

Committee(s): Equality Diversity & Inclusion Sub-Committee	Dated 11th December 2023
Subject: Draft Equality Objectives Final Report	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	1,2,3,4,5, 8
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of: Emma Moore, Chief Operating Officer	For Decision
Report author: Micah McLean, EDI Officer	

Summary

Following a decision made by the members during the last EDI Sub-Committee meeting on 4th September, the Draft Equality Objectives Consultation was relaunched. During the last meeting the EDI Directorate had mentioned that 150 people had responded to the Draft Equality Objectives Consultation, this has now risen to 275 responses (representing more than 1,000 people). In addition, this is also higher than the typical responses rates received by other local authorities such as Brent, Ealing, and Newham Council. While the responses are lower than other local authorities such as Harrow Council, the feedback received represents a higher number of people.

This is a positive achievement for the City of London Corporation and demonstrates that there is wide representation from a variety of different groups in the City Corporation Draft Equality Objectives Consultation.

The purpose of this paper is to provide a breakdown of the results ahead of a decision that will be made by members during the EDI Sub-Committee scheduled to take place on 11th December 2023.

Recommendation(s)

Members are asked to note:

The achievements of the EDI Directorate in achieving more responses to the Draft Equality Objectives Consultation.

Members to agree on:

The approach of the EDI Directorate to the Draft Equality Objectives Consultation and next steps for this piece of work.

Main Report

Background

1. The Draft Equality Objectives Consultation was launched on 1st June 2023 and initially closed on the 31st August 2023. At this point, 150 responses had been received to the consultation through online surveys, a Draft Equality Objectives Workshop that had taken place on 27th July 2023, and meetings with Departmental EDI Boards.
2. However, following the comments made by members during the last EDI Sub-Committee meeting the team proceeded with producing and implementing a communication plan to improve results to the Draft Equality Objectives Consultation.

Overall Results and Benching Against Other LAs

3. The City of London Corporation's Draft Equality Objectives Consultation 274 responses are higher than the results received for similar consultations across London Local Authorities including: Brent Council (78), Ealing Council (250), and London Borough of Newham Council (150).
4. Appendix 1 provides a graph depicting how the City Corporations results compare to that of other local authorities.
5. All of the London Local Authorities apart from the London Borough of Newham Council had hired external consultants involved in producing their respective consultations.
6. However, the number of responses received to the Draft Equality Objectives Consultation has been achieved through the EDI Directorate utilising its existing relationships with staff across the City of London Corporation and its institutions, City businesses (e.g., Legal and General), Local Authorities (e.g., Islington Council and Hackney Council), Trade Unions and other external stakeholders.
7. The EDI Directorate achieved the increase in responses to the Draft Equality Objectives through the development of a communications plan developed by the team with feedback from senior colleagues.
8. This is a positive achievement for the City of London Corporation because it has fared better in comparison to other London Local Authorities delivering similar pieces of work. In addition, the methodology the EDI Directorate has used is cost effective but has delivered meaningful results.

Where the Responses Came From

9. The EDI Directorate launched two surveys pertaining to the Draft Equality Objectives that was completed by 109 people and 133 people respectively. The second survey was a simplified version of the first survey and was designed to increase the number

of responses to the Draft Equality Objectives Consultation by ensuring the questions respondents answered were more specific.

10. This means that the EDI Directorate consulted with 240 people through online surveys. Appendices 2 and 3 highlight the different demographics of people that provided the feedback to the City Corporations Draft Equality Objectives through the online surveys.
11. Two letters were received from stakeholders associated with the City Corporation on behalf of a total of 785 people. Appendices 4 and 6 highlight the responses received from stakeholders in the form of letters.
12. Following the Draft Equality Objectives Consultation Workshop that took place on 27th July 2023 the City Corporation had the opportunity to hear the views from our stakeholders from including staff at the City of London and Across its Institutions, Metropolitan Police, Islington Council, GMB Union, Pride Equality Standard UK and The Museum of London on this piece of work. Over 30 staff across the City Corporation and its institutions, stakeholders, and partners were consulted with through this forum.
13. On 30th October 2023, The City Corporation's Innovation and Growth department submitted further feedback on our Draft Equality Objectives from 15 members of staff following their departmental EDI Board meeting. The response provided by the Innovation and Growth department to the Draft Equality Objectives Consultation can be seen in Appendix 5.

Next Steps

14. The EDI Directorate will be working with the Data Team to analyse the results and then make changes to the Draft Equality Objectives based upon the feedback received.
15. The final draft of the Draft Equality Objectives Consultation will then be produced and submitted SLT, ELB and members by end of the Q4 2023/2024.

