

# Equality Impact Assessment

EQIA FORM

CITY OF LONDON

# Equality Impact Assessment

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## Equality Impact Assessment Template.

<b>Directorate:</b> Deputy Town Clerk <b>Service Area:</b> People & HR	<b>Lead Officer:</b> Pauline Shakespeare <b>Date completed:</b> 02/01/2024
<b>Service / Function / Policy / Procedure to be assessed:</b> Workplace Attendance Policy – revision from January 2023 paper/policy – December 2023	
<b>Is this:</b> New / Proposed Existing/Review <input checked="" type="checkbox"/> Changing <input checked="" type="checkbox"/>  (Please tick appropriate box)	<b>Review date:</b> To be confirmed

## Equality Impact Assessment

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### Part A – Initial Equality Impact Assessment to determine if a full Equality Impact Assessment is required.

#### What are the aims and objectives/purpose of this service, function, policy, or procedure?

The Workplace Attendance Policy paper (February 2024) sets out the proposed changes to the current [Workplace Attendance Policy](#) (January 2023) at City of London Corporation. The policy was created to inform City of London Corporation employees, of the types of roles that exist in the Corporation, the explanation on the categorisation of roles, and the frequency of days that the employees are required to physically attend the workplace.

Compliance is reliant on the principles of collaboration, constructive dialogue with all our employees, flexibility and equity, equality diversity and inclusion, achieving consensus around common goals. The Workplace Attendance Policy sits alongside the forthcoming People strategy and Ambition 25 (Reward Programme), currently in process of being implemented by City of London Corporation.

This Equality Impact Assessment applies specifically to the revised Workplace Attendance Policy proposal (July 2023). We are committed to carrying out our equality duties and the Equality Impact Assessment has been developed to support the revised Workplace Attendance Policy.

To inform the basis of the revised Workplace Attendance Policy, both internal and external benchmarking and research have been necessary.

Please see appendix 1 – with links to research that has been undertaken externally.

#### Please indicate its relevance to any of the equality duties (below) by selecting Yes, or No?

	Yes	No
Eliminating unlawful discrimination, victimisation, and harassment	x	
Advancing equality of opportunity	x	
Fostering good relations	x	

The requirement is to have due regard to the 3 aims of the Equality Duty (albeit on a proportionate basis).

## Equality Impact Assessment

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**If not relevant to any of the three equality duties and this is agreed by your Head of Service**, the Equality Impact Assessment is now complete - please send a copy to the Equality Team. **If any of the three equality duties are relevant**, a Full EQIA will need to be undertaken (PART B below).

**PART B: Full Equality Impact Assessment.**

**Step 1 – Identifying outcomes and delivery mechanisms (in relation to what you are assessing)**

<p><b>What outcomes are sought and for whom?</b></p>	<p>Members have requested that the Workplace Attendance policy be revised to require all employees in the current Hybrid &amp; Academic categories (as outlined below) increase their expected time in the office from two days to three days per week or from 8 days to 12 days per month.</p> <p>The current Workplace Attendance Policy set out the categories that all of roles sit within in the City of London Corporation. These are summarised as Workplace-based; Hybrid; Workplace Plus; and Academic.</p> <p><b>Workplace-based:</b> An employee whose role requires them to be based in a specific City Corporation workspace or third-party site for all working days, such as a gallery, venue, office, or reception desk. No option to work from home.</p> <p><b>Hybrid</b> A desk-based employee who can work effectively from a variety of workspaces including home. Expected to be in the office a minimum of 2 days per week or 8 days every 4 weeks (to be defined by the relevant Chief Officer). Employees can attend the office more than this if that is their preference, but no less.</p> <p><b>Workplace Plus</b> An employee whose role generally requires them to be based in a specific City Corporation workspace or third-party site, but with a limited option to work from home (maximum 1 day per week or equivalent) where appropriate and with managerial approval.</p> <p><b>Academic</b> An individual whose role requires them to be workplace-based for all working days during term time but can follow hybrid worker arrangements outside of term time.</p> <p>Figure 1 shows the current breakdown across the workforce of the workplace attendance categories.</p>
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Headcount by Workplace attendance

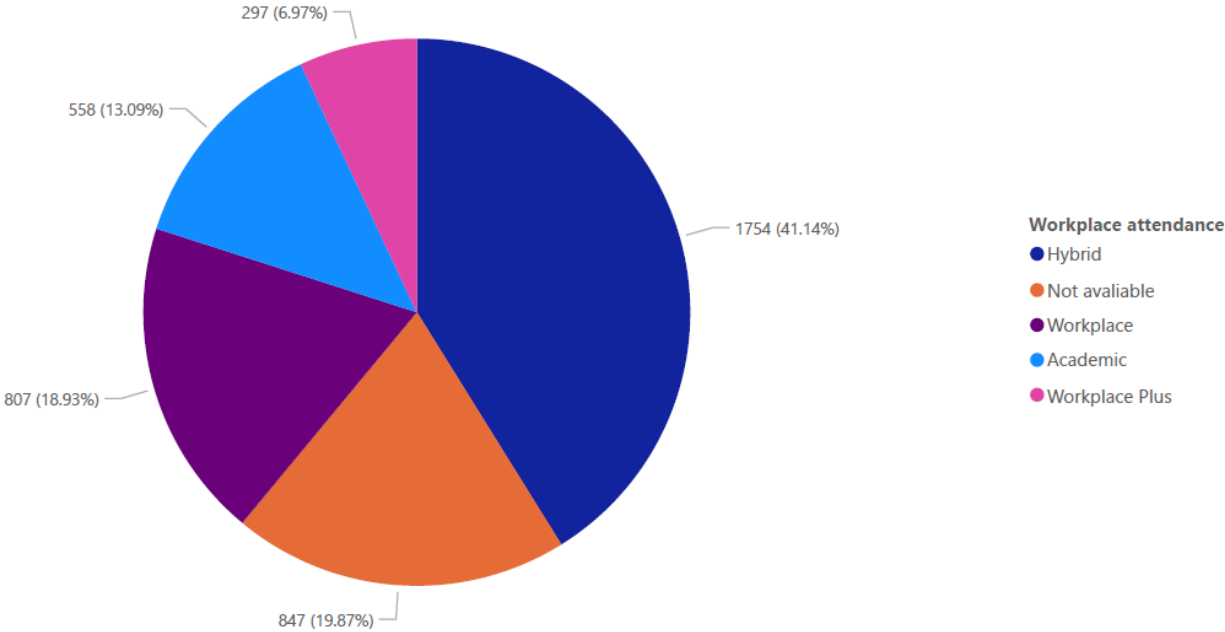


Figure 1 – Current breakdown of categories as outlined in the 2023 Workplace Attendance Policy

The two role categories that will be primarily affected is 'Hybrid'-1754 employees and 'Academic'- 553 employees (whilst not mainly affected due to presence required in term time – outside of term time arrangements follows the normal protocol for 'Hybrid'.)

