| Committee:   | Dated:         |
|--|----------------|
| Corporate Services Committee                       | 12 July 2023   |
| Subject: Centrally Managed Mandatory Training for  | Public         |
| Employees  |                |
| Which outcomes in the City Corporation's Corporate | 1, 2, 8        |
| Plan does this proposal aim to impact directly?    |                |
| People are safe and feel safe.                     |                |
| People enjoy good health and wellbeing.            |                |
| We have access to the skills and talent we need    |                |
| Does this proposal require extra revenue and/or    | No             |
| capital spending?                                  |                |
| If so, how much?                                   | Not applicable |
| What is the source of Funding?                     | Not applicable |
| Has this Funding Source been agreed with the       | Not applicable |
| Chamberlain's Department?                          |                |
| Report of: Ali Littlewood, Chief People Officer    | To note        |
| Report authors Cindy Vallance, Assistant Director, |                |
| Organisational Development and Talent              |                |

## **Summary**

This report provides an update to the Committee on work being undertaken to address the risk of non-compliance with centrally managed mandatory training for employees. Appendix 1 sets out an approach that will be taken to continue to progress and improve current practices to ensure compliance.

### Recommendations

Members are asked to note the status of centrally managed mandatory training compliance and the City Corporation's approach to continue to ensure continued improved compliance.

### **Main Report**

### **Background**

Contracts of employment for employees' state that compliance with all learning and development courses as directed is required by all employees of the City of London. However, while increasing steadily, current completion rates are less than 100%, and the Committee has requested a report on current compliance and a set of recommendations to continuously improve compliance. There is a risk to City Corporation if mandatory training is not completed, although the existing HR data and

system issues means it is currently difficult to report fully and accurately on all training completions.

#### **Current Position**

- 1. A suite of 12 centrally delivered online mandatory training offerings for continuing employees are held within Human Resources in City Learning, the City of London Learning Management System. Offerings and completion rates are outlined in Appendix 1. While compliance has increased over the past three years, 100% compliance has still not been achieved, although please can it be noted that, at any point in time, 100% compliance would not be possible due to long term leave arrangements, new starters, and leavers.
- 2. Data for completion of this mandatory training is currently kept in a separate system from the master employee record, *City People*. The master system transfers data via an interface between *City People* and *City Learning* that tracks training completed, adds new starters, and removes leavers.
- 3. The current system does not include interim, temporary, and casual employees.
- 4. Line managers are responsible for ensuring mandatory training compliance by their employees and can monitor individual employee and collective team reports on mandatory training completion. Managers receive an automated email when an employee commences their mandatory training and when the programme of training is completed. However, there is currently no regular dashboard reporting for managers to check mandatory training compliance across their team(s) on a regular basis and take action to rectify.
- 5. A small number of additional face-to-face training offerings are considered mandatory for managers<sup>1</sup> but there is currently no facility within the system to capture and report on completion of these offerings.
- 6. Role-specific mandatory training is also assigned and completed within individual departments and institutions given the wide array of activity undertaken within City Corporation departments and institutions. Completion of role-specific training is not managed or monitored centrally. The responsibility for completion of role-specific mandatory training sits with the Chief Officer for each subject area: for instance, professional accreditations for teachers and academic employees; social care employees; and finance employees. Role specific training and accreditations are also required in other areas such as: security; facilities management; manual handling; grounds keeping; and advanced cyber security amongst others.

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<sup>&</sup>lt;sup>1</sup> Manager F2F Mandatory Training offerings: New Manager Induction (pilot scheduled for April 2023); Managing Health and Safety; Mental Health First Aid Awareness; Equality Analysis.

7. Below is a timetable of activities that we plan to take place between August 2023 and the end of December 2023 to reduce the current risk of non-compliance with centrally managed mandatory training.

| <b>Completion Timeline</b> | Activity   |
|----------------------------|--|
| Summer 2023                | For all new employees, adjust the probation policy, process and form to explicitly require completion of all mandatory training within the first three months of the probation period as a requirement to pass probation.  On the rare occasion, that the training cannot be completed in this period, probation will be extended until such time as all mandatory training has been completed.  |
| Summer 2023                | For all existing employees, adjust the appraisal policy and process to explicitly require completion of all mandatory training that was not completed during induction or that needs to be completed again in cases of re-certification.   |
| Autumn 2023                | As part of a new HR Manager Dashboard that will be rolled out in autumn 2023, include mandatory training compliance for all Chief Officers to disseminate as appropriate.  Include communications as part of this programme of work to emphasise and reinforce the importance of compliance with mandatory training, including expectations of managers to oversee employee compliance and escalation procedures for non-compliance.   |
| Winter 2023                | A limited amount of mandatory training content review is already underway. This will continue and expand as part of People Strategy work to ensure that it is fit for purpose and that it makes appropriate use of micro-learning and new technologies. For instance, some training is currently overly lengthy, some mandatory training is out-of-date and some do not continue to be reasonable for all to complete (for example: driver check). The review will require a collaboration with subject matter experts to align what elements of training are essential to roles based on job responsibilities and renewal timing where appropriate. |