Corporate & Strategic Implications

Strategic Implications

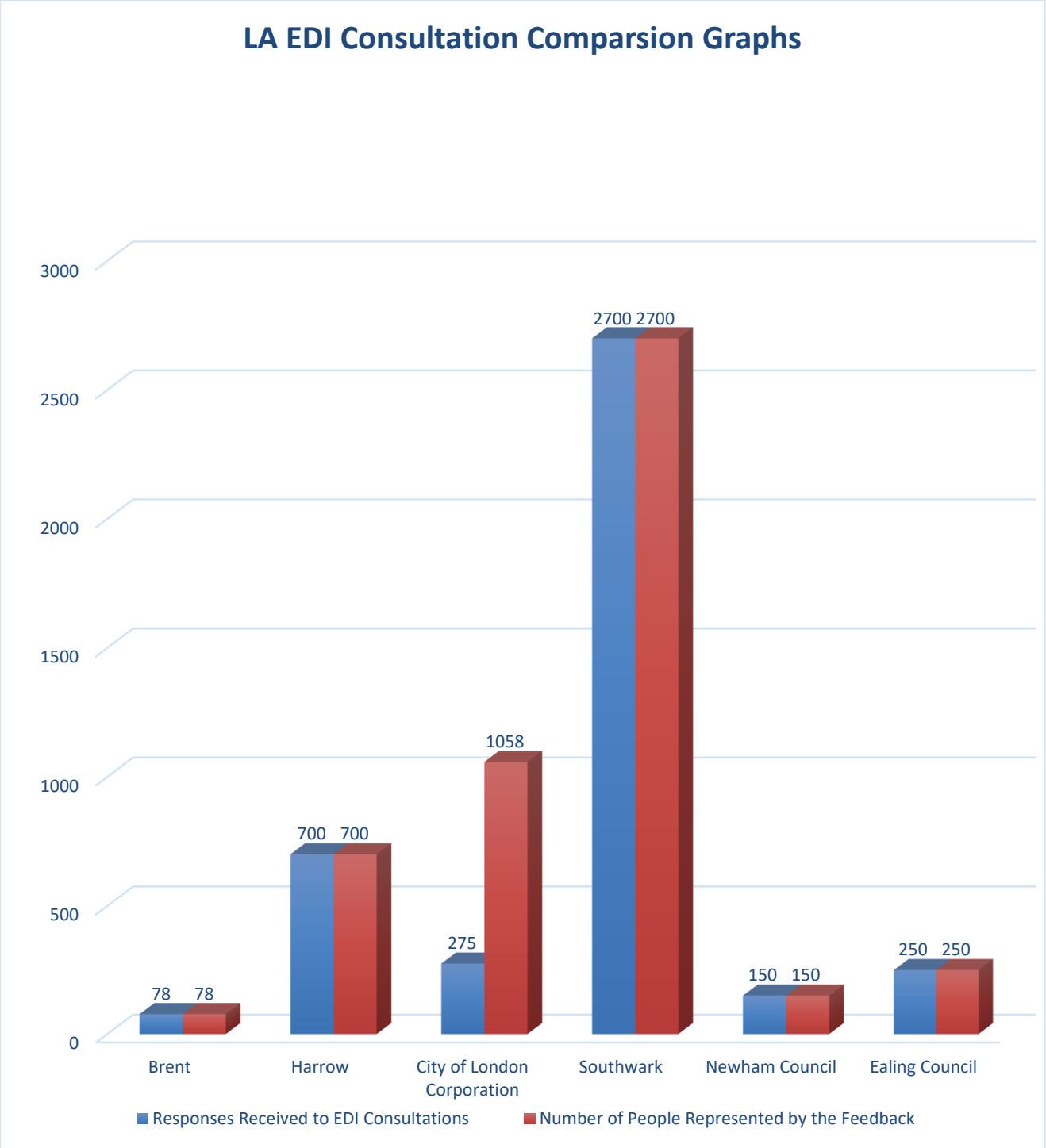
16. The proposals align with outcomes 1, 2 3, 4, 5 and 8 of the Corporate Plan 2018 to 2023. It also aligns with the CoLC's Social Mobility Strategy 2018 to 2028 and other Strategic Plans.
17. Resource implications –The project led by the EDI directorate is cross-cutting and it will have resource implications for all CoLC departments, services and institutions. Consequently, each department and institution should consider the human and financial resources required to achieve the Equality Objectives of the CoLC and to comply with the CoLC obligations under the Equality Act 2010 and related regulations.
18. Legal implications – The Public Sector Equality Duty (Section 149 of the Equality Act 2010) is supported by the specific duties regulation which requires public bodies to set themselves, specific and measurable equality objectives every four years. This proposal will enable the CoLC to comply with its obligations and specific duties regulations mentioned in the Equality Act.

19. Risk implications – The risk of non-compliance with the Equality Act 2010 and related regulations includes reputational damage and the possibility of the proceedings being brought by the Equalities and Human Rights Commission.
20. Equalities implications – This proposal will enable the CoLC to comply with the Public Sector Equality Duty 2010, Section 149 which covers the Public Sector Equality Duty and the Specific Duties regulations mentioned above. This proposal involves setting objectives required to comply with the Equality Act 2010. This proposal, is therefore, likely to have a positive impact on citizens protected by existing equality legislation which are age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership and pregnancy and maternity.
21. Climate implications – N/A
22. Security implications – N/A

