Public Document Pack

Corporate Services Committee

Date: **WEDNESDAY, 9 SEPTEMBER 2026**

Time: 1.45 pm

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

Members:

Florence Keelson-Anfu (Chair)
Anthony David Fitzpatrick (Deputy Chairman)
Simon Burrows
Deputy Timothy Butcher
Deputy Henry Colthurst
Steve Goodman OBE
Deputy Christopher Hayward
Stephen Hodgson
Sandra Jenner
Gregory Lawrence
Alderman Professor Michael Mainelli
Alderman Christopher Makin
Deputy Andrien Meyers
Deputy Alastair Moss
David Sales
Mandeep Thandi
James Tumbridge
Philip Woodhouse

Enquiries: **Chris Rumbles**
christopher.rumbles@cityoflondon.gov.uk

Accessing the virtual public meeting

Members of the public can observe all virtual public meetings of the City of London Corporation by following the below link:
https://www.youtube.com/@CityofLondonCorporation/streams

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

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

Ian Thomas CBE
Town Clerk and Chief Executive

AGENDA

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

Part 1 - Public Agenda

1. **APOLOGIES**

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

3. **MINUTES**

To consider minutes as follows:-

a) To agree the public minutes of the Corporate Services Committee meeting on 1 July 2026 (Pages 7 - 14)

b) * To note the draft public minutes of the Joint Consultative Committee meeting on 8 June 2026

4. *** FORWARD PLAN**

Joint report of the Town Clerk and Chief People Officer and Executive Director of HR.

For Information

5. *** ACTION TRACKER**

Report of the Town Clerk.

For Information

6. **RESOLUTION OF POLICY AND RESOURCES COMMITTEE TO CORPORATE SERVICES COMMITTEE**

For Discussion
(Pages 15 - 16)

7. **EARLY CAREERS TALENT PIPELINE**

Report of the Chief People Officer and Executive Director of HR.

For Decision
(Pages 17 - 26)

8. **PREVENTING SEXUAL HARASSMENT POLICY PROPOSAL**

Report of the Chief People Officer and Executive Director of HR.

For Decision
(Pages 27 - 68)

9. **PROBATION POLICY**

Report of the Chief People Officer and Executive Director of HR.

For Decision
(Pages 69 - 120)

10. **PROGRAMME SAPPHIRE UPDATE**

Chamberlain to be heard.

11. *** COMPTROLLER & CITY SOLICITORS DEPARTMENT BUSINESS PLAN 2026–2028: QUARTER 2 PROGRESS REPORT**

Report of the Comptroller & City Solicitor.

For Information

12. *** PEOPLE & HR BUSINESS PLAN QUARTER ONE (Q1) PROGRESS REPORT**

Report of the Chief People Officer and Executive Director of HR.

For Information

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

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

15. **EXCLUSION OF THE PUBLIC**

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

For Decision

Part 2 - Non-Public Agenda

16. **NON-PUBLIC MINUTES**

To agree the non-public minutes of the Corporate Services Committee meeting on 1 July 2026.

For Decision
(Pages 121 - 122)

17. **RISK APPETITE FOR CR44: ORGANISATIONAL CHANGE READINESS**

Report of the Chief People Officer.

For Decision
(Pages 123 - 136)

18. **HEALTH & SAFETY ANNUAL ASSURANCE 2025/26**

Report of the Deputy Town Clerk.

For Decision
(Pages 137 - 190)

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

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

Part 3 - Confidential Agenda

21. **CONFIDENTIAL MINUTES**

To consider minutes as follows: -

a) To agree the confidential minutes of the Corporate Services Committee meeting on 1 July 2026

b) To note the draft confidential minutes of the Joint Consultative Committee meeting on 8 June 2026

22. **DECISIONS TAKEN UNDER DELEGATED AUTHORITY OR URGENCY PROCEDURES**

Report of the Town Clerk.

For Information

23. **DIRECTOR OF LONDON PROGRAMMES**

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

For Decision

24. **MEMBER-LED RECRUITMENT - NATURAL ENVIRONMENT DIRECTOR**

Report of the Chief People Officer and Executive Director of HR.

For Information

25. **WORKPLACE ATTENDANCE UPDATE INCLUDING ATTENDANCE MONITORING UPDATE**

Report of the Chief People Officer and Executive Director of HR.

For Decision

26. **AMBITION 25**

Chief People Officer and Executive Director of HR to be heard.

27. **HR DASHBOARDS**

Chief People Officer and Executive Director of HR to be heard.

28. **HR UPDATE**

Chief People Officer and Executive Director of HR to be heard.

29. **TOWN CLERK'S UPDATE**

The Town Clerk to be heard.

This page is intentionally left blank

CORPORATE SERVICES COMMITTEE
Wednesday, 1 July 2026

Minutes of the meeting of the Corporate Services Committee held at Guildhall on Wednesday, 1 July 2026 at 1.45 pm

Present

Members:
Florence Keelson-Anfu (Chair)
Anthony David Fitzpatrick (Deputy Chairman)
Simon Burrows
Deputy Timothy Butcher
Deputy Henry Colthurst
Steve Goodman OBE
Deputy Christopher Hayward
Stephen Hodgson
Sandra Jenner
Gregory Lawrence
Alderman Christopher Makin
Philip Woodhouse

Members Observing
Joanna Abeyie (Guildhall)
Benjamin Murphy (Guildhall)
James Tumbridge (online)

Officers:

Ian Thomas, CBE	-	Town Clerk and Chief Executive
Gregory Moore	-	Deputy Town Clerk
Polly Dunn	-	Assistant Town Clerk and Executive Director of Governance and Member Services
Christopher Rumbles	-	Town Clerk's Department
Oli Sanandres	-	Town Clerk's Department
Michael Cogher	-	Comptroller and City Solicitor
Caroline Al-Beyerty	-	The Chamberlain
Claire Corbett	-	Chamberlain's Department
Simon Gray	-	Chamberlain's Department
Mark Jarvis	-	Chamberlain's Department
Cliff Morton	-	Interim Chief People Officer
Wayne Donaldson	-	People and HR Department
Chris Fagan	-	People and HR Department
Gail Kyle	-	People and HR Department
Rachel Mackay	-	People and HR Department
Sarah Martin	-	People and HR Department
Dionne Corradine	-	Chief Strategy Officer
Greg Wade	-	Community and Children's Services Department

1. **APOLOGIES**

Apologies for absence were received from David Sales, Alastair Moss, Alderman Michael Mainelli and James Tumbridge.

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

There were no declarations of interest.

3. **MINUTES**

RESOLVED – That the public minutes and non-public summary of the Corporate Services Committee meeting on 20 May 2026 be approved as an accurate record.

Matters Arising

Committee vacancies

The Town Clerk advised that a number of vacancies arising from appointments considered at the previous meeting remained unfilled. Members were invited to express an interest in serving in one remaining vacancy on each of the Joint Consultative Committee, the Equity, Equality, Diversity and Inclusion Sub-Committee, and the Member Development and Standards Sub-Committee. No further nominations were received at the meeting, and it was agreed that Members would be contacted following the meeting to seek expressions of interest in respect of the remaining vacancies.

Senior Officers - Register of Interests

The Committee received an update from the Chief People Officer regarding the declaration and publication of officers' interests. Members were advised that, in accordance with the City Corporation's statutory obligations under its local authority responsibilities, declarations of interest submitted by Chief Officers were published to support openness and transparency in decision-making. Whilst declarations were also collected from officers at Grade I and above, including interests relating to commercial and external organisations, these were maintained and monitored internally and were not subject to the same statutory publication requirements as Chief Officers.

4. **FORWARD PLAN**

The Committee received a joint report of the Town Clerk and Chief People Officer and Executive Director of HR presenting a forward plan on the work of the Committee.

The Chair confirmed that a report relating to officer accommodation would be added to the agenda for the Corporate Services Committee meeting in September.

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

5. **ACTION TRACKER**

The Committee received a report of the Town Clerk concerning the Committee's outstanding actions.

Members were advised that work remained ongoing to arrange a series of Member briefing sessions on the Employment Rights Act, Artificial Intelligence Transformation and the Performance Management Framework, with suitable dates currently being identified.

The Chief People Officer provided an update on an action relating to workforce planning and the HR function. Members were advised that the design of the HR structure had been approved in 2024 and that, rather than making further structural changes ahead of the appointment of the new Chief People Officer, work had continued to develop a clearer picture of the service offer across the City Corporation and its institutions. This included work to define the HR service catalogue and to capture the wider organisational position, with a view to ensuring that the incoming Chief People Officer would receive a clear and up-to-date briefing on arrival.

Members noted that a further update would be prepared for the September meeting, setting out the progress made during the Interim Chief People Officer's tenure, including the impact of work undertaken to improve the quality, efficiency and effectiveness of the HR function. Members were further advised that progress had been made in stabilising teams and improving service delivery, and that this work was intended to ensure the HR function was in a strong position to brief the incoming Chief People Officer without the need for them to start from scratch.

RESOLVED - That the report be received and its content noted.

6. **SENIOR REMUNERATION SUB-COMMITTEE - CHANGE TO COMPOSITION**

The Committee considered a report of the Deputy Town Clerk concerning proposed changes to the composition of the Senior Remuneration Sub-Committee, with a view to streamlining governance arrangements, reducing duplication and supporting the effective discharge of the Sub-Committee's responsibilities.

In response to questions concerning the proposed appointment of independent advisors, Members were advised that Corporate Services Committee would have a role in their selection following an appropriate recruitment process. Members discussed the balance between maintaining Member oversight and ensuring that the Sub-Committee was sufficiently focused and effective. Some Members expressed support for a smaller and more agile Sub-Committee, supplemented by independent, non-voting expertise, while others raised concerns regarding the reduction in Member representation and the principle of appointing independent advisors in this area.

Members noted that independent advisors would not be decision-makers and that they would be appointed to provide specialist advice. The Chair expressed support for the inclusion of independent advisors, noting that this reflected standard practice elsewhere and would provide additional independent scrutiny of arrangements for the remuneration of the most senior officers of the organisation. It was further noted that any advice provided by independent

advisors, and any departure from that advice by the Sub-Committee, could be recorded as appropriate.

During the discussion, an amendment was moved by the Deputy Chairman, seconded by Deputy Chris Hayward, that the Deputy Chair of the Corporate Services Committee and the Deputy Chair of the Policy and Resources Committee should be included as standing Members of the Senior Remuneration Sub-Committee. The amendment was put to a vote and carried by a majority of Members supporting it.

The Committee then considered the substantive proposal as amended. The Deputy Town Clerk confirmed that the amended composition would comprise the Chair of the Corporate Services Committee, the Deputy Chair of the Corporate Services Committee, the Chair of the Policy and Resources Committee, the Deputy Chair of the Policy and Resources Committee, the Chair of the Finance Committee and the Chair of the General Purposes Committee of Aldermen, with two independent advisors attending in a non-voting advisory capacity.

The substantive proposal, as amended, was put to a vote and carried. Members noted that a further report would be brought back setting out the proposed recruitment process for the independent advisors.

RESOLVED - That Members: -

- Approved the revised composition of the Senior Remuneration Sub-Committee, as amended, to comprise:

  Chair of the Policy and Resources Committee;
  Chair of the Corporate Services Committee
  Chair of the Finance Committee
  Chair of the General Purposes Committee of Aldermen
  Deputy Chair of the Policy and Resources Committee
  Deputy Chair of the Corporate Services Committee
  2 Independent Advisors (non-voting)

- Agreed that the appointment of Independent Advisors be progressed in accordance with the arrangements set out in the report.

- Agreed the Senior Remuneration Sub-Committee Terms of Reference.

7. **ORGANISATIONAL CHANGE GUIDE**

The Committee considered a report of the Chief People Officer concerning proposed amendments to the Organisational Change Guide and associated approval thresholds.

During discussion, Members were supportive of the principle of modernising the arrangements. Clarification was sought on whether the revised thresholds would also apply to contractor appointments, with a Member noting that some

contractor engagements could exceed the proposed financial thresholds for permanent posts. The Chief People Officer confirmed that further consideration would be required relating to contractor appointments, noting that some contractors were engaged and appointed directly through commercial arrangements rather than through HR processes. The Chief People Officer committed to reviewing the matter and providing clarification.

During discussion, it was suggested that the wider organisational change document appeared lengthy and could potentially be difficult for managers to navigate, and that it might benefit from simplification and streamlining. In response, clarity was provided that the immediate purpose was to seek approval for the revised approval levels and that the content of the wider policy documentation would be reviewed in due course to consider whether it could be simplified and streamlined for users.

The Chair expressed her support for the revised thresholds, noting that the Committee had repeatedly considered redundancy and organisational change matters at an operational level and that the proposed arrangements would provide a more proportionate approach to governance and the Committee's strategic level of focus.

RESOLVED - That Members: -

- Approved revision of the Organisational Change Guide to introduce updated approval thresholds for organisational change proposals;
- Agreed that Corporate Services Committee approval would be required only where proposals involve:
    a) an increase in recurrent establishment cost of £200,000 or more; or
    b) large-scale workforce impact affecting 20 or more employees or multiple departments;
    c) the creation of senior posts; (Grade I and above or roles exceeding £100,000);
- Agreed that all other organisational change proposals were subject to Chief Officer approval, in consultation with the Chief People Officer;
- Agreed that Chief Officers may, at their discretion, refer any proposal to the Corporate Services Committee where it is of significant complexity, sensitivity, or wider organisational impact;
- Authorised the Chief People Officer to approve organisational changes on the terms stated, while ongoing governance processes and changes to the Employee Handbook and policy guidance are updated accordingly, including consultation with the recognised Trade Unions.

8. **GENDER, ETHNICITY AND DISABILITY PAY GAPS (MARCH 2025 SNAPSHOT)**

The Committee considered a report of the Chief People Officer concerning the City Corporation's Gender, Ethnicity and Disability Pay Gap position as of March 2025.

During discussion, Members welcomed the positive progress reported in relation to the City Corporation's gender and ethnicity pay gaps, but with a concern being expressed regarding the comparatively low declaration rates for social mobility data. It was questioned whether staff fully understood the purpose of the data collection exercise and how the information would be used, and with it being suggested that opportunities should be explored to further promote participation through Employee Resource Groups and wider staff engagement activities. Members also queried the suitability of certain social mobility questions, noting that some could produce misleading responses or fail to capture individual circumstances accurately.

Members were advised that declaration rates were improving through the wider Equity, Diversity and Inclusion programme. A forthcoming communications campaign would seek to build confidence and encourage colleagues to update their diversity information. It was noted that the current social mobility questions followed an externally recognised framework, with supplementary local questions being considered while maintaining national benchmarking consistency. The City Corporation's approach remained focused on understanding social mobility and inclusion rather than creating a hierarchy of backgrounds.

A Member sought clarification regarding the workforce figures used within the report, with it being explained that reported headcount included a wider population than the core employee establishment, including casual employees, teachers and professors, which accounted for the difference between the figure shown in the report and workforce figures reported elsewhere.

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

9. **PROGRAMME SAPPHIRE**

The Committee received a report and presentation of the Chamberlain providing an update on Programme Sapphire and progress towards implementation of the new payroll solution.

During discussion, Members sought assurance on payroll testing, including parallel run results and readiness for implementation. The Chamberlain advised that testing against approximately 4,940 employees had produced an exact or acceptable match in 83% of cases, with remaining discrepancies linked mainly to identified defects or data issues being addressed. It was also questioned whether the programme remained on track given the ambitious timetable and previous payroll team resource constraints. It was confirmed that additional support had been introduced and that the programme remained focused on the planned implementation timetable. Reference was made to expected benefits from the new system, including improved self-service functionality and greater payroll efficiency.

An assurance was sought on pensioner access and on whether existing payroll processes were being improved rather than replicated in the new system. The Chamberlain undertook to provide a further update on pensioner access and confirmed that a benefits realisation process was in place to address service issues through system improvements and changes to working practices. The Committee welcomed the progress reported and noted that further updates would follow as implementation milestones were reached.

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

10. **REVENUE OUTTURN 2025-26**
The Committee received a joint report of the Deputy Town Clerk, Chief People Officer, Chamberlain and Comptroller and City Solicitor concerning the 2025-26 revenue outturn.

In response to a question concerning the distinction between local risk and central risk budgets, Members were advised that the drawdown against central risk reflected approved expenditure for matters properly chargeable to that budget and did not indicate an overspend against local risk budgets.

RESOLVED – That Members: -

- Noted the revenue outturn for 2025/26 showing an overall favourable variance to final budget of £1.244m; and
- Noted agreed carry forward requests on Central and Local Risk of £0.754m to 2026/27.

11. **DECISIONS TAKEN UNDER DELEGATED AUTHORITY OR URGENCY PROCEDURES**
The Committee received a report of the Town Clerk advising Members of action taken outside the Committee's meeting schedule, in consultation with the Chair and Deputy Chairman, in accordance with Standing Order Nos. 40(a) and (b).

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

12. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
There were no questions.

13. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT**
There were no items of urgent business.

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

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

There was one non-public question raised as follows:

City Corporation Enhanced Recruitment Controls

16. **ANY OTHER BUSINESS THAT THE CHAIR CONSIDERS URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**
There were no items of urgent business considered whilst the public were excluded.

17. **CONFIDENTIAL MINUTES**
RESOLVED – That the confidential minutes of the Corporate Services Committee meeting on 20 May 2026 be approved as an accurate record.

