensure we hire the best people from all backgrounds and, where necessary, respond to trends in underrepresentation with equitable hiring processes. Efforts to challenge inequity in



recruitment processes, is already in train, including collaboration with our staff networks, and our leadership accelerator, both of which have seen us attract and engage with an increasing number of ethnic minority and deaf, disabled, and neurodivergent talent. We know this is just the beginning and remain enthusiastic about building careers for talent from all backgrounds. Hiring inclusively is the first step, however, to ensure our people feel psychologically safe, valued, and respected, our workforce will continue to benefit from consistent education through our inclusivity programme and engagement with the varying lived experiences of our partners and people continues.

LEADING BY EXAMPLE AND LEADERSHIP ACCOUNTABILITY

Our active bystander' education has begun to equip our leaders with the knowledge to lead by example, learn from effective practices within other forces, tackle inappropriate behaviour and ensure our police service prioritises the wellbeing of those working with us with professionalism, integrity, and compassion. Programmes such as 'Leading with Impact' for female employees, and the Positive Action Leadership Scheme (PALS) for black, asian and ethnic minority constables, sergeants, and police staff, enable accountability among our senior leaders to ensure they remain proactive in levelling the playing field for underrepresented talent at every level. Additionally, the addition of inclusivity objectives within personal development reviews will ensure our workforce prioritises its commitment to equity and can demonstrate those objectives are being met.

STANDARDS AND ETHICS

It is vital that those who work in policing have trust and confidence in the police as their employer and feel empowered to uphold the high standards the public expect. We have invested in our Professional Standards Department to ensure that we effectively uphold our commitment to 'police with professionalism, integrity, and compassion'. For example, our 'Domestic Abuse Matters' training for all officers has already seen 800 officers successfully trained, including 80 percent of frontline staff. We are now in the top two police services in England and Wales for successful evidence-led prosecutions for domestic abuse.

CULTURE

We have invested in proactive cultural review audits which examine internal conduct and the culture of teams, uncovering elements of hidden culture which impact on how people feel at work, including low level unacceptable behaviours not reaching the threshold for misconduct. While in the pilot stage, these reviews have and will continue to inform how we consider and value intersectionality, ensure access needs are met, tackle microaggression, and to ensure an authentic sense of inclusion. Our wellbeing activities are shaped by our people, enabled and supported by our leaders and assessed against the His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) police effectiveness, efficiency, and legitimacy (PEEL) inspection regime. We continuously spotlight wellbeing, participate in national activities and events and offer a large variety of services to provide mental health and wellbeing support to our staff and officers.

ZERO TOLERANCE

Our zero tolerance for all behaviours that compromise the values of our Policing Plan or the public's trust in our ability to serve them, is expected as business as usual. Our listening circles, which provide our people space to safely share concerns, have been described as 'effective practice' by the College of Policing and have since been implemented by several police services. Our Violence Against Women and Girls (VAWG), and Police Race Action Plans, are both leading our work to be actively anti-racist and strengthen our response to crimes directed at women and girls. This, with our evolving inclusivity programme, will drive our continuous improvement in this area.



OUR CONTINUED COMMITMENT

- We will introduce pledges from police leaders, staff and officers that they will be held accountable for delivering.
- We will increase the diversity of underrepresented talent from all backgrounds within student officer intakes and at all levels across our service.
- We recognise that the demographic of our employees does not reflect the diversity of the UK population and so we will focus efforts to enable, attract, retain and develop people from a broad range of backgrounds, including socio-economically diverse backgrounds, deaf, disabled and neurodivergent people.
- We will consistently deliver regular mandatory education on a variety of subjects pertinent to the cultures and lived experiences of our people, partners and public.
- We will ensure that all leaders working for us complete mandatory and regular inclusive leadership training. We will regularly review the effectiveness of this education through relevant metrics, including our staff survey.
- We will introduce inclusivity objectives into professional development reviews to drive individual accountability.
- We will leverage the value of our Professional Standards Department to monitor the complaints and feedback we receive on our service and use our new investment in technology to record and address these in a timely manner and with empathy. We are implementing the new National Code of Ethics locally, which has a focus on ethical leadership. This aligns with our ethical dilemmas training which equips our inspectors and supervisors with the confidence and knowledge to have challenging conversations with colleagues around ethical policing.
- We will complete audits every quarter and use the results of these to inform changes in culture, the content of our inclusivity programme and professional standards work.
- We will embed recommendations from all national policing plans and working together with Professional Standards, victim satisfaction, and use of force monitoring teams ensure expected high standards are met.

WHERE DO WE WANT TO BE?

In 2027, we hope to be reflecting the Greater London area and beyond more closely and improving representation levels year-on-year, particularly as the Greater London population is a part of our commuter and leisure communities and our own workforce.

We will continually review our internal data collection to ensure that it accurately reflects changing social interpretations of protected characteristics, such as gender identification and relationships.

We will have seen an increase in people self-declaring protected characteristics at all levels across our service, with all feeling included and valued.

Our staff survey will have seen an improved completion rate, indicating that people see the value in sharing their feedback and this would provide us a more representative picture of how all our people feel working within our service.

We want those who work for our service to feel a sense of pride in working for City of London Police to feel valued and respected as individuals.



HOW WILL WE MEASURE THIS?

- Recruitment and retention figures of all people, with special focus on those from minority backgrounds;
- A decrease in the number of complaints made due to poor ethical standards;
- Promotion of all people, with a specific focus on monitoring the progress of under-represented talent to bridge promotion gaps;
- Year-on-year progress of our people declaring their differences;
- Outcomes and impact of our ethical dilemmas training;
- The number of cases of discrimination, bullying or otherwise, being reported and consequences of this reporting;
- Improved assessment results of our culture, both qualitatively and quantitatively; and
- Our staff engagement score and staff survey will provide insight into the impact of interventions and solutions ascribed because of our cultural audits.



OUR POLICIES



Through our **POLICIES** we will ensure public, internal, and external scrutiny and accountability, a commitment to continuous learning, and enhance equity for our people, public and partners.

We create policies and processes that are informed by lived experiences and the expectations of our people, public and partners, including the diverse representation of our independent scrutiny and decision-making bodies.