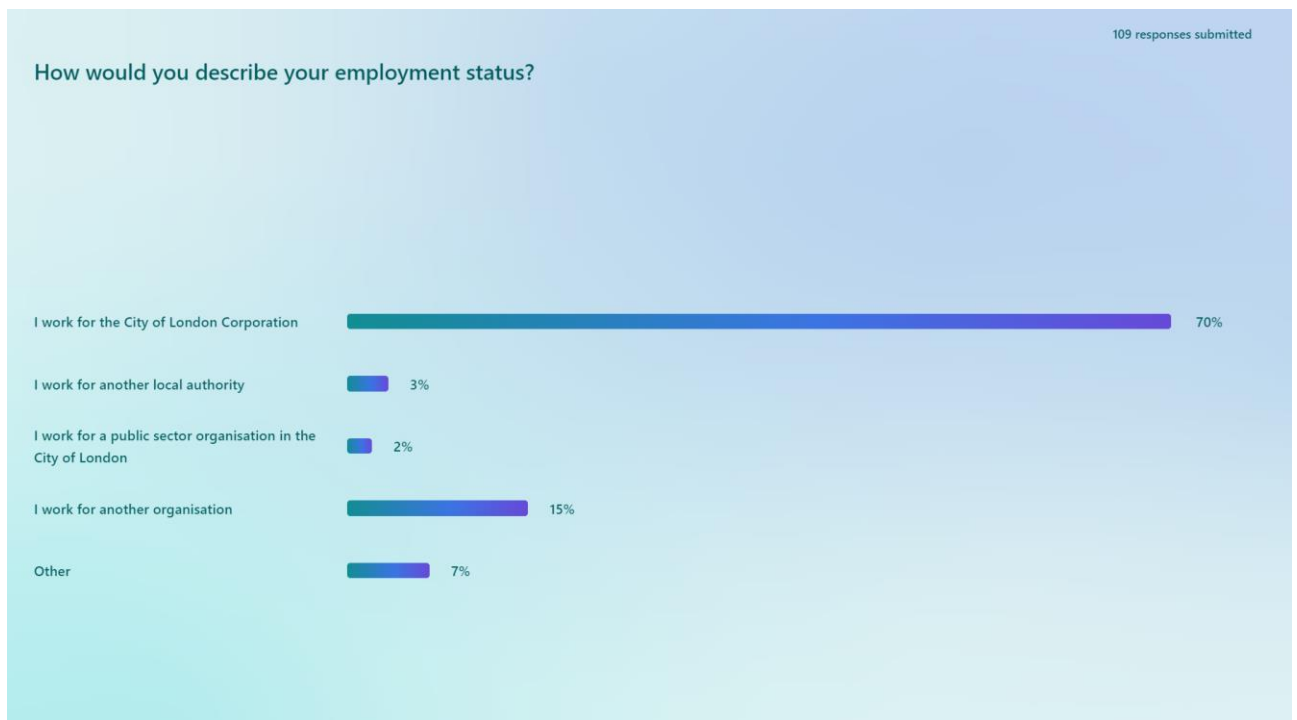
Conclusion

23. In conclusion, The City of London Corporation has made significant progress in improving responses to the Draft Equality Objectives Consultation in the space of a month and are currently seeking feedback from members pertaining to the next steps with members regards to this piece of work.

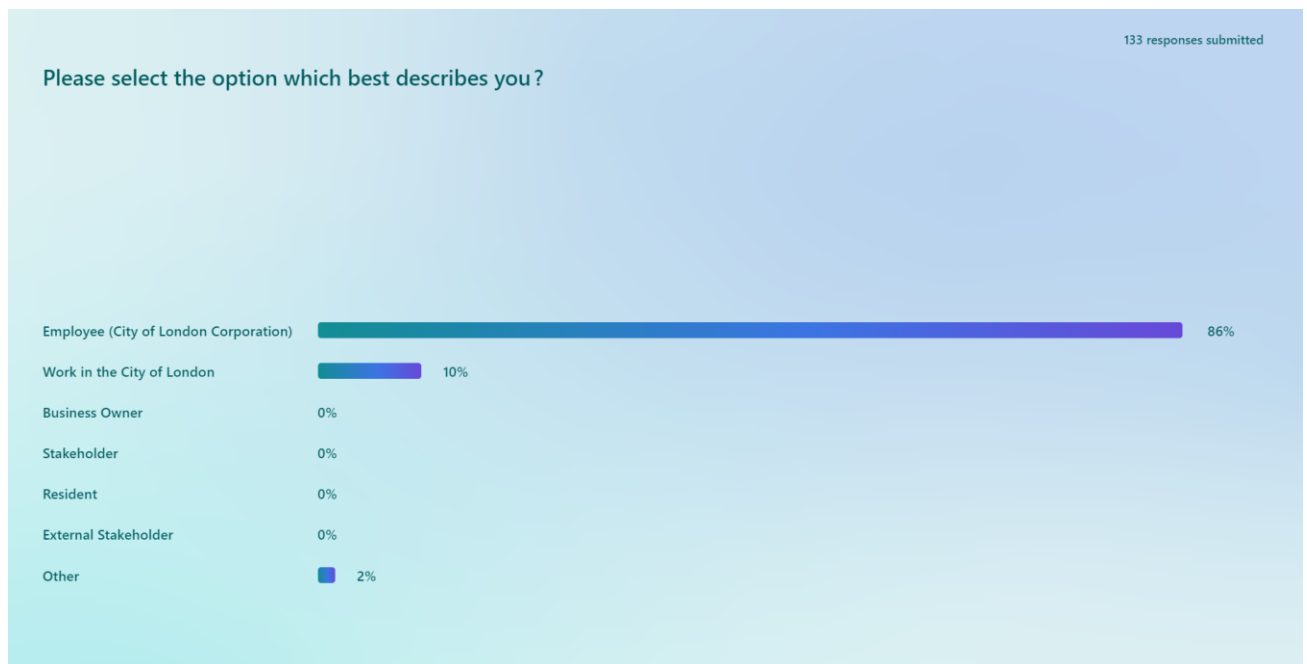
Appendix 1 – LA EDI Consultation Comparison Graph



Appendix 2 – Summary of Respondents from 1st Draft Equality Objectives Survey



Appendix 3 – Summary of Respondents from 2nd Draft Equality Objectives Survey



Appendix 4 – Responses from Epping Forest Heritage Trust



**Epping Forest
Heritage Trust**

Deputy Andrien Meyers and Dr Joanna Abeyie
Chairman and Deputy Chairman
Equality, Diversity and Inclusion Sub-Committee
City of London Corporation
The Guildhall
London EC2V 7HH

22nd August 2023

Consultation on your Draft Equality Objectives

Dear Andrien and Joanna

Thank you so much for engaging so widely on the draft Equality objectives for the City of London Corporation. I am delighted to respond on behalf of Epping Forest Heritage Trust, the charity and membership organisation which works alongside the City of London, as Conservator, with a vision to protect and preserve Epping Forest for the enjoyment of generations of people to come.

Firstly, congratulations on the draft objectives. We think they are a strong basis to build on. And we are delighted that you mentioned Epping Forest as "a national treasure" in your forward to the consultation. We agree!

However we are concerned that the draft objectives do not go far enough, especially in relation to access to the green spaces that you manage, including Epping Forest.

