City of London Corporation Committee Report

Committee(s): Professional Standards and Integrity Committee – For information	Dated: 3rd June 2025
Police Authority Board – For Information	23rd July 2025
Subject: Equity, Diversity, Inclusivity (EDI) Update	**Public report:** For Information
This proposal: • delivers Corporate Plan 2024-29 outcomes	People are safe and feel safe
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of:	Commissioner of Police
Report author:	Det Supt Kate MacLeod

Summary

1. With a clear EDI Performance Framework and Implementation Plan in place, the ICOD (Inclusivity, Culture and Organisational Development) Team are in a better position to report on our progress against our Strategy. Of the 76 actions we have committed to complete over the next three years, 28 of these will form our priorities for years 2025/26. As of this quarter, 14% (4) of these actions have been completed, 72% (20) are in progress and 14% (4) have not yet been started.

2. The 'Our People' strand remains the most advanced due to the current national scrutiny on behaviour and culture within Policing. We will be building on this work next quarter, progressing actions on evaluation of our leadership schemes for under-represented groups, improving our capture of diversity data, delivery of our cultural audits and establishment of an Ethics Committee. We also plan to progress some actions under the 'Our Public' pillar to help balance delivery, formalising our workplan for the youth IASG (Independent Advisory Scrutiny Group) and reviewing all National EDI plans alongside our local engagement activity.

3. The key successes for this quarter include finalising our priorities and thematics for 2025/26, continuing to roll out our Inclusivity Programme and progressing various initiatives on leadership and culture. Our biggest risk to delivery remains team capacity verses demand, we have outlined our requirement for dedicated

analytical support to mitigate this, which has been acknowledged and accepted by the Chief Officer Team. We have also recently filled our Organisational Development (OD) Practitioner vacancy to ensure this team is at full strength.

4. Operating within this space, we acknowledge that we will need to adapt and flex our plans based on new trends and a changing political landscape. An example of this has been seen in recent weeks, where the Supreme Court Ruling relating to the legal definition of a 'woman' has required us to respond quickly, but with due consideration to our colleagues and our communities.

2025-26 prioritisation

5. Since our last Committee meeting, Member feedback has been considered and our ambitions reviewed accordingly. Our full EDI Strategy now totals 76 actions across the four priority pillars, 28 (37%) of these have been prioritised for delivery in 2025/26. Of the remaining actions, 18 (24%) of these are medium priority with 30 (39%) low priority. This grading has since been signed off by our Chief Officer Team and at our internal EDI Strategic Board, the full paper can be found at Appendix 1.

6. The large majority 18 (64%) of our 2025/26 actions are under the 'Our People' pillar and focus on improving diversity of under-represented talent and rolling out mandatory EDI education and training initiatives, alongside inclusion of EDI as part of Professional Development Review (PDR) objectives for all colleagues, and more generally ensuring our ambitions are fully understood by our Senior Leadership Team. We also continue to work across force to deliver cultural audits, developing this approach further is also a high EDI Strategy priority for 2025/26.

Delivery overview this quarter

Actions status	Q1 (Actual)	Q2 (Forecast)	Q3 (Forecast)	Q4 (Forecast)
Completed	4	9	22	28
In progress	20	19	6	0
Not started	4	0	0	0

Quarterly Forecasted Progress of Actions By Status
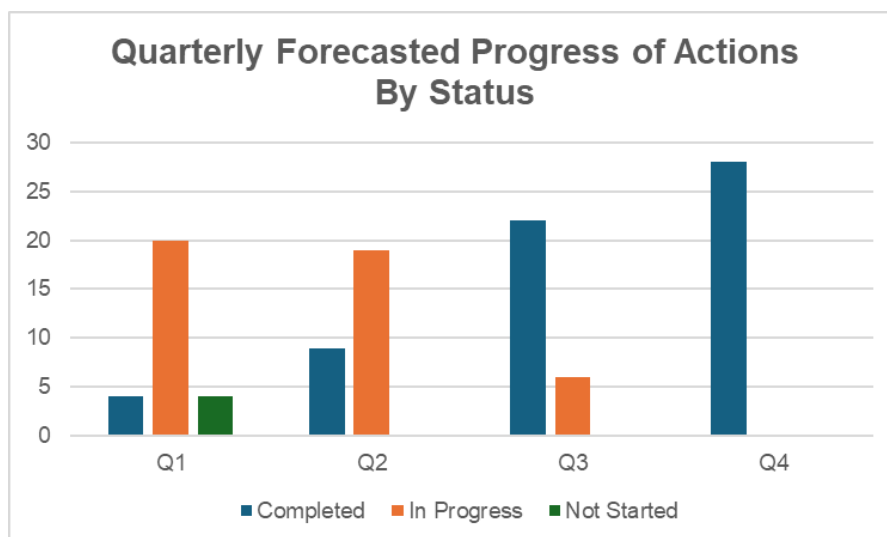
7. The following progress is calculated using a weighted average of 'Completed' actions (with a weighting of 1) and 'In progress' actions (with a weighting of 0.5) out of the total number of actions per pillar. A forecast of progress has been calculated using the same methodology for Q2 to Q4.

