EEDI Review for the City of London Corporation

This report presents the findings and recommendations of the EEDI Review for The City of London Corporation (CoLC), conducted by Belonging Pioneers between November 2024 and April 2025. The review was commissioned to assess the current state of EEDI across CoLC's diverse departments and institutions, evaluate progress against strategic objectives, and provide actionable recommendations to embed EEDI as a 'golden thread' throughout the organisation.
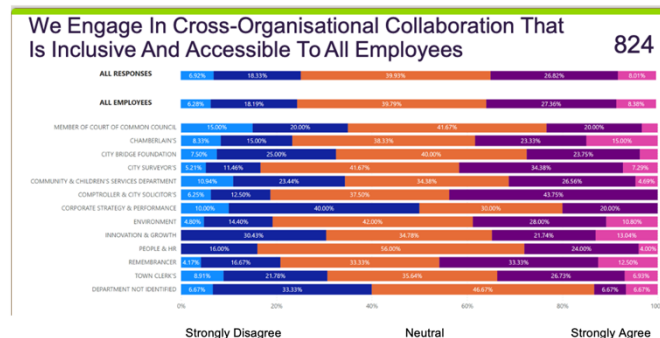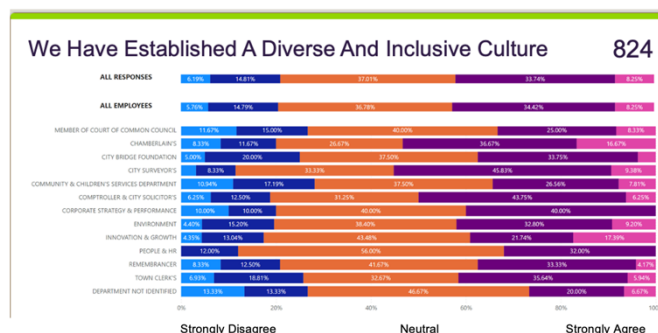
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Belonging Pioneers
14th April 2025

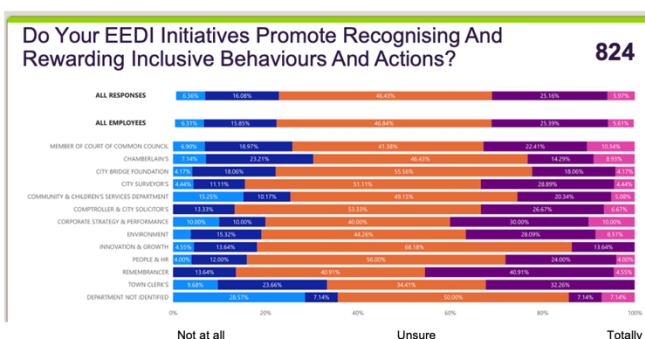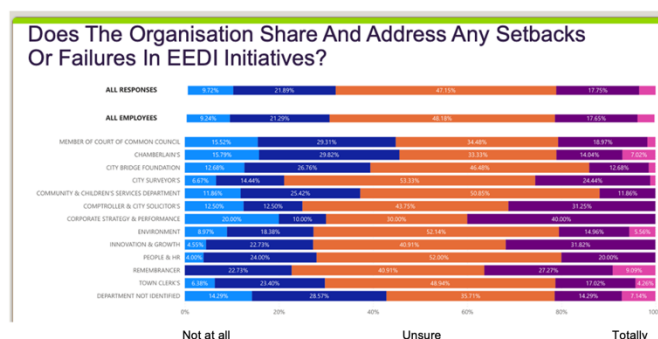[Click here to return to contents Page]

Executive Summary

1. The City of London Corporation is at a pivotal crossroads in its EEDI journey—poised between compliance and true cultural transformation.

The organisation has made progress in collecting diversity data, launching inclusive initiatives, and aligning EEDI with its strategic plan. It is currently in a transitional phase: while some departments and institutions (like the Barbican, Guildhall School, City of London Police and City Bridge Foundation) are leading with advanced practices, others are still in compliance mode. This variation in EEDI maturity presents both a challenge and a remarkable opportunity for organisation-wide transformation.
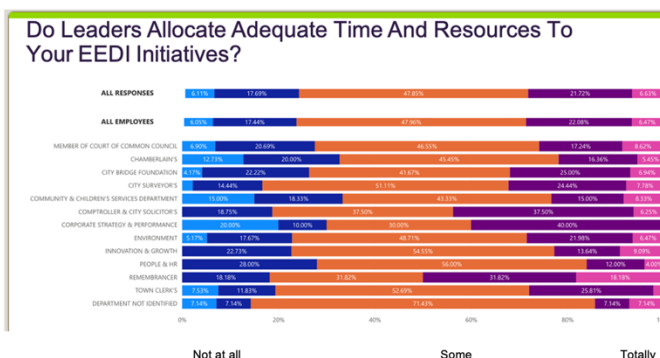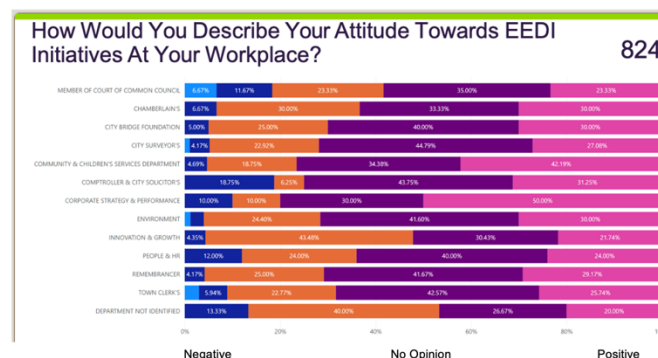

We Have Established A Diverse And Inclusive Culture — 824

We Engage In Cross-Organisational Collaboration That Is Inclusive And Accessible To All Employees — 824

2. Cultural barriers and inconsistent engagement are holding back progress.

A deep-dive into the organisational culture reveals competing narratives—heritage and tradition sometimes clash with modern EEDI values, and rituals or symbols of inclusion are inconsistently embedded. Daily behaviours and psychological safety remain inconsistent. These cultural contradictions risk undermining The City of London Corporation's ambitions unless directly addressed.

Does The Organisation Share And Address Any Setbacks Or Failures In EEDI Initiatives?

Do Your EEDI Initiatives Promote Recognising And Rewarding Inclusive Behaviours And Actions? — 824

3. Staff want to contribute to EEDI—but feel disconnected and undervalued.

Survey data and listening circles highlight a strong appetite among staff, especially self-identified changemakers, to help shape and deliver EEDI. However, many feel excluded from decision-making or unrecognised for their volunteer efforts. This disconnect is most acute among mid-level staff, who view EEDI as compliance-driven and are sceptical about leadership's commitment. Harnessing this latent energy is key to unlocking sustainable change.

How Would You Describe Your Attitude Towards EEDI Initiatives At Your Workplace? — 824

Do Leaders Allocate Adequate Time And Resources To Your EEDI Initiatives?

4. The review has identified a clear roadmap for rapid and strategic improvement, recommending three "quick wins" (a high-profile EEDI relaunch, distribution of a practical toolkit, and a recognition programme for EEDI volunteers) to build momentum. Five "big wins" offer a blueprint for lasting impact: co-creating a shared EEDI purpose, building authentic connections through open dialogue, empowering grassroots engagement, scaling best practices via a federated governance model, and embedding EEDI in the Digital, Data, and Technology strategy for real-time, data-driven progress.
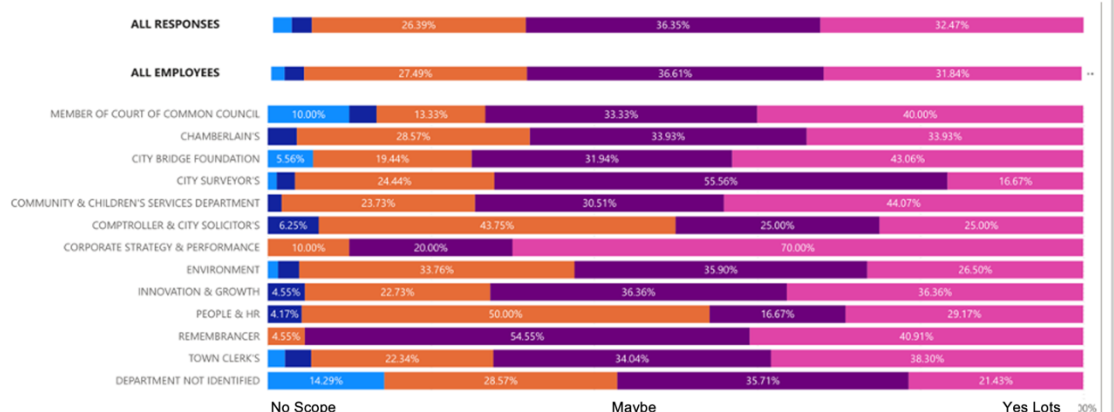
Strategic Roadmap for EEDI Improvement

Three 'Quick Wins' **1**

Relaunch EEDI with an Authentic and Engaging Communications Campaign

Distribute The EEDI Toolkit to all staff

Launch a Recognition Programme for EEDI Volunteers

2 **Five 'Big Wins'**

A blueprint for lasting impact:

Co-create a shared Purpose for EEDI

Build meaningful connection

Enable innovative grassroots engagement

Scale best EEDI practices via a federated governance model

Embed EEDI in the Digital, Data, and Technology strategy for real-time, data-driven progress

5. The stakes are high: bold action will build trust and world-class status—inaction risks stagnation, disengagement, and reputational harm.

If The City of London Corporation takes committed action, it can become a beacon of inclusive excellence, with stronger staff engagement, consistent standards, accelerated progress, and enhanced risk management. If it fails to act, it faces growing inequalities, legal and reputational risks, and missed opportunities for innovation and community impact.

Do You Think There Is Scope To Improve The Impact Of Your EEDI Initiatives On Your Organisation?

	No Scope		Maybe	Yes Lots
ALL RESPONSES		26.39%	36.35%	32.47%
ALL EMPLOYEES		27.49%	36.61%	31.84%
MEMBER OF COURT OF COMMON COUNCIL	10.00%	13.33%	33.33%	40.00%
CHAMBERLAIN'S		28.57%	33.93%	33.93%
CITY BRIDGE FOUNDATION	5.56%	19.44%	31.94%	43.06%
CITY SURVEYOR'S		24.44%	55.56%	16.67%
COMMUNITY & CHILDREN'S SERVICES DEPARTMENT		23.73%	30.51%	44.07%
COMPTROLLER & CITY SOLICITOR'S	6.25%	43.75%	25.00%	25.00%
CORPORATE STRATEGY & PERFORMANCE	10.00%	20.00%	70.00%	
ENVIRONMENT		33.76%	35.90%	26.50%
INNOVATION & GROWTH	4.55%	22.73%	36.36%	36.36%
PEOPLE & HR	4.17%	50.00%	16.67%	29.17%
REMEMBRANCER	4.55%	54.55%	40.91%	
TOWN CLERK'S		22.34%	34.04%	38.30%
DEPARTMENT NOT IDENTIFIED	14.29%	28.57%	35.71%	21.43%

Recommendations and Risk Mitigation

Three Quick Wins

1. Relaunch EEDI with a Communications and Engagement Campaign: Address the missing pillar of 'connection' by authentically communicating progress, acknowledging past gaps, and signalling renewed commitment—propitiously timed with the appointment of the new EEDI Director.

2. Distribute Part 1 of the EEDI Toolkit delivered with the EEDI review to all staff: Equip colleagues with practical tools and shared standards for inclusive behaviour, enabling active bystander intervention and a psychologically safe environment.

3. Launch a Recognition Programme for EEDI Volunteers: Value and celebrate the contributions of volunteer staff, fostering best practice sharing and increasing engagement.

Five Strategic 'Big Wins'

1. Develop a Shared Purpose for EEDI: Engage all staff and stakeholders in defining a unifying vision that resonates across the organisation, supporting inclusive collaboration and innovation.

2. Build Meaningful Connections: Facilitate open dialogue and authentic listening, ensuring all voices—especially those from under-represented groups—are heard and valued.

3. Innovative Grassroots Engagement: Empower change agents through agile, cross-departmental teams and short-term secondments, supported by senior leadership sponsorship.

4. Leverage Institutional Good Practice: Adapt and scale successful EEDI approaches from advanced institutions, considering a collaborative federated governance model to accelerate knowledge transfer and consistency.

5. Embed EEDI in the Digital, Data, and Technology (DDaT) Strategy: Centralise EEDI data, deploy dynamic EEDI dashboards, and use predictive analytics to drive equitable outcomes, supported by robust risk mitigation and compliance mechanisms.

