

City of London Corporation Committee Report

Committee(s): Professional Standards and Integrity Committee – For information Strategic Planning & Performance Committee – For Information Police Authority Board – For Information	Dated: 6 th February 2025 11 th February 2025 12 th February 2025
Subject: Equity, Diversity, Inclusivity (EDI) Update	Public report: For Information
This proposal: <ul style="list-style-type: none"> delivers Corporate Plan 2024-29 outcomes 	People are safe and feel safe
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:	Commissioner of Police
Report author:	Det Supt Kate MacLeod

Summary

Following consultation with internal stakeholders and external partners, we are now able to present our EDI Strategy Implementation Framework which has recently been submitted in force through our internal governance boards. As have also produced an accompanying Plan which outlines our Year 1 priorities and delivery milestones from within the framework. Our focus within Inclusivity Culture and Organisational Development (ICOD) is now on finessing our performance packs and outcome measures to support this, ensuring we are prioritising competing tasks effectively.

Delivery of our Inclusivity Programme is ongoing, over 400 places were taken on modules between October and December 2024, a calendar of events for 2025 has been created, ensuring alignment to National days of EDI significance. Linked to this,

mapping of our Evaluation Strategy is now underway and has been made an ICOD priority for 2025.

A review of our Staff Networks and Associations has been completed and a series of recommendations ratified through our internal governance- this has included a decision to increase the number of hours that active members are expected to spend on network activities.

We are proud that the National Black Police Association (NBPA) has selected CoLP as the host force for this year's NBPA Conference, the first time it has come to central London since it was founded in 1998. We are aware of both the opportunities and challenges this presents, a Planning Committee has been established and 2 initial meetings have taken place to carefully monitor, review and drive this activity.

Other core deliverables for ICOD in 2025 are underway, notably herein we provide updates on our Code of Ethics lead (including the creation of an Ethics Committee) and Police Leadership Programme).

Recommendation(s)

Members are asked to:

- Note the report.

Main Report

i. Local Update and Developments

EDI Governance, Implementation and Measurement within CoLP

1. Our EDI Strategy was published in July 2024, we were awarded our 'silver' rating by Inclusive Employers in September 2024. Since this time, the ICOD team have worked with internal stakeholders and key partners to produce our Implementation Plan and accompanying Framework and delivery milestones, this can be found at Appendices 1 and 2. The framework takes each of the 'Commitment' statements made within the four sections of the strategy (Our People, Our Policies, Our Public and Our Partners) and provides 'SMART' (specific, measurable, achievable, realistic and timely) actions against each one. Alongside this, we have also incorporated recommendations from our

Inclusive Employers Assessment as we work towards a 'Gold' rating over the next 5 years.

2. In addition to assigning ownership, we have also awarded a 'low', 'medium' or 'high' priority status to ensure that we maintain focus. In parallel, we have projected the status of each initiative over a 3 year period as either:-

Developing	Project / initiative is underway or in planning stages but not yet delivered
Achieving	Project / initiative has been delivered at base level but not evolved further
Advancing	Project / initiative has been delivered and has reached a sophisticated stage (for example, gone a step further by informing National innovative practice)

3. This methodology replicates that used by the College of Policing, with the aim of ensuring consistency of approach.
4. The framework has gone through a series of consultations, internal workshops have taken place both before and after the holiday season where we have achieved representation from members of our Black Police Association (BPA), Network of Women (NoW), Disability Enabling Network (DEN), Christian Police Association (CPA), LGBTQ+ and Police Staff Networks, along with members of our Trade Union and Police Federation. Externally we have consulted with colleagues at Inclusive Employers, Business Disability Forum (BDF), the College of Policing and via specialist EDI Peer review. Feedback has been positive, with colleagues particularly encouraged that the plan now goes beyond 'words and statements' and towards more tangible actions. Concerns were raised over the number of initiatives proposed, this has been negated by a stringent prioritisation grid / milestone assessment. Alongside this, ICOD are also presenting to our Chief Officers next month on our key priorities and deliverables for the year ahead, thereby incorporating this framework.
5. Our next steps are towards ensuring that we have clarity on our outcomes and the measurement of these. Our EDI Performance Pack / Dashboard continue to evolve and will capture these metrics as we develop our work in this area. At this time we have focused prioritisation around our Year 1 activities- we will need to dedicate more time towards the mapping for Years 2 and 3.