18. **MAJOR WORKS TEAM (HRA), DEPARTMENT OF COMMUNITY AND CHILDREN'S SERVICES**
The Committee considered a confidential report of the Executive Director of Community and Children's Services relating to the Major Works Team.

PROGRAMME SAPPHIRE
The Committee received a confidential update relating to Programme Sapphire.

19. **HR UPDATE**
The Chief People Officer was heard.

==========
At this point in the meeting, having reached the two-hour point in the meeting and in accordance with Standing Order 39, the Committee agreed to extend the meeting.
==========.

20. **TOWN CLERK'S UPDATE**
The Town Clerk was heard.

The meeting ended at 4.07pm

Chair

Contact Officer: Chris Rumbles
christopher.rumbles@cityoflondon.gov.uk

Resolution to any/all Grand Committees with Sub-Committees

To:	**CORPORATE SERVICES COMMITTEE**	09 September 2026
From:	**POLICY AND RESOURCES COMMITTEE**	09 July 2026

That in the interests of demonstrating effective decision-making, the Policy & Resources Committee resolved:-

To instruct that any and all Grand Committees of the Court of Common Council that choose to appoint sub-committees, consider in earnest the benefits of empowering said sub-committees to take decisions without unnecessary recourse to the relevant Grand Committee, with a view to balance due diligence with efficiency.

Committees with sub-committees:

- Audit & Risk Management Committee
- Barbican Centre Board
- Board of Governors of the City of London Freemen's School
- Board of Governors of the City of London School
- Board of Governors of the City of London School for Girls
- City of London Police Authority Board
- Community & Children's Services Committee
- Corporate Services Committee
- Education Board
- Finance Committee
- Planning & Transportation
- Policy & Resources Committee

This page is intentionally left blank

City of London Corporation Committee Report

Committee(s): Corporate Services Committee	**Dated:** **9th September 2026**
Subject: Early Careers Talent Pipeline	**Public report:** For Decision
This proposal: • **delivers Corporate Plan 2024-29 outcomes**	Providing excellent service
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:	Cliff Morton Interim Chief People Officer
Report author:	Kaye Saxton-Lea Assistant Director of Learning and Organisational Development

Summary

This paper seeks Corporate Services Committee endorsement of the proposed future delivery model for the City Corporation's Impact Leadership Graduate Programme and apprenticeship provision. Both programmes remain important routes for strengthening workforce resilience, succession planning, social mobility and future skills. However, rising employment costs, central budget pressures and changes to national apprenticeship funding mean that decisions are required on future scale, funding and prioritisation. These are not recommendations which we have easily reached but are critical considering current financial pressures.

The graduate and apprenticeship programmes are key components of the Corporation's talent pipeline, supporting leadership capability, service resilience, succession planning and social mobility.

The Impact Leadership Graduate Programme has performed strongly since its 2024 relaunch, with departmental demand exceeding available placements by around 40%. Current 2026/27 funding can support five graduates within the existing central budget, rather than the previously approved annual intake of nine. The approach is therefore to reduce the 2026/27 intake to five, while reviewing whether departmental contributions can support a return to an intake of nine from 2027/28.

Apprenticeship provision also needs to be refocused. The current contingency fund can no longer sustain up to 100 centrally funded entry-level apprenticeships because of London Living Wage pressures. A more sustainable model would reduce centrally funded apprenticeships to around 65 by the end of 2026 and then to around 55 by the end of 2027. Departments would also be encouraged to use suitable vacant Grade A, B, C and D roles in hard-to-fill areas as locally funded apprenticeship opportunities, helping to maintain entry-level pathways while reducing reliance on central funding.

The apprenticeship levy position has also changed significantly. The withdrawal of key national standards is expected to create a projected annual levy underspend of £919,539. Future provision should therefore prioritise remaining levy-compliant standards, including AI and technical routes, alongside departmental engagement to identify progression pathways and maximise levy value. Committee endorsement is requested to enable People and HR to move to a more sustainable delivery model, confirm departmental contributions and prioritise remaining levy-compliant apprenticeship provision.

Recommendation(s)

Corporate Services Committee is asked to endorse a more sustainable future delivery model for the graduate and apprenticeship programmes and note the associated financial, workforce and delivery implications.

Committee is asked to endorse the following approach:

- **Centrally funded apprenticeships:** reduce provision from up to 100 centrally funded apprenticeships to approximately 65 by the end of 2026, with a further reduction to approximately 55 by the end of 2027, in line with the current budget position.
- **Impact:** This approach would bring centrally funded apprenticeship provision within available resources but would reduce the number of centrally supported entry-level opportunities available across the organisation. It may also have implications for Adult Skills (ASES) in DCCS as a training provider, as the Corporation would be commissioning fewer centrally funded apprenticeships. However, the overall impact will need to be considered in the context of the current delivery model, as some of the existing 100 apprenticeships are already subcontracted to other providers.
- **Locally funded apprenticeship roles:** encourage departments to use appropriate vacant Grade A, B, C and D posts in hard-to-fill or priority service

areas as apprenticeship opportunities, subject to workforce planning, affordability and departmental approval.
Impact: this would strengthen talent pipelines in priority areas, maintain a visible route into the organisation for young people and help offset the reduction in centrally funded apprenticeship places. It would, however, require departmental funding, manager commitment and active workforce planning to identify suitable roles. Consideration will also need to be given to the off-the-job learning requirement built into apprenticeships. (6 hours off the Job learning per week is required for all apprentices to do their course work & projects etc)

- Maximising use of remaining levy-compliant standards, including AI and technical apprenticeship provision where it aligns to organisational skills needs.

Information for the committee to note

- **Graduate intake for 2026/27:** The annual intake will reduce to five graduates within the existing central budget, while reviewing whether departmental contributions can support a return to an intake of nine from 2027/28.
Impact: temporarily reducing the intake to five remains affordable within the current budget but will reduce placement capacity and weaken the Corporation's ability to build future leadership capability. Securing departmental contributions from 2027/28 would enable a return to nine graduates, preserving leadership pipeline capacity, supporting succession planning and responding to strong departmental demand.

Main Report

Background

1. Apprenticeships have expanded significantly since 2017 and are now an established route for developing organisational capability, supporting career progression and addressing workforce skills gaps. Centrally funded apprenticeship roles are currently supported through a £2.5m contingency fund. However, increases in the London Living Wage and associated employment costs mean that this fund can no longer sustain the level of provision originally agreed when the programme was established.

2. There are currently approximately 343 employees undertaking apprenticeship programmes. This includes 87 new entrants whose salaries are centrally funded through the contingency fund, and 256 existing employees undertaking levy-funded accredited qualifications. While the apprenticeship levy continues to support eligible accredited qualifications, recent national policy changes have resulted in the withdrawal of several qualifications from apprenticeship standards. This has narrowed the range of levy-funded provision available and made full utilisation of the levy increasingly challenging.

3. The Impact Leadership Graduate Programme was reintroduced in 2024 and provides two-year fixed-term learning contracts, rotational placements and a

Level 7 Leadership and Management qualification. The Corporation currently employs 14 graduates across two cohorts. Funding was approved for nine graduate posts per year, but revised salary and on-cost assumptions mean only five can be recruited in 2026/27 within the current budget.

Current Position

4. The apprenticeship digital levy fund for 2026 stands at £1,522,255. The withdrawal of key standards, including leadership and management provision, is projected to result in an annual underspend of approximately £919,539. This reduces the Corporation's ability to use levy funding for higher-value workforce development and requires a sharper focus on remaining standards, including AI and technical provision.
5. The financial position therefore has distinct elements, the £2.5m contingency fund can no longer sustain up to 100 centrally funded apprenticeships; and the withdrawal of national apprenticeship standards creates a projected annual levy underspend of £919,539. Please note the digital levy fund cannot be spent on salaries, only on authorised apprenticeship training
6. The table below summarises recent use of now-withdrawn leadership and management apprenticeship standards.

Use of withdrawn leadership and management apprenticeship standards: last 12 months

Apprenticeship	**Level**	**Annual Spend**	**Employees**
Senior Leader	Level 7	£404,486	85
Improvement Leader	Level 6	£54,000	25
Management, HR, Coaching	Level 5	£98,068	45
Team Leader	Level 3	£40,798	19
Total		**£597,352**	**174**
Total Levy Spend	**£1.3m**		

Options

Risks and Implications

- **Reduced leadership pipeline:** reducing the graduate intake to five may weaken future leadership capability and succession planning. This will be mitigated by reviewing departmental contributions to support a return to nine graduates from 2027/28.

- **Unmet manager demand:** reduced placement capacity may affect departmental confidence and engagement. This will be mitigated through early engagement with departments to confirm demand, funding contributions and workforce planning priorities.
- **Skills gaps:** the loss of key apprenticeship standards may constrain workforce capability, progression and innovation. This will be mitigated by prioritising remaining levy-compliant standards, including AI, technical and other provision aligned to organisational skills needs.
- **Financial inefficiency:** unused levy funds expire and return to HMRC, representing lost workforce development value. This will be mitigated by actively redirecting levy use towards available standards that support current and future capability needs.
- **Equality, diversity and inclusion:** reduced graduate and apprenticeship intake may limit entry and progression routes for underrepresented groups and weaken social mobility impact. This will be mitigated through active monitoring, targeted workforce planning, completion of an EQIA and the development of locally funded apprenticeship opportunities in suitable vacant roles.

Options Analysis

7. The options below align with the recommendations set out in section 3 and distinguish between action recommended now, future consideration and activity not recommended at this stage. The preferred overall approach is to protect the Corporation's strategic talent pipeline where affordable, while refocusing delivery around workforce planning priorities, departmental contribution and remaining levy-compliant apprenticeship provision.

Apprenticeship Programme Options

Option 1 recommended: reduce centrally funded apprenticeships from up to 100 to around 65 by the end of 2026, with a further reduction to around 55 by the end of 2027, in line with the current budget position. This would bring centrally funded provision within available resources, while reducing the number of centrally supported entry-level opportunities.

Option 2 recommended: encourage departments to use appropriate vacant Grade A, B, C and D posts in hard-to-fill or priority service areas as locally funded apprenticeship opportunities, subject to workforce planning, affordability and departmental approval. This would help offset the reduction in centrally funded apprenticeship places, maintain a visible entry route for young people, support social mobility and strengthen talent pipelines in priority areas.

Option 3 recommended: focus remaining levy activity on available standards, including AI and technical provision where these align with organisational skills needs.

This would maximise the value of remaining levy funding and support future-facing capability where suitable standards are available.

Option 4 not recommended at this stage: explore levy transfer to external organisations only if internal utilisation cannot be achieved and internal workforce development opportunities have been exhausted. This option should remain a secondary consideration, as the immediate priority is to maximise benefit for the Corporation's own workforce and service priorities.

Corporate and Strategic Implications

8. Strategic – The proposals support excellent services by strengthening workforce resilience, internal talent pipelines, succession planning and future skills.

9. Financial implications – The report identifies pressure on the graduate budget and a projected £919,539 apprenticeship levy underspend. Maintaining programme scale may require departmental contributions or budget reprioritisation.

10. Resource implications – Delivery will require continued People and HR coordination and active departmental support to host graduates, identify suitable apprenticeship roles and contribute to workforce planning.

Legal implications

None arising from the report.

Risk implications

11. The main risks are reduced leadership pipeline capacity, weaker succession planning, under-utilisation of levy funding and reduced ability to address skills gaps. These can be mitigated through targeted prioritisation, departmental engagement, clear workforce planning decisions and active monitoring of equality and social mobility impacts. There is also a reputational risk if reductions in early-entry opportunities are not clearly communicated as part of a more sustainable and targeted delivery model.

Equalities implications

12. Graduate and apprenticeship routes play an important role in supporting access to employment, career progression and social mobility. Any reduction in programme scale should therefore be actively monitored to assess potential equality impacts, particularly in relation to entry-level opportunities and progression pathways for underrepresented groups. Reductions in provision may also have implications for the Corporation's future performance in the Social Mobility Index and should be considered as part of ongoing workforce and equality monitoring.

Climate implications - There are no specific climate implications arising from this report.
Security implications – There are no direct security implications.

Conclusion

13. The graduate and apprenticeship programmes remain strategically important to attracting, developing and retaining talent across the Corporation. The aligned recommendations and options provide a sustainable way forward by reducing the graduate intake to five for 2026/27 within the existing central budget, while reviewing whether departmental contributions can support a return to an intake of nine from 2027/28. The approach also brings centrally funded apprenticeship provision within available resources by reducing places to around 65 by the end of 2026 and around 55 by the end of 2027, while encouraging departments to create locally funded apprenticeship opportunities in suitable vacant roles. This will help mitigate the impact of reduced central funding, preserve visible entry routes for young people and strengthen talent pipelines in priority or hard-to-fill areas. Alongside this, focusing remaining levy activity on available AI, technical and other levy-compliant standards will maximise public value from the levy and support future-facing workforce capability. Subject to Committee endorsement, People and HR will work with departments to confirm graduate placement demand, review funding contributions, identify suitable apprenticeship roles and monitor the financial, workforce and equality impacts of the proposed delivery model.

Appendices

Appendix 1: Graduate cost forecast

The table below summarises the forecast cost position for the current and proposed graduate cohorts to September 2028.

	FY 26/27	FY 27/28	FY 28/29
Cohort 1 ends September 2026	£106,311.50		
Cohort 2: 29 October 2025 to 29 September 2027	£462,672.00	£462,672	
Cohort 3: Sept 27 - Sept 29 anticipated costs for a cohort of five graduates		£285,687.00	£308,448.00
Total	£568,983.00	£748,359.00	£308,448.00

*FY 2028/29 does not include any graduates recruited in 2029.

Appendix 2: Scheduled withdrawal of key apprenticeship standards

14. In 2025, the Government confirmed the withdrawal of eight Level 7-degree apprenticeships for employees aged over 21, materially narrowing the range of levy-funded development available to the Corporation. Over the last three years, 85 employees have completed Level 7 apprenticeships, representing a total investment of £866,588 and demonstrating the importance of these programmes in building leadership and professional capability. In April 2026, funding was withdrawn for a further 16 apprenticeship standards, predominantly in leadership and management, creating an anticipated underspend of £919,539. While the policy intent is to redirect funding towards younger learners, foundation apprenticeships and shorter skills-based provision, the detail and practical value of these replacement programmes remain uncertain. This creates a significant challenge for organisational workforce planning and limits access to established, high-value development routes that have supported capability building across the Corporation.

Appendix 3: Removal of 22 apprenticeship standards

15. The Corporation contributes 0.5% of its monthly pay bill to the apprenticeship levy, equating to £1,199,001 in 2025–26. The levy account currently holds £1,522,255, with a further £120,752 added each month. As levy funds expire after twelve months if not used, the withdrawal of 22 key apprenticeship standards presents a direct risk to levy utilisation and value for money. The reduction in suitable programmes significantly constrains the Corporation's ability to use its levy strategically to support workforce development, succession planning and internal progression. From August 2026, replacement provision is expected to focus primarily on lower-level apprenticeships and shorter, lower-value courses. While these may provide some targeted benefit, they are unlikely to offer the same breadth, depth or strategic return as the withdrawn standards, particularly in relation to leadership capability and specialist professional development.

Appendix 4: Future AI and technical standards

16. The emerging suite of AI-related apprenticeships and short-course units presents a timely opportunity for the Corporation to strengthen capability in a rapidly evolving area of strategic importance. Provision such as the Artificial Intelligence and Automation Practitioner (Level 4) and AI Leadership units (Level 5) offers practical routes to build confidence, technical understanding and leadership readiness in relation to digital transformation. Active promotion of these programmes would support employees to develop relevant future-

facing skills while enabling the Corporation to respond more effectively to changing service demands, innovation priorities and workforce expectations. Investing in these standards will help position the organisation to harness new technologies with greater confidence, strengthen resilience, and support the development of a modern, adaptable workforce.

Background Papers
None

Kaye Saxton-Lea
Assistant Director of Learning and Organisational Development
T: 0207 332 1927
E: kaye.saxton-lea@cityoflondon.gov.uk

This page is intentionally left blank

City of London Corporation Delegated Authority Report

Committee(s): Corporate Services Committee	**Dated:** 9 September 2026
Subject: Preventing Sexual Harassment Policy Proposal	**Public report:** For Decision.
This Proposal: • My Wellbeing & Belonging – employees should have sufficient support & resources to undertake their work. • Trustworthy Leadership – Leaders and managers hold responsibility for creating a safe physical and psychological working environment.	Delivers People Strategy 2024-2029 outcomes.
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:	Cliff Morton - Chief People Officer.
Report author:	Maggie Heneghan – Senior Policy Officer and Industrial Relations.

Summary

The **Employment Rights Act 2025** will:

- Strengthen the duty on employers to take 'reasonable steps' to prevent sexual harassment of their employees by increasing the duty to take 'all reasonable steps'.
- Introduces employer liability for third-party harassment. This liability is not just limited to sexual harassment, but extends to harassment on the grounds of age, disability, religion or belief, sex and sexual orientation.

These changes are due to come into force on **30 October 2026**.

As part of our duty to take 'all reasonable steps' to prevent sexual harassment, we propose the implementation of a dedicated Preventing Sexual Harassment Policy with effect from **1 October 2026**.