INDEPENDENT, PUBLIC, INTERNAL, AND EXTERNAL ACCOUNTABILITY

Our Independent Advisory and Scrutiny Group (IASG), provides feedback and challenge on matters relating to stop and search, use of force, equality and inclusion and professional standards. We recognise the need to ensure these groups are made up of a diverse range of people, who have relevant lived experience or are directly impacted by the issues we are seeking to learn from, tackle or address. The group is also invited to provide appropriate independent input on critical incident gold groups, capturing community concerns. This relationship is successful in influencing our policies and has expanded to form a Youth Independent Advisory Group (YIAG), who were actively involved in our Stephen Lawrence Day Foundation event. Our partnership with Mentivity, who educate and provide insight into young black people's experiences of interacting with the police, has already seen an improved relationship with the black community. We remain committed to evolving the way we police with the support of these independent groups.

CONTINUOUS LEARNING

We engage regularly with staff networks and associations and external communities in reviewing our work, through listening groups and internal and external events, ensuring policies and practices translate into behaviours that ensure we proactively treat all community members and our people, with fairness. Our Professionalism and Trust team, combined with senior diversity champions across our organisation, will continue to cultivate a learning mindset in this area to ensure that policies are inclusive of considerations relevant to all.

ENHANCING EQUITY FOR OUR PEOPLE

We are committed to ensuring that we support investment in the recruitment, retention and progression of all people and, where relevant, focusing efforts on those from a broad diversity of backgrounds, including disabled, black, asian, and minority ethnic officers and staff, to improve the low levels of representation in senior roles. We will support promotion by delivering a variety of programmes developed to provide support for all our employees, with tailored focus on under-represented groups. This initiative will form part of our commitment to develop our future leaders and ensure equitable career progression for all.



OUR CONTINUED COMMITMENT

- We will establish partnership standards to ensure we can receive and review feedback from the public and our partners and share this with internal stakeholders to create new ways of working.
- We will monitor the effectiveness and impact of our IASG and YIAG, through our internal and public reporting metrics.
- We will use our staff networks and associations as key partners in delivering inclusive and relevant policies and review these quarterly to ensure their effectiveness.
- We will track the progression of talent through robust and impartial development platforms and processes.

HOW WILL WE MEASURE THIS?

- Monitoring and scrutinising data through qualitative insights into effectiveness of relationships with key community groups and the impact this has had on policing, including new policies, processes, or codes of behaviour.
- Equitable processes will be measured in respect of their purpose; data will be collected on the value they add and/or the problem they solve.
- Our gender and ethnicity pay gap reporting will provide insights into progress made on equitable pay structures.
- Our staff networks and associations' ability to inform, contribute and shape policies that impact our people.
- Staff survey and staff engagement scores will allow us to measure the effectiveness of equitable hiring activities and policies.
- Exit interviews and the national leavers' framework will provide insights and inspire on-going activity to ensure we retain our skilled and talented people.

WHERE DO WE WANT TO BE?

City of London Police policies are intrinsic to tackling systemic challenges that compromise our ability to be an inclusive, accessible and equitable police service.

We will be a police service which has inclusion and equity, organically, at the forefront of policy design, creation and implementation. Policy-makers will lead with empathy, emotional intelligence and understanding of the impact such policies have on those working within our service and those we serve.

Additionally, any updates to policies will incorporate equity, accessibility and inclusion in real time for those working within the police service.

Our measuring mechanisms will inform progress on this goal across the three-year cycle.



OUR PUBLIC



By collaborating with our **PUBLIC**, we will build and sustain authentic engagement, increase standards in our response to crime and place victims at the heart of our policing.

We will proactively and enthusiastically engage with the public and communities by actively listening to their experiences. We will partner with key community stakeholders and those living and working within the City of London, to solve and tackle crime, create new ways of working together and opportunities to build on the positive work of the City of London Police.

WHERE ARE WE TODAY?

Our current victim satisfaction surveying process looks at responses from victims of crime who have answered questions relating to their treatment, how well they were kept informed, and their satisfaction with the overall service. The response rate for July-December 2023 survey was just three percent, with 51 responses from a possible 1031.

The data told us:

- how they were treated had the highest victim satisfaction levels and showed the largest increase at 27 percent;
- 'kept informed' levels experienced a 16 percent increase in satisfaction;
- satisfaction with the overall service had a 12 percent increase;
- satisfaction with the service provided by the contact centre voice channel remains above the 95 percent target and stable over the long-term;
- satisfaction rates concerning the online reporting tool have seen slight increases over the last three quarters, although in the main they remain under the 85 percent target;
- positive anecdotal feedback included: 'we were treated very well', 'supportive', 'professional', 'respectful'; and
- negative anecdotal feedback included: 'ignored', 'long delays between updates and progress' and 'disappointment' with case investigations and outcomes.

Disproportionate use of stop and search and force has remained consistent in the previous two years, although figures within City of London Police are observably better than the national average.

EDUCATION

Our Inclusivity Programme will continue to upskill our officers on experiences from a broad range of backgrounds. Police officers and staff must feel confident communicating, understanding, and appreciating the intersectionality of all members of the public and their colleagues to ensure we effectively and efficiently tackle crime. Our Custody ADHD screening has increased awareness and education of neurodiversity, adjustments, and assessment. We will continue to extend this education to ensure inclusive policing for non-neuro-typical people. As well, our sign video app has ensured that our service is accessible to deaf British Sign Language users, offering communication via video calls. We recognise this is just the beginning and are committed to being a fully accessible service to all who rely on us and will continue to build on these efforts.



Since 2016, City of London Police has partnered with the Prince's Trust, supporting the Mosaic primary and secondary school mentoring programmes. Mosaic's secondary school mentoring programme creates opportunities for young people growing up in our most deprived communities. We have also supported our people to complete a 12 week placement on the team programme, where officers and police staff undertake a short attachment to co-deliver the team's programme, with a delivery partner organisation, for example, higher education providers and the YMCA.

Our police cadets programme promotes a sense of citizenship and life skills amongst our cadets; this is achieved by having a structured policing development program which the cadets attend each week. Cadets compete in competitions such as first aid and policing skills, undertake Duke of Edinburgh training at all three levels and take part in policing operations which are suitable for their age, amongst other initiatives.