For Part-time employees, this is calculated over a 28-day period, and they are required to work '40%' of their contractual hours (example employee works 3 days a week. 4 weeks x 3 working days = 12 working days; 12 x 40% = 4.8, round up to 5 days)

The two role categories, 'Workplace-based'- 807 employees and Workplace Plus 298 employees– are already required to be onsite for longer than the proposal, so shouldn't further affect these working conditions for these employees, as they have little or no flexibility to work from home.

With effect from **1<sup>st</sup> May 2024**, employees categorised as Hybrid and Academic will spend no more than 2 days or 40% of their working time working remotely or at home, which equates to three days per week at their workplace,

### **IMPACTS**

#### **Increase in Flexible Working Applications**

Employees in the 'Hybrid' and 'Academic' categories due to the proposed increase **to three days** in the office – may submit a higher number of Flexible Working Applications to attempt to continue their current work-life balance, home needs and caring responsibilities. The Corporation may face difficult choices about decisions on how to balance the service needs if the frequency of these requests increase. HR are already seeing an increase in Flexible Working Applications due to proposed changes in legislation, and employees seeing patterns of workforces in industry being asked to return.

#### **Changes in Flexible Working legislation due to be adopted in 2024.**

With the proposed act now having received royal assent in July 2023, employers will be required to consider any flexible working requests and have a justifiable reason before rejection. This covers flexibility on part-time, term-time,

flexi-time, compressed hours and adjustable start and finish times. It may also include a right to Flexible Working from day one, but this is yet to be finalised and if this is successful, this will likely impact the number of Flexible Working applications received. Legal experts are suggesting that Employers may start to see changes from July 2024.

Applications and refusals for Flexible Working forms received, will need to be monitored in respect of protected characteristics to identify if this is resulting in a disproportionate negative impact on some groups.

### **Trend towards Part-time working**

The rise in part-time work can, in large part, be attributed to workers' increased desire to exert choice and control over their careers. "It's no longer about being nine-to-five in the office. People want to have flexibility around the way they live and work,"

### **Higher travel costs/cost of living**

**The government has announced that rail fares in England will rise by up to 5% from the 3<sup>rd</sup> March 2024,**

Annual increases to 'regulated' rail fares, such as season tickets and off-peak tickets, are usually linked to the previous July's retail prices index (RPI) measure of inflation, which for 2023 stood at 9%.

### **Travel disruptions/strikes**

Transport Unions in 2023 have had a higher frequency of balloted collective strikes days and bargaining for salary increases, and the number of strikes that happen frequently with the different train companies is increasing – which affects employee attendance on site and corporate/business revenue, through the commuter traffic declining and face to face financial meetings having to be rescheduled or cancelled at short notice. This potentially might have the largest impact on the hybrid group of employees, particularly as there is usually little notification if these are to be called off.

### **Price of Energy**

From 1 January 2024 the price for energy a typical household who use gas and electricity and pay by Direct Debit will go up by £94. This will take the price cap from £1,834 to £1,928 per year.



## Equality Impact Assessment

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From 1 January 2024, for a typical user paying by direct debit, the unit rate will be 29p/kWh for electricity and 7p/kWh for gas. The average daily standing charge will be 53 p/day for electricity and 30 p/day for gas. The increase in the price cap is because the cost of wholesale gas has gone up in recent months. This is due to world events including the conflict in the Middle East.

There is a counter argument that introducing a further day in the office may be in fact cheaper than working from home (due to the increased costs of electricity and gas, and discounts available using a Travel Card 3 days or more), rather than using a daily Oyster cap fare option.

Season Ticket holders (monthly or longer tickets) who choose not to travel on strike days can claim **100 per cent** compensation for those days through the “Delay Repay” system.

### **Disability/sickness**

It is already well known that Disabled employees face challenges with travel within the city and often have longer travelling distances to use ‘step-free’ stations. A further day in the office would increase the travel time and financial cost for this group and may have a detrimental effect on their physical and mental health.

As we see increases in employees returning to the office, this will result in more crowded/busy transport options and may have a potentially disproportionate impact on individuals that have existing conditions with long Covid being an example (who would likely be more vulnerable in busy settings) – which could result in a higher number of sick absence cases reported, impacting employees wellbeing, and cost of cover for absence (including recruitment on a temporary or permanent basis).

Additionally, there may be increased stress/anxiety and therefore disproportionate impact in employees suffering with neurodiverse conditions, with the requirement to be in a busy/lit/noisy environment (with less ability for quiet reflection).

Those employees known to be living with long term health conditions will have the flexibility to travel outside of normal rush hour to lessen the impact on them, and to work shorter days in the office. Working directly with line managers they can increase hours when at home, the approach taken will be to ensure the health and wellbeing of our employees.

The Corporation has Mental Health First Aiders available to support employee’s mental health and wellbeing.

## Equality Impact Assessment

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City of London Corporation has mental health first aiders throughout the organisation, to provide support services to employees, which raises awareness and mental health literacy, reduces stigma around Mental Health, boosts employee's knowledge and confidence in dealing with mental health issues, promotes early intervention which enables recovery. Appendix 2 – (The role of the Mental Health First Aider).

### **Location**

Employees who live longer distances away from the Guildhall Office, may be more adversely affected and this could have an impact on employee retention and attraction for potential candidates via recruitment or difficulty to hire on hard to fill roles (as other employers may offer more flexibility about where/ when they have to work.)

### **Desk Capacity**

The COVID pandemic reduced the internal desk capacity within the Guildhall in February 2020 due to Health and Safety measures (infection control and social distancing) and the number of desks remain the same in January 2024. It is therefore possible, that with the implementation of this revised Workplace Attendance Policy proposal of a possible three-day week in the office – there may be some challenges/pinch points with accommodating all employees.

Therefore, to avoid pinch points, we propose that Chief Officers and their leadership teams agree under a Local Plan, which days a week their teams should be in the office, and that these days are equally spread across the full working week – Monday to Friday to maximise the use of the overall desk capacity available and not to focus on the more popular days of Tuesday, Wednesday, and Thursdays.