Risks and Mitigation

If CoLC fails to act, it risks stagnation, widening inequalities, disengagement, legal and reputational exposure, and failure to achieve strategic goals. To mitigate these risks, the report recommends:

- Anonymous pulse surveys and peer-led listening sessions to rebuild trust.
- Staff networks and inclusive policy audits to ensure consistent implementation.
- External benchmarking and diverse decision panels to motivate data-driven action.
- Legal reviews, whistleblowing channels, and scenario planning to manage compliance risks.
- Cross-unit rotations and digital collaboration hubs to break down silos.
- 360-degree leadership reviews and external coaching to address cultural and leadership development.

CoLC stands at a pivotal moment in its EEDI journey. By building on existing strengths, addressing cultural and structural barriers, and embedding EEDI into every aspect of its operations, CoLC can realise its ambition to be a world-class, inclusive organisation. The recommended actions—both immediate and strategic—will enable CoLC to deliver more equitable outcomes for its workforce, service users, and the wider community, supporting its Corporate Plan 2024–2029 and enhancing trust, performance, and legal compliance.

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1. Background To The EEDI Review

CoLC's EEDI Journey: Building an Inclusive Square Mile

The City of London Corporation (CoLC), operating from the historic Guildhall, governs London's Square Mile—the financial and cultural heart of the capital. With a governance legacy predating Parliament itself, CoLC uniquely functions as a local authority, police authority, and port authority simultaneously.

Led by the Lord Mayor and the Court of Common Council, CoLC's remit extends beyond typical local governance. The Corporation has positioned Equity, Equality, Diversity, and Inclusion (EEDI) as a 'golden thread' woven through its Corporate Plan, People Strategy, and Equality Objectives, reflecting its commitment to creating systemic change.

This integrated approach aims to establish CoLC as a world-class organisation championing diversity and inclusion for all stakeholders, with ambitions reaching beyond internal operations to influence communities, services, and broader society.

EEDI Implementation: Challenges and Progress

Organisational Complexity
Multiple functions and regulatory requirements creating implementation challenges

Crucible Events
Incidents like 'The Barbican Stories' driving urgent EEDI attention

Leadership Engagement
Varying appetites among leaders affecting consistency of approach

The Corporation's unique structure introduces complexities for implementing EEDI principles consistently. External drivers such as diverse regulatory requirements alongside internal factors including varying leadership commitment have created implementation challenges.

Notably, specific incidents have accelerated progress in certain areas—for example, 'The Barbican Stories' publication prompted more serious EEDI engagement within The Barbican, ultimately establishing it as an internal EEDI leader.

Inside its commitment to ensuring that EEDI is successfully implemented, CoLC commissioned Belonging Pioneers, a boutique consultancy specialising in successful EEDI strategy and implementation to conduct an EEDI Review from November 2024 to April 2025, following the EDI Sub-Committee's approval of the Terms of Reference in September 2024.

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The main report contains detailed EEDI Review findings and recommendations as follow:

1. **Insights and recommendations, including:**
   - An assessment of the starting state (Annex I – Document Review Report)
   - Suggested approaches and areas for EEDI initiatives that CoLC could focus on (Section 2 & Annex B)
   - Success measures/criteria (Section 2) with more detailed narratives in Annex B)

2. **Separate Annexes that supplement the report with background context and analysis**
   Annex A   An overview of the framework, methodology & approach adopted in conducting the review
   Annex B   Pockets of good practice and detailed recommendations
   Annex C   Analysis of what is required to transform the **culture** for EEDI to be the golden thread in achieving Brilliant Basics and World Class
   Annex D   Summary of **survey findings** from a survey completed by over 850 CoLC employees
   Annex E   Summary of **listening circle** output from a listening circle with 26 EEDI champions
   Annex F   Senior Leadership Team and EEDI subject matter expert workshop Part 1 **'from the field'** output on what is required for EEDI to be the golden thread in achieving Brilliant Basics and World Class
   Annex G   Senior Leadership Team and EEDI subject matter expert workshop Part 2 - **calibration** on the complexity of what workshop participants identified is required
   Annex H   **External drivers** scan based on PESTELEDIT framework analysis
   Annex I   **Document review** report mapping CoLC departments and institutions to the Belonging Pioneers' Cultural Readiness And Needs Awareness Framework [The Belonging Pioneers' Framework]
   An executive overview of each Annex is provided in this summary report.

Toolkits are provided as 2 separate documents:

- Part 1 – This Toolkit file: 'EEDI Toolkit Part 1_2 City-of-London-Corporation-Foundational-EEDI-Toolkit.pdf' contains templates and materials regarding good practice, benchmarking and signposting to suggested experts in the field on topics relevant to CoLC areas of interest and delivery
- Part 2 – Tools For Practitioners which includes:
  - A maturity model that colleagues can use to self-assess where they are and what steps could be taken to become more inclusive and equitable, as well as actions they can take to move forward (Page 8)
  - A methodology to prioritise EEDI activities to achieve maximum impact/value (Page 11)

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1.1 EEDI In The Context Of CoLC's Strategic Framework

Aligned with its Corporate Plan 2024–2029, CoLC has set out six strategic objectives: Diverse Engaged Communities, Dynamic Economic Growth, Leading Sustainable Environment, Vibrant Thriving Destination, Providing Excellent Service, Flourishing Public Spaces. The Corporate Plan aims to achieve its strategic objectives in two stages: 'Brilliant Basics' and 'World Class'.

The Corporate Plan is supported by:

- The People Strategy 2024-2029, which has the following 5 themes: My Contribution, My Reward – Ambition 25, My Wellbeing and Belonging, Trustworthy Leadership, My Talent and Development, Building Brilliant Basics. The People Strategy elaborates further on plans to achieve Brilliant Basics in the next 2 years.
- The Equality Objectives: Inclusive and Trustworthy Leadership, Inclusive and Diverse Communities, Accessible and Excellent Services, Socio-Economic Diversity, Cross Cutting Activity: Evidence & Data.

CoLC aims to embed EEDI principles across its departments and institutions through four key stages: 'Stabilise' , 'Strengthen', 'Sustain' and 'Soar'.

During the SCAN Phase of the EEDI Review, high-level document analysis identified CoLC's linguistics related to EEDI and mapped them onto the Belonging Pioneers' Cultural Awareness and Needs Assessment Framework [The Belonging Pioneers' Framework] which Benchmarks organisations according to the following levels:

- Resistant (active opposition to DEIB initiatives),
- Stagnant (indifference and minimal effort),
- Fix & Compliance (reactive, legally driven) (DEIB 1.0)
- Strategic and Reliability (proactive, business-aligned – DEIB 2.0)
- Integral + Ownership (fully embedded in culture – DEIB 3.0a)
- Integral + Adaptable (dynamic – DEIB 3.0b)

EEDI In The Context of CoLC's Strategic Framework

The City of London Corporation has integrated EEDI principles into its strategic vision, establishing a progressive framework from 'Brilliant Basics' to 'World Class' excellence.
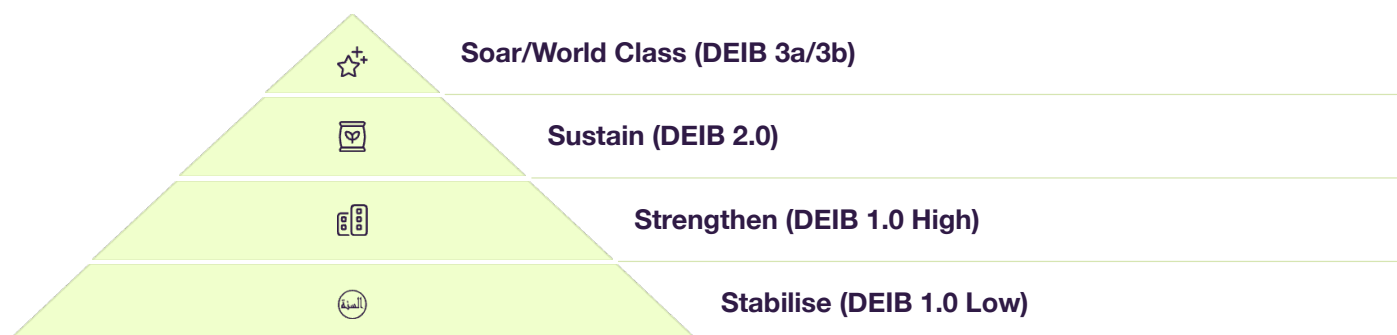
The EEDI developmental pathway aligns with CoLC's six strategic objectives, supported by the People Strategy's five themes and formal Equality Objectives. This integrated approach addresses both immediate 'Brilliant Basics' and aspirational 'World Class' standards.
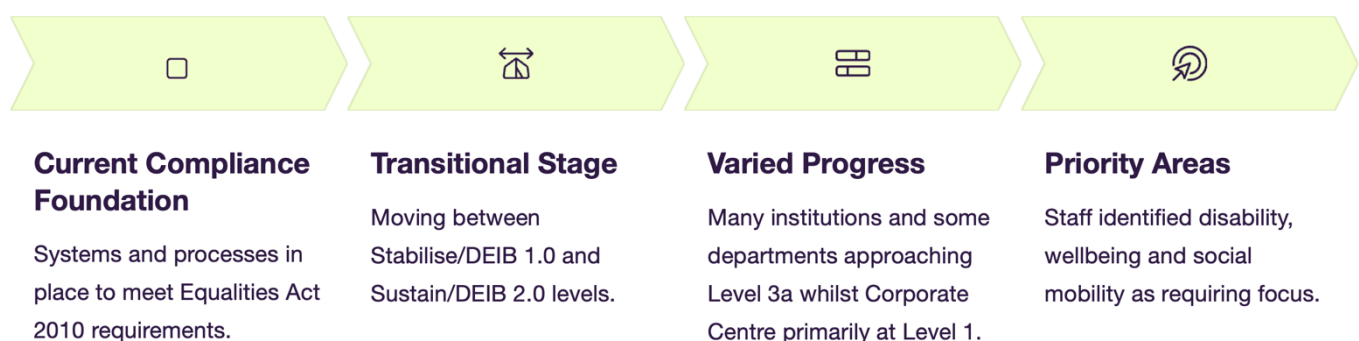
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2.0 Key Findings and Recommendations
In reading the report of findings and recommendations, It should be noted that:

1. The analysis took place at a particular point in time. For example, the document review was based on documents received by 30th November 2024. As such, any developments since will not have been factored in.

2. The SCAN phase interventions were dependent on availability and engagement. As such there was an inherent imbalance of inputs from the different departments/institutions. This has impacted what was possible in the consistency of analysis and representation of all departments/institutions in a balanced way.

3. During the review, data was gathered from 5 interventions (a document review of over 300 documents, a survey completed by 850 staff across the organisation, 25 interviews with senior leaders, union representatives and functional content experts who have an EEDI brief, a listening circle with 26 active participants in EEDI across the organisation and a workshop with 20 senior leadership team members/ their nominated representatives and their senior EEDI content experts). The data corroborate, in the main, across the 5 interventions and hence validate the analysis and findings given that inputs were received from people who are in different roles, different grades and at different levels of engagement in EEDI across the organisation. The findings from the different interventions are evidenced in Annexes D to G and I. As such the following recommendations do not provide specific triangulation to analysis in the Annexes. A quick scan of the Annexes will validate what is provided in the recommendations. One pager overviews of each Annex is provided in this report.

4. The EEDI Review identified over 150 possible initiatives that will need to be reviewed, prioritised and actioned based on resource availability and potential impact. The Toolkit (Part 2) provides a methodology for assessing and prioritising the initiatives.

5. The CultureWeb analysis synthesised all inputs from an organisational context (control systems, organisational structures, power structures as well as the more subtle aspects of organisational narratives, symbols, routines and rituals). This work informed the 5 'Big Win' recommendations provided in this report.

EEDI Review: Current Position and Key Findings

The EEDI review reveals CoLC occupies a transitional position in its maturity journey, with the current leadership team working to bridge gaps following organisational stabilisation.

Current Compliance Foundation

Systems and processes in place to meet Equalities Act 2010 requirements.

Transitional Stage

Moving between Stabilise/DEIB 1.0 and Sustain/DEIB 2.0 levels.

Varied Progress

Many institutions and some departments approaching Level 3a whilst Corporate Centre primarily at Level 1.

Priority Areas

Staff identified disability, wellbeing and social mobility as requiring focus.

External initiatives like The City Belonging Project are creating more inclusive connections across the Square Mile, giving voice to 600,000+ city workers.

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2.1   Assessment of Starting State of EEDI in CoLC

The following recommendations are in the context of some challenging times CoLC faced prior to the current leadership team being appointed to their roles in the organisation and the consequent need to stabilise the organisation before it can realise the full potential of EEDI.

The review revealed that CoLC presently occupies a transitional position in its EEDI maturity journey with the current leadership progressing at pace to bridge the gaps and deliver on its ambitious plans for the future.

CoLC has the requisite systems and processes in place to comply with The Equalities Act 2010 and is also working to foster an equitable and inclusive environment for employees and service users alike. Discussions with staff that took place during the scan phase identified general Member behaviour as the principal experience of micro-aggressions and low-level disrespectful behaviours.   Very little was said about gender or race specific issues. It is not clear whether this relatively low level of narrative about race/gender issues by people participating in the EEDI review interventions is due to these inequities having been resolved and no longer being an issue, or whether the level of psychological safety in the organisation is still insufficient for people from under-represented groups to speak up - even in a confidential space.