HIGH STANDARDS IN RESPONSE TO CRIME

We will remain visible and accessible to all, especially those communities who have lost faith and trust in policing. Our commitment to delivering recommendations across national plans will help to renew community relationships including, but not limited to, the National Police Race Action Plan, national hate crime guidance and the VAWG action plan. The Police Authority's Independent Custody Visitor Scheme will hold our officers and staff accountable for ensuring inclusive and equitable experiences for all individuals while in custody.

INFLUENCE

Our public will continue to have the agency to influence the depth and breadth of our work. We will respond promptly and professionally to their contributions through consistent consultation with a diverse range of voices, to ensure that our public are active contributors to the success of our policing. Our publication of forthcoming misconduct hearings on our public website will hold us accountable to our commitment to our policing values and build trust with disengaged community members.

TACKLING DISPROPORTIONALITY

Our use of force and stop and search figures relating to disproportionality, while less than the national average, still need to be reduced. By improving our measuring and data set collation, we will become more effective at interpreting and analysing effectively what the data reveals. Improving this process can address any issues raised through targeted training and increased understanding of the impact on adversely affected communities and seek continual improvement through peer and academic review.

OUR CONTINUED COMMITMENT

- We will continue to engage positively with young people throughout London, while also offering our unique skills and training opportunities to all police cadets across the UK, so that our young people meet and take part in peer-to-peer teaching and learning with diverse range of cadets.
- We will implement regular victim satisfaction surveys to assess and measure the effectiveness and professionalism of our services delivered.
- We will ensure the national plans that promote trust and confidence are embedded into our policing activities and provide metrics to measure the success of these.
- We will continue to engage in accessible ways with all our communities.



- We will review our complaints processes to ensure they are robust and offer a prompt way for us to efficiently respond to the views and needs of our people, public and partners.

HOW WILL WE MEASURE THIS?

- publishing and monitoring data on disproportionality and use of police powers, especially stop and search and use of force;
- auditing consultations, the number of consultations taken place with our communities, their visibility and reach and tracking our response;
- narrative and quantitative reporting on our promises, commitments, and the success of our plans; and
- monitoring the levels of reporting of hate crime and demonstrating how we have responded.

WHERE DO WE WANT TO BE?

Our victims will be at the heart of all we do and this will be evident in our data. Our investment in a new survey system that improves our ability to tackle individuals' dissatisfaction in real time, while increasing the ability for managers to hold their teams accountable, will show our victims they are a priority for all who work for us.

We are a police service that has seen a significant reduction in disproportionate use of stop and search and use of force, thus increasing confidence within our communities that our service is a fair and impartial one. Additionally, we will have established an effective way to tackle this disproportionality head on. Our metrics provide a richer picture of this data, so that we can continue to identify why disproportionality exists and provide valuable insight to reduce it.

Our Professional Standards Department will have cemented our robust approach to providing a professional service, led with integrity, delivered compassionately and supported by effective reporting mechanisms which will allow for those internally and externally to raise concerns. Additionally, the department will be holding our service accountable via an established, dedicated review panel for all decisions that involve a discriminatory allegation, including for vetting appeals. Furthermore, we will remain responsible for delivering the Police Race Action Plan, particularly around disproportionate use of police powers, and our commitment to supporting black victims of crime, embedding organisational learning and high standards.

The community we serve will be working in partnership with us and our existing Independent and Advisory Scrutiny Group to help us understand the impact of adverse interactions with the police, to ensure that we continue to be a service that understands the intersectional and cultural nuances of our communities.

OUR PARTNERS



By working with our **PARTNERS**: leading by example, we will continue to build inclusive relationships which provide enhanced services for our communities, foster innovative collaboration and establish recognition for our partners that exemplify our values.

We will achieve this by adopting a learning mindset in which both partners and the police learn from one another to increase trust and build mutually strong relationships. In turn, we will generate an inclusive and representative supply chain.

WHERE ARE WE TODAY?

Today we have positive relationships with our partners, and value the honest dialogue and knowledge sharing we have in place, including the scrutiny and feedback we receive and the value this provides.



“Working with the City of London Police has been refreshing, to say the least. Having delivered police training for the last four years with another police force, I’ve noticed a stark difference between the two forces in terms of environment and inclusivity during my sessions. Although I haven’t been embedded within the service, the inclusivity in the sessions I’ve run for student officers has been evident.

Those who participated in the inclusivity program sessions were very progressive, asked lots of questions, and showed a strong willingness to learn. The environment within the City of London Police is positive from my perspective, and there’s a genuine desire among senior leadership and others to understand and address issues, many of which stem from other forces. While the City of London Police can still improve, their unique demographic challenges mean their approach to policing is necessarily different. The communication and willingness to learn have been outstanding. Remarkably, the sessions have not been mandatory, yet attendance has been high. This demonstrates a commitment to understanding different perspectives, such as those related to colonialism, imperialism, racism, and their ongoing impacts on communities. Understanding oppression and implementing anti-discriminatory practices are crucial for finding progressive, collaborative solutions to problems often not created by those trying to solve them.

I believe we can improve further by enhancing the sessions and exploring these issues in greater depth. This would help us improve job performance and support those who want to understand more and incorporate inclusive practices into their daily work. There is significant scope to investigate how we can do this more effectively and collaboratively, building on what we’ve achieved over the past three years.

We are at a critical juncture in policing, with various action plans and reviews like the Race Action Plan and the Casey Review. It’s important to review the training objectives and delve deeper into





these topics to create a greater understanding for interested officers and, more broadly, for those needing to explore these concepts from their perspective. There is an opportunity for growth in implementing the recommendations from these reviews into our day-to-day work. Although it's challenging to address these issues from an institutional rather than a community or social perspective, this partnership can be ground-breaking. It can demonstrate that this collaborative model is the way forward for many police forces across the UK."

Mentivity



"Interacting with the City of London Police team is always an easy and pleasant experience, not only because they are determined and professional; they are also genuinely committed to including and supporting diverse talent."

The College of Policing



"Very positive and encouraging. The inclusion team have phenomenal leadership skills – open, human, keen to learn and improve. It is obvious they are passionate and have a gift for the work they are doing. They have shared, freely, resources covering the work they are doing and have an approach which understands that this cannot be a tick box, that it takes a systems approach looking at all aspects of the organisational eco-system. They are thoughtful and careful in their decision making – even on the most complex and challenging topics."