Recent polling carried out by Waltham Forest Council of its residents shows that men are more likely to visit Epping Forest than women, and white people are more likely to visit than Black or Asian people.

The polling was carried out in March and April 2023 by door to door interviews with a representative sample of 756 Waltham Forest residents.

The headline results were as follows:

- On average 36% of Waltham Forest residents visited Epping Forest at least once a week.
- 51% of residents in the north of the borough visited Epping Forest at least once a week, compared to only 24% in central Waltham Forest.
- Men visited the Forest more regularly than women with 40% visiting at least once a week, compared to 32% of women.
- 37% of 16-44 year olds and 41% of 45-64 year olds visited the Forest at least once a week compared to only 22% of 65 and overs



**Epping Forest
Heritage Trust**

Epping Forest Heritage Trust is a registered charity in England and Wales 275076 and a company limited by guarantee registered in England and Wales 1339783.

Registered office: The Warren Lodge,
Loughton,
Essex
IG 10 4RN



Appendix 5 – Feedback from the Innovation and Growth Department



Draft Equality Objectives – Request for Equality Representatives (Deadline 24th October 2023)

Link to Draft Equality Objectives: [Consultation on our Draft Equality Objectives 2023-27 \(cityoflondon.gov.uk\)](https://www.cityoflondon.gov.uk/consultation/consultation-on-our-draft-equality-objectives-2023-27)

Link to survey: [Consultation on our Draft Equality Objectives 2023 - 2027 \(office.com\)](https://www.office.com/consultation-on-our-draft-equality-objectives-2023-2027)

Name of Equality Representative Completing Form: Erin Skinner

Department: Innovation & Growth

Number of people involved in board/focus group: 15

Key Questions:

1. Why is the Draft Equality Objectives Consultation relevant to you?

- Provides a framework for us to engage with to build our own EDI plans.
- Gives a sense of shared objectives to allow us to communicate EDI plans and get buy in from our colleagues.
- Helps us to break down silos and work with other departments on shared objectives.
- Allows us to engage on a key corporate priority. •

2. What do you think is the greatest priority for Equality, Diversity and Inclusion in the City of London?

Data – getting the data right so we know which interventions are needed and when. Understanding the impact of those interventions and how we can learn from them.

Gathering data to understand our baseline.

3. How could the Draft Equality Objectives be Improved or Strengthened?

A greater sense of action from the objectives and supporting materials. They currently are quite broad and it isn't clear what specific actions will take place under each of the headings to achieve the objectives.

There is no clear measurement of success to help understand what each of the interventions might mean in practice (links to the data point above)

Appendix 6 – Letter from the City of London Access Group



City of London Access Group

Tel: 020 7332 1995

E-mail: colag@cityoflondon.gov.uk

Response to Consultation on CoL Draft Equality Objectives

2023 - 2027

A. Our Corporate Commitment – p8

Bullet point 2: [Promote and champion diversity, inclusion and the removal of institutional barriers and structural inequalities.](#)

The City of London (CoL) is failing in this regarding disabled people who are members of the City of London Access Group (CoLAG). The aspirations in this document are unfortunately divorced from what's happening on the ground, despite the best intentions of some CoL staff. I provide examples throughout this document drawn from my personal experience of volunteering for CoL to illustrate my point.

[Ref second column about the City's workforce](#)

Women and Black and minority ethnic communities are mentioned as being under represented. There is not any mention of the underrepresentation of other groups of people with protected characteristics, such as disabled or older people.

p9

After meeting Dr Joanna Abeyie at a BBC event for disabled people in 2022, I didn't have time to follow up with her in order to establish a relationship between CoLAG and the [newly established EDI Sub-committee](#), because I was swamped with work for an ongoing organisational review of CoLAG. No additional resources have been allocated to support me as Chair during the review, which has made it very difficult to progress matters. Additional resources in the form of an external consultant were brought in but to assist CoL - she actually created more work for me as CoLAG chair, which I again discuss in more detail later in my response. This disparity in support simply serves to undermine inclusion.

B. The City Corporation's Draft Equality Objectives p10

[We understand that our approach must adopt an intersectional perspective...](#)

Intersectionality is mentioned, but which protected characteristics will be considered as priorities in this context? E.g. will it be race with socio - economic status, rather than also disability and socio - economic status?

[Why are we undertaking this consultation? p10](#)

[Our approach going forward will involve coproducing our EDI strategy in partnership with our institutions and stakeholders. We are committed to co-creating a world-class EDI ecosystem in the City of London.](#)

What does coproduction and co - creation mean to the EDI Sub - committee in this context at a practical level?

Our five draft Equality Objectives - in brief – p11

1. Aspirational leadership

[Taking a broad and intersectional approach to equality, diversity and inclusion...](#)

Again, who will be prioritised amongst those with protected characteristics and what will this translate into in practice?

2. Dynamic and engaged workforce

You have overlooked volunteers, without which, the City couldn't operate in its current format.

3. Accessible and excellent services

[Creating a community centred approach to service delivery bolstered by an inclusive community and stakeholder engagement strategy](#)

CoL's current engagement strategy is not as inclusive as it needs to be and feedback from some of your marginalised communities is sometimes ignored in favour of other more powerful stakeholders.

A good example is that the input of disabled people on CoLAG regarding the exclusionary nature of colourful crossings was ignored in favour of discharging the wishes of a powerful funder. Our advice was only followed upon the imposition of a Mayoral moratorium on the installation of these crossings.

4. Understanding our communities

Will your [data led and evidence based approach to understanding and working with your communities and networks](#) embrace qualitative as well as quantitative data? Not all important information can be reduced to graphs and bar charts: including soft data to capture the stories of those who live, work in and visit the City is also needed.

Ref 2 & 4 - where would I as a disabled volunteer fit into this framework?