The revised Workplace Attendance Policy may have a detrimental impact on those with Disabilities or those with Parental or caring (or wider) responsibilities who may take longer to travel to the office, in relation to securing desks.

The Corporation desk booking system was removed in January 2024 and is due to be reviewed in 3 months' time. There may be a disproportionate negative impact on employees with mental health conditions, reasonable adjustments, or caring responsibilities (that may arrive later to the workplace as a result of school drop offs/parental requirements and are looking to secure a desk).

## Equality Impact Assessment

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Within the future police estate programme for example, our corporate services desk to people ratio is currently 59%. Whilst the Police can accommodate a move to 3 days a week, they cannot however, accommodate any further increases in their future estate at the current time.

Department Children & Community Service (DCCS) desk utilisation is currently running at 72% on average per week. With ongoing moves expected they are likely to run out of desk capacity for their team, should we increase the days in the office further than three days per week.

Corporate Strategy fully utilises Flexible Working to delivery on its objectives for the corporation: Compressed Hours, Different locations, part time working,

Currently Corporate Strategy Team FTE is 16 people with 11 desks overall – which is 68% desk capacity on the current workplace attendance arrangements. There are overflow arrangements in place via another office in Guildhall – but since the disbanding of COO, other teams such as Health and Safety and EDI have moved across, there are further challenges regarding available seating.

### **CIPD research**

CIPD research tells us that from an equality perspective, organisations that put in place additional measures to support Hybrid Workers returning to the office, has had a positive impact on employee engagement, productivity, and wellbeing in the workplace. The range of different solutions, include:

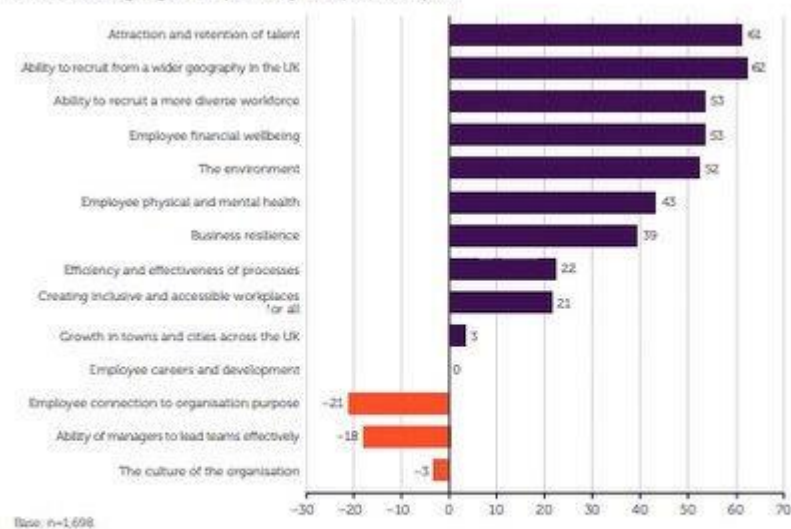
- Collaborative Spaces (44%)
- Greater investment in the quality (40%) and quantity of software (40%)
- Line Manager Training (38%)

The wider impact of hybrid working has brought a positive impact for attraction and retention, recruiting from further afield, more diverse workforce, financial wellbeing. The negatives have been highlighted as employee connection to business purpose, leading teams, and the culture of the organisation. The below chart outlines the above information.

Source – CIPD flexible and hybrid working practises in 2023:

**Figure 6: Wider impact of hybrid working**

[net score taking negative impact away from positive impact]



Employer perspectives

## Summary

The Corporate Plan highlights the strategy for City Corporation and the outcomes we seek to achieve. The internal Workplace Attendance Policy underpins this aim by ensuring that the workforce is flexible to support this delivery. The breadth of these activities is unique to our organisation and the revised Workplace Attendance Policy seeks to address this customer need, with more visibility within the City Corporation and square mile to deliver our priorities as a Place Based Organisation.

## Equality Impact Assessment

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<b>Are there any associated policies, functions, services or procedures?</b>	Flexible Working Policy Equal Opportunities Policy Recruitment and Selection Policy Flexi Time Scheme
<b>If partners (including external partners) are involved in delivering the service, who are they?</b>	

### Step 2 – What does the information you have collected, or that you have available, tell you?

**What evidence/data already exists about the service and its users?** (In terms of its impact on the ‘protected characteristics’, i.e., race, disability, sex, gender re-assignment, age, religion or belief, sexual orientation, maternity/pregnancy, marriage/civil partnership and other socially excluded communities or groups) and **what does the data tell you?** e.g., are there any significant gaps?

#### **Analysis of City Corporation Employees**

The proposed revision to the Workplace Attendance Policy impacts City of London Corporation employees as it sets the requirements for attendance in office, and in line with the Corporate Strategy, sets overall strategic direction for City Corporation and all employees will ultimately be involved with its delivery as a Place-based organisation.

The following data from the City Corporation’s People and HR department breaks down its employees by protected characteristics as of 30 October 2023. Data has been provided on two groups. ‘Directly Employed’ consists of full time, part time and directly employed temporary employees of the City Corporation, including its Institutions (the Barbican Centre, City Bridge Foundation, City of London School, City of London School for Girls, Freemen’s School, Guildhall School of Music & Drama, and City of London Police [civilian employees]). ‘Including Casuals’ consists of the Directly Employed cohort, plus casual and agency workers, contractors, and consultants.

Analysis of this data by protected characteristic has been used when considering the impact on employees for the proposed changes of the Workplace Attendance Policy itself and the planning of internal engagement with employees. However, low disclosure rates for data related to protected characteristics for City Corporation employees outside of sex and age are a barrier to analysis of the equality impacts on City Corporation employees. This has been noted as an issue to be addressed in the action plan section of this EQIA.

#### **Age**

91.3% of those Directly Employed by the City Corporation are aged between 25 and 64 years, with the largest proportion (36%) aged 35 to 49 years, closely followed by those aged 50 to 64 years (34.1%) – which typically have the highest caring responsibilities. Only 4.5% of those Directly Employed are aged between 20 and 24 years. When we include Casuals, there are some notable differences. The proportion aged 25 to 64 years is 8.6 percentage points lower, at 82.7%, with a concomitant rise in the proportion aged 20 to 24 years by 6.2 percentage points higher to 10.7%. The three groups between 25 and 64 years are also more balanced when including Casuals compared to just looking at Direct Employees, with a range of 4.4 percentage points between the categories 25 to 34 years and 35 to 49 years for Casuals, compared to 14.8 percentage points for the Directly Employed.