Inclusivity Programme Update

6. From October through to December, we delivered twelve 'face to face' events and two online modules with a total number of 410 attendees. This included

our established events (Active Bystander, Ethical Dilemmas and Mentivity - Black History / Stop Search). We have also begun our new module 'Understanding Ideologies', this will continue to be delivered through to March 2025 after which time we will review. We continue to conduct a basic evaluation for each session, feedback continues to be positive and we ensure we follow up with practical steps. For example our 'focus on - Managing colleagues with health conditions, neurodiversity and disability' was delivered in partnership with members of our Disability Enabling Network and HR, this forms part of a wider training piece that HR are leading on for Supervisors.

7. In November, aligned to White Ribbon Day, we delivered two sessions with specific focus on Violence Against Women and Girls. Detective Chief Supt Zara Brown from Bedfordshire Police provided an 'in person' talk on a high profile investigation she lead on relating to a serious sexual assault, providing insights on best forensic practice, community engagement and advice on interaction with our Criminal Prosecution Service (CPS), this provided valuable Continuing Professional Development (CPD) for our detectives in particular. Secondly, our 'Focus On - IOPC: Ending victim blaming language in the context of violence against women and girls' was relevant not just to officers in force but anyone involved in communication around victim/survivors of violence. Again, the practical value of this has already been recognised, for example, by Chief Insp Paul Doyle who has used the input to upskill his staff in our Force Control Room who may take initial calls and provide onward reporting or messaging.

Cultural Audit

8. As part of our proactive approach to mapping culture and behaviour within CoLP, Phase 2 of our cultural audit has now been completed with 87 officers participating in total, a report of key findings and next steps have recently been presented at our next Chief Officer Meeting. This outlined the methodology utilised, key findings and recommendations for next steps. In conjunction with feedback received following these initial discussions and next steps confirmed, this is being brought as a separate paper to our for PSIC review.

ii. Key Issues, Risks and Mitigations

Evaluation Strategy

9. The need for a meaningful evaluation strategy for our new workstreams has been acknowledged since its inception, we also understand that in order to achieve this we need to think 'smart'. As such, Professionalism and Trust have decided to approach the task holistically, advancing an opportunity to streamline our approach across a number of areas whilst maintaining consistency. This means that ownership will not sit purely with ICOD but will stretch across other key teams and will include, but is not limited to, evaluation of:-
- Our Inclusivity Programme modules
 - Our Police Officer and Staff Training Courses (both mandatory and optional)
 - Our Police Leadership Programme
 - Other EDI initiatives and interventions (for example, listening circles).
10. Currently our evaluation methods are basic - we send out surveys following events as listed above, but rarely do we follow up around behaviour change or embedded learning. This is vital if we are to understand the effectiveness of our inputs and whether we are achieving our force aspirations and priorities.
11. As it stands, we provide an extensive portfolio of courses across L&D and ICOD, every officer in CoLP will spend at least 5 days each year completing mandatory training as a minimum. Each package differs significantly including trainer style, curriculum content, learning method and structure. There is no comprehensive capture of this information, we rely on limited feedback and ad-hoc comment to assess the effectiveness of our inputs.
12. We have made the creation of an Evaluation Strategy as a priority for 2025, we appreciate that we are not experts in this field so are working with colleagues in academia to plan this. To date, we have identified the following as potential areas for scrutiny:-

Trainer Competence (to consider their skills, capability, knowledge)

Internal Course evaluation (to check relevance, accuracy, organisational needs, alignment with College of Policing)

External Course Evaluation (to include cost, 'CoLP' context and business needs)

Behavioural Change over time (what is being done differently as a result of the input received and cost/benefit analysis)

Community Evaluation (how to our public and communities feel as a result)

13. We are also in the process of mapping available methods of evaluation, these include classroom observations, in-course feedback questionnaires, post-course feedback, in-role observations, workbooks / follow up activities to demonstrate embedded behaviour change, professional discussions and

exams/knowledge checks. Once our mapping activities are completed later this month, we will be able to make a series of recommendations for future implementation. This will include clear Key Performance Indicators (KPIs) set out against data that can record impact.