Equality Objective 1: Aspirational Leadership: p12

We Will

Bullet point 1: [...senior leaders are well equipped to lead the EDI agenda and to act as EDI ambassadors](#)

I was very recently told by a senior Planning Officer that disabled people like to give their time for free to help improve their environment - they aren't seeking financial recompense. Yet when a volunteer is required to work three or more days a week to replace a staff team which has been disbanded, this is not inclusive, but arguably exploitative. Nor is it inclusive when other volunteers may be asked to work less often, but are not accorded any recognition over extended periods of time and when finally they are, it is minimal.

At assistant director level, I hear warm words, but see little proactive driving through of change to improve EDI. The internal processes of CoL are bureaucratic and the cogs and gears turn so slowly, that those requiring change are left to battle on for long periods of time unsupported and arguably exploited, which simply serves to reinforce their marginalised status. It isn't enough to simply initiate or sign off a process, e.g. an organisational review in the case of the group which I chair. Senior staff must ensure change towards inclusion is properly resourced and drive it through in a timely fashion, rather than leaving less senior staff to do it, who may be less committed to the EDI agenda or lack the seniority to drive it through and make it happen.

A further example of deficiencies in leadership around EDI is provided by a meeting I was invited to speak at on the controversial topic of colourful crossings. After I outlined the

accessibility issues posed by them, a Common Councillor told me that people like me (i.e. disabled) should stay at home and that if we did go out and use a colourful crossing, then we would have to accept that accidents would happen. The clear inference was that it would be our fault were we to be knocked down and killed on these crossings. This was because she thought that they looked nice and brightened up her area. I'm not often left speechless, but I was on that occasion for a short period of time. This leadership clearly wasn't inspirational in terms of EDI, as well as being an unacceptable to treat a volunteer. It points to the need for EDI training to embrace CoL volunteers as well as staff.

Bullet point 2: [Enable and empower our staff networks....](#)

A disabled member of staff was not aware there was a network for disabled people, until I as a disabled volunteer, asked if there was an Employee Resource Group (ERG) for disabled CoL staff and she set out to try to find one. No proactive approach was made to engage her.

Bullet point 6: [Set aspirational EDI targets and metrics...](#)

An overreliance on statistics and data will miss some of those stories right under your nose. Not every person neatly fits into a box, as an intersectional approach helps us to understand, whilst not every experience which you ought to be capturing, analysing and acting upon will necessarily be picked up by a rigid approach to information gathering.

Last bullet point: [EDI Sub-committee has an overview of all equalities related work through our EDI governance structure](#)

The Sub-Committee was not aware of the existence of the City of London Access Group (CoLAG), which I chair. This became apparent when I met the Deputy Chair at a BBC event aimed at recruiting disabled people to participate in programming and another member of the committee at the annual CoL Transportation dinner. They were both surprised and asked me to follow up with them, but due to my work burden for CoLAG, was unable to do so - even if I could have sent them an initial email, I would not have had the capacity to follow through and meet them, etc.

Our Five Targets

Bullet Point 3: [the Disability Confident Scheme](#) is largely meaningless and discredited in terms of validating how disabled friendly an employer is to work for, because there is zero or little external validation involved (depending upon the level of certification achieved) and that which does exist, is not quality checked. I am one of several disabled people in receipt of a national bursary from the Shaw Trust and PurpleSpace engaged in a project analysing the deficiencies of the scheme and suggesting how it may be improved. Many disabled people have no confidence whatsoever in the scheme, as we are all too well aware of its deficiencies. The government department responsible for it is well aware of its deficiencies, though planned improvements have been delayed by judicial review.

It is complacent to rely upon the Disability Confident Scheme as a way of benchmarking progress with regard to the inclusion of disabled people in the City's work. CoL needs to find a more robust and better respected way of measuring its progress with regard to the inclusion of disabled people in the City's work.

Bullet point 4: [Our key decisions are informed by our equality Impact assessments guidance and forms.](#)

CoL's EqlAs are variable in standard and often lack the input of disabled people themselves and therefore miss key issues which they should highlight.

Equality Objective 2: Dynamic and Engaged Workforce: p13

We Will

Bullet point 4: Monitor the variety of other workers we have such as casual, temporary, voluntary, and other hidden workforce.

I have never been surveyed in the 3.5 years that I have been volunteering for CoL, which leads me to ask how often is monitoring conducted?

What is done with the monitoring information collected? If CoL doesn't act on what the monitoring identifies, there's not much practical benefit to be gained from doing that monitoring in the first place.

Bullet point 6: Introduce targeted strategies and mitigations to reduce pay gaps and address other inequalities.

Reviewing at least expenses for volunteers, as well as basic recognition and reward mechanisms (e.g. vouchers for time spent, or time banking benefits) should be included within the remit of your aspirations, because it is important in tackling exploitation of volunteers from disadvantaged groups. Its omission from your draft objectives is a serious deficiency.

Bullet points 7 and 8: physical and digital accessibility of work for all employees and enhancing our inclusive workplace culture

As volunteer chair of CoLAG, I have had to contend with severely reduced resource since spring 2021 (budget frozen, officer level Secretariat support withdrawn and replaced by entry level and less support) and withdrawal of all resources by December 2021. I have received no expenses since becoming chair in January 2021. Until recently, no member has had any remuneration, although I have recently insisted on this, which is paid, most often via voucher, at a very low level for attendance at focus sessions / workshops only, i.e. not for preparation or follow - up work, or indeed any other group activity.

I have received no ICT support, despite having outdated hardware and software, which makes it difficult for me sometimes even to participate in important meetings which CoL insists are held on Microsoft Teams, against the wishes of many CoLAG members. Whilst CoL initially provided technical support to enable generally older CoLAG members with low level ICT skills to participate in meetings and consultations, that was formally taken away in December 2021, although we occasionally had ad hoc technical support from a previous member of staff purely down to their personal kindness and support for our group. Since that member of staff is not currently in role, we have no technical support. The work we do is therefore not entirely and certainly not optimally digitally accessible to us.