The impacts for proposed changes to Workplace Attendance Policy could affect any age-group.

## Equality Impact Assessment

The below table shows the full percentage breakdown.

Cohort Name	Aged 16 to 19 years	Aged 20 to 24 years	Aged 25 to 34 years	Aged 35 to 49 years	Aged 50 to 64 years	Aged 65 to 74 years	Aged 75 to 84 years	Aged 85 years and over	Unknown
<b>Directly Employed</b>	<1	4.5	21.2	36.0	34.1	3.5	<1	0.0	<1
<b>Including Casuals</b>	1.2	10.7	25.6	30.0	27.1	4.4	<1	<1	0.0

### Disability

4.5% of those Directly Employed by the City Corporation self-certify as having a disability or long-term health condition. However, more than a quarter of those Directly Employed have not provided the City Corporation with this data. Whilst the Self-Certified as Disabled proportion is slightly lower if we include Casuals, the Not Known proportion is even higher, at 35.9%.

Therefore, the proposed changes and resultant impact to this group on the Workplace Attendance Policy may be lower than expected (but due to not known disclosure rates, we do not have the full picture, and consequently there could be up to a third of the workforce that is impacted through Disability that would prefer not to disclose). The below table shows the full percentage breakdown.

Cohort Name	Self-Certified as Disabled	Self-Certified as Not Disabled	Not Known
<b>Directly Employed</b>	4.5	69.5	25.9
<b>Including Casuals</b>	3.8	60.3	35.9

## Equality Impact Assessment

### Sex

There is a virtual even split in the proportion of females and males Directly Employed by the City Corporation, whilst there is a slightly higher proportion of females when including Casuals.

In relation to proposed changes to Workplace Attendance Policy, the Female group is statistically more likely to be affected, as they tend to be the Primary Carer of children and parents, and more likely to have reduced hours, compressed hours patterns and Flexible Working agreements – although it is noted that caring responsibilities go wider than just childcare or parents.

The below table shows the full percentage breakdown.

<b>Cohort Name</b>	<b>Female</b>	<b>Male</b>	<b>Unspecified</b>
<b>Directly Employed</b>	50.2	49.8	0.0
<b>Including Casuals</b>	50.9	49.1	<1

### Race

For both those Directly Employed by the City Corporation and when including Casuals, White – British is the most common ethnicity, at over 40% for each. The next largest (excluding the large proportions, particularly when including Casuals, of no responses) is White – EU, at just over 5% for each. When just looking at those Directly Employed by the City Corporation, there are slightly higher proportions identifying as Asian or Black ethnicity groups than when including Casuals.

As White – British is the largest group of directly employed employees, this group will have the largest impact in terms of proposed changes to the Workplace Attendance Policy.

The below table shows the full percentage breakdown.

<b>Cohort Name</b>	<b>Directly Employed</b>	<b>Including Casuals</b>
<b>Arab</b>	<1	<1
<b>Asian - Bangladeshi</b>	1.4	<1



## Equality Impact Assessment

<b>Asian - British</b>	1.6	1.0
<b>Asian - Indian</b>	1.4	<1
<b>Asian - Pakistani</b>	<1	<1
<b>Any other Asian background</b>	<1	<1
<b>Black - African</b>	2.5	1.7
<b>Black - British</b>	2.9	2.0
<b>Black - Caribbean</b>	2.0	1.4
<b>Any other black background</b>	<1	<1
<b>Chinese</b>	<1	<1
<b>Irish</b>	1.4	1.2
<b>Mixed - Asian &amp; White</b>	<1	<1
<b>Mixed - White and Black African</b>	<1	<1
<b>Mixed - White &amp; Black Caribbean</b>	1.0	<1
<b>Any other mixed background</b>	<1	1.1
<b>White - British</b>	49.3	42.8
<b>White - EU</b>	5.2	5.4
<b>White - Other European</b>	<1	<1
<b>White - any other white background</b>	2.9	2.9
<b>Any other ethnic group</b>	1.0	<1
<b>Not stated</b>	21.9	32.5
<b>Prefer not to say</b>	<1	<1

### Religion or Belief

None/No religion makes up the largest proportion of responses from those Directly Employed by the City Corporation, at just over one third (34.2%), followed by Christian at 28.4%. All other religions make up small proportions, with Muslim being the largest at 3.3%. There is also a large group of people not providing any data (27.5% combining the Not Stated and Unknown categories). When including Casuals, the overall trends (None/No religion as the largest group, followed by Christian) are the same, but as at a slightly reduced percentage, with a resultant rise in the proportion not providing data (37% combining the Not Stated and Unknown

## Equality Impact Assessment

categories). Other also shows a larger proportion at 4.9%, 2.2 percentage points higher than just those Directly Employed. The below table shows the full percentage breakdown.

The data doesn't suggest that proposed changes to Workplace Attendance Policy would disproportionately affect any specific religious category – however there could be issues for some employees who are observant for their religion (if there is not a local facility) or impacts to those with dietary requirements linked to Religion.

<b>Cohort Name</b>	<b>Buddhist</b>	<b>Christian</b>	<b>Hindu</b>	<b>Jewish</b>	<b>Muslim</b>	<b>None / No religion</b>	<b>Other</b>	<b>Sikh</b>	<b>Spiritua l</b>	<b>Not stated</b>	<b>Unknow n</b>
<b>Directly Employed</b>	<1	28.4	1.4	<1	3.3	34.2	2.7	<1	1.0	4.3	23.2
<b>Including Casuals</b>	<1	21.4	<1	<1	2.1	31.4	4.9	<1	<1	3.3	33.7

### Gender Reassignment

For both cohorts, Not Known is the largest response group when it comes to data relating to Gender Reassignment, with over 90% for those Directly Employed. This makes it very difficult to draw any concrete conclusions using this data. It is notable, however, that, unlike most other questions related to the Protected Characteristics, including Casuals reduces the proportion with no response.

The data doesn't suggest that proposed changes to Workplace Attendance Policy would disproportionately affect any specific Gender Reassignment category, however there could be impacts to employees that have decided to transition.

The below table shows the full percentage breakdown.

## Equality Impact Assessment

Cohort Name	Gender identity different from sex registered at birth	Gender identity the same as sex registered at birth	Information Refused	Not Known
Directly Employed	<1	7.4	<1	92.4
Including Casuals	<1	13.6	<1	85.8

### Pregnancy and Maternity

2.1% of those Directly Employed by the City of London Corporation have been on maternity leave in the 12 months between November 2022 and October 2023. Comparative data including Casuals is not available.