The policy has been developed following consultation with relevant stakeholders, including recognised Trade Unions, Senior Employee Representatives, HR colleagues and the Equality, Equity, Diversity and Inclusion team.

The report is provided for information under delegated authority arrangements approved by the Corporate Services Committee on 27 November 2024.

Recommendation(s)

It is recommended that Members approve the implementation of the Preventing Sexual Harassment Policy.

Main Report

Background

The Employment Rights Act 2025 will increase employers' duty to take all reasonable steps to prevent sexual harassment.[1] The Act also extends to prevent sexual harassment by third parties.[2] The change is effective from 30 October 2026.

Current Position

Our sexual harassment procedure currently makes up part of our Bullying, Harassment and Sexual Harassment Policy.

[1] Employment Rights Act 2025, last accessed 18 August 2026.

[2] Ibid.

The current procedure is primarily focused on responding to incidents after they have occurred. While it provides routes for raising complaints and conducting investigations, it does not contain the preventative controls, training expectations, management guidance or risk assessment arrangements necessary to help demonstrate compliance with the duty to take all reasonable steps to prevent sexual harassment.

It does **not** include:

- Any definitions or explanation of what may constitute sexual harassment, victimisation or bullying.
- Explain third-party Sexual Harassment.
- Provide information for line managers on how to help resolve an informal concern.
- Advise when to progress to the formal procedure.
- Expand on the meaning of a vexatious or malicious grievance and the consequences for raising such a grievance.
- Align the policy with the Grievance procedure.

Preventing Sexual Harassment change

ACAS recommends that employers consider having a specific policy on sexual harassment, training everyone on how to recognise sexual harassment, training managers on their responsibilities and take steps to creating the right culture.[3]

The dedicated Preventing Sexual Harassment Policy and accompanying Employee Guide, Manager Guide and Manager Risk Assessment would help us toward our duty. We are also working with the Learning & Organisational Development Team on mandatory training for all staff, with information on manager responsibilities for manager training.

Why are we suggesting change now?

In preparation for the implementation of the Employment Rights Act 2025, the City Corporation is aiming to implement the updated policy from 1 October 2026. The legislation update is due to be in effect from 30 October 2026, so this would ensure we have a policy in place ahead of this date.

Consultation summary

The policy was developed in consultation with:

- HR.
- Employee Relations.

[3] Preventing sexual harassment - Sexual harassment - Acas, last accessed 18 August 2026.

- EEDI.
- City of London Police.
- City Bridge Foundation
- Trade Unions GMB and Unite.
- Senior Employee Representatives.

Feedback received through consultation has informed the final draft policy. Consultation included an HR Working Group session, an Equality Impact Assessment, engagement with recognised Trade Unions and engagement with Senior Employee Representatives.

Key policy changes.

The policy includes:

- Explicit reference to our duty as an employer.
- Focuses on preventing rather than reacting.
- Stronger third-party harassment provisions.
- Greater emphasis on manager's role in taking preventative action.
- Better reporting framework.
- Better victim support protection.
- Inclusion of risk assessment as a formal control.

It is a more structured, supportive and procedurally robust process than the previous policy.

Options

1. Two options have been provided:
   a. Adopt the new policy.

      This option supports organisational readiness for the Employment Rights Act 2025 and provides a clearer framework for our commitment to Preventing Sexual Harassment.

   b. Maintain the current policy.

      While we could opt to "do nothing", this would increase the risk of us failing to meet our employer duty to take all reasonable steps to prevent sexual harassment.

Corporate & Strategic Implications

- My Wellbeing & Belonging – employees should have sufficient support & resources to undertake their work.

Trustworthy Leadership – Leaders and managers hold responsibility for creating a safe physical and psychological working environment.

Strategic implications – this proposal supports the People Strategy by promoting the My Wellbeing and My Belonging limb, helping to ensure employees have sufficient support & resources to undertake their work. It also helps towards our Trustworthy Leadership, helping managers to take responsibility for creating a safe working place and addressing concerns early on.

Legal implications – The revised policy applies to all workers. The policy has been subject to review by recognised Trade Unions and Senior Employee Representatives.

Risk implications – Failure to adopt the revised policy would increase the risk of the organisation failing to take all reasonable steps in line with the Employment Rights Act 2025.

Equalities implications – An Equality Impact Assessment Form has been completed and will be kept updated. The EEDI team and trade unions have provided feedback which we are implementing.

Conclusion

It is proposed that the dedicated Preventing Sexual Harassment Policy be adopted.

Appendices

- Appendix 1 – Proposed Preventing Sexual Harassment Policy
- Appendix 2 – Current Bullying, Harassment & Sexual Harassment Policy

Cliff Morton

Interim Chief People Officer

E: cliff.morton@cityoflondon.gov.uk

Maggie Heneghan

HR Senior Policy Officer and Industrial Relations

E: maggie.heneghan@cityoflondon.gov.uk

This page is intentionally left blank

Employee Handbook

CITY OF LONDON

Title	Page count
Preventing Sexual Harassment Policy	Pages 3-15
Preventing Sexual Harassment Appendices	Pages 16-20

Preventing Sexual Harassment Policy

Content Warning: This Policy relates to Sexual Harassment and may be triggering for some people to read. If you would prefer to discuss this policy or need support, please contact your HR Business Partner (see their intranet page at HR Business Partnering for more information).

Employee Handbook

CITY OF LONDON

Table of Contents

Introduction **3**

Scope **3**

Dignity at work **4**

Definitions: What is Sexual Harassment? **5**

Sexual harassment 5

Victimisation 7

Whistleblowing 7

Reporting routes for victims and witnesses **8**

Informal procedure 8

Formal procedure 9

Right of Appeal **11**

Third-Party Sexual Harassment **11**

When it's a crime **12**

Support available **13**

Confidentiality **14**

Toolkit **14**

External Links / Other Resources **15**

Additional Training **15**

For All Staff 15

For Managers 16

Appendix 1: Sexual Harassment Reporting Form **18**

Introduction 18

Section 1: Employee details 18

Section 2: The person the sexual harassment concern relates to (please fill out as much information as you can 18

Section 3: Summary of incident 19

Section 4: The resolution 20

Section 5: Signature and Date 20

Appendix 2: Sexual Harassment Procedure Map 22

Introduction

1. The City of London Corporation is committed to creating and maintaining an inclusive, respectful and discrimination-free working environment for all staff. All concerns related to sexual harassment are treated seriously and addressed appropriately, in line with the City Corporation's commitment to dignity, fairness and respect at work.

2. Employees are expected to uphold high standards of conduct by acting in accordance with the Code of Conduct and by demonstrating behaviours that maintain trust and confidence between colleagues, the City Corporation and the public.

3. The City Corporation recognises that there may be times when an employee experiences inappropriate behaviour in the workplace. Staff are encouraged to report such incidents in line with this policy, so that concerns can be addressed and appropriate steps taken to protect individuals and prevent recurrence.

4. The Employment Rights Act 2025 introduces a duty to take **all reasonable steps** to prevent sexual harassment. In support of this duty, the City Corporation encourages staff to raise concerns at the earliest opportunity to enable issues to be addressed promptly and support the safety and dignity of all staff at work.

5. This policy, together with accompanying documents (see the **Toolkit** heading below), sets out a clear and structured approach for preventing and resolving sexual harassment concerns. It explains both informal and formal procedures, supports staff in challenging unwanted sexual behaviour and outlines the support available where a sexual harassment concern or grievance has been raised. The policy applies both to employees who feel they have experiences sexual harassment and to those to whom an allegation relates.

6. The policy is aligned with Preventing sexual harassment - Sexual harassment - Acas guidance.

Scope

7. This policy applies to all City Corporation staff excluding teaching staff in City Corporation Schools who have their own respective sexual harassment policies.

8. This policy sets out the procedure for addressing cases of sexual harassment at the City Corporation. This is inclusive of sexual harassment by consultants, contractors and agency workers and/or third parties such as customers, suppliers or visitors to our premises.

9. The policy applies to conduct:

- In the workplace;
- At work-related events;
- During work-related travel;
- Online or through digital communication; and
- In any other circumstances where an individual is working, representing us or otherwise connected to work.

Dignity at work

10. The City Corporation is committed to fostering a positive workplace culture that values equity, diversity and inclusion. Treating others with dignity and respect is fundamental to maintaining a healthy, safe and supportive working environment and to preventing and addressing unacceptable behaviour.

11. We are committed to taking proactive measures to encouraging a positive work culture and to prevent sexual harassment of our workers by:

- Providing mandatory training on Preventing Bullying, Harassment & Sexual Harassment on an annual basis.
- Providing additional training for line managers to ensure they understand their responsibility in preventing and addressing sexual harassment in the workplace, including by third parties.
- Encourage managers to undertake regular risk assessments to determine all reasonable measures that can be implemented to minimise the risk of exposure to sexual harassment in the workplace, including by third parties;

- Encouraging individuals to treat others with respect as part of this policy.

12. Risk assessments should be reviewed periodically and following any incident, complaint, workplace change or identified risk.

13. This policy forms part of the City Corporation's ongoing commitment to promoting dignity at work and ensuring that all staff are able to carry out their roles in an environment free from harassment and inappropriate conduct.

Definitions: What is Sexual Harassment?

Sexual harassment

14. The Equality Act 2010 defines sexual harassment as unwanted conduct of a sexual nature. It has the purpose or effect of violating the dignity of a worker or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

15. Examples of sexual harassment include, but is not limited to:

- Criminal behaviour, including sexual assault, stalking, indecent exposure and offensive communications such as cyberflashing. For further clarification on what constitutes a crime, please see Appendix 1 below.
- Sexual remarks about someone's body, clothing, or appearance.
- Sexual comments or jokes.
- Displaying sexually graphic pictures, posters or photos.
- Suggestive looks, staring or leering.
- Propositions and sexual advances.
- Making promises in return for sexual favours.
- Sexual gestures.
- Intrusive questions about a person's private or sex life or discussing your own sex life.
- Sexual posts or contact on social media.

- Spreading sexual rumours about a person.
- Sending sexually explicit emails or text messages.
- Unwelcome touching, hugging, massaging or kissing.

16. It is important to note that if a person does not object to inappropriate behaviour at the time, it should not be assumed that they are giving their consent. Consent exists where clear and unambiguous consent has been freely given and continues to be given.

17. Sexual harassment in the workplace does not only relate to your primary physical work location (including when working from home). It extends (but is not limited) to a social event relating to work, work meetings, training and travelling for work. It can also happen in person or online e.g., in meetings, email, social media or via messaging platforms (for more information, please refer to the Social Media Policy).

18. In considering whether behaviour may amount to sexual harassment, the following points should be noted:

- Sexual harassment can be a one-off incident or a repeated pattern of behaviour.
- Anyone can be a victim of sexual harassment regardless of their sex, sexual orientation or gender identity (or that of the alleged harasser), and sexual harassment may occur between people of the same sex.
- Sexual harassment can come also from anyone you encounter through your work, including a co-worker, a manager, somebody in a position of authority, a customer, client or member of the public.
- A person can be affected by sexual harassment even if the conduct is not targeted at them.
- Something can still be considered sexual harassment even if the employee accused did not mean for it to be.
- A written warning; to

- Dismissal without notice for cases of potential gross misconduct (outlined in the Disciplinary Policy).

19. Aggravating factors, such as abuse of power over a more junior colleague, will be considered in determining the result of a disciplinary action.

20. Sexual harassment includes a wide range of behaviours with the most extreme form of sexual assault being a serious crime. The City Corporation will support employees who wish to press charges against offenders.

Victimisation

21. Victimisation is when an employee is treated less favourably for making a sexual harassment grievance. A worker will not be subject to a detriment (such as being denied a promotion, bullied, ostracised, given a poor reference etc.) for making a sexual harassment grievance.

Whistleblowing

22. Whistleblowing is when a worker raises a concern about wrongdoing in the public interest. A worker who blows the whistle has the right not to suffer detriment and (if they are an employee) not to be unfairly dismissed as a result of the disclosure. To be protected, a worker must reasonably believe that the disclosure is:

    - Listed in the Employment Rights Act 1996.[1] From 6 April 2026, sexual harassment has been added to this list.

    - The disclosure is in the public interest.

23. An anonymous disclosure route is available for staff who do not feel able to raise concerns openly. However, staff are encouraged to raise concerns on a non-anonymous basis where they feel able to do so, as anonymity may limit the City Corporation's ability to respond appropriately, including providing direct support, conducting a full investigation, and taking action to prevent recurrence.

24. Please see the Speak Up Policy for more information on whistleblowing.

[1] Employment Rights Act 1996, last accessed May 2026.

Reporting routes for victims and witnesses

25. If an employee feels that they are at risk of experiencing sexual harassment or have experienced sexual harassment, they may report the incident in line with Grievance Policy or Speak Up Policy. The Speak Up Policy is for whistleblowing and anonymous disclosures, but please be aware that our actions may be more limited where an anonymous disclosure is made.

26. There may be circumstances, due to the seriousness of the matter (e.g., the incident amounts to a criminal offense), where the City Corporation must take action to ensure the safety of the worker concerned or where other staff members are at risk. In these circumstances, appropriate safeguard measures will be put in place to prevent further harassment, or victimisation of the worker concerned.

Informal procedure

27. In line with the Grievance Policy, in the case of an informal disclosure, employees have the opportunity to raise concerns with their Line Manager. While there are no time limits for raising concerns about sexual harassment, doing so promptly helps the City Corporation to respond effectively and to ensure that appropriate protective measures can be put in place.

28. Line Managers should meet with the employee within five working days and provide an outcome in writing to the employee concerned as soon as possible. Line Managers are expected to approach such disclosures with sensitivity and support, listening carefully to the employee's concerns. The Line Manager should continue to meet with the employee periodically to verify if concerns have been addressed, and if not, take appropriate action to alleviate concerns.

29. If a Line Manager feels unable to deal with a concern, they should consider:

    - Contacting the Learning & Organisational Development team for additional support via email at trainingbookings@cityoflondon.gov.uk or via their intranet page at L&OD homepage.

    - Reaching out to Human Resources for additional support (see the intranet page at City of London - Corporate HR and Business Services).

30. Please see the Manager Guide and Employee Guide for more advice on appropriate responses when an employee makes a sexual harassment disclosure.

31. Where the sexual harassment disclosure reveals that the conduct at issue:

    - Has been ongoing and persistent.
    - Affects several people.
    - Where a third party is concerned.

    You should consider proceeding directly to the formal procedure (see the heading **Formal Procedure** below).

32. Where the concern relates to the Line Manager, the employee may approach an alternative or more senior manager.

Formal procedure

33. To make a formal grievance, the Sexual Harassment Reporting Form (see Appendix 1) should be completed by the person raising the sexual harassment grievance.

34. Please detail as much information as you can regarding the experience/ witnessed event (including what, how, when and where it happened, and who else may have witnessed it). We recognise that this can be difficult, so if you need support, please let your Line Manager or HR know (via the HR service desk) and alternative arrangements can be made.

35. Once the Sexual Harassment Reporting Form is completed, it should be given to either your Line Manager or Senior Manager. If neither are suitable or available, the form should be sent to your HR Advisor (HRAdvisors@cityoflondon.gov.uk).

36. A formal hearing will usually take place. The hearing will be conducted by a Grievance Hearing Officer who is independent of the issues raised, suitably

trained, experienced and of the appropriate level of seniority[2] (in line with the Managing People Policy). The Grievance Hearing Officer will be an independent party to help avoid any biases and will be supported by a Human Resources' representative where necessary.

37. The Grievance Hearing Officer should send a letter to the employee who submitted the grievance outlining:

- Their concerns.
- The procedure being followed.
- Potential outcomes.
- The employee's right to be accompanied. See Appendix 3 below for more detail.

38. Please see the Grievance Policy for more information on the hearing, including non-attendance and hearing outcomes.

39. If the decision results in the sexual harassment grievance being upheld, the person complained of may be liable to disciplinary action in accordance with our Disciplinary Policy.

40. In a small minority of cases, a vexatious or malicious grievance may be raised. Please note that a grievance will not be labelled 'vexatious' or 'malicious' unless there is clear evidence to support that conclusion. The meaning of 'vexatious' and 'malicious' is set out below:

[2] In line with the Managing People Policy, for employees up to and including Grade H, Management Levels 1, 2 and 3 can authorise progression to the formal procedure i.e., Town Clerk & Chief Executive, Deputy Town Clerk, Chief Operating Officer, Chamberlain & Chief Financial Officer, Comptroller & City Solicitor, Remembrancer, City Surveyor, Executive Director Innovation & Growth, Executive Director Environment, Executive Director Community & Children's Services, Commissioner for City of London Police, Head of City of London School, Head of City of London School for Girls, Head of City of London Freemen's School, Chief Executive Officer of the Barbican Centre, Principal of the Guildhall School of Music & Drama, Managing Director of Bridge House Estates & Chief Charities Officer. In addition, the Executive Director and Chief People Officer shall be treated as within Level 1 for this policy. Level 2 includes: Any other Senior Managers at Senior Manager Grade (SMG) Chief Officers, Heads of Service or equivalent and Senior Managers at grade I and J with responsibility for staff and associated budgets. Level 3 includes: Managers at Grade E,F,G and H.
For employees Grade I & J, Levels 1 and 2 can authorise progression to the formal procedure.