The main areas that CoLC staff identified as requiring focus were disability, wellbeing and social mobility. Pay gap performance is improving year on year. Substantial progress has been made in collecting diversity data and improving declaration rates for protected characteristics. CoLC is continuing efforts to align internal policies with external standards (e.g., GDPR compliance for sensitive data). It is also advancing initiatives that promote belonging and inclusion across diverse groups through internal efforts such as employee networks and inclusivity training and external efforts such as The City Belonging Project. The purpose of the City Belonging Project is to create a more inclusive and connected 'Square Mile' though a number of initiatives such as 'The City Belonging Networks' that connect diverse professionals working in City based organisations through specific 'networks of networks'. To date the City Belonging Project has launched: The City Muslim Network, The City Jewish Network, Latinos in The City, Women in The Square Mile, Veterans in The Square Mile and Social Mobility in The City. Initiatives like this are increasing CoLC's relevance to the 600,000+ workers who commute into London and creating mechanisms for them to have a voice in the running of the City they work in.

The review revealed that CoLC's EEDI approach currently operates between Stabilise and Strengthen/DEIB 1.0 (Fix & Compliance) and Sustain/DEIB 2.0 (Strategic & Reliable) on The Framework; with most institutions and some departments approaching Level 3a (Integral + Ownership). The Corporate Centre departments primarily operate at Level 1 with emerging movement towards Level 2, while cultural institutions, City Bridge Foundation, Family of Schools and City of London Police demonstrate more advanced strategies and practices around EEDI. In addition to the clearly articulated commitment and follow through from the leadership in these institutions, a number of external drivers have accelerated them to leadership positions in EEDI. Examples are the publication of Barbican Stories as mentioned previously and National Policing issues that had an impact on The City of London Police's progression in EEDI.

The review found that significant challenges exist across the organisation in terms of data collection, resource allocation, governance consistency, and embedding EEDI beyond compliance into organisational culture.

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The Three Pillars for EEDI Success

Successful EEDI initiatives require three foundational pillars identified by Belonging Pioneers. CoLC demonstrates strength in Vision and progress in Delivery but needs enhancement in Connection.

Vision

Clear direction with strategic insight and measurable objectives.

Connection

Authentic engagement fostering trust, respect and belonging.

Delivery

Translating commitments into tangible outcomes and accountability.

Analysis reveals strong SLT strategy but indicates a critical need to strengthen the Connection pillar. Organisational stabilisation efforts may contribute to this gap alongside EEDI-specific factors.

2.2 The Three Pillars for EEDI Success

▶ Vision: **Articulating a clear and ambitious direction for EEDI, grounded in evidence and strategic insight.** This involves defining and communicating a compelling vision for EEDI, setting measurable objectives and aligning them with organisational strategy. It ensures that EEDI ambitions are informed by data, best practice, and a thorough understanding of business context, providing a strong foundation for sustainable progress.

▶ Connection: **Fostering authentic engagement and shared commitment across the organisation.** This is about building meaningful connections by engaging colleagues, stakeholders, and communities in open dialogue, cultivating a culture of trust, respect, and belonging. Through active listening and inclusive collaboration, leaders ensure that diverse perspectives are valued and that everyone feels empowered to contribute to the EEDI journey.

▶ Delivery: **Translating vision and engagement into effective, measurable action.** The organisation drives tangible outcomes by implementing robust EEDI initiatives, embedding inclusive practices into operations, and holding people accountable for results. The focus is on delivering practical solutions, monitoring progress, and continuously improving to ensure that commitments lead to real, positive change.

Analysis of documents and conversations during the SCAN phase of the review identified that there is a robust strategy and Vision in the SLT, and results are starting to be delivered towards Brilliant Basics in terms of core infrastructure like the ERP system and the substantial task of updating the outdated HR Policies.   However, insights from interventions during the scan phase of the review indicate a requirement to bring increased focus to the middle pillar, 'connection' as described above. This could be for multiple reasons and not solely due to EEDI. For example, the many initiatives underway to stabilise the organisation may be demanding additional time from colleagues who are struggling to keep up with their day jobs as well as contribute to stabilising and growing the organisation. However, as CoLC's strategic framework has EEDI as a golden thread that runs through The Corporate Plan, People Strategy and Equality Objectives, it would be prudent to consider that it is at least in part stemming from the need to improve aspects related to EEDI.

Recommendations: Three Possible Quick Wins

📣 **Relaunch EEDI Across CoLC**

Develop an organisation-wide communications campaign to strengthen the 'Connection' pillar and reposition EEDI efforts.

📄 **Share Part 1 of The Toolkit**

Educate and empower colleagues with essential inclusive skills, establishing consistent standards for EEDI excellence.

🏅 **Launch Recognition Programme**

Acknowledge volunteer staff contributions to EEDI initiatives, addressing appreciation gaps whilst sharing best practices.

2.3   Recommendations

Three Possible Quick Wins

1. Relaunch EEDI Across CoLC

Design and launch a communications and engagement campaign across the whole organisation to re-position EEDI. The missing pillar in EEDI implementation at CoLC is 'Connection.' Through an 'honest and authentic' relaunch, CoLC can deliver a communication programme that acknowledges what has been lacking with EEDI in the past, inform colleagues of the good work that is underway and what is planned to evolve a more equitable and inclusive organisation going forward. The appointment of the new EEDI Director provides propitious timing for such a communication programme and the opportunity to signal a genuine commitment to change.

2. Share Part 1 of The Toolkit With All Colleagues As A Part Of The Relaunch

By using the Toolkit that is provided with this review (as a part of the engagement process in Quick Win 1) to educate and empower all colleagues in some of the critical skills for being more inclusive, the organisation will begin to create a consistent standard for what 'good' looks like around here' when it comes to EEDI. It will also provide colleagues with a shared tool through which they can be active bystanders and allies in contributing to a more psychologically safe environment. **Note**: It is essential that this toolkit is shared sensitively and in person rather than as a general email distribution. For example, a 'Lunch and Learns' might have a more positive impact and address potential resistance. The topics in the toolkit have been selected to raise

Toolkit Menu

Inclusive Leadership & Action Planning Tools

EEDI Action Plans, EEDI SWOT and Risk Assessments, Regular Pulse Surveys, Checklists and key questions to ask yourself

Psychological Safety

Psychological safety communication sheets, guides for staff and managers, Key Scenarios and responses, crisis communication protocol, tip sheets

Active Bystander Toolkit

Why be an Active Bystander
How to be an Active Bystander
What can get in the way and how to overcome challenges

Intersectionality

Intersectionality Managing Conflicts Between People With Different Protected Characteristics

Disability & Neuro-Inclusion

Why this is important. Apparent and hidden conditions. Abled privilege - how to recognise and steward it in yourself and others/

Communications & Events

Communication tools
EEDI Vocabulary guide
Inclusive Event Planning,

Signposting To Experts

Contact details for organisations specialising in EEDI-related services such as diversity audits, accessibility assessments, and community engagement.

By providing this toolkit, The City of London Corporation aims to empower its departments and institutions to take meaningful steps towards achieving world-class standards in EEDI. This is not just a guide but a call to action—to work collaboratively in creating a City that is inclusive for all now and into the future.

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EEDI awareness and address behavioural gaps identified during the EEDI Review. The Toolkit Menu above illustrates the key areas addressed.

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3. **Launch A Recognition Programme For Volunteers Who Have Contributed To EEDI Across CoLC**
Many volunteer staff make a significant contribution to the success of EEDI at CoLC. However, the SCAN phase identified that they do not experience being appreciated for their efforts. A recognition programme across the organisation will not only address this issue but also enable best practice to be shared in the process.

Interventions during the EEDI review such as the survey and listening circle identified that colleagues who work on EEDI at CoLC outside their day job experience that their contribution is not valued, attributed or recognised. Quick Win 3 is essential to keeping current contributors engaged and re-energising their involvement. It is important to make the recognition programme organisation wide

At its simplest, the recognition programme could be an announcement about the intention to recognise contributions to EEDI by people for whom it is not their day job, with an invitation to nominate colleagues online for their contribution to EEDI. If time and resources in the EEDI team permit, this could be supplemented by an EEDI credits model through which colleagues vote on the acknowledgements posted in the online page, leading to quarterly rewards such as experience days, time for additional training on a topic they want to develop themselves in, time away from their day jobs to develop good work, certificates and monetary or time-based rewards. An easy quick win would be to acknowledge everyone who has contributed to EEDI for whom it is not their day job - as a part of the engagement communications suggested in Quick Win 1, perhaps through an online 'wall of fame', with a communication about how the acknowledgement concept will be developed further.

Five Possible Big Wins

Addressing middle management doubts and engaging changemakers requires strategic initiatives that strengthen organisational commitment to EEDI whilst recognising volunteer contributions.

Develop Shared Purpose

Create an inclusive 'why' that resonates across CoLC despite diverse services and regulatory models.

Build Meaningful Connections

Engage all stakeholders in open dialogue using an integral approach to EEDI

Cross-Departmental Project Teams

Establish agile teams with SLT sponsors to solve business challenges whilst developing EEDI awareness.

Collaborative Federated Model

Leverage institutional expertise through structured knowledge-sharing and co-created standards.

EEDI-Integrated Technology Strategy

Align Digital, Data and Technology capabilities to deliver transparent EEDI outcomes and insights.

Five Possible Big Wins

Whilst the SLT are actively championing EEDI, the survey analysis (Annex D, Recommendation 4) illustrates that middle manager grades are doubtful about the organisation's commitment to EEDI. The survey data also illustrates that many colleagues who see themselves as changemakers want to contribute to/help shape EEDI but feel they are not given the opportunity. On the other hand, the listening circle and workshop conversations illustrated that a number of regular volunteers feel the organisation is using their labour, goodwill and enthusiasm to deliver EEDI work without valuing and recognising their contribution. The following EEDI initiatives will address these issues, increase engagement and energise EEDI at CoLC:

1. **Develop an increased sense of shared Purpose for EEDI with all staff and Stakeholders.**
What's the 'why' that will resonate with all colleagues, Members and service users to evolve an integrated approach to EEDI at CoLC? Achieving the level of inclusive collaboration required will be challenging and complex given the diversity of services, regulatory and funding models. However, the process of reaching this shared purpose alone will start to shift the culture in the organisation and enable increases in productivity, innovation and stakeholder engagement. The art here is to develop a purpose at a level that the full population can engage with in some way. It will require an innovative and perhaps groundbreaking approach in terms of where EEDI is at today.

2. Find ways to **build meaningful connections** by engaging all colleagues, stakeholders, and communities in an open dialogue about what this shared purpose might look like, cultivating a culture of trust, respect, and belonging. The key here will be a level of listening that goes beyond personal views and objectives to truly hear what's been said – irrespective of whether they are from an under-represented group or from those who are considered to have privilege. This will require a win-win approach using integral EEDI tools such as those Belonging Pioneers are currently evolving through its Pioneers Movement community.

3. Consider innovative and cost-effective approaches to engaging stakeholders in the progression of EEDI. For example, the change agents identified in the survey who want to contribute to shaping and implementing EEDI will appreciate the opportunity to step up. One approach would be to set up a project structure that involves **agile, cross departmental/institutional teams** focused on solving a business relevant issue that they are interested in working on. This would enable them to develop themselves, increase their visibility and at the same time enable CoLC to gather input to

the development of a shared purpose. The appointment of SLT members as sponsors to these teams will also open up the opportunity of mentoring/reverse mentoring – thereby mutually developing awareness and capability. Operating this initiative through short term secondments (for example) will address the challenge of people having to work unpaid extra time to contribute to EEDI. The cross-organisational nature of this approach will also help to build relationships and trust between different parts of the organisation. The approach suggested here is conceptual in design. Its purpose is to illustrate how a number of different recommendations could be combined to have a positive impact not only on EEDI, but also on organisational performance.

4. Given that many of the institutions are ahead in their implementation of EEDI, the centre can gain significant benefit and accelerate implementation of EEDI from the experience and wisdom of colleagues in the institutions. There are many pockets of good practice that can be adapted either as a shared solution across the whole organisation or used to increase capability to accelerate becoming World Class in a specific sector such as the cultural sector. However, the current hub and spoke operating model makes it challenging for those leading in EEDI outside the centre to share expertise. One approach would be to consider a slightly different operating model for EEDI - a collaborative federated operating model.

