

City of London Corporation Committee Report

Committee(s): Equality, Diversity and Inclusion Sub-Committee	Dated: 5 th February 2025
Subject: Equality Information Report 2024	Public report: For Decision
This proposal: <ul style="list-style-type: none"> • Delivers Corporate Plan 2024-29 outcomes • Provides statutory duties 	Diverse Engaged Communities Providing Excellent Services Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain’s Department?	N/A
Report of:	Dionne Corradine, Chief Strategy Officer
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Summary

This report seeks approval to publish the City of London Corporation’s Equality Information Report 2024 to meet our responsibilities under the Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017¹. This requires City Corporation to publish annually, in a manner that is accessible to the public, information relating to the protected characteristics of its employees and other persons affected by its policies and practices. This Equality Information Report covers the period 1 April 2023 to 31 March 2024, and will be published on our website once approved - the deadline for publication is 30 March 2025.

Recommendation(s)

Members are asked to:

- Endorse the Equality Information Report 2024 provided at **Appendix 1** for publication on the City Corporation’s external website by 30 March 2025, thereby fulfilling our legislative responsibilities.

¹ [The Equality Act 2010 \(Specific Duties and Public Authorities\) Regulations 2017](#)

- Note the continued commitment to improving the quality of Equity, Equality, Diversity and Inclusion (EEDI) data on employees and service users, and the progress made to date on encouraging employees to share their diversity data.

Main Report

Background

1. The Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017 requires the City Corporation to publish annually, in a manner that is accessible to the public, information relating to the protected characteristics of its employees and other persons affected by its policies and practices. The deadline for publishing the annual report is 30 March.
2. The Equality Information Report 2023 was completed following a Compliance Health Check to ensure that the City Corporation was compliant at a strategic level in its equality duties and commitments. This identified several improvements that could be made to ensure full compliance in our equalities disclosures.
3. The 2023 report was endorsed by Members in the EDI Sub-Committee meeting held on 21 March 2024 and was subsequently published on the City Corporation's website². This report was produced with a new format and additional content to ensure its compliance with the Equality Act 2010 and to improve its utility for Members and Officers.

Current Position

4. The Equality Information Report 2024 is provided as appendix 1 and follows the same content and format guidelines as the 2023 report. The purpose of the report is to ensure our compliant disclosure of equalities data for 2023/24. It should be considered alongside other documents (such as the Pay Gap Report) and our ongoing work on inter-and-intrasectionality and impact, which exist separate to our statutory obligations around disclosure of data. To meet our requirements under the Equality Act 2010, it has been produced formatted to maximise accessibility around structuring, font size, colour scheme, alt-text, and compatibility with screen reader software.
5. The report covers the period from 1 April 2023 to 31 March 2024, and features comparative data for the previous 12-month period where appropriate. It includes:
 - a. An employee profile in respect of the nine protected characteristics set out in the Equality Act 2010 (Section A)
 - b. An analysis of salary and grade profile by certain protected characteristics (Section B)
 - c. Service user equalities data in respect of Adult and Children's Social Care, Education Support for Children, Rough Sleepers, Housing and Homelessness, and Adult Skills and Education (Section C).
6. Because of the relatively low numbers of individuals being reported on for data collected by the City Corporation (on employees and users of statutory services)

² [Equality and inclusion - City of London](#)

it has at times been necessary to aggregate categories to maintain the integrity of the data and comply with GDPR requirements to ensure no individuals are easily identifiable. Where it is not possible to aggregate categories to maintain anonymisation, or aggregation would be detrimental to the wider analysis, exact data labels or entries have been redacted.