- A vexatious grievance is one which is pursued unreasonably and regardless of its merits, and which may seek to harass, burden or disrupt organisational processes.
- A malicious grievance is a concern raised in bad faith, for example where allegations are knowingly false or intended to cause harm to an individual or the organisation.

41. See the Grievance Policy for more information.

Right of Appeal

42. In line with the Grievance Policy, employees should submit their appeal within five working days of receiving the written decision. If pursuing an appeal, an employee must complete and send the Appeal Form (see Appendix 2 of the Grievance Policy) to Employee Relations at the following email address: employeremployeerelationsappeals@cityoflondon.gov.uk.

43. An appeal cannot be used simply because the employee disagrees with the outcome; it must be based on specific grounds, such as:

- A procedural irregularity.
- New evidence becoming available.
- Concerns that relevant information was not considered.

44. The Right of Appeal is available only to current employees, or to former employees who have exercised that right within six months of leaving employment with the City Corporation (for example, if an employee resigns on 1 January while a grievance they submitted is ongoing, they must submit any appeal by 1 July).

Third-Party Sexual Harassment

45. The City Corporation will provide all suppliers with this policy to ensure that expectations are clear, however we are aware that this may not prevent inappropriate behaviour by people who are not employed by the City Corporation.

46. If a visitor/ third-party commits a breach of this policy they will be asked to leave the premises and where they are representing another company, their behaviour will be reported to their employer. Additionally, the individual will be warned about the inappropriate nature of their behaviour and may be banned from the City Corporation premises. A Human Resources' representative must be informed if there are any allegations of sexual harassment by a third-party.

47. If there is an allegation of a City of London Corporation employee sexually harassing a third-party (e.g., a contractor or customer) in the workplace, this policy should be followed and disciplinary action may be taken.

When it's a crime

48. Where a Line Manager is informed by an employee that they have been sexually assaulted or raped in the workplace, the employee may wish to report the incident to the police. Employees are not required to report incidents of sexual assault or rape to the police, and no pressure must ever be placed on them to do so. The Line Manager must handle the conversation with sensitivity and understanding and provide appropriate support throughout the process.

49. It should be noted that, in certain circumstances, the City Corporation may be required to report the matter to ensure that appropriate protections are in place for the affected employee and for others who may be at risk. Line Managers should speak with Human Resources before discussing police reporting with the employee.

50. This may include situations where the manager or the employee reasonably believes that there is:

- An ongoing risk to the safety of the employee or others; or
- An increased risk to the employee's safety because they are a vulnerable person (for example, due to a mental health condition).

51. Where a Line Manager is unsure how to proceed, they should seek advice from their Human Resources Business Partner (see their intranet page at HR Business Partnering) and, where relevant, the Local Authority Designated Officer (see more information at Local Authority Designated Officer (LADO) - guidance for staff).

52. An internal investigation will not usually be delayed solely because a police investigation is underway. An internal investigation may also reach a different outcome to a criminal investigation (for example, where there is insufficient evidence to pursue a criminal prosecution but sufficient evidence to justify disciplinary action, including dismissal).

53. The Line Manager and/or their Human Resources Business Partner should liaise with the police to ensure that the internal process does not risk prejudicing any criminal investigation.

Support available

54. The investigation process will be a fair and thorough process with no presumption regarding the incident or outcome. All those involved in addressing sexual harassment grievances will have received appropriate training so that they can undertake their role sensitively and effectively.

55. At work, the person who raised the grievance should have a conversation with their Line Manager to review matters such as their current working arrangement and consider whether any additional support is needed, for example by using the Flexible Working or Special Leave and Time-Off Policy.

56. Any adjustments should be recorded and reviewed every two weeks and documented/shared with the relevant parties (e.g., a Line Manager or Senior Manager, Trade Union representative). If there is time-off resulting from sexual harassment at work, such as sickness or appointments for specialist support, this should not be counted towards sickness trigger points.

57. At work, the following support options are available for anybody who has experienced or witnessed sexual harassment, been accused of sexual harassment, or Line Managers who are dealing with sexual harassment grievances:

- Employee Assistance Programme (EAP) (available in the Employee Handbook).
- Occupational Health Services (for counselling).
- Trade Union (to act as a representative in Disciplinary Actions).

58. There are also additional external support services linked at the heading **External Links / Other Resources** below.

Confidentiality

59. The City Corporation will aim to deal with sexual harassment grievances sensitively and with respect for the privacy of all individuals involved. All employees must treat any information communicated to them in connection with an investigation or sexual harassment grievance as confidential sharing on a 'need-to-know' basis only.

60. Please note that electronic recording of meetings or hearings may be permitted so long as it is agreed by all parties. Consent for recordings (including for companions or witnesses) must be obtained from all relevant parties in advance of the meeting to ensure the scheduled hearing is not disrupted. Recording may also be required as a reasonable adjustment. This applies to meetings held in person, by telephone, or remotely using virtual technologies such as Teams.

61. If an employee refuses to the recording of a sexual harassment grievance procedure, the Investigation Officer must source a notetaker. The notetaker is subject to the same confidentiality requirements as all other parties.

62. The names of witnesses, whose evidence is relevant to the grievance procedure, may be disclosed to the individual under investigation unless it is believed that a witness's identity should remain confidential.

63. Any information collected during a sexual harassment grievance procedure, including meeting notes, emails, statements, and recordings (where agreed), will be stored securely in accordance with the Data Protection Policy.

Toolkit

64. Available in the Employee Handbook:

- Preventing Sexual Harassment Policy.
- Appendices:
  - Sexual Harassment Reporting Form.
  - Preventing Sexual Harassment Procedure.

- Sexual Harassment Process Map.

- Employee Guide: Sexual Harassment.
- Manager Guide: Sexual Harassment.
- Risk Assessment.
- Grievance Policy.

External Links / Other Resources

- ACAS.
- Citizens Advice Bureaux.
- Victims Support.
- Sexual assault referral centre.
- Rights of Women.
- Samaritans.
- LGBT Foundation.
- Galop- LGBT+ Sexual Violence Support.
- Rape Crisis England and Wales.
- The Survivors Trust.
- SurvivorsUK- For men and non-binary people affected by rape and sexual abuse.
- Government website support services.

Additional Training

65. Available on SAP: Find Learning – SAP SuccessFactors.

For All Staff

- Stand Up Against Street Harassment.

- Bystander intervention.
- Equally Yours.
- Inclusive communication.
- Conflict management.

For Managers

- Communicating as a manager.
- Crucial and difficult conversations.
- People manager grievance management.
- People manager leading diverse teams.

Sexual Harassment Policy Appendices

Appendix 1 – Sexual Harassment Reporting Form. Page 17

Appendix 2 – Sexual Harassment Procedure Map. Page 20

Employee Handbook

CITY OF LONDON

Appendix 1: Sexual Harassment Reporting Form

Introduction

We recognise that raising a concern about sexual harassment can be very distressing, and we are committed to handling all concerns with care, sensitivity, and respect.

Before completing this form, you may find it helpful to read the Preventing Sexual Harassment Policy, which explains how concerns are approached and the support available. The City of London Corporation is committed to preventing sexual harassment and to taking steps to protect you and others from sexual harassment risks going forward.

Once you have completed this form, please share it with your Line Manager, or with a Senior Manager if you do not feel it is appropriate to involve your Line Manager. If neither option is suitable or available to you, you may forward the form to your HR Business Partner. Details of your HR Business Partner can be found on the HR page of COLNET, or via the HR Service Desk if you do not have intranet access.

Experiencing sexual harassment can be extremely distressing. If you feel you would benefit from additional support at this time, there are a number of organisations that can offer help. These are listed in the **Links / Additional Materials** section of the Sexual Harassment Prevention and Action Policy.

Section 1: Employee details

Name:	Contact number:
Job title:	Location:
Department:	Section/Service:
Name of employee's Line Manager:	Name of employee's Senior Line Manager:

Section 2: The person the sexual harassment concern relates to (please fill out as much information as you can

Name:	Contact number:
Job title:	Location:
Department:	Section/Service:
Name of employee's Line Manager:	Name of employee's Senior Line Manager:

Section 3: Summary of incident

Incident information:	
Time and date of incident.	
Please provide a description of the incident *(please include as much information as possible and add additional pages if required).*	
Please provide details of witnesses of the incident.	
Have you told anybody about this incident? (if yes, please provide details of who).	
Have you notified the police?	
Supporting information	

Are you submitting any supporting documentation?	
Is there any additional evidence that you are aware of which you do not have access to? (e.g. CCTV, emails which other parties may have, etc.)	

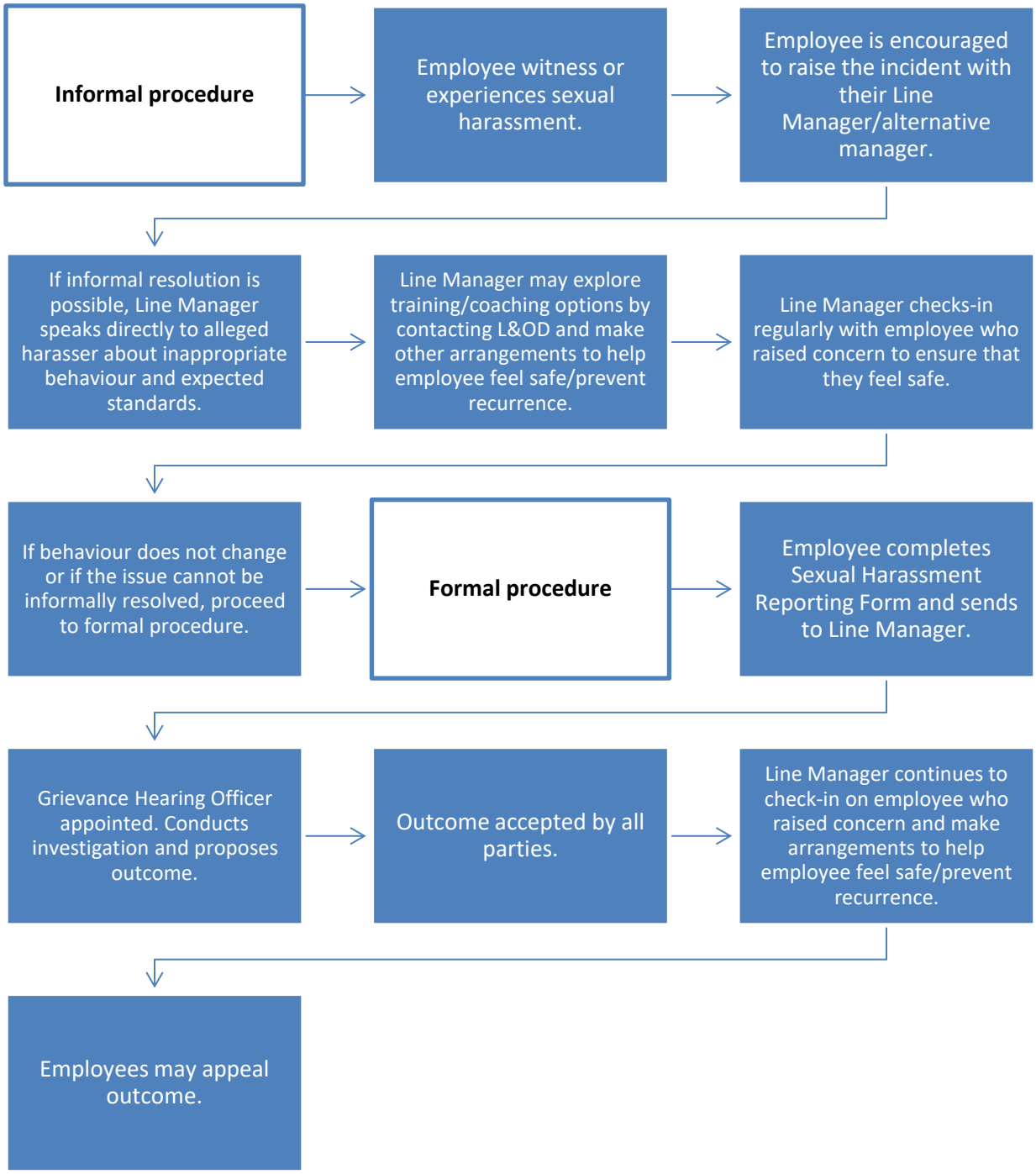
Section 4: The resolution

Outcome	
How would you like to see this resolved?	

Section 5: Signature and Date

Signature	Date

Appendix 2: Sexual Harassment Procedure Map


Informal procedure
Employee witness or experiences sexual harassment.
Employee is encouraged to raise the incident with their Line Manager/alternative manager.
If informal resolution is possible, Line Manager speaks directly to alleged harasser about inappropriate behaviour and expected standards.
Line Manager may explore training/coaching options by contacting L&OD and make other arrangements to help employee feel safe/prevent recurrence.
Line Manager checks-in regularly with employee who raised concern to ensure that they feel safe.
If behaviour does not change or if the issue cannot be informally resolved, proceed to formal procedure.
Formal procedure
Employee completes Sexual Harassment Reporting Form and sends to Line Manager.
Grievance Hearing Officer appointed. Conducts investigation and proposes outcome.
Outcome accepted by all parties.
Line Manager continues to check-in on employee who raised concern and make arrangements to help employee feel safe/prevent recurrence.
Employees may appeal outcome.

Bullying, Harassment and Sexual Harassment Procedure

Table of Contents

Statement of intent 2
Scope 2
Purpose 3
Responsibilities 3
Procedure for dealing with bullying, harassment and sexual harassment and Process Map . 4
Dealing with a Single Incident and/or initial concerns 5
Stage 1 Informal resolution 5
Stage 2 Formal resolution – Complaint Resolution Meeting 6
Formal resolution – Outcome letter 8
Stage 3 Appeal 8
Other matters 9
Record keeping 9
Overlapping bullying, harassment and sexual harassment with other formal procedures 9
Matters out of scope 10
Working environment during the course of a complaint 10
List of appendices 12
Links / Other resources 12

Statement of intent

1. The City Corporation has a zero-tolerance approach to bullying, harassment and sexual harassment. Bullying, harassment and sexual harassment constitute misconduct and in the most serious cases, may result in dismissal from employment without notice. All allegations of inappropriate behaviour or language in the workplace will be taken seriously, with a thorough investigation, appropriate action taken, and support given, as necessary.

2. Everyone has the right to be treated with fairness, dignity and respect whilst at work. The Equality Act 2010 places an obligation on organisations and their employees to avoid unlawful discrimination in relation to specified protected characteristics. These are age, disability, race, religion or belief, sex, sexual orientation, marriage and civil partnership, gender reassignment and pregnancy and maternity. This ensures that we establish an environment in which everyone can feel safe and work effectively and confidently as set out in the Equal Opportunity Policy.

3. The City of London Corporation is committed to promoting good employee relations within a working environment that fosters team working. Employees and others working at all levels of the organisation have a responsibility to maintain professional relationships. They are expected to avoid actions or using words that would harm the mental or physical wellbeing of others. They will, as stated, in the Code of Conduct policy, demonstrate appropriate behaviours defined internally and that adhere to the Principles of Public Life. The Managing People Policy and Equal Opportunity Policy each set out in more detail the standard of conduct expected of all those who work for or on behalf of the City Corporation. The Director of Human Resources will be responsible for advising on the day-to-day operation and interpretation of this procedure.

Scope

4. The aims of this procedure are to ensure that all employees are aware:

    - of what constitutes bullying, harassment and sexual harassment
    - the protected characteristics set out in the Equality Act 2010
    - of their right to report incidences of bullying, harassment or sexual harassment (as defined in the Equality Act 2010) and how this will be addressed.

Bullying, harassment, sexual harassment, and associated discrimination can occur or be experienced in relation to more than one protected characteristic. It is acknowledged that the experience of victims who have multiple protected characteristics is often heightened.

5. The formal process for complaints set out in this procedure applies to all employees except Chief Officers, teachers, and police officers for whom separate procedures apply. Whilst the procedure is available to individuals directly employed by the City Corporation, incidents raised by other workers should be taken seriously and dealt with appropriately by managers and Chief Officers.

6. This procedure covers behaviour that occurs in the workplace, online and outside working hours where this may impact upon work or working relationships (Social Media Policy).

Purpose

7. The purpose of this procedure is to ensure we have a working environment in which instances of bullying, harassment and sexual harassment are always treated as unacceptable and employees have the confidence to complain about such behaviour, should it arise, in the knowledge that concerns will be dealt with appropriately, fairly and without bias. Complaints will be investigated promptly, ensuring employees' rights are protected.

Responsibilities

8. Employees must:

    - Ensure that their conduct is in accordance with the principles set out in this procedure.
    - Not bully, harass or sexually harass other colleagues or managers.
    - Bring matters relating to bullying, harassment and sexual harassment to the attention of their manager at the earliest opportunity.
    - Participate in investigation proceedings as applicable.

9. Employees are expected to:

    - Report any instance of bullying, harassment or sexual harassment where the problem cannot be resolved informally to their line manager, Chief Officer or HR representative.
    - Report any instance of bullying, harassment or sexual harassment which they witness or comes to their attention to their line manager, Chief Officer or HR.