Key Differences Between A Collaborative Federated Model and a Hub and Spoke Model:
A collaborative federated operating model blends the autonomy and agility of a federated approach with intentional, structured collaboration and knowledge-sharing across units. This is distinct from both a purely federated model (where units operate independently) and a hub and spoke model (where the hub sets direction and the spokes follow). The table below identifies how this model differs and what the pros and cons are when the spokes are ahead of the hub in EEDI:

Aspect	Collaborative Federated Model	Hub and Spoke Model
Structure	Decentralised, but with active, structured collaboration and shared governance	Central hub sets strategy, spokes adapt and implement
Decision Making	Local units retain autonomy but co-create standards, share best practice, and align on priorities	Hub leads, spokes follow and feed back
Knowledge Sharing	Systematic sharing and scaling of innovations across all units	Hub disseminates knowledge, spokes may have less input
Alignment	Achieved through consensus, shared frameworks, and regular cross-unit engagement	Achieved through central mandates and governance
Resource Pooling	Resources, tools, and expertise are pooled and targeted collaboratively	Hub provides resources, spokes consume

Pros when local units are ahead of the Centre in EEDI, this model:

- **Scales Best Practice Quickly:** Advanced spokes can lead communities of practice, mentor others, and help co-create EEDI frameworks that are adopted across the federation, accelerating overall progress.
- **Empowers Local Innovation:** Spokes retain the freedom to innovate and adapt EEDI approaches to their context, while still contributing to collective learning and improvement.
- **Builds Collective Ownership:** Shared decision-making and mutual support foster a sense of ownership and accountability for EEDI outcomes across all units, not just the hub.
- **Reduces Duplication:** Collaboration helps avoid redundant efforts and enables pooling of resources, tools, and data for greater efficiency.
- **Enhances Consistency:** While local autonomy is preserved, regular collaboration and shared frameworks help maintain a baseline of consistency in EEDI standards and reporting.

Challenges of implementing collaborative, federated governance for EEDI

- **Complex Governance:** Requires robust, inclusive governance structures to coordinate collaboration, resolve conflicts, and ensure accountability without stifling local initiative.
- **Potential for Slower Consensus:** Achieving agreement across diverse, autonomous units can take time, especially if some are more advanced than others.
- **Risk of Uneven Progress:** Less advanced units may struggle to keep pace, and without strong facilitation, the benefits of leading spokes may not be fully realised.
- **Resource Demands:** Effective collaboration needs investment in facilitation, communication platforms, and shared learning infrastructure.
- **Data and Process Inconsistency:** Without careful management, differences in data definitions, processes, or reporting can persist, complicating organisation-wide measurement and benchmarking.

The key to success in a collaborative federated model is strong, inclusive governance and a culture of open collaboration, ensuring that innovation is harnessed for the benefit of the whole organisation, not just individual units

5. **Including an EEDI view in the Digital, Data, and Technology Strategy**. The DDaT Strategy is central to achieving CoLC's EEDI objectives under the Corporate Plan 2024–2029. By aligning data infrastructure, predictive analytics, and risk mitigation, the strategy ensures robust, actionable insights to drive equitable outcomes across services, workforce, and communities. Below are the critical technological steps and recommendations to accelerate progress. The following steps will enable robust, data-driven, and transparent progress on EEDI objectives, ensuring that technology directly supports equitable outcomes across all CoLC services, workforce, and communities

a) EEDI Data Integration for Transparent Reporting

All departments and institutions have critical data requirements to fulfil statutory, regulatory and business needs. The adoption of a shared technology roadmap estate for the whole of CoLC, including the City of London Police, Barbican Centre, Guildhall School of Music and Drama and the Schools, does mean that:

- The DDaT Strategy's **'Brilliant Basics'** approach centralises EEDI metrics (e.g., disability disclosure rates, pay gaps) into a unified Corporate Data Platform for all. The OneLake is a start in the right direction, though there is a need for urgency as the business interaction between stakeholder, users, workers bend visitors will create a complex mix of technology demands on the Centre.
- Consolidate EEDI metrics (e.g., disability disclosure rates, pay gaps) into a single source of truth.

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b) Technology Convergence for Effectiveness – Progressing from Data to Information to Insight and Knowledge

It is hoped when the new ERP system goes live, the organisation will be able to:

- Deploy dynamic dashboards to track workforce diversity, service accessibility, and community engagement metrics.
- Integrate automated accessibility checkers into the DDaT user centered design workflow

c) Predictive Analytics to Support Effective Decision Making in EEDI

To enable the EEDI journey from Brillant Basics to World-Class, the DDaT governance framework aims to use predictive analytics to support the following:

- Forecast policy impact for services, underrepresented groups, staff and protected characteristics.
- Ability to analyse community feedback from the CoLC's stakeholder's (including user, groups, customers, visitors, officers and members) prioritising seldom-heard voices.
- Identify social mobility barriers using Intersectionality data

d) Strategic Risk Mitigation

The DDaT Strategy if implemented fully will assist CoLC to reduce legal and operational risk by:

- Partnering with UKRI to adopt the social mobility index methodology for workforce analytics.
- Ensuring PSED compliance through granular, real-time EEDI disclosures.
- Aligning with ISO 30415:2021 (EDI in HR)
- Integrating with the Shared Technology Roadmap to align EEDI targets with procurement processes.

What Would Be Possible If CoLC Gets This Right?

Successful implementation of EEDI and Digital strategies would transform CoLC into an exemplar organisation, creating tangible benefits for staff, stakeholders and communities.

Stronger organisational fabric
Authentic engagement fostering connection, trust and belonging across all CoLC entities.

Culture of inclusion
Consistent standards empowering staff as active allies with psychological safety.

Data-driven progress
Integrated metrics and predictive analytics enabling proactive equality interventions.

Operational excellence
Streamlined processes reducing duplication whilst strengthening PSED compliance.

Community impact
Enhanced service delivery promoting social mobility throughout the Square Mile.

These outcomes would position CoLC as an emerging world-class leader in embedding EEDI principles across public service delivery.

What Would Be Possible If CoLC Gets This Right?

If CoLC successfully implements the recommended EEDI initiatives and the Digital, Data, and Technology (DDaT) Strategy as outlined, several significant positive outcomes would be possible:

1. Stronger Organisational Connection and Engagement
By relaunching EEDI with a focused communications and engagement campaign, CoLC would foster a shared sense of purpose and connection among all staff, members, and stakeholders. This would increase authentic engagement, build trust, and cultivate a culture of respect and belonging across the diverse organisation and its service users. Empowered colleagues would feel valued and motivated to contribute actively to EEDI efforts, thereby improving overall organisational cohesion and productivity.

2. Consistent and Inclusive Standards of Behaviour
Sharing an EEDI Toolkit with all colleagues and encouraging its use would establish a consistent standard for inclusive behaviours and psychological safety. This would assist staff in being confident and effective as active bystanders and allies, contributing to a more supportive and inclusive environment. Recognition programmes for volunteers would further reinforce positive contributions and encourage widespread participation in EEDI initiatives.

3. Accelerated and Data-Driven EEDI Progress
Through DDaT Strategy including an EEDI lens, CoLC would centralise and integrate EEDI data across all departments and institutions into a unified Corporate Data Platform. This would provide a single source of truth for metrics like disability disclosure rates and pay gaps, supported by dynamic dashboards for real-time monitoring of workforce diversity, service accessibility, and community engagement. Predictive analytics would enable forecasting of policy impacts and identification of social mobility barriers, helping the organisation to proactively address inequities.

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4. Enhanced Organisational Efficiency and Risk Management

Technology convergence via a new ERP system and a shared technology roadmap would streamline data management and reporting processes, reducing duplication and improving efficiency. Strategic risk mitigation would be strengthened by ensuring compliance with legal obligations such as the Public Sector Equality Duty (PSED) and alignment with standards like ISO 30415:2021. This would reduce legal and operational risks associated with EEDI.

5. Collaborative and Innovative EEDI Governance

Adopting a collaborative federated operating model would enable CoLC's institutions and departments to share best practices, innovate locally, and co-create EEDI standards while maintaining autonomy. This approach would accelerate scaling of good practice, foster collective ownership, and enhance consistency across the organisation, ultimately driving CoLC towards becoming a world-class leader in EEDI.

6. Improved Stakeholder and Community Outcomes

By prioritising seldom-heard voices and engaging diverse stakeholders in open dialogue, CoLC would better understand and meet the needs of its communities. This inclusive approach would enhance service delivery, promote social mobility, and strengthen the organisation's reputation as a fair and equitable public body.

In summary, getting these elements right would enable CoLC to embed EEDI deeply into its culture and operations, making it a more inclusive, innovative, and resilient organisation that delivers equitable outcomes for its workforce, service users, and the wider community. This would also support CoLC's broader strategic goals under its Corporate Plan 2024–2029, enhancing organisational performance, stakeholder trust, and legal compliance.

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What Would Happen If CoLC Gets It Wrong When Implementing These EEDI Review Recommendations?
If CoLC gets its EEDI efforts wrong, several negative consequences could arise:

1. Erosion of Trust and Engagement
Failure to build a shared sense of purpose and connection around EEDI could deepen scepticism, especially among middle managers and changemakers who want to contribute but feel excluded. Volunteers and staff may feel undervalued and exploited, leading to disengagement, lower morale, and reduced participation in EEDI initiatives. This would undermine organisational cohesion and the culture of inclusion CoLC seeks to foster.
Mitigation Strategies:
- **Anonymous Pulse Surveys:** Regularly deploy short, anonymous surveys to gauge morale and gather candid feedback on EEDI efforts. Act on findings and communicate changes made as a result.
- **Peer-Led Listening Sessions:** Facilitate peer-led, small-group listening sessions (not management-led) to create psychologically safe spaces for honest dialogue, especially for those who may feel excluded or undervalued.
- **Transparent Failure Sharing:** Publicly acknowledge where EEDI efforts have fallen short and outline corrective actions, demonstrating humility and a commitment to learning.

2. Inconsistent and Ineffective EEDI Implementation
Without consistent tools, training, and recognition, standards for inclusive behaviour will remain unclear, resulting in uneven application of EEDI principles across departments and institutions. This inconsistency risks perpetuating unconscious bias, psychologically unsafe environments, and barriers for underrepresented groups, limiting progress toward a truly inclusive workplace.
Mitigation Strategies:
- **Staff Networks:** Give staff networks autonomy and resources to advocate for their needs and drive grassroots consistency across the organisation.
- **Inclusive Policy Audits:** Conduct regular, external audits of policies and procedures to identify and address inconsistencies or bias, ensuring uniformity in EEDI standards.
- **Blind Process Reviews:** Use blind CV screening and anonymised decision-making in recruitment and promotions to reduce unconscious bias and standardise inclusive practices.

Risk Mitigation: Avoiding EEDI Implementation Pitfalls

Erosion of Trust
Staff disengagement and volunteer exploitation would undermine CoLC's inclusive culture.

- Deploy anonymous pulse surveys
- Facilitate peer-led listening sessions
- Share failures transparently

Inconsistent Implementation
Unclear standards perpetuate unconscious bias and create psychologically unsafe environments.

- Empower autonomous staff networks
- Conduct inclusive policy audits
- Implement blind process reviews

Missed Opportunities
Failing to identify and address systemic inequities, social mobility barriers, and community needs through lack of predictive analytics and real time reporting.

- External Benchmarking
- Diverse Decision Panels
- Real time data dashboards

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3. Missed Opportunities and Poor Decision Making

Inadequate use of data and technology to integrate, analyse, and act on EEDI metrics will reduce transparency and hinder evidence-based decision making. Without predictive analytics and real-time reporting, CoLC risks failing to identify and address systemic inequities, social mobility barriers, and community needs. This can lead to ineffective policies and services that do not meet diverse stakeholder expectations.

Mitigation Strategies:

- **External Benchmarking:** Routinely benchmark EEDI data and practices against similar organisations to spot gaps and best practice you might otherwise miss.
- **Diverse Decision Panels:** Require diverse panels for all major decisions (hiring, policy, procurement), ensuring a range of perspectives and reducing the risk of groupthink.
- **Real-Time Data Dashboards:** Implement real-time, public-facing dashboards for key EEDI metrics, increasing transparency and enabling rapid course correction

4. Increased Legal and Operational Risks

Failure to comply with Public Sector Equality Duty (PSED) and relevant standards (e.g., ISO 30415:2021) due to poor data governance and risk mitigation could expose CoLC to legal challenges and reputational damage. Weak alignment between EEDI targets and procurement or HR processes may compound these risks, resulting in costly consequences and loss of public confidence.

Mitigation Strategies:

- **External Legal Reviews:** Schedule periodic external legal reviews of EEDI policies and data governance to ensure compliance with evolving regulations and standards.
- **Whistleblowing Channels:** Establish confidential, well-publicised whistleblowing channels specifically for EEDI concerns, with guaranteed non-retaliation and clear follow-up processes.
- **Scenario Planning:** Conduct scenario planning exercises (such as mock audits or discrimination claims) to test and strengthen risk mitigation processes.