Proposed changes to the Workplace Attendance Policy may affect this group due to Primary Carer responsibility, although the percentages are very low, this may result in increased Flexible Working Applications.

Cohort Name	Employees on Maternity Leave in Last 12 Months
Directly Employed	2.1
Including Casuals	Data unavailable

### Sexual Orientation

For both cohorts, Heterosexual is the area that makes up the largest proportion of response, at over 50% for when either excluding or including casuals. The proportions identifying as Sexual Orientations other than Heterosexual are similar when excluding or including Casuals, with a slight increase in the proportion identifying as Bisexual when including Casuals. Whilst those Directly Employed have a higher rate of Declining to Specify, when including Casuals, the proportion of no responses increases by 7.4 percentage points.

There doesn't appear to be any correlation or impact with Sexual Orientation and proposed changes to the Workplace Attendance Policy, however the highest disclosure for employees is Heterosexuality.

The below table shows the full percentage breakdown.

## Equality Impact Assessment

Cohort Name	Asexual	Bisexual	Gay	Heterosexual	Lesbian	Pansexual	Queer	Declined to specify	Unknown
<b>Directly Employed</b>	<1	2.1	3.0	57.4	<1	<1	<1	5.1	31.2
<b>Including Casuals</b>	<1	3.1	3.0	50.2	<1	<1	<1	4.1	38.6

### Marriage and Civil Partnership

Not Specified/Unknown makes up the highest proportion of responses relating to Marriage and Civil Partnership for those Directly Employed by the City Corporation, at 40.6%. Where there is a response, the largest groups are Married, at 28.4%, and Single, at 19%. The overall trends on proportion are the same when including Casuals, though lower proportions for the response groups are likely due to the much lower response rate, with 57% having no recorded Marital/Civil Partnership status.

It is difficult to understand what impact the proposed Workplace Attendance Policy will have on this characteristic due to the high percentage of Not Specified – however, there may be an adverse effect on the Marriage and Civil Partnership group that may likely have parental responsibilities and require more flexibility with their work. The below table shows the full percentage breakdown.

Cohort Name	Civil Partner	Divorced	Married	Partner	Separated	Single	Widowed	Not Specified / Unknown
<b>Directly Employed</b>	<1	2.8	28.4	7.2	1.0	19.0	<1	40.6
<b>Including Casuals</b>	<1	2.0	20.2	5.2	<1	14.2	<1	57.0

### **Data by role category/Workplace Attendance Policy**

The data the Corporation holds on role category gives an insight on the potential implication/impact and is set out below: -

#### **Hybrid**

## Equality Impact Assessment

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There are (1010) Females and (744) Males in this category. Therefore, this could mean that up to 2/3 of this group could potentially have an impact with increases to the amount of the hours they have to attend the office, due to existing childcare solutions or statutory caring responsibilities.

There is the highest number of employees in this category of role. (1754)

There are (87) employees that have disclosed Disability in this category, with (381) employees not providing any disclosure, which may mean that this figure is higher and therefore the Corporation may have more Disabled employees than is understood. The Disabled group may encounter challenges with attending the office on a higher frequency of days, as research shows that their standard journey time (due to station access) may be longer and more complex.

For Ethnicity, the data shows that the most impacted ethnicity within the Hybrid group is White (1062).

For Sexual Orientation, the largest response is Heterosexual. There is no correlation/data to suggest that changes to the Workplace Attendance Policy would have any detrimental impact.

### Hybrid (grade breakdown)

A – none

A+ - none

B – 66

B+-0

C- 270

C+ 5

D-390

D+ 4

E-335

E+5

F-295

F+-13

G and above - 171

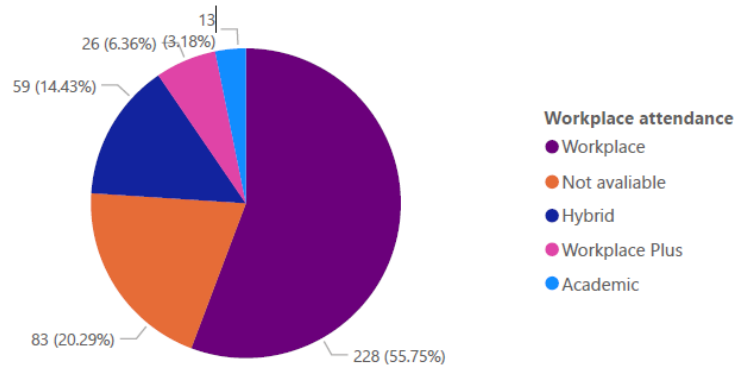
# Equality Impact Assessment

F9 and other – 61

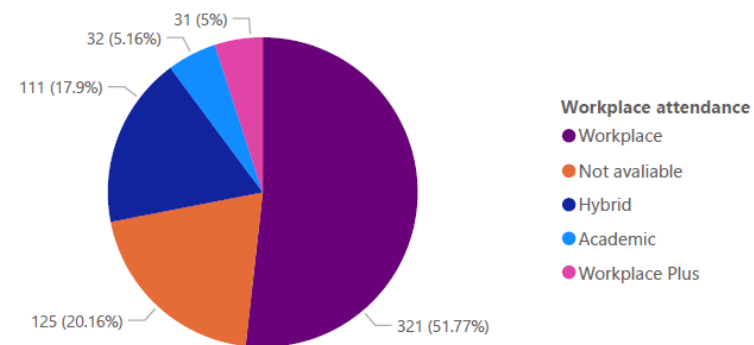
Not known (casual) 139

From the data above, we can summarise that Grades A-C (336 employees or 19%) within the Hybrid categorisation, may face a higher financial impact with the revised requirement to attend the office for 3 days a week due to lower annual salary against increased travel costs.