Expenses for in - person meetings have also long been taken away, since our budget was frozen in April 2021. We have not met in person since spring 2020. In this way too, the physical accessibility of our work is compromised, as occasionally meeting in person is helpful to cementing group cohesion.

Our Five Targets

Bullet point 1: Staff survey results show improved outcomes in engagement, ability to influence work and sense of well-being...

Volunteers should also be surveyed. As an unsupported Chair of a group carrying out substantial and important work for the City, who is disabled and on an extremely limited income, I feel very stressed by the volume of work I am asked to undertake for CoL, so much so that it regularly undermines my physical and emotional health.

Bullet point 2: Annual workforce data on staff recruitment and retention shows similar recruitment and career progression rates for staff across underrepresented groups.

The work I do has essentially replaced the work of an in - house team and I'm often treated by staff members as if I do actually work for CoL. As part of the review of the group I chair,

CoL's legal team has been consulted, presumably to ensure any remuneration I receive does not confer the status upon me of being an employee. How is this congruent with a fair career progression for somebody in my position?

Also, I'm sure CoL provides staff with contracts, but when I have asked if there are plans to introduce volunteer contracts so that we know what we can expect in return for our labour, I'm told that that isn't on the agenda. Why not? Perhaps if potential volunteers knew upfront that we would be totally unsupported in our roles, we could make a more informed decision not to take them on in the first place. E.g. I was told I needed to only find 1.5 hours every other month as a minimum time commitment for my role when considering taking it on, whereas partly due to withdrawal of CoL support, I have not infrequently had to work a three to four day week.

Bullet point 3: HR data on pay and grade gaps shows an improving picture across all underrepresented groups.

A review of the organisation I chair has been dragging on for almost two years and still nothing has actually changed practically, as I'm informed that even piecemeal improvements cannot be implemented, e.g. expenses paid, until the overall package can be taken to Committee for approval. I have insisted on some very modest remuneration for myself and other group members which remunerates me for a maximum of 1/10 of my time input, although it does cover more of other members' time input, albeit at a very low level in terms of value. In the meantime, the exploitation of a socio - economically disadvantaged disabled person continues. I'm promised jam tomorrow, but in the best part of two years it still hasn't arrived, despite repeated assurances to the contrary that it is about to do so.

Equality Objective 3: Accessible and Excellent Services: p14

We Will

Bullet point 1: Ensure that our services...are accessible and co-created with service users and stakeholders through an agreed approach to consultation, coproduction and engagement.

This unfortunately does not mirror my experience as Chair of CoLAG, a good example being the ongoing externally facilitated review of the group. Thus I had no involvement in:

- the CoL decision to bring in an external consultant to facilitate what was initially an internally led review, with no communication about this from CoL for several months, despite repeated queries on my part
- writing the brief for tendering the work
- selecting the consultant.

When I informed the relevant CoL staff that the appointed consultant had themselves recently asked me how to go about doing what CoL had just appointed them to do, I was told it was too late to reverse the decision, which obviously was a direct result of a total lack of co - commissioning and coproduction. I was then nonetheless expected to work with and support that consultant, despite their manifest shortcomings for the role, which meant that I effectively had to perform some of the consultant's work unremunerated. A CoL staff member and officially apologised, but this failed to improve the extant situation and condemned me to months of unpaid administrative support and covering up for an incompetent external consultant.

On a different point, whilst generally well disposed towards advancing inclusion of disabled people in the work of CoL, the staff with whom I regularly engage cannot even agree

amongst themselves on a consistent approach to recognition and reward for the members of the group I chair for the City.

Regarding the existence of an [Ethical Policy](#), I have never been informed about nor read this and would like to know how its contents sit with the excessive and arguably exploitative workloads I have personally experienced 'volunteering' for CoL.

Concerns also exist within CoLAG around being asked by a senior member of staff to undertake the work of professional access consultants, as we have people with that experience as members, for an extremely modest rate of remuneration.

Moreover, in more than one case very modest amounts of remuneration agreed to by CoL have never actually been paid, as certain members of staff have refused to take responsibility for the remuneration process after the engagement took place, leaving it to me as Chair to design and implement an invoicing process which I lacked the capacity to carry out.

Bullet point 2: [Strengthening equality impact analysis in service planning, decision-making and impact evaluation...](#)

CoL's EqlAs are variable in standard and often lack the input of disabled and older people themselves and therefore miss key issues which should be identified and analysed. What are the plans to improve the quality of the EqlAs and to actually involve in their production the people who are likely to be impacted by the policies and developments being analysed? Many CoL staff lack sufficient understanding of accessibility and inclusion to produce high standard, comprehensive EqlAs, but when this issue is raised (diplomatically), this legitimate concern is dismissed.

More broadly, this objective should not just relate to services, but accessibility and excellence in everything that CoL does.

[Equality Objective 4: Understanding Our Communities: - p15](#)

We Will

Bullet points 1 & 2: [Key datasets and evidence based approach](#)

As previously stated, a data - led and evidence - based approach to understanding and working with CoL's communities and networks must embrace not only quantitative, but also qualitative data. Otherwise CoL risks failing to capture some of the critically important lived experience and stories of those who live, work in and visit the City.

A good example is that I have repeatedly informed mid - level and senior staff that with no remuneration (or minimal and only very recent remuneration by way of voucher) and no expenses for what at times is a three to four day week role, I am forced to subsist on £500 a month disability benefit, as I am unable to take on additional work. I have repeatedly explained over a period of almost two years that I am not in a financial position to effectively subsidise CoL, given that I do not receive expenses to cover my utilities costs. These may not seem like much if you are a CoL Assistant Director, but are a lot if you live on a very low income. When it was apparent that this abstract information appeared not to be understood, I tried to make it easier for the staff to digest and act on by explaining this means that I cannot turn on my heating during the day in wintertime when undertaking CoL work, still to no avail. I asked if they could at least approve expenses ahead of any wider form of recognition coming out of the organisational review, but was told this wasn't possible.