10. Managers are expected to:

    - Make themselves and their staff aware of their responsibilities to implement this procedure and making every effort to ensure that bullying, harassment and sexual harassment does not occur.
    - Uphold a working environment in which bullying, harassment and sexual harassment is not tolerated and cannot flourish.
    - Ensure that they do not bully or harass or sexually harass their staff or other colleagues and ensure that performance management issues, are not handled in a way that may constitute bullying, harassment or sexual harassment.
    - Take immediate action if bullying and/or harassment/ sexual harassment is suspected or identified, whether or not a complaint has been made.
    - Be responsive and understanding, take all allegations of bullying, harassment and sexual harassment received either informally or formally, through this procedure seriously and deal with them promptly and sensitively with advice and support from HR representatives.
    - Act as role models, proactively addressing instances of bullying, harassment and sexual harassment.

11. Occupational Health Service will:

    - Work alongside HR and Health and Safety to minimise the risks to ill health through bullying, harassment or sexual harassment.
    - Provide relevant counselling as requested by HR in instances where support is needed.

12. Human Resources will:

    - Act confidentially and impartially in accordance with the Bullying, Harassment and Sexual Harassment Procedure or Disciplinary Procedure with respect to the alleged perpetrator/s.
    - Assist in resolving difficulties regarding any cases that arise. Intervention such as professional mediation or counselling can be provided at any stage in the procedure if the situation warrants it.
    - Ensure that information provided is accurately documented.

Procedure for dealing with bullying, harassment and sexual harassment and Process Map

13. The line between bullying, harassment and sexual harassment and other behaviour such as workplace banter or performance management may not always seem clear. It is important to remember that how behaviour is perceived and the actual impact it has on the recipient is a key consideration.

14. It should be noted that whether allegations are made informally or formally, prompt action will be taken. This procedure and process map provides steps to reassure staff and offer multiple avenues for raising concerns and types of resolutions.

Dealing with a Single Incident and/or initial concerns

15. Discussing an issue can make a significant difference in helping to identify the problem and thinking through how to resolve them. This may include, taking the person/s aside for a discussion or writing an email to explain how their actions made you feel. Opening up an informal discussion can often help to rebuild relationships allowing the opportunity to reflect and adjust behaviours that may produce an amicable resolution.

16. Silence permits bullying, harassment and sexual harassment to continue. If the complainant is unable to reach a resolution, they may wish to talk to a colleague, friend, relative or a Trade Union Representative in order to obtain another perspective on the situation, particularly if the unwanted behaviour continues. This also ensures that a third party knows about the unacceptable behaviour.

17. The complainant is encouraged to write down each incident including the date, time, emotions, who was around and what was said and done. This is important because if the matter is escalated specific examples may be required. They can speak to bystanders if appropriate, try to avoid being alone with the alleged perpetrator and utilise the services of the Employee Assistance Programme who can offer advice and support if necessary.

Stage 1 Informal resolution

18. Any employee who wishes to make a complaint of bullying, harassment or sexual harassment will first be encouraged to discuss the matter informally with their line manager if they feel able to do so. If they do not feel able to approach their line manager, then they can instead discuss the matter with another manager or senior officer.

19. Informal resolution should always be viewed as a constructive and a credible response. It provides an opportunity for managers, employees and colleagues to discuss situations in a supportive, empathetic and solutions-focused way. Constructive dialogue promotes positive behaviours and effective relationships in the workplace, fostering an environment of mutual understanding and respect.

20. Solutions may include: an early resolution meeting, coaching or mediation. These would generally be undertaken by the manager, but in some situations a third party may be selected. These measures should help to identify a mutually acceptable outcome to remedy the situation being complained about. Informal resolution aims to support colleagues by securing lasting and constructive solutions in a non-adversarial way. Any agreement reached is both voluntary and confidential.

21. An initial outcome of informal resolution may be that the line manager determines that the matter should be dealt with formally.

22. If an employee believes that their concerns have not been resolved to their satisfaction through the informal approach, then they can progress to the formal procedure.

Stage 2 Formal resolution – Complaint Resolution Meeting

23. An employee must put their formal complaint in writing to the relevant manager setting out the nature of the complaint, what steps they have taken to resolve it and what resolution they seek. They should do so as soon as they can, usually within one month of the date the employee tried to resolve the matter informally or from the issue occurring where it is agreed with the manager that the matter should be raised formally. The employee's formal complaint should be submitted within 3 months of the last incident occurring unless there are exceptional reasons why this could not happen. A complaint form is available to assist employees with setting out their complaint.

24. On receipt of the formal complaint the manager (referred to as the Complaint Resolution Manager for the purposes of this procedure) will arrange to meet with the employee at a formal Complaint Resolution Meeting, usually within 5 working days of receipt of the complaint. The Complaint Resolution Manager will usually be accompanied by an HR representative.

25. The employee is entitled to be accompanied at the meeting by a colleague or trade union representative. The employee and their companion must make every effort to attend any meetings arranged to consider their complaint. If the employee's companion cannot attend on the date arranged the employee may offer a reasonable alternative date and time so long as it is no more than five working days after the original date.

26. During this meeting, the Complaint Resolution Manager has the right to ask the employee to respond to questions directly put to them, although the employee may on request confer with their representative at any time during the meeting.

27. The purpose of the formal Complaint Resolution Meeting is to:

- enable the employee to outline their complaint in more detail (they may bring to the meeting any documentation by way of example such as the notes they have kept of incidents) and can suggest colleagues who may be able to substantiate their complaint or concern.
- enable the Complaint Resolution Manager to ask relevant questions to establish and clarify the circumstances of the complaint in order to establish all the relevant facts, dates, background and surrounding circumstances.
- consider the resolution they seek
- consider steps they have taken to resolve the matter informally
- explore what action can reasonably be taken to resolve the matter
- confirm that save for exceptional circumstances any employee/s complained about will be provided with an agreed summary of the complaint made against them and will be given the opportunity to respond. The Complaint Resolution Manager will determine how this will take place (e.g. by interview with the Complaint Resolution Manager, making a written statement in response or in some circumstances attendance at a reconvened complaint resolution meeting)
- discuss the level of confidentiality that can be maintained and who else will need to be involved if at all, in order to resolve the complaint.
- seek solutions rather than apportion blame in a constructive, honest and collaborative fashion.
- draw up relevant parts of the decision and/or action plan to be shared with other parties to the complaint.
- discuss where the behaviour complained of constitutes to serious disciplinary allegations, as prompt action may be needed under the Disciplinary Procedure.

28. Once the Complaint Resolution Manager has a clear understanding about the complaint, there could be 4 possible outcomes at this stage:

I. The Complaint Resolution Manager may be able to suggest a solution/action plan at the meeting.

II. The Complaint Resolution Manager may decide to adjourn (usually reconvening within ten working days) in order to consider the matter further, check facts, dates, documentation, etc - and may wish to interview other employees in connection with the complaint. Any employee interviewed may be accompanied by a trade union representative or colleague but must answer questions asked of them. If the complainant is being bullied or harassed because of their sex, disability, gender identity, race, religion or sexual orientation, others may be asked if they are also being bullied as it may be a collective issue.

III. The Complaint Resolution Manager may decide that due to the complexity of the matter a formal investigation is warranted which they will usually undertake in person or might allocate to another manager within the department.

- In exceptional circumstances an independent manager outside the service may be more appropriate due to the nature of the complaint and in such cases the Director of HR or their representative will be consulted and will determine if this is an appropriate route.
- However, investigations must be prioritised by all involved, be proportionate and balanced. The investigation should involve only those who are necessary in order to make an informed decision and should be concluded without delay, usually within 3 weeks of the complaint resolution meeting.

IV. The Complaint Resolution Manager decides that after careful consideration there is no case to answer.

29. The Complaint Resolution Manager will also consider any temporary changes to the workplace or to working arrangements that might be appropriate whilst the complaint is being dealt with. This will be done in conjunction with the line manager and the complainant.

Formal resolution – Outcome letter

30. The Complaint Resolution Manager will confirm their decision in writing which will usually include:

- a summary of the issues and the employee's proposed solution and any immediate action/s agreed at the meeting
- the decision and any action plan and review period/ date and the right to appeal against the decision
- Where appropriate, the employee complained about will be informed of the outcome where it relates to them.

Stage 3 Appeal

31. If the employee considers the complaint has not been satisfactorily resolved, they have the right to submit an appeal in writing to their Chief Officer within 10 working days of receipt of the outcome of the Complaint Resolution Meeting. The appeal will outline which elements of the decision and/or action plan are not agreed and the resolution sought. Any further details in support of the appeal must be provided within 10 working days of receipt of the outcome of the Complaints Resolution Meeting. The written appeal will be shared with the Complaints Resolution Manager.

32. The appeal will normally be heard by a more senior manager than the person who considered the initial complaint. Appeals will normally be arranged within 10 working days from receipt of the appeal. The Appeal Officer will be impartial and not previously involved in the case detail, therefore this may be an Independent Level One officer who will be supported by an HR representative. The employee has the right to be accompanied by a colleague or a trade union representative. The format of the appeal will be to consider the grounds put forward by the employee and resolution sought rather than a complete review of all of the evidence gathered at the Stage 2 Complaints Resolution Meeting. The employee may request that their appeal is a review of the paperwork only, without the attendance of either party at a hearing.

33. At the Stage 3 Appeal Meeting:

    - the employee will outline their appeal detailing why they remain dissatisfied
    - the Appeal Officer may ask questions of them and discuss possible alternative solutions as appropriate
    - the Complaints Resolution Manager will comment on the grounds of appeal and the resolution being sought
    - the Appeal Officer may ask questions of the Complaints Resolution Manager about the steps taken to address the complaint
    - the Appeal Officer may outline their decision at the meeting or may decide to give the matter further consideration in which case the employee will be notified in writing of the decision within 5 working days of the meeting.

Other matters

Record keeping

34. Written records will be treated as confidential and stored in accordance with the Data Protection Act 2018. A copy of the outcome letter will be placed on the file of the person who raised the complaint whether it is substantiated or not. A copy will only be placed on the file of the employee/s complained about if the concern is substantiated and will remain on file for 12 months.

Overlapping bullying, harassment and sexual harassment with other formal procedures

35. In circumstances where a concern or complaint raised results in a disciplinary investigation being commissioned, this will be the resolution to the complaint and the employee may not further the complaint under the Bullying, Harassment and Sexual Harassment Procedure, unless there remain issues which were not investigated under the Grievance or Disciplinary Procedure.

36. Where a complaint is raised during the course of a Disciplinary, Sickness, Capability or other formal Procedure, in some circumstances it may be appropriate to suspend the formal action in order to deal with the complaint. In other circumstances where they are related it may be appropriate to deal with the matters concurrently as one investigation but with clear outcomes under each procedure. The Director of Human Resources will determine the appropriate way forward in these circumstances. Similarly, where counter-complaints are raised these will be dealt with together.

Matters out of scope

37. At any stage of a complaint of bullying, harassment or sexual harassment, this may result in a disciplinary investigation being commissioned alongside other actions put in place to address the complaint. Whilst the complainant may progress their complaint in relation to any other proposed actions put in place, the decisions to undertake a disciplinary investigation is a management decision and cannot be appealed against under this procedure.

38. Where an employee who raises a complaint does not wish their identity to be revealed or does not want those complained about to be informed, there may be little that can be done to address the complaint and in such circumstances the employee will be advised accordingly.

39. Issues relating to service delivery or whistleblowing are not matters that will be addressed under this procedure.

40. Issues raised under the Grievance Procedure cannot be subsequently raised under the Bullying, Harassment and Sexual Harassment Procedure.

Working environment during the course of a complaint

41. Employees are expected to work together, professionally during the course of the investigation. In exceptional circumstances it may be considered appropriate to temporarily relocate or re-assign employees. The manager at the informal stages or the complaint resolution manager at the formal stages will keep the complainant updated of progress on a regular basis. The employee will be encouraged to seek additional support such as through a colleague, the Employee Assistance programme, staff networks or their trade union.

Bullying, Harassment and Sexual Harassment Process Map

Stage One: Informal resolution

- If an employee feels that they are being subjected to bullying, harassment or sexual harassment, they will be encouraged to attempt to resolve the matter informally in the first instance if they feel able to do so confidently.

Stage Two: Formal Resolution Meeting and Outcome

- If the complainant is unable to reach a resolution at the informal stage, they may put their complaint in writing within one month of trying to resolve the complaint informally.
- This should be submitted to their manager or where appropriate their manager's manager.
- The Complaint Resolution Manager will arrange a meeting withing 5 working days of receipt of the complaint.
- Separate meetings may be convened with both/all parties as necessary, until the investigation has been conducted and conclusions drawn.
- A decision may be made and there are 4 possible outcomes at this stage:

  1. Resolution
  2. Further investigation
  3. Formal investigation
  4. No case to answer

- The Complaint Resolution Manager will confirm their decision in writing.
- If any party believes they have not been treated fairly or their complaint resolved satisfactorily, they can raise their concerns via the Appeal process.

Stage Three: Appeal

- A level one manager will arrange an appeal within 10 working days of the appeal notice being received.
- On conclusion of the appeal meeting, the employee will be informed of the decision in writing within 5 working days.

List of appendices

- Appendix 1 – Legal Position, Definitions and Examples of Unacceptable Behaviour
- Appendix 2 - Glossary of terms including examples of discriminatory behaviours
- Appendix 3 – Complaints form

Links / Other resources

- Code of Conduct
- Equal Opportunity Policy
- Managing People Policy
- Social Media Policy
- ACAS – Discrimination, bullying and harassment
- ACAS- Sexual Harassment
- Equality Act 2010
- Grievance Procedure
- Disciplinary Procedure
- Whistleblowing Policy
- Health and Safety Executive – Employers responsibility
- Corporate Health and Safety and Wellbeing Policy
- Employee Assistance Programme
- Human Resources – Business Partners
- City of London recognised Unions

City of London Corporation Delegated Authority Report

Committee(s): Corporate Services Committee	**Dated:** 9 September 2026
Subject: Probation Policy	**Public report:** For Decision
This Proposal: • Promotes best practice in line with Supporting a Thriving Community aims including – having a strong legal and regulatory framework and access to global markets. • Is in line with other London Councils' approach. • Reduces risk of unfair dismissal claims under Employment Rights Act 2025.	Delivers Corporate Plan 2024-29 outcomes.
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:	Cliff Morton - Chief People Officer.
Report author:	Maggie Heneghan – Senior Policy Officer and Industrial Relations.

Summary

The Employment Rights Act 2025 will reduce the qualifying period for protection against unfair dismissal from two years to six months with effect from January 2027. In preparation for this change, and in line with approaches adopted by other London local authorities, the City Corporation has reviewed its probation arrangements.

The proposed Probation Policy (see Appendix 1) reduces the standard probation period from six months to four months and the maximum extension period from three months to four weeks.

It also introduces a more structured framework for managing probation, including enhanced support for employees, clearer review requirements, emphasis on evidencing meetings, greater emphasis on reasonable adjustments and a formal appeal process.

The policy has been developed following consultation with relevant stakeholders, including recognised Trade Unions, Senior Employee Representatives, HR colleagues and the Equality, Equity, Diversity and Inclusion team.

Recommendation(s)

It is recommended that Members:

- Approve an updated Probation Policy that includes the following revisions:
    - A reduction of the standard probation period from six months to four months;
    - A reduction of the maximum extension period from three months to four weeks;
    - A more structured framework for managing probation, including enhanced support for employees, clearer review requirements, emphasis on evidencing meetings, greater emphasis on reasonable adjustments and a formal appeal process (as detailed in paragraph 11);

Main Report

Background

1. The Employment Rights Act 2025 will reduce the qualifying period for protection against unfair dismissal from two years to six months.[1] The change is effective from January 2027.

Current Position

Legislative driver

2. In line with approaches adopted by other London Councils (see Appendix 3), the City Corporation has reviewed its probation arrangements in preparation for the implementation of the Employment Rights Act 2025.
3. The reduction in the unfair dismissal qualifying period increases the importance of ensuring that concerns relating to performance, conduct or attendance are identified and addressed during the probation period.

Probation change

4. Please see the table below reflecting both the previous and updated probation periods.

Previous probation period	Updated probation period
6 months	4 months
3-month extension	4-week extension in exceptional circumstances

5. These changes are being proposed to ensure that probation decisions can be concluded effectively before employees obtain protection from unfair dismissal protections.
6. The revised arrangements also strengthen support for employees through clearer objectives, regular reviews, reasonable adjustments and a more structured probation process.

[1] Employment Rights Act 2025.

Why are we suggesting change now?

7. In preparation for the implementation of the Employment Rights Act 2025, and following benchmarking against other London local authorities, the City Corporation has reviewed its probation arrangements.
8. We are keen to implement as soon as possible and will support this change through a training package launched in the Autumn.

Consultation summary

9. The policy was developed in consultation with:

- HR.
- Employee Relations.
- EEDI.
- City of London Police.
- City Bridge Foundation
- Trade Unions GMB and Union.
- Senior Employee Representatives.

10. Feedback received through consultation has informed the final draft policy. Consultation included an HR Working Group session, an Equality Impact Assessment, engagement with recognised Trade Unions and engagement with Senior Employee Representatives. Capacity challenges with Trade Union colleagues as a result of Pay and A25 negotiations has meant consultation has taken longer than originally planned.

Key policy changes.

11. Key changes contained within the revised Probation Policy include:

- A reduction in the standard probation period from six months to four months.
- A reduction in the maximum probation extension period from three months to four weeks, with extensions limited to exceptional circumstances.