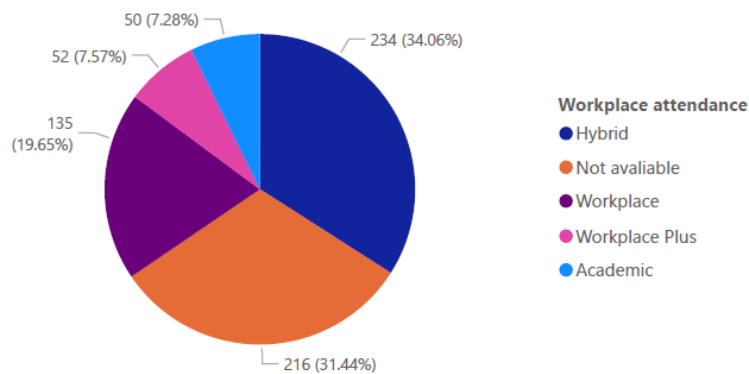
Under £20K Headcount by Workplace attendance



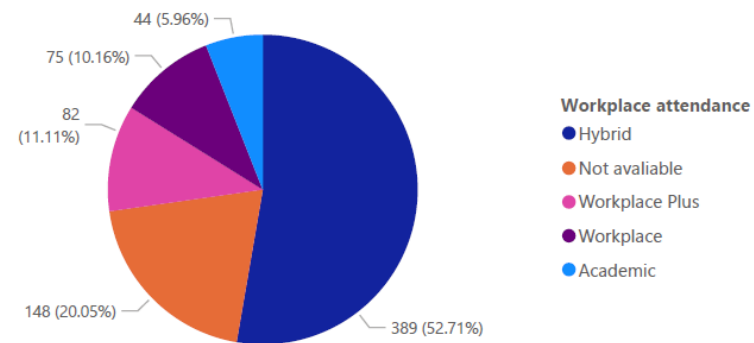
£25K-£24,999 Headcount by Workplace attendance



£30K-£34,999 Headcount by Workplace attendance



£35K-£39,999 Headcount by Workplace attendance



## Equality Impact Assessment

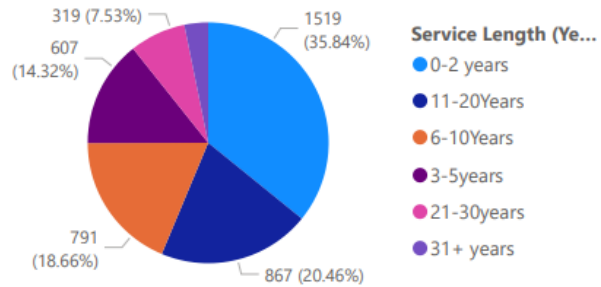
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### Service Length

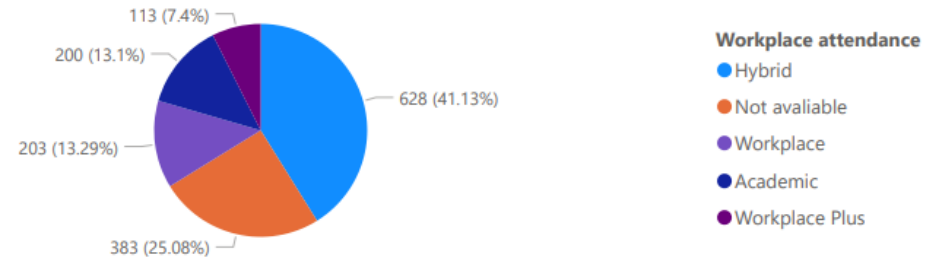
There is the potential of increased turnover amongst employees who are in the early stages of their career. For example, employees who occupy hard-to-recruit positions and started at the City on the agreement of working two days a week in the office could potentially look elsewhere.

# Equality Impact Assessment

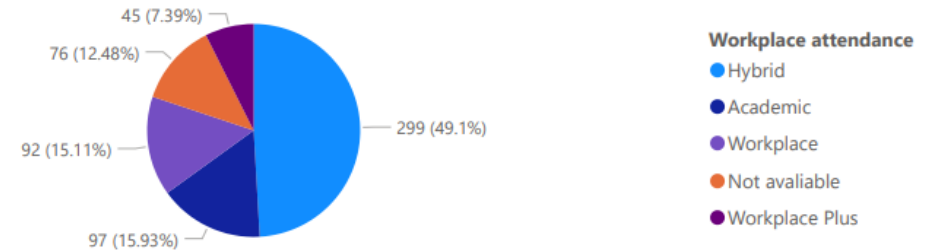
Headcount by Service Length (Years):People+



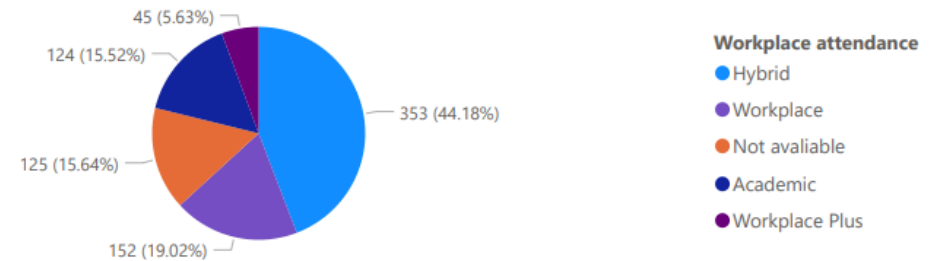
0-2years Headcount by Workplace attendance



3-5years Headcount by Workplace attendance



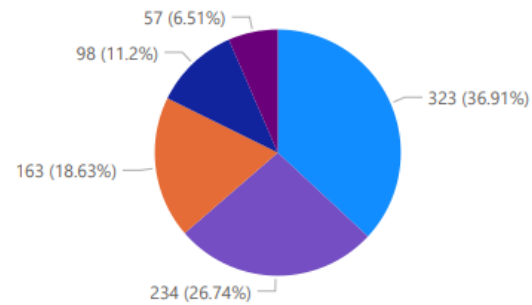
6-10years Headcount by Workplace attendance





# Equality Impact Assessment

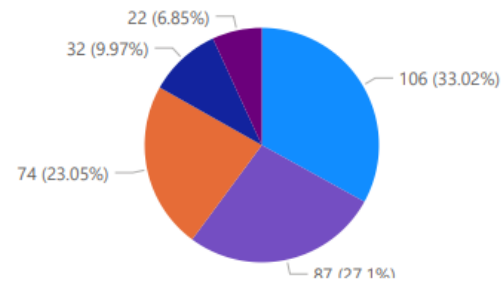
### 11-20years Headcount by Workplace attendance



**Workplace attendance**

- Hybrid
- Workplace
- Not available
- Academic
- Workplace Plus

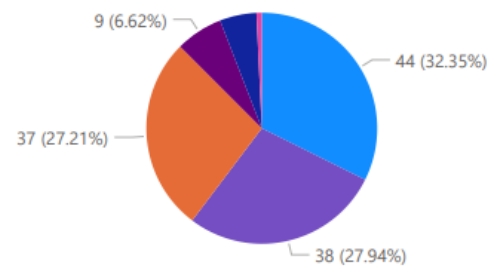
### 21-30 years Headcount by Workplace attendance



**Workplace attendance**

- Hybrid
- Workplace
- Not available
- Academic
- Workplace Plus

### 31+ years Headcount by Workplace attendance



**Workplace attendance**

- Hybrid
- Workplace
- Not available
- Workplace Plus
- Academic
- #MULTIVALUE

Hybrid category effect on department

## Equality Impact Assessment

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The departments that will be most impacted by changes to Hybrid working days in office are:

Environment 282 employees

Chamberlains 239 employees

City of London Police Civilians 223 employees

### **Academic**

There are (319) Females and (234) Males in this category. Therefore, this could mean that up to 60% of this group could potentially have an impact with increases to the amount of the hours they have to attend the workplace (outside of term time arrangements), due to existing childcare solutions or statutory caring responsibilities.