Thus experience has been that some of the people I work with as chair of CoLAG are so far divorced from the lived experience of socio - economically disadvantaged people that they appear incapable of conceiving of what it is like to work in freezing cold wintertime conditions

which exacerbate the symptoms of one's disability. There is an unwritten assumption that anyone volunteering for CoL is essentially well - heeled, but that isn't necessarily the case, a point I have to make repeatedly to gain any traction.

I am concerned this point wouldn't be picked up by a purely data - led approach, in which case, CoL would also be failing to really understand the communities with which it works.

CoL also risks failing to secure the support of the communities involved unless you give them space to respond in the way that they feel is most appropriate to expressing their views, as opposed to the way that CoL feels is most appropriate to package their responses.

With regard to CoL's annual reporting cycle, I have been a member of CoLAG for 3.5 years and haven't been surveyed once, so re - examining and extending the reach of this work is important.

Bullet point 3: ...consulting, understanding and working with our communities...

Clearly, you must reach well beyond residents' meetings, as acknowledged, but what will the wider community engagement stakeholder strategy you mention actually comprise in practice? As I mentioned, as CoLAG Chair I have twice met members of the Sub - Committee, but it's been left to me to follow up. I have lacked the resources - including time, given my excessive workload - to do so, given that I am totally unsupported in my role, whereas you have more resource than I and could have proactively taken it upon yourselves to follow up with CoLAG.

CoL therefore does need to evaluate and strengthen its arrangements for consulting, understanding and working with its communities. It is critical that you take it upon yourselves to reach out more broadly, rather than waiting for some communities to come to you.

Bullet point 5: Delivering better health outcomes for hidden workers

As previously stated, the work I do for CoL exerts a physical and emotional toll on my health.

Unfortunately I am not familiar with this report, but CoL should perhaps concentrate on getting its own house in order before telling others how they should do things. It may be that the report contents are so urgent that isn't possible. Nonetheless I am not comfortable with CoL telling others how to do things given the poor practice I experience which has a negative impact upon my well - being as a CoL volunteer.

Our Five Targets

Bullet point 5: information to influence your work

Influencing CoL's work isn't dependent only on residents having the necessary information.

CoLAG often - not always – has the information we need, but the real issue is that what we say is not always acted upon when it is incongruent with what CoL senior managers and officers have already decided they want to do. It's as much about culture change in terms of the attitudes of mid - level and senior staff, some of whom think they know best and have it all sussed around accessibility and inclusion, despite not having the lived experience of certain protected characteristics themselves. CoLAG members repeatedly encounter a deep rooted professional arrogance amongst not all, but some members of staff, which really impacts our ability to be heard and to make a difference in a positive way.

Also it isn't just residents who need to be targeted with this aspiration and although the point subsequently refers to those who may live outside the City, the term 'residents' alone is inappropriate.

Finally, it isn't just about people who use CoL facilities and services, but also those who do things for CoL or engage with the City in other ways, including as volunteers.

Equality Objective 5: Socio-economic diversity p16

I am broadly very much in favour of this objective, but again, volunteers seem to have been left out of your analysis, plans and aspirations, with the emphasis upon your paid workforce, although schools and care leavers are mentioned.

I am also concerned that many of the aspirations and goals in the document focus on monitoring, rather than actually changing things on the ground. I appreciate that the prevailing situation needs to be documented before resources can be justified to rectify any identified problems, but monitoring on its own will only achieve change slowly. I would feel more confident in the ability of this document to achieve change at an appropriate speed if at least some mention is made of the potential for concrete plans embracing actions based on the findings of your monitoring.

We Will

Bullet points 1 & 3: Five-Point Pathway & outreach programs

My experience suggests best practice needs to be shared internally and programmes run internally before you concentrate on sharing best practice with external partners and running outreach programmes. Please refer back to my response to the first two bullet points under 'We Will' regarding Equality Objective 4 on page 8 regarding myself as a low income disabled person effectively subsidising CoL operations.

I believe that it is unreasonable that as previously stated, I do not receive expenses and very recently only very partial remuneration at variable low rates, despite essentially replacing paid staff. This is particularly so given I was initially told the time commitment involved for chairing CoLAG could be as little as 1.5 hours every other month. The situation is exacerbated, because as a disabled person unable to work full time, the work I do for CoL prevents me from taking up other offers of paid work. When I warn I will have to seriously consider resigning to undertake properly paid work, I am always assured that the organisational review will be concluded swiftly and that remuneration will soon be in place. Since November 2021 however, change has not been forthcoming and I remain socio - economically disadvantaged. Again, please refer to page 8.

Bullet point 3: ...outreach programmes to address barriers from underrepresented groups

I am aware of CoL staff in middle ranking management positions who cannot afford to attend performances in your own venues. Similarly when I am asked for my views about the accessibility of CoL operated venues, I admit that I have not been able to attend for some time, as I cannot afford to do so. It's a terrible indictment of CoL and potentially embarrassing and humiliating for the individuals concerned to have to admit to being too poor to attend events put on by the organisation for which they work or volunteer.

Thus outreach programmes to address barriers from underrepresented groups therefore need to start very close to home with your own employees and volunteers.

Bullet point 5: meeting socio-economic diversity targets

Despite having all resourcing withdrawn, I have nevertheless faced criticism for a lack of diversity amongst the membership of the group I chair beyond disability and (older) age. I am acutely aware of this issue and would very much like to recruit members from a more diverse background, but with the review dragging on, I cannot recruit additional volunteers when I do not know the nature of the reconstituted group to which I would be recruiting them. In this instance, CoL blames me for a situation essentially of its own making.