- Greater emphasis on reasonable adjustments, including consideration of adjustments when assessing performance.
- A more structured probation framework, including scheduled one-to-one meetings, probation review meetings and defined timelines.
- Enhanced documentation requirements, including probation review forms, improvement plans and a probation procedure map.
- A right to be accompanied at formal probation meetings, and clarification that it is Senior Employee Representatives for employees in Grades H – J.
- A formal appeal process, with defined grounds of appeal and time limits for submission.
- Increased managerial accountability and HR oversight, including escalation where probation reviews are not completed.
- Supporting resources for managers and employees, including a Manager Guide, Employee Guide and Quick Guide

It is a more structured, supportive and procedurally robust process than the previous policy.

12. Options

1. Two options have been provided:

   a. Adopt the new policy.

      This option supports organisational readiness for the Employment Rights Act 2025 and provides a clearer framework for managing probation periods.

   b. Maintain the current policy.

      While we could opt to “do nothing” this would increase the risks described above.

13. Corporate & Strategic Implications

Strategic implications – this proposal supports the People Strategy by promoting the effective management of performance during probation, encouraging early intervention where concerns arise and ensuring decisions are evidence-based. The revised policy has been developed through consultation with HR, EEDI, City of London Police, City Bridge Foundation, recognised Trade Unions and Senior Employee Representatives.

Legal implications – The revised probation period applies to new starters only and will be reflected in new contracts of employment. Existing employees are unaffected

by the change. The policy has been subject to consultation with recognised Trade Unions and Senior Employee Representatives.

Risk implications – Failure to adopt the revised policy would increase the risks associated with the reduced qualifying period for unfair dismissal. This may mean that, in a case where an employee fails to pass their probation period, the organisation could be open to legal dispute risks. The proposed approach is in line with other London Councils.

Equalities implications – An Equality Impact Assessment Form has been completed and will be kept updated. The EEDI team and trade unions have provided feedback which we are implementing.

14. Conclusion

It is proposed that the revised Probation Policy be adopted. The revised policy sets out the new probation arrangements to be introduced for new starters, provides clearer guidance for managers and employees, strengthens procedural safeguards and supports the organisation's preparations for the implementation of the Employment Rights Act 2025.

Appendices

- Appendix 1 – Proposed Probation Policy
- Appendix 2 – Current Probation Procedure
- Appendix 3 – London Councils' Probation Policy

Cliff Morton

Interim Chief People Officer

E: cliff.morton@cityoflondon.gov.uk

Maggie Heneghan

HR Senior Policy Officer and Industrial Relations

E: maggie.heneghan@cityoflondon.gov.uk

Title	Page count
Probation Policy	Pages 4-16
Probation Appendices	Pages 17-27

Probation Policy

Date of Publication	September 2026
Policy Version	**2026-Probation Policy-07**
Owned by	HR Policy Team, People and HR
Last Reviewed	10 August 2026
Next Review	24 January 2027

Table of Contents

Introduction **3**

Scope **3**

Who's involved? **4**

Reasonable Adjustments During Probation **5**

Learning and Development **6**

Probation Period **6**

Probation Outcomes **10**

Confirming Employment 11

Extension 11

Failure to meet required standard 11

Formal Meeting **11**

Extension **13**

Dismissal Notice Period **14**

Probation Appeal **14**

Confidentiality **15**

Toolkit **15**

Links / Other resources **15**

Appendix 1: Probation Review Form **18**

Meeting log: 18

Employee Information: 18

Part 1: Initial Meeting 18

Objectives 18

Part 2: First probation review (2 months) 19

Improvement Plan (if applicable) 21

Part 3: Final probation review (4 months) 21

Appendix 2: Appeal Form **24**

Appendix 3: Right to be Accompanied **27**

Introduction

1. All appointments to the City Corporation are subject to a probation period, which provides a structured opportunity for the employee and the organisation to confirm suitability for the role through the assessment of performance, conduct and behaviour in line with the Code of Conduct.

2. This policy sets out a clear framework for managing and supporting new employees during probation. The policy also describes the procedure to be followed where standards are not met, including the agreement of necessary improvements and associated timescales.

3. The probation procedure is summarised in the Probation Procedure Map (Appendix 3) and should be read alongside the Manager and Employee Probation Guides (see the **Toolkit** heading below).

4. Employees have the right to be accompanied at formal probation meetings as follows:

    - Employees may be accompanied by a representative of the recognised Trade Unions, GMB or Unite. Please note that Trade Unions may apply qualifying periods before representation is available and employees may wish to take this into account when considering membership.

    - Employees in Grades H–J may also be accompanied by a Senior Employee Representative.

5. More information on representation is available at Unions & Senior Employee Representatives and Appendix 4 on the Right to be Accompanied below.

6. The City Corporation recognises that starting a new role can be challenging and is committed to setting achievable objectives and providing appropriate support, training and reasonable adjustments (where required) to help employees succeed.

Scope

7. This policy applies to employees new to the organisation, or those who have transferred to a new role or been promoted internally, whilst still in their probation period.

8. It does not apply to the below as they are subject to separate procedures:

    - Teaching Staff in the City of London Schools.

    - Police Officers.

- Agency workers, consultants, contractors or other third-party workers, who remain subject to the terms and procedures of their employment contract.

9. It does not apply to employees who have transferred or been promoted internally and who are no longer in their probation period, at the time of the new appointment.

Who's involved?

10. The following individuals may be involved in the probation review meetings.[1] All parties must remain impartial and objectively assess the evidence presented:

Title	Procedure	Responsibilities
Line Manager	Informal	• Support the employee in passing probation. • Communicate expected standards to employee during their first week. • Clarify how performance will be monitored and the timescales. • Discuss training, development and associated timescales. • Confirm employee has completed their mandatory training. • Address concerns at the earliest opportunity. • Host probation review meetings (see the Manager Guide in the **Toolkit** heading below). • Ensure probation decisions are evidence-based and supported by documented discussions, objectives, feedback and any support provided to the employee.

[1] Management level required must be in line with the Managing People Policy, for employees up to and including Grade H i.e., Levels 1,2,3,4 for carrying out probation review meetings. Levels 1 and 2 for formal probation meetings, plus a HR representative. Levels 1 and 2 (and accompanied by a HR representative) for probation appeals.
For employees Grade I & J, Levels 1 and 2 for probation review meetings. Level 1 for formal probation meeting and appeal, plus Executive Director or Chief People Officer.

		• If the employee fails to meet the requisite standard, follow the formal meeting procedure (see the heading **Failure to Pass Probation Period – Formal Meeting** below for more information).
Human Resources' representative	Formal	• Part of formal meeting. • Provides procedural advice. • Supports the fair and consistent application of the policy.
Decision-maker	Formal	• Makes decision as to whether an employee has passed their probation period based on the evidence provided.
Appeal Manager	Formal (appeal)	• Reviews and decides outcome based on the evidence provided.

Reasonable Adjustments During Probation

11. The organisation is committed to equality of opportunity and recognises its duty under the Equality Act 2010 to make reasonable adjustments for employees with a disability. It is both in the employee's and the wider organisation's interest if the reasonable adjustments are implemented as soon as possible, to make it easier for employees to perform in their role.

12. Reasonable adjustments can be requested at interview, appointment or during the probation period. The Line Manager must take reasonable steps to implement agreed reasonable adjustments as soon as practicable and discuss with the employee what is required to facilitate their performance. The Line Manager must contact Occupational Health where necessary (see their intranet page at Welcome to the Occupational Health Service).

13. Adjustments may relate to duties, hours of work, performance targets, training, supervision arrangements or the probation process itself.

14. The Line Manager must continue to liaise with the employee on what is best suited to their particular needs, in line with what is reasonable. If the employee believes there are other reasonable adjustments which may help their performance, the employee should raise this with the Line Manager during their regular one-to-ones.

15. Any agreed reasonable adjustments will be considered when assessing the employee's performance and suitability for the role.

16. Please see the City Corporation's Reasonable Adjustments Passport Guide Reasonable Adjustment Passport Form and Reasonable Adjustment Checklist for more information on reasonable adjustments.

Learning and Development

17. All mandatory training is required to be completed within the employee's probation period. This can be found via SAP at SuccessFactors: Home under the 'View My Learning' tab.

18. If an employee is finding it difficult to complete the training after the first three months at the City Corporation, they should raise this concern with their Line Manager. Line Managers should also be alert and encourage employees to do their training within the first three months. If training is not completed within the three-month timeframe, Line Managers should consider whether any reasonable adjustments are necessary.

19. Delays to training will not in itself be a reason for failure to meet the required standard, but will be considered alongside general performance.

20. If there is outstanding mandatory training that has not been completed with the probation period, the Line Manager will receive a notification.

21. Additionally, it is expected that an employee will undertake any Learning and Development as required for their role. Please contact the Learning and Organisational Development team via email at trainingbookings@cityoflondon.gov.uk or via their intranet page at L&OD homepage for more information on the training and development opportunities available for new starters.

Probation Period

22. The standard probation period is four months, but this may differ depending on the employee's contract of employment. During the probation period, the employee's performance in the new role will be assessed.

23. Line Managers should meet with a new employee on a regular basis to ensure that objectives are clear and to assist the employee with settling into their role. Please see the Manager Guide (see the **Toolkit** heading below) for more guidance.

24. Managers should ensure that concerns are addressed at the earliest opportunity. Failure to identify and communicate concerns during probation may undermine the fairness of any subsequent decision and limit the organisation's ability to assess suitability for the role.

25. The timetable below sets out the minimum expectations for managing and reviewing an employee during their probation period (see the Probation Procedure Map at Appendix 3 below for a visual):

Timeline	Status	Description
Week 1	Welcome meeting.	The Line Manager must: • Organise an introductory and welcome meeting. • Clearly explain the expectations of the role in line with the role profile and potentially any seasonal changes (i.e., are there weather changes which may affect the work/ are there busy periods that the employee should be prepared for and informed of). • Implement any agreed reasonable adjustments. • The Line Manager should liaise with the employee to help ensure that implemented reasonable adjustments are catered to the individual's needs. • Evidence meeting in writing and send to the employee. • Onboard and induct the employee in line with our Onboarding and Induction Policy. The employee may, and is encouraged to, raise questions they have about the role/ team/ department/ leave/ pay or otherwise, and request reasonable adjustments in line with the Reasonable Adjustments section above.
Month 1	Routine one-to-one.	The Line Manager should: • Organise weekly one-to-one meetings to ensure that the employee is settling in, understands assigned tasks and deadlines that they have been assigned, and is clear on the required standard of performance. • Input the meetings in Outlook calendar.

		• Raise and address any issues or concerns as they arise. • Review the effectiveness of reasonable adjustments and adjust if required. • Evidence the meeting in writing and send to the employee. The employee may, and is encouraged to, raise questions they have about the role/ team/ department/ leave/ pay or otherwise, and request reasonable adjustments in line with the Reasonable Adjustments section above.
Month 2 **(before the beginning of Month 3)**	Probation review meeting 1.	The Line Manager must: • Organise a formal probation meeting and document it in writing using the Probation Review Form (Appendix 1). • Discuss strengths and any areas for improvement. • Agree an improvement plan with the employee if there are performance concerns. This will not apply in the majority of cases. See the Probation Review Form (Appendix 1) for more information. If the form is not sent to HR within 10 days of Probation Review Meeting 1, the Senior Manager and HR will be made aware. • Notify HR if there are any concerns or if an improvement plan is agreed. • Evidence meeting in writing and send to the employee. The employee may, and is encouraged to, raise questions they have about the role/ team/ department/ leave/ pay or otherwise, and request reasonable adjustments in line with the Reasonable Adjustments section above.

		Since this is a formal meeting, the employee has the right to be accompanied by a Trade Union representative, Senior Employee Representative or a companion of their choice.
Start of Month 3	Routine one-to-one	The Line Manager should: • Organise one-to-one meetings to ensure that the employee is settling in, understands assigned tasks and deadlines that they have been assigned, and is clear on the required standard of performance. • Input the meetings in Outlook calendar. • Raise and address any issues or concerns as they arise. • Review the effectiveness of reasonable adjustments and adjust if required. • Confirm if mandatory training has been completed. • Evidence meeting in writing and send to the employee. The employee may, and is encouraged to, raise questions they have about the role/ team/ department/ leave/ pay or otherwise, and request reasonable adjustments in line with the Reasonable Adjustments section above.
Month 3 **(at least 10 working days before the beginning of Month 4).**	Probation review meeting 2.	In most cases, the employee will successfully pass probation. The Line Manager must: • Organise a formal probation meeting with the employee. • Document it in writing using the Probation Review Form and send to the employee and HR. • In a small minority of cases where the required standard is not met, follow the

		process set out under the heading **Failure to Pass Probation Period – Formal Meeting** as the final probation review must take the format of a formal meeting in line with the Managing People Policy. The employee may, and is encouraged to, raise questions they have about the role/ team/ department/ leave/ pay or otherwise, and request reasonable adjustments in line with the Reasonable Adjustments section above.

26. For example, if an employee joined on 1 February, the Line Manager meets with the employee on 1 February. The Line Manager then organises weekly one-to-one meetings to take place throughout the month of February. On 15 March, the Line Manager should organise the first probation review meeting. Throughout the month of March and into April, the Line Manager should organise one-to-one meetings to check-in on the employee. By 15 April (or earlier), the Line Manager organises the final probation review meeting.

27. It is essential that the final probation meeting takes place at least 10 working days before the beginning of month four of probation (i.e., 3 months and 2 weeks into the employee's probation period), ensuring sufficient time for any follow-up action. Where there are extenuating circumstances delaying the final review within the four-month window, Line Managers should contact HR immediately via the HR Service Desk so that appropriate action can be taken within the permitted timeframe.

28. It is the Line Manager's responsibility to conduct the probationary review meetings and confirm if the employee has passed the probation period. If an employee reaches the end of the four-month probation period without a formal decision to terminate employment, the Line Manager should contact HR immediately to determine appropriate next steps.

29. During the probation period, the employee will not be subject to the Capability, Disciplinary or Sickness Absence procedures. The Sickness Absence reporting procedures should still be followed during the probation period and any sick days accrued during probation will be carried forward.

Probation Outcomes

Confirming Employment

30. If the manager is satisfied the employee has achieved the necessary standards and demonstrated suitability for the role, the Line Manager should upload the Probation Review Form (Appendix 1 below). Please ensure that the meeting is evidenced in writing and sent to the employee. Once the Probation Review Form is received by HR, employment will be confirmed. Further guidance on the Manager's role can be found in the Manager Guide.

31. Following successful completion of the probation period, further performance review will be through the Performance Development Framework & Appraisal Procedure.

Extension

32. As above, the probation period may be extended in exceptional circumstances up to a period of four weeks. The formal meeting must be held to assess rationale for extension (see below for more information).

Failure to meet required standard

33. A failure to meet the required standard should not come as a surprise to the employee. Line Managers should ensure that they have flagged concerns to the employee at the two-month and/or four-month review meeting. It should be evidence-based and the Line Manager should ensure they have documented the review meetings to support their decision.

34. Please note that failure to meet required standard only applies in a minority of cases.

Formal Meeting

35. If the employee fails to meet the standards for performance, conduct or attendance - or if an extension is being considered - and the Line Manager does not consider that the required improvements have been achieved, the final probation review will take the format of a formal meeting. The employee has the right to be accompanied at formal meetings by a work colleague, Trade Union Representative (GMB or Unite) or a Senior Employee Representative.

36. The formal meeting should be held **at least 10 working days** prior to the end of the final probation review. It may take the format of a Teams' meeting if there would otherwise be a failure to attend. The Line Manager should organise the formal meeting and organise a note-taker. The note-taker is subject to the same confidentiality requirements as the other parties.

37. The Line Manager must contact HR to notify them and to allow them to attend the formal meeting **with 10 working days' notice**. Please see the Manager Guide and Employee Guide for a timeline of the formal meeting procedure (see the **Toolkit** heading below).

38. Those present at the formal meeting will include:

- Line Manager. The Line Manager should also take notes or source a note taker for the meeting and ensure that it is evidenced in writing.
- Employee concerned.
- Employee's representative which can be a work colleague, Trade Union representative (GMB or Unite) or Senior Employee representative (if the employee decides to avail of this option).
- HR representative and procedural advisor.
- The Decision-maker and chair. This will be an employee of the requisite level of authority and seniority in line with the Managing People Policy.[2]

39. The employee should be given **10 working days'** notice of the meeting.

40. The employee has the right to be accompanied at the formal meeting by a companion, Trade Union representative or Senior Representative. If the employee's chosen representative or companion is unable to attend, the employee should propose an alternative date within 5 working days of the original meeting date. In exceptional circumstances, where the employee can demonstrate that they have made reasonable efforts to secure representation, a further postponement may be agreed.

---

[2] For employees up to and including Grade H, Level 1 (plus an HR representative) and Level 2 (plus an HR representative) may conduct a formal probation meeting and probationary appeals.
For employees Grade I & J, Level 1 (plus an Executive Director or the Chief Officer/their delegated officer) may conduct a formal probation meeting and probationary appeals.
Level 1 includes Town Clerk & Chief Executive, Deputy Town Clerk, Chief Operating Officer, Chamberlain & Chief Financial Officer, Comptroller & City Solicitor, Remembrancer, City Surveyor, Executive Director Innovation & Growth, Executive Director Environment, Executive Director Community & Children's Services, Commissioner for City of London Police, Head of City of London School, Head of City of London School for Girls, Head of City of London Freemen's School, Chief Executive Officer of the Barbican Centre, Principal of the Guildhall School of Music & Drama, Managing Director of Bridge House Estates & Chief Charities Officer. In addition, the Executive Director and Chief Officer shall be treated as within Level 1 for this policy.
Level 2 includes Any other Senior Managers at Senior Manager Grade (SMG) Chief Officers, Heads of Service or equivalent and Senior Managers at grade I and J with responsibility for staff and associated budgets.