There are (553) employees in this category of role.

There are (13) employees that have disclosed Disability in this category, with (257) employees not providing any disclosure, which may mean that this figure is higher and therefore the Corporation may have more Disabled employees than is understood in this category. The Disabled group may encounter challenges with attending the workplace on a higher frequency of days, as research shows that their standard journey time (due to station access) may be longer and more complex.

For Ethnicity, the data shows that the most impacted ethnicity within the Hybrid group is White (280). However, the non-disclosure or not stated rate is (247) – this means that there is a section of this group that may be impacted and this data is not available.

For Sexual Orientation, the largest response is not specified (290), followed by heterosexual (221). There is no correlation/data to suggest that changes to the Workplace Attendance Policy would have any detrimental impact to this protected characteristic but without a full data set this may be skewed.

Academic (grade breakdown)

## Equality Impact Assessment

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A – 0

A+ - 0

B – 26

C- 53

D-31

D+

E-41

F-25

G and above - 9

From the data above, we can summarise that Grades A-C (79 employees or 14%) within the Academic categorisation, may face a higher financial impact with the revised requirement to attend the office for 3 days a week due to lower annual salary against increased travel costs.

### **Workplace-based:**

There are 807 employees in this category, (213) Females and (594) Males.

There are (33) employees that have disclosed Disability in this category, with (139) employees not providing any disclosure, which may mean that this figure is higher and therefore the Corporation may have more Disabled employees than is understood in this category.

For Ethnicity, the data shows that the most impacted ethnicity within the Workplace-based group is White (478). However, the non-disclosure or not stated rate is (30) – this means that there is a section of this group that this data is not available.

For Sexual Orientation, the largest response is heterosexual (515) – with (51) not stated. There is no correlation/data to suggest that changes to the Workplace Attendance Policy would have any detrimental impact to this workplace category and protected characteristic but without a full data set this may be skewed.

Proposed changes to the Workplace Attendance Policy should not affect the Workplace-based group as they cannot work from home.

## Equality Impact Assessment

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### **Workplace Plus:**

There are 298 employees in this category, (158) Females and (140) Males.

There are (20) employees that have disclosed Disability in this category, with (45) employees not providing any disclosure, which may mean that this figure is higher and therefore the Corporation may have more Disabled employees than is understood in this category.

For Ethnicity, the data shows that the most impacted ethnicity within the Workplace-based group is White (227). However, the non-disclosure or not stated rate is (7) – this means that there is a section of this group that this data is not available.

For Sexual Orientation, the largest response is heterosexual (209) – with (63) not stated. There is no correlation/data to suggest that changes to the Workplace Attendance Policy would have any detrimental impact to this workplace category and protected characteristic but without a full data set this may be skewed.

Proposed changes to the Workplace Attendance Policy should not affect the Workplace Plus group as they already only have a maximum 1 day for homeworking and only with prior management approval.

**Has there been any consultation with, or input from, customers / service users or other stakeholders?** If so, with whom, how were they consulted and what did they say? If you haven't consulted yet and are intending to do so, please list which specific groups or communities you are going to consult with and when.

### Internal / Employees engagement

- a. Executive Leadership Board – consulted in December 2023.
- b. Trade Unions – have been consulted in January 2024.
- c. HR – consulted in December 2023.
- d. Employees – January 2024.
- e. EDI Director – January 2024.

## Equality Impact Assessment

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**Are there any complaints, compliments, satisfaction surveys or customer feedback that could help inform this assessment? If yes, what do these tell you?**

The City of London Corporation engages a third-party agency, People Insight, to conduct a full survey of its employees on a regular basis, to provide an objective, quantitative and qualitative measure of engagement and identify issues to help make positive changes to the workplace. This information is supplemented by pulse surveys on a variety of more specific subjects. Response data is broken down by demographics such as department, length of service and a range of others for chief officers and senior management, to assist with target action planning where most needed. Analysis is provided for demographic breakdowns with five or more responses to ensure that individual responses remain anonymous.

When the initial pulse surveys were sent to employees in January 2023, the most favoured number of days in the office was 2, closely followed by 3. It is worth highlighting that departments such as Remembrancers and School employees work from the office more significantly than other departments.

The feeling of divide by our employees who fall into the categories of Workplace-based, Workplace Plus and Academic (see Appendix A) where the nature of their role requires them to attend their workplace or office for 5 days a week or those who cover evening functions is gaining momentum. Feedback from our workers in the non-hybrid and academic categories outlines a risk around the potential for underlying resentment across the workforce as a result of their requirement to be at their place of work or office for 5 days a week, versus the requirement of the hybrid and academic workers attending for 2 days a week.

## Equality Impact Assessment

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### Step 3 – Identifying the negative impact.

#### a. Is there any negative impact on service users?

<b>Equality Themes</b>	<b>Positive Impacts</b>	<b>Negative Impacts Identified</b>	<b>Solutions (Ways to mitigate negative impact)</b>
<b>Age</b> (including children, young people, and older people)	N/A	N/A	N/A
<b>Disability</b> (including carers)	N/A	N/A	N/A
<b>Sex</b> (men and women)	N/A	N/A	N/A
<b>Race</b> (including Gypsies & Travelers and Asylum Seekers)	N/A	N/A	N/A
<b>Religion or belief</b> (including people of no religion or belief)	N/A	N/A	N/A
<b>Gender Re-assignment</b> (those that are going or have gone through a transition: male to female or female to male)	N/A	N/A	N/A
<b>Pregnancy and Maternity</b>	N/A	N/A	N/A
<b>Sexual orientation</b> (including gay, lesbian, bisexual and heterosexual)	N/A	N/A	N/A
<b>Marriage and Civil Partnership</b>	N/A	N/A	N/A

## Equality Impact Assessment

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### Step 4 – Changes or mitigating actions proposed or adopted

**Having undertaken the assessment are there any changes necessary to the existing service, policy, function, or procedure?  
What changes or mitigating actions are proposed?**

The Workplace Attendance Policy will be updated to reflect the final agreed changes in required workplace attendance.