Risk Mitigation: Avoiding EEDI Implementation Pitfalls

Increased Legal and Operational Risks

Exposure to legal challenges and reputational damage through failure to comply

- External Legal Reviews
- Whistleblowing channels
- Scenario planning

Cultural Leadership Failings

Failure to implement strong leadership and accountability leads to disengagement and reputational harm

- 360-Degree leadership reviews
- External EEDI Coaching
- Leadership shadowing

Governance Fragmentation

Siloed approaches prevent knowledge-sharing and create uneven progress.

- Establish cross-unit rotations
- Create digital collaboration hubs
- Pilot federated governance models

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5. Fragmented Governance and Slower Progress

Maintaining a hub-and-spoke model without effective collaboration risks isolating advanced units and preventing the sharing of best practices. This could lead to uneven progress, duplication of effort, and inefficiencies. Without strong, inclusive governance and a culture of open collaboration, innovation may be stifled and organisational ownership of EEDI diluted.

Mitigation Strategies:

▶ **Cross-Unit Rotations:** Create temporary cross-departmental secondments or project teams so staff can share knowledge and best practice, breaking down silos.

▶ **Shared Digital Collaboration Hubs:** Launch a digital collaboration platform (for example, an internal wiki or Slack channel) dedicated to EEDI, where teams can share resources, innovations, and updates in real time.

▶ **Federated Governance Pilots:** Pilot a federated governance model in select areas, evaluate its impact, and scale up based on lessons learned, rather than a wholesale shift all at once.

6. Cultural and Leadership Failings

If CoLC does not implement EEDI recommendations effectively—with strong leadership, accountability, and a genuine commitment to culture change, the organisation could face a toxic workplace, disengaged staff, reputational harm, and ultimately fail to achieve its EEDI and strategic goals. This includes addressing discriminatory behaviours and challenging exclusionary practices such as bullying, harassment, and marginalising those who speak up or hold different views.

Mitigation Strategies:

▶ **360-Degree Leadership Reviews:** Implement 360-degree feedback for all leaders, including EEDI-specific competencies, with results tied to performance reviews and development plans.

▶ **External EEDI Coaching:** Provide external coaching or mentoring for leaders (not just internal training), focusing on inclusive leadership and accountability.

▶ **Leadership Shadowing:** Arrange for senior leaders to shadow staff from different backgrounds and levels, fostering empathy and first-hand understanding of inclusion challenges.

By embedding these tangible mitigation strategies, CoLC can proactively address the root causes of each risk, increase resilience, and ensure EEDI progress is authentic, sustainable, and widely supported.

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What Would Happen If CoLC Did Nothing With The EEDI Review Recommendations?

Stagnation of EEDI Progress

Diversity initiatives would remain peripheral rather than integral to organisational culture.

Widening Inequities

Systemic barriers would persist, reducing psychological safety for underrepresented groups.

Declining Staff Morale

Disengagement would increase turnover and reduce productivity across departments.

Legal & Reputational Risks

Non-compliance with equality legislation could damage CoLC's standing as a public service leader.

Inaction would ultimately undermine CoLC's strategic ambitions for 2024-2029, eroding community trust and hindering service delivery throughout the Square Mile.

What Would Happen If Colc Did Nothing With The EEDI Review Recommendations?

If CoLC chooses to do nothing in response to the recommendations outlined, several adverse outcomes could occur:

1. Stagnation of EEDI Progress

Without relaunching EEDI initiatives, sharing tools, or fostering connection, the organisation risks stagnating in its diversity and inclusion efforts. The consequent lack of momentum could lead to a culture where EEDI remains peripheral rather than integral, making meaningful change unlikely and perpetuating existing inequalities.

2. Widening Inequities and Exclusion

Failure to develop a shared purpose, engage staff, or recognise volunteers' contributions could deepen feelings of disconnect and marginalisation among underrepresented groups and allies. This could reinforce systemic barriers, reduce psychological safety, and hinder efforts to create an inclusive environment.

3. Reduced Staff Engagement and Morale

Ignoring the need for active communication, recognition, and connection can lead to disengagement, dissatisfaction, and a decline in morale among staff and volunteers. This can increase turnover, reduce productivity, and undermine efforts to foster a positive workplace culture.

4. Missed Opportunities for Organisational Improvement

By not leveraging good practices, insights from advanced institutions, or innovative engagement methods, CoLC would miss opportunities to accelerate progress. The organisation would likely continue to operate with inefficient, reactive, and siloed approaches rather than proactive, collaborative, and strategic ones.

5. Increased Legal and Reputational Risks

Neglecting the importance of continuous measurement, accountability, and embedding EEDI into organisational culture could lead to non-compliance with legal obligations, such as anti-discrimination laws. This increases the risk of legal challenges, fines, and reputational damage, especially if inequalities persist or worsen.

6. Failure to Achieve Strategic Goals

Without a committed, connected, and well-supported approach, CoLC would struggle to meet its strategic objectives related to EEDI, including becoming a 'world-class' organisation. This would undermine its reputation as a fair, inclusive, and innovative leader within the public sector.

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7. Impact on Community and Stakeholder Trust

Inaction could erode trust among communities, service users, and stakeholders who expect the organisation to uphold principles of fairness and inclusion. This could diminish the organisation's legitimacy and effectiveness in delivering equitable services.

Choosing not to act on these recommendations would likely result in stagnation, increased inequalities, organisational disengagement, legal risks, and reputational damage. It would hinder CoLC's ability to foster a truly inclusive environment, deliver equitable outcomes, and meet its strategic ambitions for 2024–2029 and beyond.

Summary:

The 3 Quick Win' recommendations in this report are designed to enable rapid follow through to the momentum and engagement created through the EEDI Review process. This will ensure continuity at minimum cost.

The 5 'Big Win' recommendations in this report are what the review analysis identified as having the potential for most impact based on Belonging Pioneers' experience of EEDI implementation. They will enable a foundation for sustainable change.

Annexes B-G and I of the main report contain specific and detailed recommendations. For example, the Tables in Annex B highlight key findings from the review and provide recommendations in relation to resources, policy and guidance, EEDI learning and development, infrastructure, services and data.   It covers pockets of good practice as well as what is required to achieve Brilliant Basics and World Class.

All recommendations fall into one of 10 core themes as illustrated in the diagram below.

Continuing Your EEDI Journey
Building an Inclusive Organisation

Strengthen Corporate Centre Capability Create a backbone for coordinated, effective action	**Connect EEDI to Mission** Integrate inclusion into the core of what you do	**Enhance Accountability** Set clear expectations and measure what matters	**Engage Middle Management** Develop champions for EEDI Transformation
Optimise Resources Maximise impact through strategic allocation	**Develop Data Capabilities** Provide dashboards for information and decision making	**Facilitate Knowledge Exchange** Spread excellence and innovation across boundaries	**Address Member Engagement** Diversify leadership and foster inclusive governance
	Support Staff Networks Sustainably Empower grassroots change with adequate resources	**Develop Psychological Safety** Create inclusive space for authentic participation	

In total the review identified in the region of 150 potential initiatives, some of which are more challenging and complex, others of which are simple to implement and clear. The Toolkit Part 2 (Page 11) provides a methodology for prioritising all recommendations and will support the development of an implementation plan for Phase 2 of the EEDI Review.

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Executive Overview of Framework, Methodology and Approach (Annex A of Main Report)

Framework Overview
The Belonging Pioneers' Framework evaluates organisational EEDI maturity across a spectrum from resistant and stagnant attitudes, through compliance and strategic alignment, to fully integrated and adaptive practices. The levels range from:

- **Resistant** (active opposition to DEIB initiatives),
- **Stagnant** (indifference and minimal effort),
- **Fix & Compliance** (reactive, legally driven),
- **Strategic and Reliability** (proactive, business-aligned),
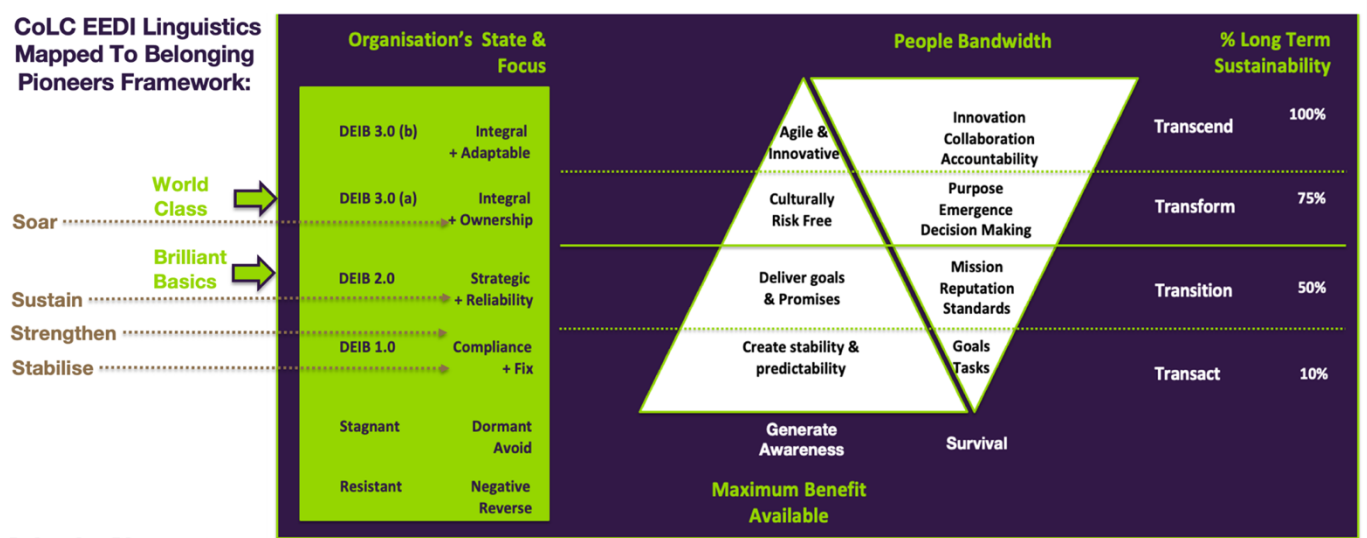- **Integral + Ownership** (fully embedded in culture),
- **Integral + Adaptable** (dynamic, evolving, and a core part of organisational DNA).

This framework was used to map CoLC's strategic EEDI benchmarks as illustrated below.

Methodology
The review followed the Belonging Pioneers' Scan-Focus-Act methodology:

- **Scan Phase:** Analysed CoLC's language and definitions around EEDI, including key concepts such as 'World Class' (excellence and leadership across all strategic outcomes) and 'Brilliant Basics' (operational excellence and robust foundations) as well as the four key phases of EEDI maturity in CoLC's model: Stabilise, Strengthen, Sustain, and Soar.
  The review mapped these definitions onto the framework and identified
  - **DEIB 1.0 (Low)** = **Stabilise:** Address immediate compliance and governance needs.
  - **DEIB 1.0 (High)** = **Strengthen:** Build robust systems and align with strategic priorities.
  - **DEIB 2.0 (Low)** = **Sustain:** Embed EEDI practices for long-term consistency.
  - **DEIB 3.0** = **Soar:** Achieve leadership & innovation in EEDI. Set benchmarks for others.
- **Focus Phase:** Incorporated insights from a Senior Leadership Team (SLT) workshop, where over 20 colleagues, including EEDI experts, contributed practical perspectives on achieving 'Brilliant Basics' and 'World Class' standards across three service user communities: London as a destination, Services, and Culture and Learning.
- **Act Phase:** Used the Cynefin 4-Point Framework (Clear, Complicated, Complex, Chaotic) to categorise and prioritise the narratives and challenges identified, enabling the organisation to address issues according to their complexity and impact.

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Executive Overview: Pockets Of Good Practice And Detailed Recommendations (Annex B)

This Annex provides a comprehensive review of CoLC's current strengths, challenges, providing actionable recommendations for advancing EEDI across its operations, in alignment with its Corporate Plan, People Strategy, and Equality Objectives for 2024–2029.

Note: The Author intended to distil the information in this document to make it more readable, but project timelines did not permit. This document contains ideas for CoLC to stand out in Brilliant Basics and World Class. The recommendation is to review the content in detail using the prioritisation tool provided in the Toolkit that accompanies the review in order to mine the value in this document.

Key Findings
▹ **Policy and Guidance:**
CoLC's policies are aligned with national frameworks such as the Equality Act 2010 and show an emerging focus on intersectionality and inclusive procurement. However, translating high-level commitments into actionable, intersectional policies remains a challenge. There is a risk of policies being too generic or compliance-driven, rather than innovative and tailored to the complex needs of diverse communities.
▹ **Balancing Global and Local Priorities:**
As both a global financial centre and a local authority, CoLC faces challenges in harmonising global ambitions with local equity needs. Initiatives like the Socio-Economic Diversity Taskforce and City Belonging Project exemplify efforts to bridge these priorities, but more cohesive frameworks are needed to prevent fragmentation and ensure equitable outcomes for all stakeholders.
▹ **Learning and Development:**
There is a strong foundation in inclusive leadership development – particularly at City of London Police, with targeted coaching, training, and maturity models in place. Yet, leadership teams require enhanced and ongoing cultural competency training to embed inclusive practices and drive systemic change.