Inclusive Employers

INNOVATIVE COLLABORATION

We will work to improve the services designed for under-served groups through creative partnerships such as Operation Reframe, which includes our teams working with licensed premises, security staff and promoting 'Ask for Angela', in addition to our Ride Along Scheme that we plan to enhance through partnerships with communities. Both activities provide the public with insight into our policing and the chance to speak to officers on a one-to-one basis. These are some of the ways for us to build relationships with and learn from all of our communities and provide them with greater knowledge of our policing values.

ACCOUNTABILITY

Our partners will contribute to our solutions and responses in addressing equity, diversity, inclusion and accessibility challenges within our people, teams, and with our public. Our commissioner's apology letter to the LGBTQ+ community recognised historical discriminatory application of legislation in place at that time towards that community. The 'Be Lads' safety campaign provided practical advice to men on how to assist women in feeling safe when they are walking alone. These are just two examples of how we proactively and practically continue to hold ourselves accountable, working with suppliers who can assist us in our aim to be one of the most inclusive police service.



INCLUSIVE PROCUREMENT

We will ensure that our procurement process is equitable for existing and new suppliers, to ensure a fair process for those seeking to work with the City of London Police. We will continue to deliver our commitment for diverse independent companies across our supply chain. Supporting diversity in external companies and suppliers, is a key priority for City of London Police.

COMMUNITY-BASED ENGAGEMENT AND RECOGNITION

We have already made progress on establishing partnerships with organisations that can further educate us on cultural differences among our public and commit to building on this. Our educational discussion 'Focus On', which informed officers of the history and experiences of Gypsy Roma Travellers, was impactful in driving cultural understanding and respect for this community's lived experience and saw over 140 officers' attend. Moreover, our Network of Women, which introduced young women to careers within the service, has also allowed us to expand our talent pools. We plan to continue creating new partnerships and build on existing partnerships like these to maximise our ability to keep people safe.

OUR CONTINUED COMMITMENT

- We will ensure we can measure the impact of this work, review its progress, and build on outcomes.
- We will work in partnership with the Corporation Procurement Department to proactively identify and introduce partners from a diverse range of backgrounds to our supply chain.
- We will facilitate opportunities to proactively bring diverse suppliers on board, through engagement exercises, including our responsible procurement toolkit.
- We will build on these efforts and create additional plans in the areas where we still require growth and improvement, within the diversity of our hiring and partnering.

WHERE DO WE WANT TO BE?

We would like our partners to feel respected, valued and enthusiastic about working with us, to ensure that partnerships enhance the services we deliver for our victims, communities, and the public. We will achieve this by our partners actively seeking working relationships with us, because they see City of London Police as the service of choice.

Our partnerships extending beyond the relationships we currently have, to include other services, not limited to, but also capturing other police and emergency services, academia, social services, other sectors and relevant, associated networks. This will help us to shape and improve the service we deliver to the public.

HOW WILL WE MEASURE THIS?

- establish effective practice by learning from partners who have been successful at working with a diverse range of partner groups and suppliers;
- monitor procurement bids from those non-traditional suppliers;
- the number and quality of partnerships formed across all areas of our service delivery, demonstrating how we have formed partnership activities, both qualitatively and quantitatively; and
- surveys with partners, capturing their view on success and learnings.



HOW CAN YOU TRUST US TO DELIVER ON THESE PLANS, AND HOW CAN YOU HOLD US TO ACCOUNT?

Performance against this plan will be reported in our quarterly EDI progress report and assessed through internal and external scrutiny and governance, including the EDI Strategic Board, Professional Standards and Integrity Committee and Police Authority Board.

- **Measurement:** we will update our public and people every quarter on the progress we have made against this plan, including through relevant and transparent data.
- **Impartiality:** we will work with external, independent stakeholders to ensure that we are being independently reviewed on our progress.
- **Transparency:** this strategy will include public and people consultation. We will have pre-planned, quarterly meetings with our public and community-based partners to discuss live issues, hear their voices on matters affecting them and to build relationships with all those communities that live and work within the square mile.
- **Accountability:** we will report our progress through internal and external governance chains to ensure we are accountable on progress against each of the Ps and to reassure our people on our commitment and progress.
- **Consultation:** our public and people remain central to the success of our plan and we will create regular opportunities for engagement with both, to ensure we fulfil the commitment of ‘nothing about us without us.’
- **Understanding our impact:** using our Insights Team, we will monitor the impact of our efforts on our people, partners, public and policies. We will grow the number of teams involved in monitoring, to ensure our collective effort is evidenced and measured for impact and effectiveness. We will expand our monitoring, where relevant, to track representation of disabled people, women, and ethnic minorities.

OUR PERFORMANCE FRAMEWORK REVIEW

- We have set annual objectives for each of each ‘P’ outlined above.
- We will have quarterly progress reviews, including sharing public update to redress areas of focus (to ensure agility to achieving annual goals).
- We will report our progress to independent scrutiny groups, and the Police Authority Board, to ensure we are accountable on progress.
- Our Equity, Diversity and Inclusion Strategic Board will regularly review and monitor the progress we have made with this strategy.



City of London Corporation Committee Report

Committee(s): Equity, Equality, Diversity and Inclusion Sub Committee	Dated: 20/11/2025
Subject: Social Mobility Employer Index 2025 Results	Public report: For Information
This proposal: <ul style="list-style-type: none"> • delivers Corporate Plan 2024-29 outcomes • provides statutory duties • provides business enabling functions 	Aligns to Socio-Economic Diversity Equality Objective Diverse, Engaged Communities, Dynamic Economic Growth Providing Excellent Services
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, Inclusion and Diversity Change Partner	

Summary

This report shares the City of London Corporation's performance in the 2025 Social Mobility Employer Index (SMEI). The City Corporation achieved its highest ever ranking: 24th out of 140 entrants. This is the highest ever ranking of a local authority since the SMEI began.

This means the City Corporation has climbed 34 places since 2024, and 62 since 2023. This progress reflects a continued commitment to socio-economic diversity, embedded within our Equality Objectives (2024–2029) and key to the City Corporation's Corporate Plan (2024-2029) and People Strategy (2024-2029).