The Workplace Attendance Policy is a framework to ensure employees understand and participate in the Corporations requirements for the way that work is delivered. Notwithstanding, any agreed Flexible Working arrangements will be supported to ensure that we continue to meet equality, diversity, and inclusion, and conforms to our requirement to meet relevant equality legislation, which is to have due regard to how this policy and practise will advance equality of opportunity and eliminate discrimination.

## Step 5 – Monitoring

### How are you going to monitor the existing service, function, policy, or procedure?

It is corporate policy for EQIAs to be carried out for corporate services, functions, policies and procedures, and it is the role for the corporate EDI directorate to ensure this takes place and monitor the policy through an equality lens. It is the responsibility of the Chief Officers, Directors and Managers of our services (including HR), to ensure that relevant EDI activity is monitored in relation to this policy.

The intention is for the proposed Workplace Attendance Policy to move the City Corporation to align with other local authorities, government departments and financial services in relation to employees returning to the office (most are requiring 3 days attendance) See appendix A for links to research on this subject.

It is worth noting that some research has raised issues such as higher anxiety levels/sickness levels/ lower employee retention with increased requirement to work in office – which all has a detrimental financial impact.

Should this strategy change, and revisions are needed to this policy, EDI impacts and workplace requirements will be reviewed – this is likely to be on an annual basis.

## Part C - Action Plan

Barrier/s or improvement/s identified	Action Required	Lead Officer	Timescale
Low disclosure rates for data related to protected characteristics (outside sex and age) and social mobility indicators for City	EDI Directorate and People & HR Department to work on improving disclosure rates.	Director of Equality, Diversity, & Inclusion / Chief People Officer	To be confirmed once agreed with Director of Equality, Diversity & Inclusion



## Equality Impact Assessment

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Corporation employees. Response rates are even lower generally when including Casuals. This is a barrier to analysis of the equality impacts on City Corporation employees.			
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Equality Impact Assessment approved by:

	Date:
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**Please send an electronic copy of the Equality Team**

## Equality Impact Assessment

### Annex 1: Communities and groups impacted by the services provided and activities undertaken by the City of London Corporation

The following section draws from text and data already available in the public domain, as well as contributions from across the City of London Corporation and its Institutions. It illustrates some of the groups impacted by activity of the City of London Corporation, what data is collected and used regarding EDI for those groups, where there are identified gaps, and any existing policies that influence this work. When analysing the impact of departmental strategies, policies, services, and plans on the communities served by the City Corporation, as part of undertaking a full EQIA, the sources cited below should be considered.

Community/Group	Department / Institution	Summary of Department/Institution Data Collection/Evidence Base for Communities and Groups Impacted by Services
<b>City of London Corporation Employees</b>	<b>Operations - Corporate People &amp; HR</b>	<p>The City Corporation's People &amp; HR department collects data on its employees to inform its commitments under the Public Sector Equality Duty, its Equality Objectives and Action Plan, and wider HR policy. These reports detail the employee profile for full time, part time, and directly employed temporary employees, based on six protected characteristics (Sex, Age, Ethnicity, Disability, Religion &amp; Belief, and Sexual Orientation). It does not include any data on City of London Police Officers and Employees, and any City Corporation employees who are classed as casual and agency workers, contractors, and consultants. In addition, the reports include analysis on overall employee profile, salary and grades, top 5% earners, and the City Corporation's Gender, Ethnicity, and Disability Pay Gaps.</p> <p>The City Corporation also collects data on marital status, caring responsibilities, and social mobility indicators as part of its records on employees (type of school attended, Free School Meal eligibility, familial attendance at university, main household earner occupation when aged 14). These currently do not form part of the annual reporting requirements. Disclosure for all the types of demographic data outlined is on a voluntary basis (bar sex and age, which is compulsory), and disclosure rates vary. The Annual Equalities and Inclusion Monitoring Reports are reviewed by the City Corporation's Corporate Services Committee and are then published on the City Corporation's website: <a href="#">Equality and inclusion - City of London</a>.</p>
<b>City of London Police Workforce</b>	<b>City of London Police</b>	<p>The City of London Police collects data on its entire workforce using the following protected characteristics: age, disability, marital &amp; civil partnership status (in respect of eliminating unlawful discrimination), pregnancy &amp; maternity/paternity, ethnicity (including ethnic or national origins, colour, and nationality), religion or belief (including lack of belief), sex,</p>

## Equality Impact Assessment

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		<p>gender identity, and sexual orientation. This data is used for anonymised reporting and monitoring purposes.</p> <p>In addition to this data, which has a statutory or business information requirement, the workforce is invited to maintain additional personal information about themselves in a confidential area within HR Self Service. Disclosure rates vary as data capture is not mandatory for all protected characteristics.</p> <p>The City of London Police reports to the Home Office on all the above listed protected characteristics (excepting marriage and civil partnership status) annually as part of the Police Workforce Census. Marital &amp; civil partnership status is reported to College of Policing for promotion information.</p> <p>The City of London Police publishes its Public Sector Equality Duty Report, which includes a breakdown of this information as well as a review of the force's Equality Objectives, annually on its website: <a href="#">Equality and diversity employment statistics   City of London Police</a></p>
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## Equality Impact Assessment

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### Data sources (External)

[More than a third of UK workers 'would quit if told to return to office full-time' | Working from home | The Guardian](#)

[Two thirds of UK employees say workplace anxiety has increased on return to office, study finds \(peoplemanagement.co.uk\)](#)

[The CEOs drawing a hard line on return-to-office policies - BBC Worklife](#)

[Report: 9 in 10 companies will require return to office by 2023 | HR Dive](#)

[Seven in 10 companies globally have mandated return to the office, study reveals \(peoplemanagement.co.uk\)](#)

[The sectors returning to the office in 2023 | HR News](#)

[The companies backtracking on flexible work - BBC Worklife](#)

[Brace for a return to office life — Here's a list of which firms are doing what \(fnlondon.com\)](#)

[Civil servants to be ordered back to the office for at least three days a week in WFH... - LBC](#)

[Bankers told to return to desks as restrictions end - BBC News](#)

[Flexible and hybrid working practices in 2023: Employer and employee perspectives \(cipd.org\)](#)

### Data sources (Internal)

i-Trent – see workplace attendance category statistics.  
Pulse Surveys (employees)