Strategic Recommendations
▹ **Funding and Resource Allocation:**
Prioritise cross-departmental collaboration, transparency in EEDI funding, and expansion of external partnerships. Embed equity-focused budgets and collaborative funding models across institutions to ensure sustainability and impact.
▹ **Leadership Development:**
Mandate accountability for EEDI in leadership appraisals, strengthen governance structures, and foster cross-departmental collaboration. Invest in advanced, immersive cultural competency training and reverse mentoring to build leadership capacity and drive innovation.
▹ **Policy Modernisation:**
Develop intersectional policy toolkits, embed intersectionality and equity analysis into all strategic frameworks, and co-design policies with marginalised communities. Leverage data dashboards and participatory approaches to ensure policies are evidence-based and responsive to diverse needs.
▹ **Balancing Compliance and Innovation:**
Shift from a compliance-driven to an innovation-focused mindset by piloting EEDI innovation labs, integrating equity into digital and climate strategies, and reframing compliance as a catalyst for proactive change.
▹ **Global-Local Alignment:**
Embed local equity clauses in global economic strategies, align sustainability initiatives with community benefits, and establish advisory panels and equity funds to ensure that global growth uplifts local communities.

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(An Edited Extract Of The Content In Annex B)

What CoLC is doing well:	Issues and challenges CoLC has to overcome to achieve **Brilliant Basics** in the context of its **Corporate Plan**, **People Strategy**, and **Equality Objectives**	Issues and challenges CoLC has to overcome to achieve **World Clase** in the context of its **Corporate Plan**, **People Strategy**, and **Equality Objectives**
1.2 Resources: People, Funding, and Materials – Leadership Capacity		
Leadership capacity Pockets of Good Practice: **1. Guildhall School of Music & Drama (GSMD): Transformational Feedback and Leadership Development.** Training for more than 80 staff members in **Critical Response Process (CRP)** and coaching methodologies, to develop leadership skills that enhance trust, resilience, and reflective practice. **2. Barbican Centre: Inclusive Leadership Coaching for Diversity Network Co-Chairs** **3. City of London Police - Embedding EDI into Leadership Accountability -** establishment of the **Equality & Inclusion Strategic Board**, chaired by the Assistant Commissioner, where leaders must demonstrate progress in embedding EEDI into their operations.	**Leadership capacity gaps** There is a need to strengthen leadership buy-in and expertise to champion EEDI effectively, ensuring leaders role-model inclusive behaviours and drive systemic change across the organisation. **1. Corporate Strategy and Performance Team (CSPT): Mandatory EEDI Leadership Training** **Issue:** Only 27% of staff believe leaders demonstrate EEDI values, and leadership buy-in is inconsistent. **Action:** • Implement **mandatory EEDI leadership training** for all senior leaders. • Use insights from the **EEDI Review** to tailor training content to address specific gaps identified in leadership practices. • Align training outcomes with performance reviews, requiring leaders to demonstrate how they have applied EEDI principles in strategic decisions (e.g., budget allocations, policy design).	**Leadership capacity gaps** must be addressed with a more strategic and visionary approach. Leaders must demonstrate the ability to innovate and drive transformational change and actively champion EEDI as an essential enabler of organisational success. **Examples of what CoLC can do:** **Nominate one of the Institutions currently leading in EEDI to establish a collaborative leadership forum.** For example, City Bridge Foundation (given it already has expertise of significant partnership work, and is one of the leaders in EEDI at CoLC) could create a **Collaborative EEDI Leadership Forum** that brings together leaders from CoLC institutions to share best practices and co-develop innovative solutions for systemic challenges. This forum could: • Focus on leveraging lived experiences within leadership teams to shape policies and practices that resonate globally. • Use pooled resources from partner organisations to fund large-scale leadership development initiatives targeting socio-economic equity across London. **Data point:** Survey data and qualitative feedback highlight that staff in City Bridge Foundation report higher engagement, a stronger sense of inclusion, and a more collaborative culture compared to some other parts of CoLC
Strategic Alignment: • **Corporate Plan 2024–2029:** 'Exemplary services that meet the needs of all communities.' • **Equality Objectives 2024–2029:** 'Leaders role-modelling inclusive behaviours and driving systemic change.'		

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Executive Overview of What Needs To Change For A Culture That Supports EEDI To Emerge (Annex C)

The CultureWeb Report offers a concise analysis of how organisational culture within CoLC and its institutions shapes the progress and maturity of EEDI. Using the Johnson and Scholes CultureWeb framework, the report examines six elements—stories and myths, rituals and routines, symbols, power structures, organisational structures, and control systems—to identify both enablers and barriers to EEDI.

Key Findings:

- **Transitional Culture:** CoLC is moving from compliance-led to more strategic EEDI approaches. Maturity varies widely, with the institutions such and some departments leading in EEDI integration.
- **Competing Narratives:** The organisation's historic identity can both support and slow EEDI progress. While heritage is used to justify EEDI, it can also legitimise resistance. The image of the Square Mile as a global hub does not always match the experiences of underrepresented groups.
- **Inconsistent Rituals:** While rituals exist, their impact is uneven. Advanced areas have regular governance and reporting, but daily behaviours and psychological safety remain inconsistent.
- **Symbolic Tensions:** Historic buildings and symbols reflect tensions between tradition and modern values. Some departments promote diversity, but overall commitment is inconsistent.
- **Power and Resources:** Formal structures support EEDI, but informal influence and resource allocation are variable. Staff networks are active, but progress is hampered by resource constraints and traditional hierarchies.
- **Structural Silos:** EEDI implementation is fragmented, with limited cross-departmental collaboration and knowledge sharing, leading to inefficiencies.
- **Accountability:** Performance measurement varies; some departments have clear KPIs, others lack defined metrics, making progress difficult to sustain.

Patterns and Contradictions:

- There is a gap between EEDI commitments and actual resources or implementation.
- Positive attitudes are not always matched by action.
- The institutions are generally more advanced than administrative departments. Opportunities for knowledge transfer and sharing of best practice is currently limited by the hub and spoke operating model.
- Middle management doubts about investment in EEDI and compliance-driven attitudes hinder EEDI's spread.

Recommendations:

1. **Bridge Central Paradigms:** Explicitly align EEDI with departmental missions using relevant approaches.
2. **Accelerate Change:** Challenge slow-progress narratives and use change management to boost engagement.
3. **Evolve Rituals:** Expand leadership coaching, inclusive training, and psychological safety initiatives; review traditional practices for exclusion.
4. **Transform Power Structures:** Establish succession planning, targeted development, and minimum EEDI resourcing.
5. **Redesign Structures:** Consider a collaborative federated governance model to facilitate sharing and implementation of best practice.
6. **Strengthen Governance:** Standardise data collection, reporting, and embed EEDI in performance reviews.

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Executive Overview Of What 850 Staff Say About EEDI At CoLC (Annex D)

The EEDI Survey Analysis Report presents a comprehensive review of CoLC's EEDI landscape, based on extensive staff survey data and correlation analysis. The findings reveal an organisation with a solid foundation in EEDI but with significant opportunities for improvement, particularly in engagement, leadership accountability, communication, and addressing socioeconomic barriers.

Key Findings

‣ **Engagement Gaps:** While most staff recognise the value of EEDI, engagement levels vary considerably across departments and grades. The feeling of disconnection is most pronounced among mid-level staff (Grades D-G), with 30% viewing EEDI as primarily compliance-driven and 31% expressing scepticism about resource allocation.

‣ **Leadership and Accountability:** There is a strong correlation between leadership engagement and organisational EEDI effectiveness. Senior leaders demonstrate high personal commitment, but this is not always cascaded effectively throughout their teams.

‣ **Knowledge and Communication:** Widespread knowledge gaps about EEDI initiatives exist, especially among mid-level staff. This highlights the need for a more comprehensive and accessible communications strategy.

‣ **Socioeconomic Diversity:** Respondents identified socioeconomic exclusion as a significant gap, calling for a review of recruitment and promotion practices and a reconsideration of what constitutes 'professionalism' within the organisation.

‣ **Trust Deficit:** Privacy concerns and doubts about leadership commitment to EEDI implementation indicate a trust deficit, particularly among non-participants who provided feedback for non-participation in the survey.

‣ **Change Orientation:** There is a strong positive correlation between willingness to lead or promote change and high EEDI engagement, regardless of demographic background.

Recommendations

1. **Better Engage All Staff in EEDI Design and Evolution:** Move from a top-down approach to a collaborative, staff-led model. Establish cross-grade working groups, regular feedback mechanisms, and recognition for staff contributions to foster ownership and connection.

2. **Enhance Leadership Accountability:** Implement formal EEDI objectives for all senior leaders and department heads, with transparent reporting and measurable goals in performance reviews. Celebrate exemplary leadership and address non-compliance.

3. **Improve Communications and Staff Engagement:** Develop a comprehensive EEDI communications strategy that goes beyond information sharing to build genuine understanding. Regularly share updates, success stories, and progress metrics across multiple channels.

4. **Provide Targeted Support for Grades D-G:** Offer specialised training, peer learning groups, and recognition programmes to transform this critical middle layer from being compliance-focused to becoming EEDI champions.

5. **Address Socioeconomic Diversity and Class Barriers:** Review recruitment and promotion practices and reconsider definitions of professionalism to ensure pathways for those from less affluent backgrounds.

6. **Implement Agile Cross-Departmental EEDI Project Teams:** Empower EEDI champions across departments to lead initiatives, share best practice, and build a sustainable network of advocates.

7. **Develop Trust-Building Measures:** Increase transparency through clear data usage policies, honest acknowledgment of challenges, and regular progress reporting. Create safe channels for feedback to rebuild confidence.

8. **Integrate Change Management Principles:** Apply change management techniques to EEDI implementation, articulating a compelling case for change and empowering early adopters.

9. **Establish Mechanisms for Psychological Safety:** Train managers to facilitate difficult conversations, model vulnerability, and recognise courage in sharing perspectives, thereby fostering an environment where diversity leads to innovation.

Selected Graphs From Annex D

My Views About EEDI In General

View	Count
They are an essential part of a successful organisation	272
They help to improve behaviours	151
They create a positive and productive work culture	123
They generate a positive sense of belonging	99
They are ignored by most people	48
They stop organisations getting into trouble	38
I'd rather not answer this	36
They over complicate our work and choices	34
Other	24

If you were to improve your EEDI Initiatives, what actions would you suggest?

Action	Count
Better engage all staff in its design and evolution	358
Improve communications and staff engagement	296
Improve management and leadership engagem...	277
Explore benefits of a more diverse and inclusive...	219
Improve reporting on activities	191
Simplify the programme	163
I can't think of any improvements	57
Minimise its cost and impact	30
Close it down - it's a waste of money and time	25

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Does The Organisation Share And Address Any Setbacks Or Failures In EEDI Initiatives?

	1	2	3	4	5
ALL RESPONSES	9.72%	21.89%	47.15%	17.75%	
ALL EMPLOYEES	9.24%	21.29%	48.18%	17.65%	
MEMBER OF COURT OF COMMON COUNCIL	15.52%	29.31%	34.48%	18.97%	
CHAMBERLAIN'S	15.79%	29.82%	33.33%	14.04%	7.02%
CITY BRIDGE FOUNDATION	12.68%	26.76%	46.48%	12.68%	
CITY SURVEYOR'S	6.67%	14.44%	53.33%	24.44%	
COMMUNITY & CHILDREN'S SERVICES DEPARTMENT	11.86%	25.42%	50.85%	11.86%	
COMPTROLLER & CITY SOLICITOR'S	12.50%	12.50%	43.75%	31.25%	
CORPORATE STRATEGY & PERFORMANCE	20.00%	10.00%	30.00%	40.00%	
ENVIRONMENT	8.97%	18.38%	52.14%	14.96%	5.56%
INNOVATION & GROWTH	4.55%	22.73%	40.91%	31.82%	
PEOPLE & HR	4.00%	24.00%	52.00%	20.00%	
REMEMBRANCER	22.73%	40.91%	27.27%	9.09%	
TOWN CLERK'S	6.38%	23.40%	48.94%	17.02%	4.26%
DEPARTMENT NOT IDENTIFIED	14.29%	28.57%	35.71%	14.29%	7.14%

Key. ●1 = Not At All   ●3 = Some   ●5 = Totally

Does The Organisation Share Lessons Learned In Relation To EEDI To Encourage All To Improve?

