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| Committee(s): Corporate Services Committee | Dated: 12 July 2023 |
| Subject: Ban the Box Implementation Timeline | Public |
| Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly? | 8: We have access to the skills and talent we need. |
| Does this proposal require extra revenue and/or capital spending? | No |
| If so, how much? | N/A |
| What is the source of Funding? | N/A |
| Has this Funding Source been agreed with the Chamberlain's Department? | N/A |
| Report of: Alison Littlewood, Chief People Officer | For Information |
| Report author: Cindy Vallance, Assistant Director, Organisational Development & Talent | |

Summary

A paper with a focus on implementing "Ban the Box" and revising "Vetting" as part of pre-employment checks was brought to Corporate Services Committee (CSC) meeting in May 2023. Since that time, an additional paper focusing primarily on Vetting but including Ban the Box was shared with Senior Security Board in June 2023. A commitment was made to share the proposed implementation plan / timeline at this meeting and a proposal was suggested to also incorporate a private Members' Session to explore Ban the Box in greater detail prior to launch which is targeted in October following further discussion at CSC. See Appendix 1 for the full timeline.

Recommendation

Members are asked to note the report, including the notification that a private Member's session will also be held prior to launch of Ban the Box; in September 2023.

Main Report

Background and current position

1. The Ban the Box campaign was described in the May CSC paper. By way of summary, it was launched in the UK in 2013 and is led by Business in the Community. Its purpose is to ensure that people do not face unfair discrimination and that criminal records are not used to exclude people from applying for roles, although employers may still ask about convictions at a later stage in the recruitment process and there may be some convictions that cannot be accommodated.
2. The City of London Corporation must have in place robust vetting procedures to reduce any risks which may exist when employing staff in accordance with the Ban the Box campaign. This will allow the differentiation of roles where Ban the

Box is appropriate. Therefore, implementation of Ban the Box is incorporating updates from the vetting review.

3. The Task & Finish Group is working to an ambitious programme plan and timeline that will incorporate revisions to all relevant pre-employment recruitment policies that reference Ban the Box and Vetting as well as all associated materials. Appropriate consultation across City Corporation will take place with departments, institutions, legal services and unions. A draft launch communications plan will also be created. Working closely with the Deputy Chair of the Corporate Services Committee, a private briefing for all members will be offered prior to finalising recommendations in the report for the Corporate Services Committee. The session will provide the opportunity for reflection and discussion on the intended outcomes as well as the risks of implementing Ban the Box. This session may also include expert external contributions and early discussions in the summer with key organisations involved in inclusive recruitment practices will also take place.
4. The T&F Group implementation plan is included here in Appendix 1.

Corporate and Strategic Implications

5. Strategic implications – Adoption of the Ban the Box principles supports the City of London Corporation’s commitment to inclusive recruitment practices, thereby ensuring access to the skills and talent the Corporation needs. As mentioned above, as the work continues, due thought will be given to other inclusive recruitment practices and whether these should also be considered for implementation. A private member’s session will take place prior to the launch of Ban the Box to confirm across Membership the work that has already been agreed or any change of direction that might be deemed necessary at that time.
6. Additionally, a review of vetting will enhance the Corporation’s confidence about its vetting decisions and provide the right foundation for managing risk, which lasts for as long as a person holds a security clearance.
7. Financial implications – None.
8. Resource implications – None.
9. Legal implications – None at this stage. Comptrollers will need to be satisfied with any policy or vetting changes to ensure we continue to meet statutory and other legal requirements.
10. Risk implications – Use of Ban the Box in a way that is not mindful of risk and incomplete vetting carries risks for roles where national security or criminality concerns are a consideration, as well as vetting being used at an inappropriate level. There would be substantial reputational risk should the Corporation not meet its statutory obligations either in vetting or DBS as well as the risk posed by those individuals being employed inappropriately for the role, we engage them to undertake.

11. Equalities implications – Ban the Box is intended to help support people with criminal convictions back into work and society groups more likely to have convictions or criminal history. When the policy/framework is complete, a Test of Relevance will be able to be completed.

12. Climate implications – None.

13. Security implications – As noted above, vetting helps identify, manage, and mitigate risks for roles which includes jobs with access to high-risk sites, highly classified or sensitive information or systems and will serve as a check and balance to Ban the Box implementation.

Conclusion

14. This paper outlines the recommended timeline requested at May CSC for revisions to pre-employment checks including Vetting, Ban the Box and DBS. A further private session for members will be organised prior to the launch of Ban the Box to brief members more fully on the campaign and to discuss the City Corporation's responses to it. This session may include expert external speakers to outline opportunities and risks with various inclusive recruitment approaches including Ban the Box. Invitations to this session will be extended to all members the Court of Common Council. The launch of Ban the Box is currently scheduled to take place following approval by CSC in October 2023.

Appendices

Appendix 1: Pre-Employment Checks: Vetting, Ban the Box and DBS Implementation Plan

Background Papers

None.

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