7. Section A, the employee profile data, reflects the City Corporation's workforce on 31 March 2024. It covers both full and part-time employees, and directly employed temporary staff, but excludes casual and agency workers, contractors and consultants. Its scope consists of the employees of the departments of the City Corporation and its Institutions³. City of London Police Officers are not included as this data is reported separately to the City of London Police Authority Board. This data was previously presented as part of the Annual Employee Profile to the Corporate Services Committee meeting held on 3 July 2024⁴.
8. Information is drawn from basic payroll and HR information system data. Whilst some characteristics are collected on all employees (e.g. age), additional sensitive information is voluntarily shared by employees through the self-service facility on the HR information system. Employees may also actively indicate they prefer not to share information on certain characteristics. This means that not all the categories include 100% data capture. The percentage breakdown of characteristics is presented as a proportion of the number of employees sharing data, not the total number of employees for optimal accuracy.
9. Publicly available data is used to provide an understanding of the demographics and protected characteristics of the communities which constitute the different groups of persons affected by our services and policies, in comparison with our workforce. Data is presented on the residential population of the City of London, workers at businesses based within the City of London (where available), and the wider populations of London and England & Wales. Residential data is drawn from the 2021 Census, and workforce data from the Annual Population Survey⁵. We are confident these are the most comprehensive, accurate, and appropriate sources for comparative data.
10. Section B provides details of salaries and grades for City Corporation employees in relation to protected characteristics. The definitions of employees and protected characteristics are as in Section A. The protected characteristics of Gender Reassignment and Gender Identity, Legal Partnership Status and Pregnancy and Maternity have been excluded from this section, as the data held when broken down by grade does not meet the standard for GDPR compliant disclosure.

³ The Barbican Centre, the City Bridge Foundation, the Guildhall School of Music & Drama, and the independent schools that the City Corporation supports - City of London Freemen's School, City of London School, City of London School for Girls, and the City Junior School.

⁴ Item 5 – Annual Employee Profile Report 2023-2024. Please see Background Papers for further detail.

⁵ Census and Annual Population Survey was accessed via the Nomis, a service provided by Office for National Statistics, as a platform to publish statistics related to population, society and the labour market at national, regional and local levels. including data from current and previous censuses:

[Nomis - Official Census and Labour Market Statistics](#)

11. Information on the City Corporation's gender pay gap for 2023/24 will be reported and published on the government portal by 30 March 2024 as required by legislation; the report will also be published on the City Corporation website in due course⁶. Detailed information on pay gaps (gender, ethnicity, disability) for this period will be also presented as part of the annual Pay Gap Report later this year.
12. Section C captures equalities data on people who are impacted by the City Corporation's statutory services and policies. Protected characteristic and demographic data related to users of our statutory services and policies have been collected wherever possible, though noting that in some areas numbers are extremely low so have not been published to ensure GDPR compliance.
13. Improvement have been made to the report compared to the previous iteration to enhance the quality and scope of data presented, and much effort has been underway since summer 2024 to encourage and improve data disclosure rates. However, this report covers the period up to March 2024, so will not yet reflect these changes – which will be visible in next year's report (FY2024-25). This means that for this report it is not yet possible to include detailed analysis of characteristics such as social mobility and care leavers⁷. This will change for the next reporting period.
14. Activity to improve data and the sharing of diversity information (as part of the People Strategy 2024-29 and Equality Objectives 2024-29) during 2024 includes the development of a consistent set of Equity, Equality, Diversity and Inclusion (EEDI) questions are used across the board at various stages of the employee life cycle, inclusive language in line with current good practice that aligns more closely with external data sources (such as the Census) for better benchmarking. There has been an ongoing coordinated communications campaign which seeks to encourage data sharing with a particular focus to improve declaration rates on socio-economic diversity and other areas where disclosure rates are lower. All of this will be reflected in the next iteration of the report.
15. Work is also ongoing to improve the provision and reporting of Equity, Equality, Diversity and Inclusion (EEDI) data within the City Corporation, including closer alignment of various annual reports, (such as this Equalities Information Report, the Annual Employee Profile Report, and other reports which rely on similar workforce data).