	1	2	3	4	5
ALL RESPONSES	8.57%	24.68%	40.00%	20.65%	6.10%
ALL EMPLOYEES	8.30%	24.89%	39.52%	20.68%	6.61%
MEMBER OF COURT OF COMMON COUNCIL	11.86%	22.03%	45.76%	20.34%	
CHAMBERLAIN'S	14.04%	33.33%	35.09%	12.28%	5.26%
CITY BRIDGE FOUNDATION	11.11%	31.94%	37.50%	16.67%	
CITY SURVEYOR'S	5.56%	18.89%	40.00%	28.89%	6.67%
COMMUNITY & CHILDREN'S SERVICES DEPARTMENT	17.24%	27.59%	41.38%	8.62%	5.17%
COMPTROLLER & CITY SOLICITOR'S	12.50%	43.75%	37.50%	6.25%	
CORPORATE STRATEGY & PERFORMANCE	20.00%	50.00%	20.00%	10.00%	
ENVIRONMENT	5.15%	23.61%	40.34%	23.18%	7.73%
INNOVATION & GROWTH	33.33%	42.86%	14.29%	9.52%	
PEOPLE & HR	4.00%	32.00%	40.00%	20.00%	4.00%
REMEMBRANCER	4.55%	13.64%	27.27%	31.82%	22.73%
TOWN CLERK'S	9.68%	25.81%	38.71%	21.51%	4.30%
DEPARTMENT NOT IDENTIFIED	7.14%	35.71%	50.00%	7.14%	

Key. ●1 = Not at all   ●3 = Usually   ●5 = Totally

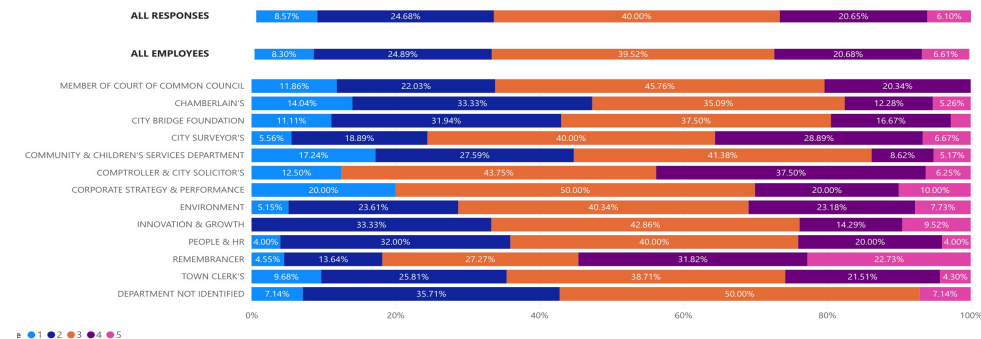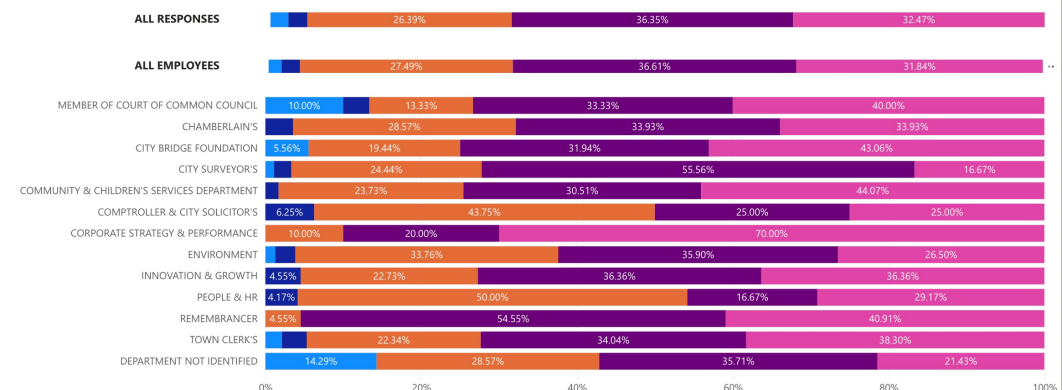## We Engage In Cross-Organisational Collaboration That Is Inclusive And Accessible To All Employees   824

	1	2	3	4	5
ALL RESPONSES	6.92%	18.33%	39.93%	26.82%	8.01%
ALL EMPLOYEES	6.28%	18.19%	39.79%	27.36%	8.38%
MEMBER OF COURT OF COMMON COUNCIL	15.00%	20.00%	41.67%	20.00%	
CHAMBERLAIN'S	8.33%	15.00%	38.33%	23.33%	15.00%
CITY BRIDGE FOUNDATION	7.50%	25.00%	40.00%	23.75%	
CITY SURVEYOR'S	5.21%	11.46%	41.67%	34.38%	7.29%
COMMUNITY & CHILDREN'S SERVICES DEPARTMENT	10.94%	23.44%	34.38%	26.56%	4.69%
COMPTROLLER & CITY SOLICITOR'S	6.25%	12.50%	37.50%	43.75%	
CORPORATE STRATEGY & PERFORMANCE	10.00%	40.00%	30.00%	20.00%	
ENVIRONMENT	4.80%	14.40%	42.00%	28.00%	10.80%
INNOVATION & GROWTH	30.43%	34.78%	21.74%	13.04%	
PEOPLE & HR	16.00%	56.00%	24.00%	4.00%	
REMEMBRANCER	4.17%	16.67%	33.33%	33.33%	12.50%
TOWN CLERK'S	8.91%	21.78%	35.64%	26.73%	6.93%
DEPARTMENT NOT IDENTIFIED	6.67%	33.33%	46.67%	6.67%	6.67%

Key ●1 = Strongly Disagree   ●3 = Neither Agree Nor Disagree   ●5 = Strongly Agree

Do You Think There Is Scope To Improve The Impact Of Your EEDI Initiatives On Your Organisation?

	1	2	3	4	5
ALL RESPONSES			26.39%	36.35%	32.47%
ALL EMPLOYEES			27.49%	36.61%	31.84%
MEMBER OF COURT OF COMMON COUNCIL	10.00%	13.33%	33.33%	40.00%	
CHAMBERLAIN'S		28.57%	33.93%	33.93%	
CITY BRIDGE FOUNDATION	5.56%	19.44%	31.94%	43.06%	
CITY SURVEYOR'S		24.44%	55.56%	16.67%	
COMMUNITY & CHILDREN'S SERVICES DEPARTMENT		23.73%	30.51%	44.07%	
COMPTROLLER & CITY SOLICITOR'S	6.25%	43.75%	25.00%	25.00%	
CORPORATE STRATEGY & PERFORMANCE	10.00%	20.00%	70.00%		
ENVIRONMENT		33.76%	35.90%	26.50%	
INNOVATION & GROWTH	4.55%	22.73%	36.36%	36.36%	
PEOPLE & HR	4.17%	50.00%	16.67%	29.17%	
REMEMBRANCER	4.55%	54.55%	40.91%		
TOWN CLERK'S		22.34%	34.04%	38.30%	
DEPARTMENT NOT IDENTIFIED	14.29%	28.57%	35.71%	21.43%	

Key ●1 = No Scope   ●3 = Maybe   ●5 = Yes lots

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What Staff Network Co-Chairs And Departmental EEDI Leads Say About EEDI Priorities at CoLC (Annex E)

This report summarises the key findings from a listening circle held with 26 EEDI Champions at CoLC. Participants identified areas that CoLC needs to focus on to progress EEDI through an open, free text question on Menti. The submitted areas were then voted on and participants worked in small groups on the top 4 themes selected through the vote: member behaviour and diversity, systemic inequality, accountability standards, and the embedding and resourcing of EEDI beyond volunteer efforts. The report also includes Menti feedback, capturing candid staff perspectives on inclusion and exclusion within the organisation.

Key Themes and Insights

1. Member Behaviour and Diversity

Participants highlighted a persistent disconnect between members and staff, with members often failing to recognise or accept feedback regarding their behaviour. The homogeneity of the membership, rooted in longstanding institutional traditions, was seen as a fundamental barrier to cultural change and diversity. While member induction and training present opportunities for improvement, progress remains slow, and there are doubts about senior leadership's willingness to address problematic member conduct. Ongoing awareness training and consistent modelling of inclusive behaviours were identified as necessary steps.

2. Systemic Inequality Within the Organisation

CoLC's historical legacy and deep ties to the financial sector were identified as significant challenges when addressing equality. Recent organisational decisions—such as those regarding statues linked to the slave trade—were viewed as balancing public relations with genuine attempts to address legacy issues. The slow pace of institutional response was seen as problematic, causing frustration and embarrassment among staff. There were concerns about the effectiveness of staff networks and the EEDI forum in driving real change, given that key decisions remain with senior leadership and Members.

3. Accountability Standards for Members and Staff

Inconsistent management training and a lack of clearly articulated values have led to uneven accountability for staff behaviour. The Code of Conduct is not prominently featured, and diversity networks are often relied upon to resolve institutional issues without adequate support. There is a high tolerance for low-level disrespectful behaviours, and insufficient tools or guidance for addressing everyday workplace problems. The group called for a shift from consultation to concrete action and for greater clarity and accessibility of organisational standards.

4. Embedding and Resourcing EEDI Beyond Volunteer Efforts

There was widespread frustration over the lack of tangible progress despite repeated discussions. Responsibility for EEDI is often left to volunteers and staff networks, with insufficient organisational ownership or resourcing. The absence of a comprehensive EEDI plan with clear priorities and responsibilities was noted, as was the tendency for the organisation to take credit for volunteer-led initiatives rather than making genuine, institution-wide commitments.

Menti Feedback

Staff identified several areas requiring urgent attention for CoLC to become truly inclusive, including:

- Addressing member behaviour and increasing diversity among members
- Acknowledging and tackling systemic inequality and historical legacies
- Setting and upholding clear behavioural standards for all
- Investing in well-resourced, organisation-wide EEDI programmes rather than relying on volunteers
- Improving data collection and transparency to inform inclusive governance and communications
- Providing more effective manager training and fostering cultural competence across all levels

Among factors that help staff feel included are: supportive line managers, staff networks, recognition, clear communication, and a sense of being listened to and valued. Conversely, experiences of exclusion are driven by poor communication, lack of transparency, resistance to change, unfriendly behaviours, siloed working, and a lack of recognition and support for development.

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Executive Overview of The Senior Leadership Team Workshop Part 1 (Annex F)
What Good Looks Like and What Needs To Be Managed For Successful EEDI Implementation At CoLC

This report presents the collective insights and recommendations from a Senior Leadership Team (SLT) and EEDI Subject Matter Expert (SME) workshop, focused on embedding EEDI as a 'golden thread' throughout CoLC. The workshop explored what constitutes 'Brilliant Basics' and 'World Class' standards for EEDI across Culture & Learning, Service Delivery, and London As A Destination.

Vision for EEDI Excellence
Participants defined 'Brilliant Basics' as an environment where all staff feel comfortable, valued, and engaged, with accessible and welcoming spaces, equitable experiences, and EEDI integrated into everyday decision-making. 'World Class' was described as an organisation where everyone feels they belong, the workforce and leadership are truly diverse, and CoLC sets a benchmark for best practice in diversity and inclusion.

Key Areas for Change and Improvement

Culture and Learning:
- Foster openness, active listening, and psychological safety, enabling staff to share ideas and challenge constructively.
- Empower both top-down and ground-up engagement, ensuring all voices are heard.
- Provide tools, time, and training for staff and leaders to develop EEDI skills, including tailored learning programmes and regular feedback mechanisms.
- Encourage a culture of reciprocal learning, breaking down silos through events and collaborative activities.

London as a Destination:
- Ensure services and leadership reflect the diversity of the communities served.
- Integrate EEDI into business planning, recruitment, and project delivery from the outset.
- Embed measurable objectives for senior leaders and improve representation at all levels.
- Secure dedicated resources and funding for EEDI initiatives, both centrally and locally.

Services:
- Deliver accessible, inclusive services that meet the needs of all stakeholders and communities.
- Make EEDI visible in all policies, processes, and systems, with clear, jargon-free language.
- Establish transparent reporting and feedback mechanisms and monitor service user diversity.
- Promote ongoing learning and development for all staff, including bitesize and role-specific training.

Priorities for Stakeholder Groups
- **Members:** Develop greater diversity of thought, embrace change, improve understanding of EEDI's benefits, and commit to behavioural codes and ongoing learning.
- **Staff:** Build accountability, foster a growth mindset, diversify the workforce (especially at senior levels), and ensure clear expectations and support for professional development.
- **Service Users:** Encourage co-creation of services, ensure fair treatment and inclusive experiences, and provide regular opportunities for feedback and representation.

Enablers and Barriers
To achieve EEDI as a golden thread, the organisation must:
- Decrease defensiveness and increase understanding between staff and members.
- Move from consultation to genuine collaboration and co-design.
- Address resource limitations transparently and prioritise transformation projects.
- Ensure policies and processes are accessible, up-to-date, and designed with input from diverse staff networks.

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Executive Overview of The Senior Leadership Team Workshop Part 2 (Annex G)
Exploring Complexity At CoLC To Support Prioritisation Of EEDI Initiatives

This report synthesises outcomes from Part 2 of the workshop, exploring the complexity of embedding EEDI across CoLC, focusing on Culture & Learning, Service Delivery, and London As A Destination. The findings are presented using a complexity matrix—clear, complicated, complex, and chaotic—highlighting the varying levels of challenge and opportunity in advancing EEDI.