Delivery of National Black Police Association (BPA) Conference October 2025

14. CoLP are excited to announce that we have been selected as the host force for this event later in the year. This presents an excellent opportunity for CoLP to showcase both local and National BPA membership, improve awareness of issues impacting black and other ethnic minority groups, as well as helping improve trust and confidence in Policing at all levels.
15. A Planning Committee has been created and the first meeting took place on 19th December, we were pleased to welcome attendees from both local and National BPAs as well as from Essex Police (who hosted the event last year) to ensure we are incorporating lessons on worked well and what could be improved for 2025. Our focus currently is on confirming a venue and dates so that we can publicise these to our partners, we will be expecting representatives from all forces and around 350 attendees in total. Following this, we can then focus our attention on content, themes and speakers.
16. In addition to the size and scale of the event, we also expect challenges around our history within the City and links to slavery, but we will continue to work with our black colleagues to plan how we treat with sensitivity whilst also 'owning' our past and showing our progress and future commitment. We will also need to be mindful of the National feeling in policing around recent events, including the shooting of Chris Kaba, which has created strong feeling- significantly with some of our specialist officers in London. Again, this is where open conversation with our BPA colleagues and early consideration of such issues will be key to successful delivery.

Staff Network Review

17. At our January EDI Strategic Board, a paper was presented which sought to equip our network members with access to the best practice and provide support for network activity in order to help drive positive culture change. This came about following a request from our networks for more clarity around procedures and processes supporting their management and delivery in CoLP, previously listed as a 'risk' at this Committee. ICOD conducted benchmarking activities with other forces to better understand the support that networks require and how we can enhance opportunities for effective working to improve our outcomes.
18. As a result of this review, a number of recommendations were recently approved, in summary:-

Incorporation of Networks: A force structure for our networks to be implemented in line with all protected characteristics (as per UK Equality Act 2010), each to complete its own Terms of Reference to provide a clear understanding of objectives/roles

Protected Time: An increase in protected time for Executive Committee members to a maximum of 32 hours per month and for Active members an increase to a maximum of 12 hours protected time per month. Line managers will be expected to positively consider supporting any additional abstraction, subject to operational and business requirements. A monitoring framework is being created so that both members and supervisors are able to record and assess the impact and value of network activities.

Training: To ensure that network members have the skills and knowledge required to deliver in accordance with the Equalities Act, further training courses (at CMI Level 4-6) to be arranged for 2025.

Finance: An annual budget submission from each network to apply for funding activities and accompanying log of all activities attended throughout the financial year, including learning imparted (to also assist with Personal Development Reviews).

Best Practice: Our networks to be consulted when new policies and procedures are developed or reviewed.

19. In implementing these recommendations, we are confident that our networks can evolve into robust, strategic assets that not only support individual well-being but contribute to the forces mission in becoming one of the most inclusive and trusted forces in the UK.

iii. Forward Look

Inclusivity Programme

20. In relation to future Inclusivity Programme modules, we continue to respond to what people are telling us (whether that be via our staff survey, cultural audit or organisational learning) and ensuring the modules we deliver are relevant to identified themes and have practical value. We have modules planned for this quarter of 2025 as follows:-

- Lawrence Davies LLM presenting on black justice (following his presentation at the National Black Police Association Conference).
- LGBTQ+ parenting event in partnership with Pricewaterhouse Coopers
- Time to Talk / Mental Health awareness session
- Ethics Panel- Transitioning and gender fluid officers and staff
- ICOD team continue to deliver sessions on 'active bystander' and 'ethical dilemmas'
- Single parent support / awareness (in planning stages)
- Focus on Bipolar (in planning stages)

21. As we continue to professionalise our programme, we have also worked with our Staff Networks and Associations to create a forward-planning diary of

events, ensuring that our modules are promoted in advance and are aligned, as appropriate, to significant dates in our EDI calendar.