Our Five Targets

There is also a significant crossover between socio - economic diversity and the use of certain facilities in the City, such as the Barbican, by younger City residents, e.g. from the Golden Lane estate. I have repeatedly witnessed the predominantly elderly Barbican residents do everything that they can in consultations to argue that young adults should be excluded from the areas where they live, e.g. because the former want to use some of the spaces to skateboard.

As a disabled person I fully appreciate the residents' health and safety concerns around skateboarding, but it concerns me that efforts are repeatedly made to design out the inclusion of young adults from many iconic City spaces and no effort that I have witnessed made to even allocate them some small space for their own requirements. The provision of spaces for younger people seems to stop around the age of 10, as per the plans for enhancing the Barbican Podium with a playspace which will not appeal to even older children.

C. The Consultation Process p18

Our Consultation Principles

Inclusive

As previously indicated, CoLAG has not usually been proactively sought out on EDI matters. On this occasion, I was told about the in - person consultation event by an individual CoL member of staff.

Accessible

The draft objectives have been circulated in an inaccessible format for those who do not have paid - for PDF editing software, including volunteers such as myself. A Word version should be made available to enable people to more quickly comment on the document itself, without needing to replicate parts of the text to pinpoint the part of the document one is critiquing - a much more time - consuming process.

By being in - person only, the July 2023 consultation event excluded those unable to travel to the event for accessibility reasons, including staff members and volunteers. Moreover, with it timed just after lunch, it required those travelling in to travel during their lunchtime, thereby potentially forgoing the opportunity to eat.

Only hard and electronic copies of the document are mentioned. Is it available in easy read, braille or British Sign Language formats for example?

Your draft document states that: '[We endeavour to engage with all interested individuals, groups and organisations and will actively seek out and welcome the views of those who do not normally get involved in consultations](#)'.

I have been invited to contribute to this consultation process by a member of staff, but when I have sought to email in my submission to the consultation, I have received an email stating that: 'The Microsoft 365 group, ediconsult@cityoflondon.gov.uk, is configured to reject messages sent to it from outside its organization -- unless the sender is a guest group member. amandacsi@yahoo.co.uk isn't part of the organization, and it isn't a guest group member'.

Physically excluding digital contributions to the process from your stakeholders who do not have a City of London configured email address is not inclusive and not accessible. This restriction

needs to be removed, otherwise you will continue to actively exclude voices from the communities with which you profess you want to engage.

Our Key Consultation Questions

As I try to demonstrate throughout this document with practical examples drawn from my experience of chairing a CoL group, it's not that I don't support the contents of this draft document as far as it goes, but rather that I think the draft objectives simply **don't go far enough** in various ways, including in terms of:

- the breadth of diversity embraced in terms of protected characteristics: there seems to be an emphasis upon gender and race, but not upon disabled and LGBTQI+ people, for example, which is fairly universal beyond CoL
- the type of stakeholder prioritised: generally the workforce and nearly always excluding volunteers
- the area of activity emphasised: e.g. exclusively services in objective 3
- insufficiently emphasising the need for CoL to be more proactive in consistently reaching out to all the communities you need to engage with
- insufficiently attributing responsibility to CoL for outturns, rather than sometimes pushing it back to the communities you seek to serve or other stakeholders
- the need to go beyond monitoring to outline practical changes which will be made when problematic issues come to light, which I've no doubt they will.
- a failure to explain both the incentives and disincentives to promote / ensure compliance amongst staff and other stakeholders, i.e. what is the jeopardy if staff simply decide to pay only lip service to the objectives and conversely, what will you do to encourage them to adopt them?
- a failure to address the issue of funding, which is always used in the case of CoLAG to justify inaction and perpetuate the inequitable status quo.

I also question **five targets** being selected for each of the five objectives. Are all of them equal priorities? Could one objective have made do with four targets, whilst another might have benefited from six? It comes across as gimmicky, rather than authentically tied to need. It may be that the Sub - committee had a long list of more than five targets for each objective and you simply agreed on your top five, but if this was the case, it would have been helpful for that to be explained.

In broad terms, the document also feels very **theoretical** and divorced from my practical experience of volunteering for CoL. It looks fine on paper, but what will it actually mean in practice and how long will it take to catalyse change on the ground? In my experience, CoL takes a very long time to respond, unless something is manifestly in what it perceives to be its interests, like saving money at the expense of volunteers, in which case change can be implemented with zero warning to those negatively impacted.

I'm disappointed, because I really hoped that this document would usher in some real change in the City, but I struggle to believe that it will, certainly not for people like me in my position. Probably I approached the document with an anticipation which was naïve. Perhaps the negative aspects of my experience of volunteering for CoL has overshadowed my perception, although my disaffection is shared by several of my CoLAG colleagues, who have become very disillusioned with CoL as a result of the withdrawal of support for our

work. Ironically, this is regarded as important not only amongst ourselves, but also by CoL staff members, but is not recorded the priority it requires. It would appear that ensuring accessibility and inclusion in the City's built environment and open spaces unfortunately isn't regarded to be as important as relaying the athletics track at Parliament Hill, renewing the Barbican, or a whole host of other funding commitments the City has recently made, a tiny fraction of the outlay for which could revolutionise CoLAG's operation and experience of our members, including me as Chair.

Ultimately, I can only judge what is written here on the basis of my experience, rather than based on reading the aspirations which may never come to fruition off the page to practically improve the situation for the group which I chair, my individual personal situation and ultimately, the experience of many people with protected characteristics when engaging with and being physically present in the City of London. This document feels like a missed opportunity - it needs to go further.

Amanda Jacobs

Chair

28 July 2023

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