Options

16. Recommended: Members of the Equality, Diversity & Inclusion Sub-Committee endorse the Equality Information Report 2024 provided at Appendix 1 for

⁶ The report will be published on the Equality and Inclusion section of the City Corporation's external website, alongside previous iterations: [Equality and inclusion - City of London](#)

⁷ Following a resolution of the Court of Common Council in January 2024, the City Corporation recognises care experienced as if it were a protected characteristic where practicable, and approved the City of London's Specific Policy, 'Care Experienced as a Protected Characteristic': [Court of Common Council - Thursday, 11th January, 2024 - Item 9 Care Experience as a Protected Characteristic](#)

publication on the City Corporation's external website by 30 March 2025, thereby fulfilling our statutory responsibilities.

17. Not recommended: Members decide that the Equality Information Report 2024 should be redrafted, and, once this has occurred, authorise the Chair and Deputy Chair to endorse the report for publication on the City Corporation's external website by 30 March 2025, thereby fulfilling our legislative responsibilities.
18. Not recommended: Members decide that the Equality Information Report 2024 should be redrafted and returned to them for later endorsement. As the next meeting of the Equality, Diversity & Inclusion Sub-Committee is scheduled for 16 June 2025, the report would not be published under after our statutory deadline, meaning the City Corporation would be in breach of its legislative responsibilities.

Proposals

19. The publication of the Equalities Information Report 2024 fulfils our statutory responsibilities. The report also supports our People Strategy 2024-2029 and our Equality Objectives 2024-2029, in that it provides data and analysis to understand the diversity and makeup of our staff and service users, and where we need to make changes or improve as an organisation.
20. It also forms part of our continued commitment to improving the quality of Equality, Diversity and Inclusion (EEDI) data on employees and service users. Further progress on encouraging employees to share diversity data and enhancing the provision, alignment, and utility of our reporting will be demonstrated in future iterations.

Corporate & Strategic Implications

Strategic implications – The Equalities Information Report, and activity required to facilitate its production and improvement, aligns with the outcomes of the Corporate Plan 2024-2029 (specifically Diverse Engaged Communities and Providing Excellent Services), with the People Strategy 2024-2029, and the City Corporation's Equalities Objectives 2024-2029.

Financial implications – None.

Resource implications – The delivery of improvements to data quality, provision, and reporting to satisfy statutory requirements and achieve the City Corporation's EEDI ambitions requires ongoing resource and collaboration between the Corporate Strategy and Performance (Performance & Analysis and EEDI functions) and People & HR.

Legal implications – The Public Sector Equality Duty (s.149 of the Equality Act 2010) requires public bodies to publish an annual Equality Information Report.

Risk implications – Not publishing an annual Equality Information Report in a manner accessible to the public poses legal and reputational risks.

Equalities implications – The Equality Information Report 2024 provides an overview of the diversity of the City Corporation's employees and service users in respect of the protected characteristics set out in the Equality Act 2010. Equalities information is integral to the City Corporation having due regard to the three aims of the Public Sector Equality Duty (to

eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010; to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; to foster good relations between persons who share a relevant protected characteristic and persons who do not share it). To meet our requirements under the Equality Act 2010, it has been produced formatted to maximise accessibility around structuring, font size, colour scheme, alt-text, and compatibility with screen reader software

Climate implications – None.

Security implications – None.

Conclusion

21. The Equality Information Report 2024 fulfils our obligations under the Equality Act 2010 and presents insights and analysis into the diversity of our employees and the communities we operate within.

22. We are committed to improving the provision and reporting of Equity, Equality, Diversity and Inclusion (EEDI) data within the City Corporation, including on additional characteristics and closer alignment of various annual reports.

Appendices

- Appendix 1 – City of London Corporation Equality Information Report 2024

Background Papers

- [City of London Corporation Equality Information Report 2023](#)
- [Annual Employee Profile Report 2023 - 2024 \(Cover Paper\)](#)
- [Annual Employee Profile Report 2023 - 2024 \(Appendix 2 Annual Workforce Report - Trend Data\)](#)

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