Socio-economic diversity has been woven into the development of the EEDI Strategic Framework. It is visible in the Theory of Change Strategy and will be a key programme within the EEDI roadmap and workstreams.

Feedback and recommendations from the SMEI have been incorporated into the Action Plan and Theory of Change, ahead of the formation of the Socio-Economic Inclusion Working Group.

The City of London Corporation will next provide a submission to the SMEI in 2028.

Recommendation(s)

Members are asked to:

- Note the progress of social mobility as measured by Social Mobility Employer Index
- Note the areas of focus and next steps
- Note the next SMEI submission due 2028

Main Report

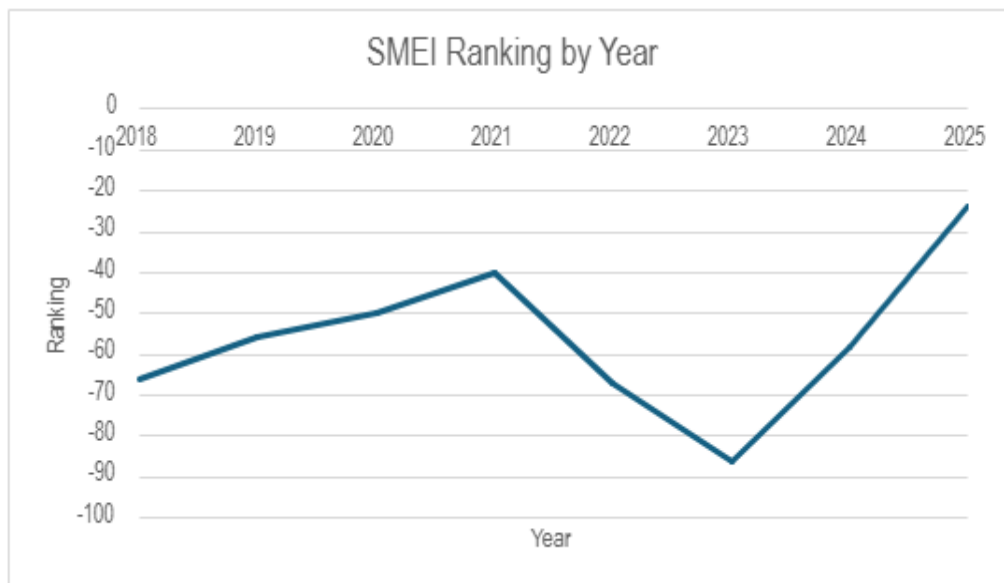
Background

1. City of London Corporation participates in the Social Mobility Employer Index to
 - Benchmark our progress against ourselves and other organisations
 - Receive targeted feedback to enable continuous improvement
 - Demonstrate commitment to equity, equality, diversity and inclusion
2. Our 2025 submission was a cross-organisational effort, with significant contributions from the Barbican Centre, Guildhall School of Music & Drama, City Bridge Foundation, People and HR, Innovation & Growth, Department of Community and Children's Services and Family of Schools.
3. The City Corporation's SMEI assessment has been led by different areas within the City Corporation, and with different levels of engagement throughout the City Corporation and its Institutions.

Current Position

- The City of London Corporation ranked 24 out of 140 in 2025. All rankings to date are presented below.

Table1: City of London Corporation SMEI rankings by year



Year	2018	2019	2020	2021	2022	2023	2024	2025
Ranking	66	56	50	40	67	86	58	24
# Entries	106	125	119	203	149	143	150	140

- In 2024, the City Corporation set Socio-Economic Diversity as one of the Equality Objectives. At the same time, the SMEI portfolio also moved into the Chief Strategy Officer's portfolio, and focused efforts to report socio-economic trends and address social mobility gaps. In the years following, City Corporation has climbed up the rankings.
- The feedback from Social Mobility Foundation identified significant strengths in pre-18 outreach, attraction and post-18 outreach, and external advocacy. All three areas contributed to the City of London Corporation's high ranking.
- Recruitment and selection, routes into employment, data collection, pay progression and retention, and culture and internal advocacy, are all areas identified for improvement.

Table 2: Feedback by Section

Section	2025 Feedback	Ranking in Section
Pre-18 Outreach	Good, can build on	6
Attraction and Post-18 Outreach	Good, can build on	11
Recruitment and Selection	Needs improvement	27
Routes into Employment	Needs improvement	48
Data Collection	Needs improvement	71
Pay Progression and Retention	Needs improvement	45
Culture and Internal Advocacy	Needs improvement	57
External Advocacy	Good, can build on	7

Key Data

8. SMEI has altered the feedback format in recent years. In 2024, sub-sections were RAG scored which has not been continued in 2025. This year, Social Mobility Foundation have introduced section level RAG scoring and rankings.
9. Several of the recommendations from the 2024 amber areas are echoed in the 2025 feedback and are already included in the draft action plan.

Table 3: 2024 and 2025 SMEI feedback by section

Section	2024 Feedback	2025 Feedback
Pre-18 Outreach	Needs improvement	Good, can build on
Attraction and Post-18 Outreach	Not Enough Information	Good, can build on
Recruitment and Selection	Needs improvement	Needs improvement
Routes into Employment	Needs improvement	Needs improvement
Data Collection	Needs improvement	Needs improvement
Pay Progression and Retention	Needs improvement	Needs improvement
Culture and Internal Advocacy	Needs improvement	Needs improvement
External Advocacy	Needs improvement	Good, can build on

Corporate & Strategic Implications

Strategic implications – socio-economic diversity is one of the Equality Objectives, which connect with Corporate Plan (2024-2029) and People Strategy (2024-2029). Socio-economic diversity is woven into the developing EEDI Strategic Framework, visible in the Theory of Change Strategy, Governance and Accountability theme.

Financial implications - none

Resource implications - none

Legal implications - none

Risk implications - none

Equalities implications – strengthens visibility and continues progress towards Equality Objectives.

Climate implications - none

Security implications - none

Conclusion

10. City of London Corporation's participation in the SMEI reflects a strong commitment to social mobility and continuous improvement. The results indicate good, and in some cases, exceptionally high-quality social mobility activity in specific areas and Institutions within City of London Corporation. Other areas, often more internal facing functions, can be improved and we have recommendations which can guide this activity. By acting on our SMEI recommendations ahead of re-submission in 2028, the City Corporation can further its impact, continue to drive sector-wide change, and ensure that its workplace is truly representative and inclusive.