Code of Ethics Delivery

22. Under our new lead in this area, we continue to work closely with the College of Policing on this workstream, hosting a visit from Senior Leaders at the end of last year where they attended a Code of Ethics workshop. The workshop allowed them to meet with colleagues (including our new student officers) to gain an insight in to their understanding of the new Code and what it means in practice and also helping us to increase awareness within our own force.
23. In our ambition to bring the Code 'to life' in force and act as a testing ground for ethical dilemmas, ICOD are in the process of creating an internal 'Ethics Committee' to be responsible for enhancing trust and confidence in the governance and actions of the City London Police. We know from benchmarking with other forces that such initiatives have a positive impact on daily decision-making and have enabled policing colleagues to challenge in a constructive manner. Our cultural audits have shown that we need to further embed standards of behaviour, our Ethics Committee will support this aim by identifying organisational improvement opportunities to promote our core values of Professionalism, Integrity and Compassion.
24. Terms of Reference for our Ethics Committee have been drafted with objectives as follows:-
- Promoting high standards of ethical conduct in accordance with the Code of Ethics.
 - Embedding ethics at the heart of organisational decision making
 - Providing a focus for education and understanding around ethical issues.
 - Scrutinising Force values and their application.
 - Encouraging discussion within and outside of the organisation, promoting a culture of inclusion and ethical standards.
25. As we continue to develop our work on this piece, we are cognisant of the need to measure impact and promote organisational learning; as part of this we are linking in with an existing Regional Ethics Committee as well as including in our Evaluation Strategy.

Police Leadership Programme (PLP)

26. The PLP has been designed by the College of Policing to provide a comprehensive leadership development journey for the whole career of anyone working in policing. The Programme focuses on five levels of leadership from foundation/entry level to executive leaders and our work within CoLP to ensure effective delivery continues at pace.

27. The Force is part of an NPCC pilot, partnering with Durham University and four other forces, who have collaboratively designed a programme mapped to the College of Policing's curriculum for first and mid-line leaders. The Programme is mandated for all officers, police staff and volunteers in target ranks and grades, whether newly promoted or experienced within those staffing groups. It covers both leadership and management development and includes the following modules: inclusive leadership, personal leadership, operational and work-based leadership, organisational leadership, leading partnerships and coaching and mentoring.
28. The Programme will be delivered over five days, with two days being focused on COLP specific management practices and policy. Director/Service Leads within Corporate Services have been consulted and will provide inputs, including strategy and governance, Human Resources, Change, Information Management and Professional Standards.
29. Learning and Development are running a pilot at the end of February with full roll out from April 2025.

Conclusion

30. In conclusion, the City of London Police continues to advance its commitment to equity, diversity and inclusion through a strategic and systematic approach. The progress made in delivering the EDI Strategy Implementation Framework, including the prioritisation of initiatives and measurable outcomes, reflects a proactive and collaborative effort to embed inclusivity into the core of the organisation. With ongoing development of the Inclusivity Programme, preparation for the National Black Police Association Conference, and enhancements to staff networks and leadership initiatives, the force is not only addressing immediate priorities but also laying the foundation for sustainable change. These efforts, supported by robust evaluation strategies and ethical leadership frameworks, reinforce the Force's mission to be one of the most inclusive and trusted police services in the UK.

Appendices

- Appendix 1- EDI Strategy Implementation Plan and Framework
- Appendix 2 – EDI Delivery Milestones
- Appendix 3 – Inclusivity Programme Evaluation

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