| Winter 2023 | Mandatory training completion is currently tracked only for continuing employees. A separate project exploring the use of casuals and interim employees will require adjustments of processes and systems in working with these individuals and will include a review of the mandatory training for all categories of interim employees.   |
|-------------|--|
| Winter 2023 | In the case of role specific non-centrally managed mandatory training, Chief Officers will be asked to report on completion of all mandatory training that they oversee to enable the creation of a summary master list for City Corporation. This information will feed into the implementation of the Enterprise Resource Planning (ERP) system which will include employee master training records and the ability to undertake more effective training reporting for all employees.                            |
| Spring 2024 | Implementation of the proposed new ERP system will include moving the current learning management system into the master People system. The new system will include an improved manager's dashboard to facilitate ease of viewing to monitor compliance of all mandatory training, including face to face mandatory training for managers.   |
| Continuing  | Each department and institution should decide the most appropriate approach at a local level to meet the needs of the organisation while enabling employees the necessary time to complete mandatory training. Given the City Corporation's corporate objective to champion investment in relevant employee skills development, it is reasonable to expect that each department and institution will build in a reasonable amount of time at a local level for development as part of business-as-usual practices. |
| Continuing  | A culture of responsibility and accountability must be more deeply embedded across City Corporation. Each employee should take responsibility for completing all their   |

required training. Since completion of all required training is a contractual term, each individual who holds line management responsibility for employees, supported by appropriate reporting, should be held accountable for ensuring employees compliance with all mandatory training.

## **Corporate & Strategic Implications**

Strategic implications – Nearly a quarter of the annual central training budget is allocated to mandatory training and the process to manage completion of mandatory training is onerous and resource intensive with current systems. Suitable financial and resource investment through clearly assigned responsibilities and accountabilities held by subject matter experts working in collaboration with the central HR team must continue to enable this work to be progressed. Financial investment in the ERP will ease the burden of more manual tracking processes. The completion of mandatory training can help to build a culture of shared responsibility and accountability and can help to improve employee engagement by providing practical learning and development opportunities.

Financial implications – The ERP system will require substantial financial investment and will include mandatory training; however, it is not in the scope of this paper to outline in detail.

Resource implications – The current system requires manual efforts by both line managers and employees as well as the team that oversees the system. The completion of mandatory training is a critical element of business-as-usual activity within the organisation that must be maintained even in the face of other strategic and operational priorities.

Legal implications – Mandatory training ensures that all employees are aware of the organisation's policies, procedures, and legal obligations. It helps protect the organisation from legal action, by ensuring employees are fully aware of their responsibilities.

Risk implications – Mandatory training makes employees aware of the potential risks and hazards associated with their job and helps to prevent accidents and injuries. It helps to ensure all employees are performing their jobs safely and effectively and are meeting the organisation's standards.

Equalities implications – As noted above, non-compliance with mandatory EDI training puts the City of London at risk of equalities challenges. This is mitigated by the Equality and Inclusion learning module explaining the aims of the Equality Act and what characteristics it protects by law, the types of behaviour classified as prohibited conduct, the personal and organisational benefits of a diverse and inclusive workplace, how to approach and handle

sensitive subjects at work, and simple steps that can be taken to treat people fairly and respectfully.

Climate implications - None

Security implications – As noted above, non-compliance with mandatory security modules puts the City of London at risk, particularly when facing human and digital threats.

#### Conclusion

Members are asked to note the status of mandatory training compliance and the actions that will help to increase and ensure continuing compliance. The engagement of leadership, managers and colleagues with this approach will be integral to its success.

# **Appendices**

Appendix 1: Centrally Managed Mandatory Training Completion Data for FY 21/22, 22/23, 23/24 through 31 May 2023

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# Appendix 1

# **Centrally Managed Mandatory Training Completion**

- 1. Action Counters Terrorism (ACT)
- 2. Customer Service
- 3. Data Protection
- 4. Driver Check
- 5. Equality and Inclusion our commitment
- 6. Fire Awareness
- 7. Fraud Awareness
- 8. Health, Safety and Wellbeing
- 9. New Starters' Orientation
- 10. Our Social Media Policy
- 11. Prevent
- 12. Secure Remote Working

See records that follow for 21/22, 22/23 and 23/24 through 31 May 2023.