Appendices

- Appendix 1 – Social Mobility Employer Index Feedback

Background Papers

- [Social Mobility Report](#), presented to EEDI SC 16 June 2025, item 7
- [City of London Corporation's Social Mobility Employer Index 2025 submission](#)

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EMPLOYER INDEX 2025

YOUR FEEDBACK

CITY OF LONDON CORPORATION

INTRODUCTION

Thank you for joining the Social Mobility Employer Index 2025 and for leading the change in building workplaces that are more representative, innovative and successful.

Welcome to your individual feedback report. This report focuses on the changes you could make to have the biggest impact on social mobility and provides tips on how to get started.

Whilst your whole submission was reviewed when marking, this report will only give feedback on the areas we have identified as the most impactful for improving social mobility. In creating these reports, we have taken into consideration what you included in your submission, your size, sector and whether you are a repeat or first-time entrant.



SUMMARY

Across each section of the Index, we have assessed your performance against the key areas that will drive – or hinder – social mobility.



You're doing well in many areas of the Index and we're confident that continuing this good practice and actioning the feedback in this report will result in tangible improvement to social mobility outcomes over the coming year.



There is still room for improvement and on the next page we have indicated the sections that you are doing better or worse on. Then, for each section we have made recommendations for steps you can take to improve.

YOU ARE
24TH
IN THE SOCIAL
MOBILITY
EMPLOYER INDEX
2025

YOUR DASHBOARD

SECTION	PERFORMANCE IN SECTION	RANKING IN SECTION
SECTION ONE: PRE-18 OUTREACH	Good - can build on	6
SECTION TWO: ATTRACTION AND POST-18 OUTREACH	Good - can build on	11
SECTION THREE: RECRUITMENT AND SELECTION	Needs improvement	27
SECTION FOUR: ROUTES INTO EMPLOYMENT	Needs improvement	48
SECTION FIVE: DATA COLLECTION	Needs improvement	71
SECTION SIX: PAY, PROGRESSION AND RETENTION	Needs improvement	45
SECTION SEVEN: CULTURE AND INTERNAL ADVOCACY	Needs improvement	57
SECTION EIGHT: EXTERNAL ADVOCACY	Good - can build on	7



Performance in section reflects how well you are doing in this section based on known effective practice of what works – and what doesn’t. It can be used to help you direct your efforts over the next year.



Ranking in section reflects how well you are doing in this section relative to other entrants in the Index. It shouldn’t be used to direct your efforts, as it doesn’t necessarily align with where the biggest impact can be made.

KEY RECOMMENDATIONS

Contribute to the social mobility research agenda. Research can not only inform public policy but also enables businesses to identify and implement evidence-based effective practice. You can get involved by partnering with academic institutions, providing anonymized workforce data for analysis, funding targeted studies, or piloting formally evaluated interventions.

Your Theory of Change is robust and offers detailed information about what you want to achieve, how and why. Consider how you can support other employers earlier in their outreach journey.

Take the next step in your social mobility strategy by including clear targets and timeframes to closing gaps that you have identified. Add these to your strategy and publish them externally so other employers are encouraged to take action.

SECTION ONE: PRE-18 OUTREACH



1

PRE-18 OUTREACH

WHY IT MATTERS

High-quality careers education in schools leads to measurable improvements in several key student outcomes, including career readiness, academic performance, labour market awareness, and successful transitions into further education, employment, or training. But it's not currently equal: students from lower socioeconomic backgrounds are less likely to feel 'career ready' and are less likely to have awareness of the range of jobs and opportunities – including apprenticeships – available to them.

THE HIGHEST PERFORMING EMPLOYERS IN THIS SECTION...

- Run multiple outreach projects that have a theory of change designed to tackle barriers to employment for specific groups of young people rather than just raise awareness of their own organisation.
- Align their outreach work to the Gatsby Benchmarks and guidance from the Careers and Enterprise company.
- Evaluate their outreach work against short, medium and long-term outcomes and share this freely with others working to improve careers education and employment outcomes.

1

PRE-18 OUTREACH

YOUR FEEDBACK

- › Section 1 is one of the strongest sections in your submission. Your Theory of Change is robust and offers detailed information about what you want to achieve, how and why. Consider how you can support other employers earlier in their outreach journey. If you are not doing so already, sharing your findings with your sector and in the public domain will help ensure that outreach activities are evidence based and continue to develop in line with best practise. It is just as helpful to know what isn't having an impact, as much as what is.

SECTION TWO: ATTRACTION AND POST-18 OUTREACH



2

ATTRACTION & POST-18 OUTREACH

WHY IT MATTERS

Young people from lower socioeconomic backgrounds studying in college or at university are less likely to have the networks in place to be aware of opportunities such as vacation schemes or internships, less likely to have access to application support for job roles and more likely to report financial constraints on gaining relevant work experience. Together, this contributes to their lower likelihood of securing a professional role than those from higher socioeconomic backgrounds, even if they have the same grades.

THE HIGHEST PERFORMING EMPLOYERS IN THIS SECTION...

- Take a data-led approach to working with colleges and universities (if they have a graduate scheme) across the UK via the institutions' own careers team, offering ring-fenced paid opportunities for students from lower socioeconomic backgrounds to gain meaningful work experience or gain employability skills.
- Partner with other local/regional employers, job centres, local authorities and prisons to create jobs or employability programmes specifically for post-18 young people who are more likely from lower socioeconomic backgrounds such as care leavers, prisoners and long-term unemployed individuals.