Culture and Learning
The analysis reveals that while some aspects of EEDI can be addressed with clear actions—such as ensuring staff voices are heard, providing useful continuing professional development (CPD), and setting clear expectations—many areas require more nuanced approaches. Complicated issues include equipping senior leaders with the necessary skills, prioritising transformation projects, and ensuring transparency and fairness in staff treatment. Complex challenges involve fostering a growth mindset, embracing change, and building a genuinely inclusive experience for both staff and service users. Chaotic elements, such as maintaining stability during change and advocating for coherent staff development, require adaptive leadership and resilience.

A recurring theme is the need for both top-down and ground-up engagement, with a strong emphasis on reciprocal learning, active listening, and breaking down silos. There is a call for more inclusive and accessible policies, a unified diversity calendar, and better data systems for tracking and informing decision-making. The importance of psychological safety, a sense of belonging, and a healthy workplace culture are highlighted as essential for EEDI to thrive.

London as a Destination
The report identifies the necessity for CoLC to be a leader in EEDI, not only internally but also as a model for other local authorities. Clear actions include reverse mentoring, representative recruitment at events, and embedding EEDI in all service delivery. Complicated and complex areas involve co-designing work with staff, standardising behavioural measures for recruitment, and ensuring staff retention through inclusive practices. Chaotic factors include adapting to diverse needs and creating a truly reflective and representative workforce.

There is a strong emphasis on engaging departments and institutions in meaningful decision making, building empowered networks, and ensuring that EEDI is considered from the outset of all projects. The need for reliable reporting mechanisms, standardised data capture, and accessible IT tools to support neurodiversity is also underlined.

Services
For service delivery, the report calls for accessible information and sites, safeguarding for all communities, and services that are flexible and responsive to the needs of diverse users. Staff are encouraged to adopt appreciative enquiry, build partnerships, and engage with networks to support the EEDI strategy. Consistent language, up-to-date policies, and a baseline expectation of EEDI groups with real influence are highlighted as necessary foundations.
Complex challenges include meeting the individual needs of every person, fostering a culture where staff feel safe to make mistakes, and ensuring everyone is empowered and trusted. Chaotic elements, such as building trust and openness to critical feedback, are recognised as essential for cultural transformation.

Overarching Insights
Across all areas, the report stresses the importance of:
❥ Clear and accessible policies and processes
❥ Ongoing, inclusive learning and development for all staff
❥ Effective data collection and analysis to inform action
❥ Strong governance, accountability, and leadership
❥ Embedding EEDI in business planning and resource allocation
❥ Creating psychologically safe, welcoming, and adaptable environments

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Executive Overview of External Environmental Drivers Impacting EEDI   (Annex H)
This report analyses the key external trends influencing CoLC's EEDI initiatives, using the comprehensive PESTELEDEIT framework. This approach examines eleven dimensions—Political, Economic, Social, Technological, Environmental, Legal, Ethical, Demographic, Ecological, Intercultural, and Time—highlighting both the challenges and opportunities facing CoLC as it seeks to advance EEDI maturity.

Key Findings

- **Political and Legal Pressures:** CoLC faces increasing regulatory scrutiny and must align with national and international EEDI standards, including the Equality Act 2010 and its forthcoming amendments. There is a growing expectation for demonstrable progress, not just compliance, and a need to proactively address new legal duties such as preventing sexual harassment.
- **Economic and Social Factors:** Persistent pay gaps and underrepresentation of certain groups remain entrenched, despite the proven economic benefits of diversity and inclusion. Societal expectations are shifting rapidly, with greater awareness of intersectionality and rising demands for diverse leadership and visible progress on EEDI.
- **Technological and Digital Inclusion:** Advances in data analytics and artificial intelligence offer new tools for tracking EEDI progress, but also present risks of perpetuating bias, especially in automated recruitment. Ensuring accessible and inclusive digital platforms is increasingly important, particularly in the context of remote and hybrid working.
- **Environmental and Ecological Integration:** There is a growing emphasis on integrating EEDI with sustainability and climate action, recognising that environmental factors can disproportionately impact marginalised communities. CoLC has an opportunity to lead by ensuring equitable access to environmental benefits and green jobs.
- **Ethical and Intercultural Considerations:** Ethical leadership, transparent reporting, and balancing freedom of expression with protection from discrimination are now central to EEDI practice. As a global city, CoLC must also enhance intercultural competence and ensure its public spaces and cultural offerings are truly inclusive.
- **Demographic and Time Factors:** London's population is increasingly diverse, yet progress towards proportional representation in leadership—especially for Black professionals—remains slow, with some estimates suggesting a 50-year timeline. Accelerating progress and regularly updating EEDI policies to reflect societal change are essential.

Critical Insights

- The business case for EEDI is strong, but there is a risk that economic arguments may overshadow the fundamental moral imperative for equality.
- Much of CoLC's current activity remains reactive and compliance-driven; genuine transformation requires deeper integration of EEDI into the organisation's core values and practices.
- Data quality and ethical use must be prioritised to avoid reinforcing existing biases.
- Accelerating timelines for representation and embedding environmental justice are crucial

Recommendations
Short-term (1–2 years):
- Develop robust data strategy for evidence-based decision making, addressing privacy+ bias risks.
- Establish clear accountability frameworks with transparent metrics and regular reporting.
- Audit and improve the accessibility of all digital platforms and services.
- Update EEDI frameworks to explicitly address intersectionality.
- Create clear ethical guidelines for EEDI, particularly regarding AI and balancing competing rights.

Medium-term (2–5 years):
- Set ambitious targets to accelerate proportional representation, especially in leadership.
- Integrate EEDI and sustainability strategies to ensure equitable outcomes.
- Build intercultural competence across the workforce.
- Reform recruitment, progression, and retention processes to tackle structural barriers.
- Create mechanisms for sharing best practice across departments and institutions.

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Executive Overview Of The Document Analysis Report (Annex I)

The Document Analysis Report provides a comprehensive review of CoLC's progress and maturity in EEDI across its departments and institutions. The EEDI Review assessed how EEDI is embedded in CoLC's culture, governance, and operations, and identifies both strengths and areas for improvement as the organisation seeks to deliver on its Corporate Plan 2024–2029 and associated People Strategy and Equality Objectives.

Methodology
The review utilised the Belonging Pioneers' Framework, which assesses organisational EEDI maturity from resistance and compliance through to strategic, integral, and adaptive practice. Over 300 documents from across CoLC were scrutinised, with narrative and discourse analysis applied to map current practice, identify trends, and highlight both shared solutions and areas of divergence.

Key Findings
- **EEDI Maturity Levels:** Most departments and institutions are positioned at the 'Strategic and Reliability' stage (DEIB 2.0), with some, such as the City Bridge Foundation and Guildhall School of Music and Drama, demonstrating advanced integration (DEIB 3.0). However, many areas remain at a developing stage, with progress often siloed and inconsistent.
- **Shared Solutions and Good Practice:** Examples of effective EEDI practice include the consolidation of data systems (e.g., OneLake), public reporting of pay gaps, targeted recruitment and reverse mentoring, and collaborative initiatives such as the Propel Programme and City Belonging Project.
- **Improvement Over Time:** Departments show evidence of moving from compliance to more strategic approaches, with improvements in data collection, training, and inclusive policy development. However, gaps remain in intersectional data, consistent application of Equality Impact Assessments, and leadership accountability.
- **Systems and Processes:** While many departments have established frameworks and policies, integration of EEDI into operational workflows and performance management is often incomplete. Data collection is improving but lacks depth in areas such as intersectionality.
- **Trends and Patterns:** There is a growing emphasis on inclusive communication, staff networks, and community engagement. However, challenges persist in resource allocation, data quality, and the embedding of EEDI into decision-making and governance.
- **Governance and Accountability:** The creation of EEDI Leads and an EEDI Forum has improved coordination, but the voluntary nature of some roles and uneven adoption across departments limit overall impact. Formal governance structures are still being established.

Strategic Recommendations
- **Enhance Data Systems:** Develop intersectional analytics and mandate socio-economic data disclosure to enable more nuanced understanding and action.
- **Embed Accountability:** Link a proportion of senior leaders' performance to EEDI outcomes and expand cross-departmental key performance indicators.
- **Foster Cultural Change:** Launch grassroots ambassador programmes, expand staff training, and align procurement and recruitment with EEDI objectives.
- **Standardise Processes:** Ensure consistent application of Equality Impact Assessments and inclusive practices across all departments.
- **Strengthen Governance:** Formalise EEDI governance structures and ensure dedicated, paid resources for EEDI leads and networks.

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> **Sample Table 1 From Annex I**: Department vs The Framework Maturity Level Mapping From Document Review

Department/Institution	Maturity Level
City of London Corporation	DEIB 1.0(Fix and Compliance) moving to DEIB 2.0 (Strategic and Reliability), with elements of progress t
Barbican Centre	DEIB 2.0(Strategic & Reliability) moving to-DEIB 3.0 (a)(Integral & Ownership)
Children's and Community Services	DEIB 2.0(Strategic & Reliability)-with elements of DEIB 3.0(a) (Integral and Ownership)
Chief Strategy Officer Department	DEIB 2.0 (Strategic & Reliability)
Town Clerk Department	DEIB 2.0 (Strategic and Reliability)
Chamberlain Department	DEIB 2.0 (Strategic and Reliability) moving to DEIB 3.0(a) (Integral and Ownership)
City of London Police	DEIB 2.0 (Strategic and Reliability) moving to DEIB 3.0(a) (Integral and Ownership)
Environment Department	DEIB 2.0 (Strategic & Reliability)
City of London "Family of Schools"	DEIB 2.0 (Strategic & Reliability) with elements of DEIB 3.0(a) (Integral & Ownership)
Innovation and Growth Department	DEIB 2.0 (Strategic and Reliability) with elements of DEIB 3.0(a) (Integral and Ownership)
City Surveyors Department	DEIB 2.0 (Strategic and Reliability)
People & HR Department	DEIB 1.0(Fix and Compliance) moving to DEIB 2.0 (Strategic and Reliability)
Remembrancer Department	DEIB 2.0(Strategic & Reliability)-with elements of DEIB 3.0(a) (Integral and Ownership
City Bridge Foundation	DEIB 3.0(a) (Integral and Ownership)
Comptroller and City Solicitors Department	DEIB 1.0(Fix and Compliance) moving to DEIB 2.0 (Strategic and Reliability)
London Archives	DEIB 2.0 (Strategic & Reliability)
Guildhall School of Music & Drama	DEIB 2.0(Strategic & Reliability) moving to-DEIB 3.0(a) (Integral & Ownership)

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Appendix - About Belonging Pioneers

Belonging Pioneers, founded by Ishreen Bradley over 20 years ago, is a leading boutique consultancy dedicated to advancing inclusion and belonging for all within organisations.

With its clear Purpose of ensuring **every** individual has the opportunity to thrive at work, Belonging Pioneers partners with visionary CEOs, C-suite and people leaders who are committed to driving meaningful cultural transformation. Through research-led strategy and implementation advisory, coaching, consulting and training services, Belonging Pioneers empowers organisations to build inclusive environments where all employees—regardless of background—can succeed.
Their innovative **Win-Win** approach ensures that colleagues from both underrepresented and majority groups benefit from inclusion and belonging efforts, resulting in enhanced psychological safety, increased productivity, and alignment with social purpose goals.

Why CEOs Choose Belonging Pioneers:
- ⯈ **Strategic Expertise:** Offering tailored advice and development programmes that address organisational challenges and unlock potential.
- ⯈ **Proven Impact:** Delivering measurable results through evidence-based methodologies that foster inclusivity and drive business growth.
- ⯈ **Collaborative Leadership:** Guiding senior leaders to implement transformational strategies with clarity, courage, and confidence.

Successful projects have been delivered for clients in financial services, construction, technology and the cultural sector as well as local Government. Belonging Pioneers' work in culture transformation for inclusion and belonging began with transforming the culture of one of London's premier art galleries by coaching leadership teams, empowering diverse talent, and implementing breakthrough initiatives. This resulted in a psychologically safe workplace that attracted diverse staff while achieving record audience engagement and visitor numbers.

Belonging Pioneers also spearheads the groundbreaking *Pioneers Movement For Belonging* — a collaborative network of forward-thinking leaders committed to evolving advanced methodologies for inclusion and belonging for all. By engaging with this movement, leaders can influence industry-wide change while ensuring their organisations remain competitive in today's rapidly shifting societal landscape.

What Sets Belonging Pioneers Apart:
- A deeply human approach rooted in authentic leadership.
- Decades of experience enabling global leaders to navigate complex challenges.
- A commitment to creating sustainable cultural transformation that delivers triple bottom-line results.

Partnering with Belonging Pioneers is an opportunity for CEOs to lead their organisations into the future—building cultures that attract top talent, foster innovation, and achieve lasting success.

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