41. The meeting will take the following format:

- The Line Manager will present the case, detailing the reasons why the employee has not successfully completed the probation period and the measures that have been taken to facilitate improvement.
- The employee will have the opportunity to state their case.
- The Decision-maker will make a decision based on the information/evidence provided. The decision may be given at the meeting, or if the decision-maker adjourns to consider matters, as soon as practicable. The decision must be confirmed in writing **within 5 working days** of the formal meeting.
- The role of the HR representative is to provide procedural advice and guidance, support the fair and consistent application of this policy and support a professional, respectful and constructive process for all participants.

42. All participants in formal probation meetings are expected to conduct themselves in a professional and respectful manner, in line with the City Corporation's values and Code of Conduct.

43. The outcome of the meeting may be to:

- Confirm employment.
- Extend employment.
- Dismiss employee.

Extension

44. In exceptional cases, the probation period may be extended for a maximum period of four weeks. Any extensions must be agreed with HR prior to being communicated to the employee via the HR Service Desk.

45. Examples may include:

- Prolonged sickness absence.
- Delay implementing reasonable adjustments.
- Insufficient opportunity to assess performance.
- Significant operational disruption.

- A need to assess sustained improvement following an improvement plan.

46. The Line Manager will notify the employee in writing of the decision to extend at Probation Review meeting 2 (before the end of month 4).

Dismissal Notice Period

47. In most cases, employees have a one-week notice period. Some posts may require a longer notice period and this will be set out in the employee's contract of employment.

48. Employment may sometimes end immediately, with the employee receiving any outstanding payments due subject to annual leave entitlements already taken. This means the employee will receive a payment equivalent to the pay they would have received had they worked their notice period.

49. Conduct concerns arising during probation may be managed through the probation procedure. Allegations of serious misconduct or gross misconduct may instead be managed under the Disciplinary Procedure where appropriate.

Probation Appeal

50. Employees have the right to appeal a decision to dismiss.

51. The request should be made to Employee Relations at EmployeeRelationsAppeals@corpoflondon.onmicrosoft.com within five working days of the Decision-maker's written decision, explaining the reasons for requesting an appeal. The appeal will be managed by an Appeal Manager and will have the requisite level of authority and seniority in line with the Managing People Policy (see footnote 1).

52. The Decision-maker will be required to prepare a written response to the request to appeal within five working days, and this will be shared with the employee.

53. The employee may request a paper review only. In this case, the Appeal Manager will consider the paperwork and confirm their decision in writing within five working days.

54. In all other cases a meeting will be held within five working days from the date that the written response was shared with the employee.

55. The decision should be confirmed in writing within five working days of the formal appeal meeting. More details are available in the Manager Guide and Employee Guide (see the Toolkit at paragraph 48). The possible outcomes are dismissal or a reinstatement of employment.

56. Please see Appendix 2 below for the Appeals Form which sets out the permissible grounds for appeal.

Confidentiality

57. The details of the probation review meetings should be kept confidential, sharing on a 'need to know' basis only.

58. Probation records should be sent to the Human Resources (HR) team once the process is complete to be retained on the employee's record, in line with the Data Protection Policy.

Toolkit

59. Available in the Employee Handbook:

- Probation Procedure and Appendices including:
  - Probation Review Form.
  - Appeal Form.
  - Probation Procedure Map.
  - Right to be Accompanied.
- Manager Guide.
- Employee Guide.

Links / Other resources

- Code of Conduct.
- Data Protection Policy.
- Employee Assistance Programme.
- CityWell.
- Learning – SAP SuccessFactors.
- Welcome to the Occupational Health Service.
- Reasonable Adjustments Passport Guide.
- Reasonable Adjustment Passport Form.

- Reasonable Adjustment Checklist.
- HR Employee Relations.
- Capability.
- Disciplinary.
- Sickness Absence.
- Managing People Policy.
- Scheme of Delegations to Officers.

Probation Policy Appendices

Appendix 1 – Probation Review Form **Page 18**

Appendix 2 – Probation Appeal Form **Page 24**

Appendix 3 – Right to be Accompanied **Page 27**

Appendix 1: Probation Review Form

Meeting log:

	Date of the meeting	Completed	Documented in writing
Initial Meeting:		☐	☐
2-month review:		☐	☐
4-month review:		☐	☐

Employee Information:

Employee Name:	
Job Title:	
Grade:	
Department/ Section:	
Start Date:	
Line Manager Name:	

Part 1: Initial Meeting

This meeting should be completed within a week of the employee commencing their employment.

Objectives

The Line Manager should identify specific objectives for the employee in line with the role profile responsibilities. Please see the Manager Guide for a full example.

Role responsibility
Probation objective

How success will be measured
Manager support measures

Employee's Signature:		**Date:**	
Manager's Signature:		**Date:**	

Part 2: First probation review (2 months)

To be completed by the Line Manager in discussion with the employee.

	Improvement Required	Good	Very Good	Outstanding
Quality of work	☐	☐	☐	☐
Efficiency and timekeeping	☐	☐	☐	☐
Attendance	☐	☐	☐	☐
Teamwork	☐	☐	☐	☐
Work relationships (teamwork and interpersonal and communication skills)	☐	☐	☐	☐

Overall progress against objectives	☐	☐	☐	☐
Management/ Supervisory skills *(if applicable)*	☐	☐	☐	☐
Has mandatory training been completed? If not, please detail a plan and timeline for completion.				
If any areas of performance, conduct or attendance require improvement please provide more detail.				
Where concerns have been identified, please summarise how these will be addressed during the remaining period of probation.				
Summarise employee's performance and progress over the period.				
Summarise training and development undertaken. Have any further areas been identified?				
Have reasonable adjustments been requested or implemented? If yes, summarise.				

Employee's signature:		**Date:**	
Manager's signature:		**Date:**	

Improvement Plan (if applicable).

Notify HR if an improvement plan is agreed.

Improvement Plan:	**Details**
Concern:	
Expected improvement:	
Support:	
Timeline:	
Outcome if not met:	

Part 3: Final probation review (4 months)

To be completed by the Line Manager in discussion with the employee **before** the end of the four-month Probation Period.

	Improvement Required	**Good**	**Very Good**	**Outstanding**
Quality of work	☐	☐	☐	☐
Efficiency and timekeeping	☐	☐	☐	☐
Attendance	☐	☐	☐	☐
Teamwork	☐	☐	☐	☐
Work relationships (teamwork and interpersonal and	☐	☐	☐	☐

communication skills)				
Overall progress against objectives	☒	☐	☐	☐
Management/ Supervisory skills (if applicable)	☐	☐	☐	☐

Has mandatory training been completed? If not, please detail a plan and timeline for completion.
Summarise employee's performance and progress over the period.
Please document below if probation has been successfully completed & employment is confirmed.
If probation has not been confirmed, the Line Manager should provide reasons and summarise what action has been taken to address any difficulties which have arisen during the probationary period.
The employee may provide any comments about their performance, conduct or attendance during the probation period.

Have reasonable adjustments been requested or implemented? If yes, summarise.			
Employee's signature:		**Date:**	
Manager's signature:		**Date:**	

Notes:

The Line Manager should ensure this form has been completed in full by the three key dates: 1 week; 2 months; and 4 months.

If the probation period has been completed satisfactorily and the employee's appointment has been confirmed, the Line Manager must upload a copy of this form here within seven working days of the final review meeting being held.

If the employee's appointment is not confirmed, the Line Manager should contact HR for advice before meeting with the employee.

Appendix 2: Appeal Form

Introduction

This form should be used where you wish to appeal the outcome of a formal probation meeting.
Before completing this form, please ensure you have read the Probation Policy. This form should be submitted within five working days of receipt of the probation formal meeting decision.

An appeal is not an opportunity to raise new issues. An appeal cannot be used simply because the employee disagrees with the outcome; it must be based on specific grounds, such as:

- A procedural irregularity.
- New evidence becoming available.
- Concerns that relevant information was not considered.

Appeals will normally be limited to a review of the original decision unless significant new information is identified.

Repeated or unsupported appeals may be managed in accordance with the organisation's policy on vexatious or malicious grievances.

The right of appeal is available only to current employees. Where an individual leaves the City Corporation's employment before submitting or concluding an appeal, the appeal procedure will not proceed. Where an individual has been dismissed, they will have five working days from the decision to dismiss to submit an appeal.

The information you provide will be used only for the purpose of managing your appeal in accordance with the Probation Policy.

It should be sent to Employee Relations at EmployeeRelationsAppeals@corpoflondon.onmicrosoft.com.

Section 1: Employee details

Name:	Contact number:
Job title:	Location:
Department:	Section/Service:
Name of employee's Line Manager:	Name of employee's Senior Line Manager:

Section 2: Probation appeal

Date of formal probation meeting:
Name of Decision-maker:
Date of decision stating employee failed their probation period:

Section 3: Grounds of Appeal

Please indicate the ground(s) on which you are appealing (tick all that apply) and provide details below. Please explain your grounds of appeal clearly and succinctly:

	Reason	Details
☐	Procedural unfairness (the probation procedure was not followed correctly)	
☐	The decision was unreasonable or not supported by evidence	
☐	Relevant evidence was overlooked or not considered	
☐	New evidence has arisen that could not reasonably have been provided earlier	
☐	Other (please specify).	

Section 4: New evidence (if applicable)

If you are submitting new evidence please describe the evidence and explain why it was not provided during the original probation meeting. Attach copies where relevant.

Section 5: Outcome sought

Please explain what outcome you believe would be reasonable at appeal stage. This may include confirmation, variation, or reconsideration of the original decision.

Do you wish your appeal to be considered as (please tick the appropriate box):

☐ Paper Review

☐ Appeal meeting

Section 6: Right to be accompanied

You have the right to be accompanied at an appeal hearing by a trade union representative or workplace colleague.

If you wish to be accompanied, please provide the details below:

Name of person accompanying you:
Job title or Trade Union representative:
Contact Number:

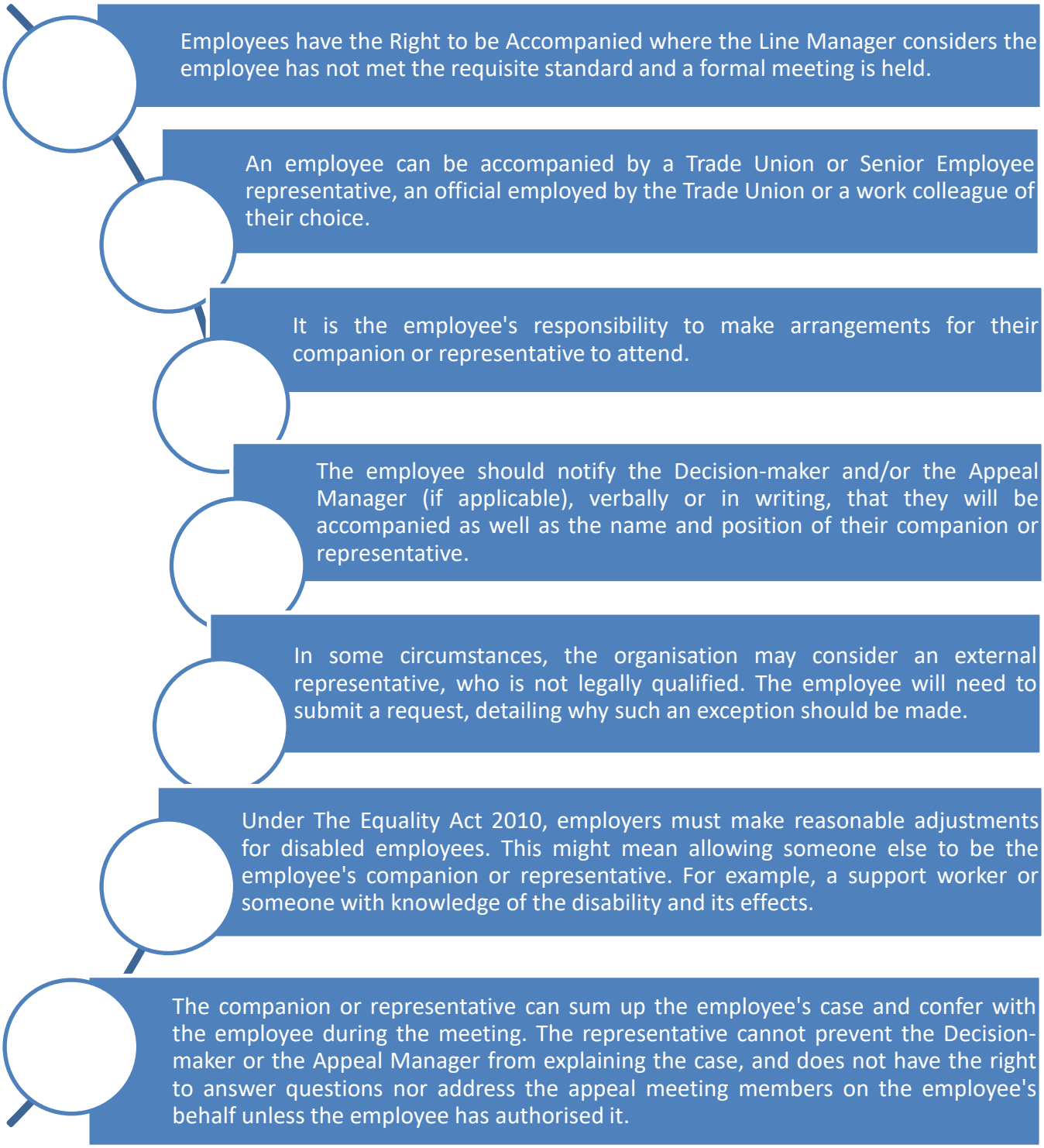
Section 7: Declaration, Signature and date

I confirm that this appeal relates to the probation decision identified above and does not introduce a new grievance.

I acknowledge that the Employee Relations' team may review the stated grounds of appeal to determine the appropriate scope of the appeal, for example whether it should be a review of the decision or involve further investigation

Employee Signature:
Date:

Appendix 3: Right to be Accompanied.



This page is intentionally left blank

Probation Procedure

Table of Contents

Introduction 1
Scope 2
Probationary Periods 2
Transfers within the City of London Corporation 3
Probation and Formal Procedures 3
Notice Periods 3
Required Standards of performance, conduct and attendance 4
Performance 4
Conduct 4
Attendance 4
Probation Review periods 5
Failure to meet required standards 5
Formal Stage 6
Review of Decision (Appeal) 6
List of Appendices 7
Links / Other Resources 7

Introduction

1. All appointments to the City of London Corporation are subject to a probationary period, during which time appropriate training and support will be provided and the ability of employees to perform their duties assessed.

2. Employees have the responsibility for demonstrating their suitability for the post and encouragement and assistance will be given to help them meet the standards of work required.

3. Managers are responsible for:

    - ensuring that the induction process is fully completed and are aware of required standards of performance, conduct and attendance (please see New Employee's Guide to Induction for full details);
    - ensuring that all new employees are properly monitored during their probationary period and that they raise any concerns at an early stage;
    - ensuring that the employee is informed at the start of their employment about what is expected of them during their probation;
    - taking action at the appropriate time(s).

Scope

4. The Probation Procedure applies to all City of London Corporation employees, except for Teachers in the three City of London Schools and Police Officers for whom separate procedures apply. It should be read in conjunction with the Managing People Policy in order to determine the appropriate level of management required for formal action.

5. This procedure does not apply to agency workers, consultants or other workers providing services to the City Corporation.

6. This procedure does not apply to existing employees who have transferred or been promoted into a different role and are not within their initial probationary period. See Transfers within the City of London Corporation section.

Probationary Periods

7. The standard probationary period is six months. However, employees on fixed term contracts of less than six months may have a shorter probationary period.

8. Probationary periods may be extended once, normally by up to a maximum of three months, if there are concerns relating to performance, conduct or attendance. Every effort will be made to help employees to settle into their new role and appropriate support will be provided as required. Employees will be advised of any issues as soon as possible and given an opportunity to discuss them and time to improve.

9. If areas of concern arise during the probationary period they will be dealt with promptly as and when they arise. This will ensure that the employee is aware of any

aspect(s) of performance / conduct which is unsatisfactory and can take action to prevent the problem escalating. However, all areas of concern will be taken into consideration when deciding whether to confirm the appointment.

Transfers within the City of London Corporation

10. Where internal transfers occur whilst employees are in their initial probation, the probationary period will be extended by up to a further three months.

11. Where employees are promoted to a new post (permanent, fixed term or a secondment) and are not within their initial probation period with the City Corporation, managers will set objectives as part of the appraisal process. If performance becomes a concern and informal management does not result in a sustained improvement, the capability procedure will apply.

Probation and Formal Procedures

12. During the probationary period employees will not be subject to the formal capability, disciplinary and sickness absence policies as set out in the Employee Handbook, however, the general principles of good practice will apply.