2

ATTRACTION & POST-18 OUTREACH

YOUR FEEDBACK

- › Consider increasing the amount of outreach you do with university students and/or those interested in applying for Graduate/Degree Apprenticeships. Both in-person and virtual outreach opportunities can help those juggling study and employment demands. Over 50% of full-time UK undergraduates are in paid employment while they study, working an average of 14.5 hours per week ([HEPI, 2024](#)). Therefore make sure outreach is offered at a range of times and dates (e.g. a mix of daytime, evening, weekend and non-weekend events). If you don't already reimburse the travel costs of students attending your in-person events, you might want to consider doing so for students from lower socioeconomic backgrounds.
- › Attending online events can sometimes be easier than attending in-person for students from low socioeconomic backgrounds who may have other responsibilities that limit their on-campus time. Recording virtual events will ensure no-one misses out. You should evaluate each mode of delivery, so that you can understand whether there are differences in effectiveness both overall and for certain student groups.
- › Outreach with universities should support careers teams to help students from a low socioeconomic background be application ready. If you offer a graduate scheme we recommend you do not close applications early, however if you do regularly close applications early, your university outreach should include the importance of applying early. It should also include guidance on preparing for psychometric tests.
- › If you offer internships for university students, target your outreach so students from a lower socioeconomic background are aware of your internship program and are supported to apply. This can help improve social mobility in your workplace because there is a high conversion rate from internship to graduate role ([UCL, 2025](#)).

2

ATTRACTION & POST-18 OUTREACH

YOUR FEEDBACK

- › Target universities according to the percentage of students who received free school meals and the percentage of students from low socioeconomic backgrounds. These metrics can be used to identify universities or cohorts with higher numbers of students from lower socioeconomic backgrounds, and the [Office for Students' 'Size and Shape'](#) dashboard is the most up-to-date source for English universities. The [Higher Education Statistics Agency](#) (HESA) provides information for Scotland, Wales and Northern Ireland the HESA.
- › Collect data on the socioeconomic background of the students attending your university activities. This helps make sure you're reaching the right students. It can also help you to identify when students from low socioeconomic backgrounds aren't attending events, so that you can take proactive steps to make them more accessible. It's also key that you explain why the information is being collected, as this builds trust and improves response rates.
- › We know that many of the events you participate in are organized by the universities themselves and therefore not under your control – but we'd encourage you to use your 'purchasing power' in these instances and ask university partners to monitor event attendees.

SECTION THREE: RECRUITMENT AND SELECTION



3

RECRUITMENT AND SELECTION

WHY IT MATTERS

Candidates from lower socioeconomic backgrounds to apprenticeships and graduate roles are consistently less likely to be made an offer than those from higher socioeconomic backgrounds, even when they have the same grades at school and/or university.

THE HIGHEST PERFORMING EMPLOYERS IN THIS SECTION...

- As well as training all staff on equitable hiring practices and accent bias, they also take a data-led, evidence-informed approach to contextualising all aspects of their application system – including interview scores, CVs, aptitude tests and academic grades.
- Remove unnecessary grade requirements – and where these are set by an external provider (e.g. a university), they are actively lobbying for change.
- Regularly review both qualitative and quantitative data from the recruitment systems to identify any areas in which candidates from lower socioeconomic backgrounds may be unfairly disadvantaged.

3

RECRUITMENT AND SELECTION

YOUR FEEDBACK

- › The next steps in your evaluation process are to investigate how social mobility intersects with other characteristics, and how your recruitment processes may impact on different groups. Recent research from UCL highlighted that graduate applicants from a low socioeconomic background are 32% less likely to be offered a role, however when evaluating the intersection between socioeconomic background and ethnicity they found that this gap grew to 45% for candidates from a low socioeconomic background and ethnic minority group ([UCL, 2025](#)). Therefore it is important that you evaluate your recruitment processes and consider the different challenges experienced by these groups.
- › We know that many employees are now using AI in their recruitment activities. Whilst it is too early to state what the impact this will have on social mobility, it is important that all employers are evaluating the impact it may have on all recruitment activities. The Department for Science, Innovation and Technology produced an AI procurement guide for employers, which can be accessed [here](#).

SECTION FOUR: ROUTES INTO EMPLOYMENT



4

ROUTES INTO EMPLOYMENT

WHY IT MATTERS

Offering a breath of entry routes and scaffolding entry through internships should enable young people to gain valuable experience and access employment in professional roles. But, we know that access to internships and apprenticeships isn't equal: young people from lower socioeconomic backgrounds are less likely to do internships in professional roles, and less likely to be start higher (including degree) apprenticeships.

THE HIGHEST PERFORMING EMPLOYERS IN THIS SECTION...

- Are offering a high number of internships relative to their size, which are of a duration long enough to enable the intern to learn significant employability skills. They are offering well-paid internships that are structured and provide references at the end.
- Are ring-fencing opportunities specifically for young people from lower socioeconomic backgrounds: the best employers in this section ringfence all or the majority of their internships.
- Pay apprentices the Real Living Wage rather than the apprentice National Minimum Wage – and some are actively campaigning to increase the NMW for apprentice.

4

ROUTES INTO EMPLOYMENT

YOUR FEEDBACK

- › Whilst you have done a lot of work in the field of apprenticeships, consider whether you can increase routes into your organisation by school leaver routes, which will widen the talent pool available. Only 29% of young people eligible for free school meals in England and 15% of Scottish students from SIMD Quintile 1 secured a place at university at the latest data count and in 2022 only 5% of degree apprentices were eligible for free school meals. Therefore, by limiting your routes into employment, many young people are locked out of your employment opportunities.

SECTION FIVE: DATA COLLECTION



5

DATA COLLECTION

WHY IT MATTERS

We know that employees from lower socioeconomic backgrounds are paid less than those from higher socioeconomic backgrounds, and are less likely to be represented in senior positions. The reasons for this are multifaceted but collecting data on aspects such as pay, progression, staff satisfaction and work allocations makes it easier for firms to identify where there might be barriers to equity of workplace experience – and then tackle these.

THE HIGHEST PERFORMING EMPLOYERS IN THIS SECTION...

- Are measuring socioeconomic background data using a range of metrics in line with guidance from the Social Mobility Commission.
- Are reviewing their data against relevant national benchmarks, and have analysed their data on an intersectional basis – i.e. looking at how other characteristics such as gender, ethnicity or sexuality might interact with socioeconomic background – to examine whether there are any differences in outcome for aspects such as team make-up, progression rates, pay, work allocations etc.
- Are ensuring that their Board and senior management are aware of this data analysis.

DATA COLLECTION

YOUR FEEDBACK

- › Increasing the completion rate for your survey will help you to make more informed decisions. To improve completion rates, it's important to build trust and psychological safety among employees through regular, transparent communication campaigns. Help your teams understand why the data is being collected, how it will be used, and the tangible impact it can have—such as informing changes in policy, organisational structure, or workplace behaviours. Involve line managers and leadership to demonstrate commitment and accountability from the top down.
- › Now that you are collecting the socioeconomic background data of your staff, the next step is to evaluate your findings compared to national benchmarks. This will enable you to develop a social mobility strategy. For example, Progress Together brings together some of the UK's largest financial firms to improve socioeconomic diversity in finance. Through collecting SEB data, they highlighted that levels of socio-economic diversity reduce significantly as seniority increases. They were then able to identify a strategic target of 50% of senior leaders coming from a lower socioeconomic background by 2030 for their member organisations.
- › We encourage all employers to advocate for the collection of the socioeconomic data of their workforce and to share what they can externally. Employer values are increasingly more important than other considerations, such as salary, for young people. Three in four young people surveyed as part of our 2024 Unheard Voices research felt employers should report on their class pay gap and nearly half of those from low socioeconomic background say it has put them off trying to get a job in an 'elite' profession, such as law or finance, which is significantly higher than their more wealthy peers ([Unheard Voices, 2024](#))

Being public encourages others to join our movement for change.

SECTION SIX: PAY, PROGRESSION AND RETENTION



6

PAY, PROGRESSION & RETENTION

WHY IT MATTERS

Professionals from lower socioeconomic backgrounds are paid £6,287 (12%) less than those from higher socioeconomic backgrounds in the same role, and it takes them on average 19% longer to achieve a promotion than staff from higher socioeconomic backgrounds – suggesting that there are internal barriers to equitable pay and progression.

THE HIGHEST PERFORMING EMPLOYERS IN THIS SECTION...

- Don't have a class pay gap – but are still actively monitoring it on a yearly basis and are ready to address any gaps that arise.
- Of those that have a class pay gap, they have published their data alongside a clear strategy detailing how they will reduce the gap. This strategy includes targets that are stretching and ambitious but manageable – and the accompanying information gives confidence that the targets will be reached.
- Have used their data collection and analysis to identify areas in which staff from lower socioeconomic backgrounds are not experiencing equity of opportunity, and have implemented relevant plans to tackle this.

6

PAY, PROGRESSION & RETENTION

YOUR FEEDBACK

- › We know that what gets measured gets done. Professionals from working-class backgrounds are paid an average of £6,287 – or 12% – less per year than their more privileged counterparts in the same occupation. You should measure and publish your class pay gap – please see [here](#) for our guide on how to do this. By doing this you will join our movement for change.
- › It is important to consider the impact of your internal processes on the promotion and retention of colleagues from a lower socioeconomic background. Research by [Co-op and Demos](#) in 2024 revealed that 76% senior business leaders felt promoting social mobility would help attract and retain staff, and 71% felt it would help achieve business results.
- › EY published a [report](#) in early 2025 that suggests steps to create a more inclusive progression process in your workplace. These steps include: create a clear and structured promotion process; analyse data on time to progression for underrepresented groups; review the behaviours that are rewarded through promotion and provide authentic role models to inspire employees.
- › Evaluation is an important step which will help you create a strategy to close your class pay gap. You do not have to have a strategy already in place to begin evaluating the impact of your internal processes on pay, progression and retention on social mobility – it can help you define it.

SECTION SEVEN: CULTURE AND INTERNAL ADVOCACY



7

CULTURE & INTERNAL ADVOCACY

WHY IT MATTERS

Internal culture of organisations is indicative of how committed they are to positive change: employers that have a positive internal culture with strong advocacy are more likely not only to have more equitable employment, but also more able to address any barriers or challenges that arise. A good internal culture makes enacting changes across the employer lifecycle easier, more effective and longer lasting.

THE HIGHEST PERFORMING EMPLOYERS IN THIS SECTION...

- Are already acting as if the Socioeconomic Duty (Section 1 of the Equalities Act 2010) has been enacted, and are incorporating consideration of socioeconomic duty into all strategic decisions in the same way as protected characteristics such as gender and ethnicity are.
- Have analysed employee perception of workplace culture, and used both this and broader socioeconomic data on employees to develop a long-term strategy to deliver equitable experience and outcomes. Their strategies include ambitious targets, and have clearly defined actions to improve (or maintain, if already good) outcomes for staff from lower socioeconomic backgrounds. They also have senior level buy-in for their social mobility work.
- Are helping other organisations to develop their own social mobility strategies.

7

CULTURE & INTERNAL ADVOCACY

YOUR FEEDBACK

- › It's great that you have an internal strategy for improving social mobility across your organisation. Make sure that this strategy includes targets and clear timeframes for achieving these. Add these to your strategy document and share this externally to encourage other employers to do the same.

SECTION EIGHT: EXTERNAL ADVOCACY



8

EXTERNAL ADVOCACY

WHY IT MATTERS

Clear public commitment and influence can drive systemic change beyond the boundaries of individual businesses, unlocking talent, boosting productivity, and fostering fairer economic growth. When employers openly support social mobility, they not only expand access to opportunity for people from disadvantaged backgrounds, but also encourage industry-wide adoption of more equitable practices, tackling unfairness and activating a positive cycle of diversity and inclusion.

THE HIGHEST PERFORMING EMPLOYERS IN THIS SECTION...

- Are working with clients and suppliers to improve their social mobility journeys in a comprehensive fashion: putting clauses into tender or procurement contracts, lobbying suppliers to improve actions; mandating compliance with the Social Mobility Pledge.
- Are taking an active lead in supporting other employers in their sector or region. They're not just a member of a sector working or lobbying group, but they are also bringing employers together to commit to offering ring-fenced work experience and employability programmes.
- Are lobbying government to enact changes via participation in roundtables, APPGs, and contributing to calls for evidence, consultations and committees.

8

EXTERNAL ADVOCACY

YOUR FEEDBACK

- › Section 8 is one of the strongest in your submission. Your collaboration and advocacy efforts are having a real impact and changing the conversation around social mobility in the UK.
- › Consider how you can widen your impact even further – contribute to the social mobility research agenda. Research can not only inform public policy but also enables businesses to identify and implement evidence-based effective practice. You can get involved by partnering with academic institutions, providing anonymized workforce data for analysis, funding targeted studies, or piloting formally evaluated interventions.

THANK YOU

ANY QUESTIONS, JUST GET IN TOUCH

employerindex@socialmobility.org.uk

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