13. If employment is terminated either during or at the end of the probationary period employees will be notified of the reasons in writing, given the opportunity of a meeting to discuss these, and given the right to request an independent review of the decision if the outcome is dismissal.

Notice Periods

14. One week's notice is required during probationary periods by either side. The nature of some posts means that longer notice periods may be necessary. An employee's Statement of Terms and Conditions will give full details of their notice period. Employees may be required to stay away from their place of work during this notice period.

Required Standards of performance, conduct and attendance

15. Employees are expected to meet certain required standards in relation to job performance. These required standards are outlined below. Failure to meet the required standards during the probationary period could result in dismissal.

Performance

16. During the probationary period the general principles of best practice will apply. Following successful completion of the probationary period employees will then be subject to the appraisal process.

17. At the start of the probationary period the line manager will discuss with the employee the objectives, behavioural standards and planned development that will be used to formally assess performance.

18. During probationary periods, employees will be under continuous assessment and meetings with their line manager should take place periodically to discuss performance against the initial objectives and to identify areas for improvement.

Conduct

19. The City Corporation expects the conduct and integrity of employees to be of the highest standard. The Code of Conduct sets the standards of conduct required at work by all employees.

Attendance

20. Providing a regular, efficient service and maintaining punctual attendance from all employees is a contractual condition and is essential in providing quality services to the public and other users.

21. The City Corporation is committed to employee health and wellbeing and has established policies, procedures and benefits to support employees.

22. The procedure for reporting sickness absence detailed within the Sickness Absence Policy should be followed by all employees, including those in their probationary period. If attendance causes concern during probationary periods it will be addressed and, if found to be unacceptable, may be dealt with, as set out in this procedure.

Probation Review periods

23. The manager will meet with the employee to set objectives in their first week ensuring that they understand what is required of them. Progress against these objectives will be monitored during regular 1:1 meetings.

24. Two formally documented review meetings will take place within the probationary period. The first review meeting will be half way through the probationary period. During this meeting the manager will review and assess the employee's performance, capability and suitability for the role.

25. The last probationary period review meeting will take place approximately 1 month before the end of the probationary period, and employees will be provided with one weeks notice of the meeting. The purpose of this meeting is to discuss performance with a view to confirming employment, extending the probationary period or providing the intention to dismiss. This meeting will be repeated if the probationary period is extended, approximately one month before the end of the extended probation period. A clear record of all meetings will be made using the Probation Review Form and a copy should be provided to the employee and the HR representative. (Appendix 1 and 2).

Failure to meet required standards

26. If, during their probationary period, including any extensions, employees fail to meet and maintain the required standards of performance, conduct and/or attendance, they will be invited to a meeting by their manager to discuss concerns. As this is an informal meeting there is no right for employees to be accompanied.

27. Managers should seek advice from their HR representative before this meeting on appropriate action which may be undertaken.

28. During this meeting, standards will be discussed. If necessary a review period set during which improvements will be expected. Further learning needs may be identified to assist the employee to achieve these standards. The outcome of the meeting will be confirmed in writing.

29. If standards improve satisfactorily this shoud be noted on the Probation Extension Form. If standards do not improve sufficiently the formal stage of this process will be initiated as outlined below.

30. If, during the probationary period, it is suspected or established that the employee does not have the qualifications, experience or knowledge that they claimed to have at the time of recruitment, the matter will be discussed to establish the facts. If the

evidence suggests that the employee deliberately misrepresented his/her abilities, qualifications or experience in any way, their employment can be terminated.

Formal Stage

31. If the required standards of performance, conduct and/or attendance have not been met at the end of the review, the formal stage will be convened before the end of the probationary period ensuring the relevant notice periods are taken into account. If, however, the failure to meet standards is sufficiently serious then the formal stage may be convened at an earlier stage. At this point the line manager will refer the case to the second line manager.

32. The second line manager will arrange a meeting, giving 5 working days written notice, setting out the reasons for the meeting and offering the right to be accompanied by a trade union representative or work colleague (whose identity should be notified to line management in advance). This meeting may result in dismissal.

33. The meeting will be chaired by the second line manager to the employee, and will also be attended by a HR representative. The line manager will present the management case at the meeting and the employee will have the opportunity to respond.

34. The outcome of the meeting will be communicated in writing by the second line manager within 3 working days. Employees have the right to request an independent review of the decision (appeal) if the outcome of the formal meeting is dismissal.

35. If dismissal is the outcome, the notice period will be one week, unless the nature of the post means that longer notice periods are necessary. If a senior manager decides there is evidence of gross misconduct, dismissal may take effect without notice.

Review of Decision (Appeal)

36. Employees have the right to request a review of the decision to dismiss by a more senior manager. This request must be made in writing to the Director of Human Resources within 7 working days of receipt of the original decision. The request must explain the reasons for requesting a review.

37. The second line manager will be asked to prepare a written response to the employee's request to review the decision within 3 working days and this will be shared with the employee. The employee may request that the review of the decision is a review of the paperwork only. In these circumstances the reviewing manager will consider the paperwork and confirm their decision in writing within 3 working days of

considering the case. In all other cases a meeting as outlined below will be arranged. The manager reviewing the case will be supported by a HR representative.

38. The meeting will usually be heard within 10 working days of the request to review the decision being received. The meeting will be attended by the employee and the manager who took the decision to dismiss. The manager who undertook the formal probation review may also be present at the meeting. The employee has the right to be accompanied by a trade union representative or work colleague (whose identity should be notified to the chair of the meeting in advance).

39. It is not usual to have new information put forward for consideration. If new information is introduced the reviewing manager will determine in consultation with their HR representative why the information was not provided at the time the original decision was made and the extent to which the evidence is material. It will be a matter for the reviewing manager to decide whether the new information should be considered or not.

40. The reviewing manager may dismiss the request, in which case the original decision will stand; or substitute some other decision (e.g. extending the probation period for a short time).

41. The decision should be confirmed to the employee in writing within 5 working days.

List of Appendices

- Appendix 1 – Probation Review Form
- Appendix 2 – Probation Extension Form

Links / Other Resources

- Capability Procedure
- Code of Conduct
- Disciplinary Procedure
- Employee Assistance Programme
- Managing People Policy
- New Employees Guide to Induction
- Sickness Absence Management Policy

This page is intentionally left blank

Probation Procedure

Introduction

All new entrants within London Councils (including those with existing continuous service) must complete a minimum four-month probationary period assessment in their new role.

It is the line manager's responsibility to complete fair and honest two- and four-month review reports. Probationary reviews meetings should be scheduled in as part of the employees Induction. It is important that line managers seek advice from HR if there are any concerns.

Policy Statement

It is London Council policy to apply a four-month probationary period to all new entrants to the organisation. During this period, the employee's performance in the new role will be assessed and the learning and feedback system will apply.

The probationary period will apply to temporary fixed term employees where they are employed by London Councils regardless of length of appointment and will also apply to new entrants including those from local authorities.

This policy will not apply to internal employees that are transferred, promoted, or redeployed within London Councils. For existing employees, the manager should refer to the existing learning and feedback process.

Attendance, performance, and conduct will be managed as part of this probation policy. Depending on the severity of the allegations (for example gross misconduct) the Disciplinary Procedure may be applied.

If an employee's performance has not reached an acceptable standard during the probationary period, their employment will be at risk, and the appointment may be withdrawn.

Supervision/Probation Assessment Review meetings

The probationary period and assessments should provide the opportunities for two-way discussions between the employee and manager about the job and other job-related needs.

In the assessment forms below the employee will be given acknowledgement where they have performed well and be able to discuss interventions where improvement is required. In areas where performance is not considered to be satisfactory, there is an expectation that the employee will improve, either through the setting of clearly defined objectives and/or via appropriate training, after which the situation will be reviewed.

It is essential that supervision meetings are scheduled into diaries on a monthly basis as well as the two- and four-month reviews to monitor progress and address any concerns at an early stage.

Comments that have been noted through supervision meetings or other meetings prior to the review meeting should be discussed and the employee will have the opportunity to discuss these

with their line manager and to make any comments that they feel are relevant. These notes can also be reference as part of the probation documents.

Assessment Criteria

As part of the induction process the line manager should discuss the SMART objectives that they would like to assess during the probationary period which is aligned to the job description. The criteria/objectives will be used to make an assessment of the employee's performance - which must relate to the job description.

Grading

Each area of work has been graded as follows:

1. **Exceeded** (the requirements of the job)
2. **Meets** (the requirements of the job)
3. **Partially meets** (the requirements of the job, showing some weaknesses)
4. **Failed** (to meet the requirements of the job)

Employees should use this probation period and subsequent probation discussions to raise any queries or to make any points that you feel are relevant but have not been raised by their line manager.

If you have a disability, your line manager should be made aware of your needs when setting up a probationary meeting and may seek advice regarding any reasonable adjustments from you and Occupational Health if appropriate.

Successful completion of Probationary period

A probation review meeting will be held at two and four months. If the employee is successful in completing their probationary period, they will be confirmed in the post at the 4-Month Probation review meeting. The line manager should submit all completed signed forms to HR.

Ending Probation Period Early

In exceptional cases of serious misconduct/incapability, the probationary period may end earlier than the 4-month period.

Extensions

In exceptional cases, the probationary period may be extended for a maximum period of four weeks. Any extensions should be discussed with HR, and the line manager will notify the employee in writing at 4-Month Probation Review meeting.

Appeals

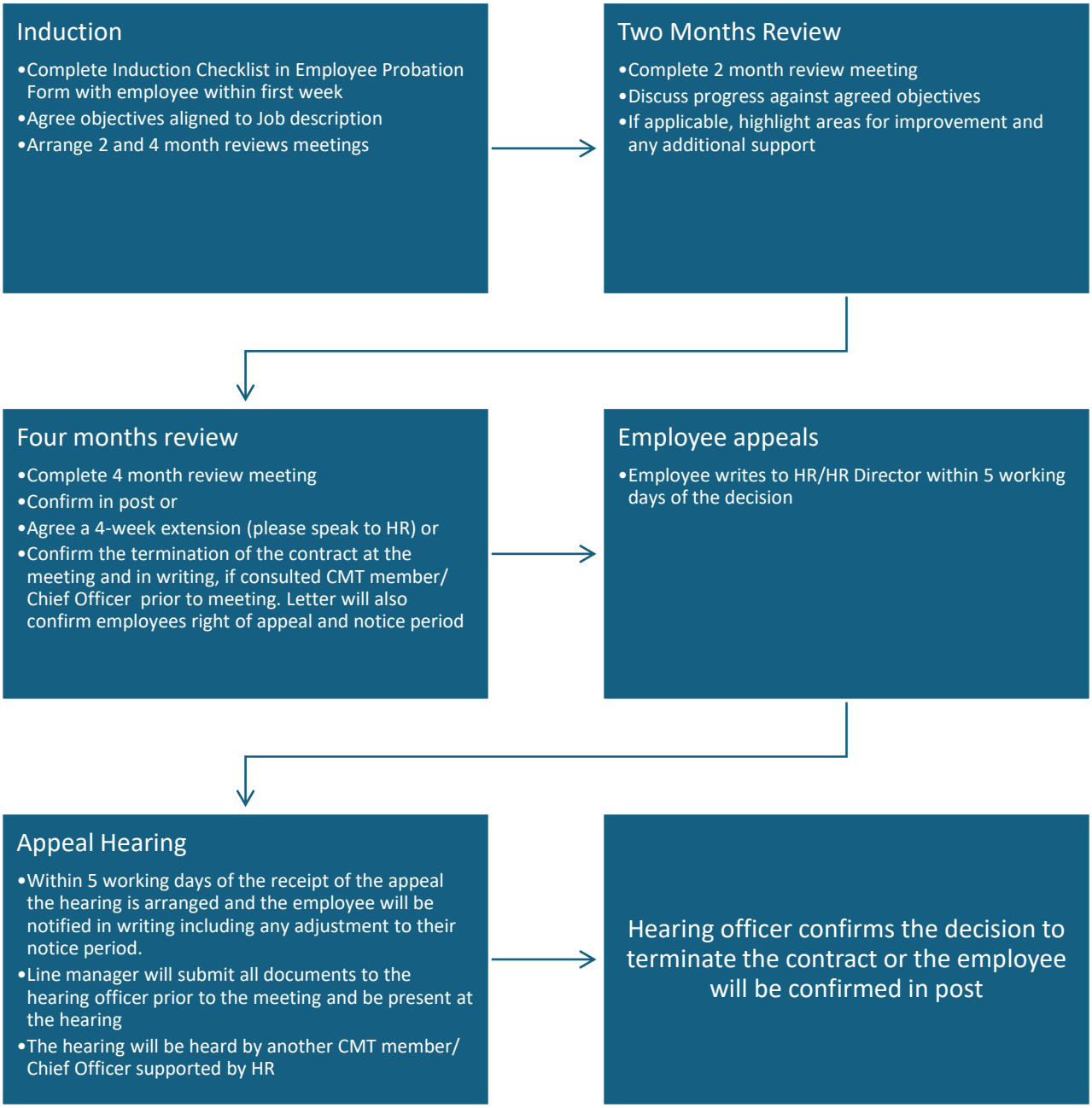
An employee may appeal against the decision to terminate their employment following the 4-Month Probation Review meeting. All appeals should be sent in writing to the LC

HR Team email box and the HR Director within five days of the decision. Appeal will be held within five working days of the receipt of an appeal. Appeals will be heard by a another CMT member (Chief Officer) and HR Director.

Notice Period

The statutory notice period of one week will apply.

Process Map:



Commencing the probationary period

Employee Probation Report

Employee Name:	
Position:	
Grade:	
Service:	
Line Managers Name:	
Date Commenced Employment:	

Induction Checklist

Please indicate that the following information/documents have been provided as part of the employee's induction process – All HR policies and forms can be found on the Employee Experience Hub:

Employee Probation Checklist:			
		Provided/Directed To	**Date**
1	**Job Description**		
2	**Contract of Employment**		
3	**Employee Code of Conduct**		
4	**Health and Safety Procedures**		
5	**Values and Behaviours**		
6	**Sickness Absence/Leave**		
7	**Disciplinary, Grievance and Capability/Learning and feedback process**		
8	**Equality & Diversity Policy/Strategy**		
9	**Pensions / Auto Enrolment Information**		
10	**Employee Assistance Programme/Wellbeing**		
Signed:		**Date:**	

Assessment Criteria

As part of the induction process the line manager should discuss the SMART objectives that they would like to assess during the probationary period which is aligned to the job description. The following criteria/objectives will be used to make an assessment of the employee's performance - which must relate to the job specification and/or values and behaviours.

Each area of work has been graded as follows:

1. **Exceeded** (the requirements of the job)
2. **Meets** (the requirements of the job)
3. **Partially meets** (the requirements of the job, showing some weaknesses)
4. **Failed** (to meet the requirements of the job)

A	
B	
C	
D	
E	

2 Month Probation Assessment Review Meeting		
Criteria	**Managers Assessment / Comments**	**Employee's Comments**
A		

Grade	Exceeds, meets, or partially meets or failed objective (please indicate)	
Further Comments / Action Required?		
B		
Grade	Exceeds, meets, or partially meets or failed objective (please indicate)	
Further Comments / Action Required?		
C		
Grade	Exceeds, meets, or partially meets or failed objective (please indicate)	
Further Comments / Action Required?		
D		
Grade	Exceeds, meets, or partially meets or failed objective (please indicate)	
Further Comments / Action Required?		
E		
Grade	Exceeds, meets, or partially meets or failed objective (please indicate)	
Further Comments / Action Required?		
Date of Review Meeting		

4 Month Probation Assessment Review Meeting

Criteria	Managers Assessment / Comments	Employee's Comments
A		

Grade	Exceeds, meets, or partially meets or failed objective (please indicate)
Further Comments / Action Required?	

B		

Grade	Exceeds, meets, or partially meets or failed objective (please indicate)
Further Comments / Action Required?	

C		

Grade	Exceeds, meets, or partially meets or failed objective (please indicate)
Further Comments / Action Required?	

D		

Grade	Exceeds, meets, or partially meets or failed objective (please indicate)
Further Comments / Action Required?	

E		

Grade	Exceeds, meets, or partially meets or failed objective (please indicate)
Further Comments / Action Required?	
Date of Review Meeting	

Summary Assessment for the Four Month Recommendation

General Time Keeping and Attendance

Include any periods of absence.

Values and Behaviours, other Competencies and Training attended.

Include one or more examples of where the employee has exceeded, or failed, in demonstrating a characteristic from our values and behaviours.

Overall Line Managers Assessment / Comments

4 MONTH RECOMMENDATION

The probation period will be satisfactorily completed, and I recommend confirmation at the end of the probation period.

Signed by Line Manager:

Date:

The employee's service has been unsatisfactory for the reasons given above.

I recommend a four-week extension.

Or

In consultation with the line managers CMT member/Chief Officer, I recommend termination of employment and have advised and confirmed in writing the employee's right to appeal.

Signed Line Manager:
CMT Member/Chief Officer:

Date:

This page is intentionally left blank

Document is Restricted

This page is intentionally left blank

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

Document is Restricted

This page is intentionally left blank

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

Document is Restricted

This page is intentionally left blank

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

Document is Restricted

This page is intentionally left blank

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

Document is Restricted

This page is intentionally left blank

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

Document is Restricted

This page is intentionally left blank