Progress by Pillar	Q1 (Actual)	Q2 (Forecast)	Q3 (Forecast)	Q4 (Forecast)
Our People	56% (18 total actions: 3 completed, 14 in progress, 1 not yet started)	67% (18 total actions: 6 completed, 12 in progress)	86% (18 total actions: 13 completed, 5 in progress)	100% (18 actions, all completed)
Our Policies	50% (2 total actions: 1 completed, 1 not yet started)	75% (2 total actions: 1 completed, 1 in progress)	100% (2 total actions: 2 completed)	100% (2 actions, all completed)
Our Public	33% (6 total actions: 0 completed, 4 in progress, 2 not yet started)	67% (6 total actions: 2 completed, 4 in progress)	92% (6 total actions: 5 completed, 1 in progress)	100% (6 actions, all completed)
Our Partners	50% (2 total actions: 2 in progress)	50% (2 total actions: 2 in progress)	100% (2 total actions: 2 completed)	100% (2 actions, all completed)

Quarterly Forecasted Progress of Actions by Pillar
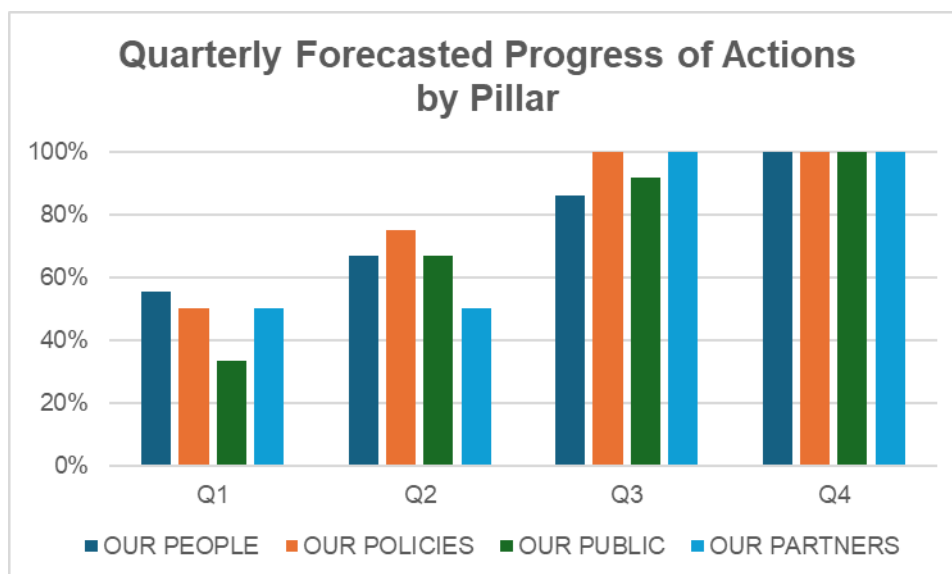
Key successes and issues

2025/26 actions completed this quarter	Summary of results and impact
2.7 Creation of Retention and Exiting Workgroup (with programme of work in place)	*Relates to feedback from Inclusive Employers around capturing why people are leaving / staying. In place with reporting lines.*
3.1 Creation of 'Inclusivity Programme' as mandatory for all	*Was already in place, work now focuses on evaluating impact and compliance.*
3.2 Creation of EDI calendar to inform activity	*Completed for 25/26 in line with Nationally significant dates. Allows for effective planning and proactive identification of relevant themes.*
11.1 Review of Staff Networks and Associations	*Review completed, 6 months trial of recording network working hours underway to inform next steps.*
2025/26 actions not yet started this quarter	**Summary of issues with commencing**
3.3 Review of internal approach to engagement and creation of strategy (including intranet revamp)	*Awaiting second OD employee to help with the engagement strategy. This should be commenced next quarter*
11.6 Review of Equal Opportunities Policy	*SOP's all awaiting HR overview. We will then commence*
15.1 A review to take place of all National plans to ensure adequate capture.	*Only issue has been capacity – should commence next quarter.*
15.2 Clear ownership and reporting mechanisms agreed	*This has been delayed awaiting sign off priorities.*

Update on Successes, Issues and Risks

Governance, Resourcing and Delivery

8. Our EDI Priorities Paper (see Appendix 1) have now been presented and signed off at both our EDI Strategic Board and Chief Officer Meeting. This provides us with the following:-

    - A clear action plan of 76 actions required to deliver our EDI Strategy.
    - A list of key deliverables which will be achieved in 2025/26 and which the 76 actions will help to execute.
    - An overarching plan of 3 'thematic' areas (evaluation, measurement and engagement) which we will use as strands that help to progress all actions.

9. With the addition of a Chief Inspector to the team, we have been able to create three working groups to help deliver against National Plans (Violence Against Women and Girls, Business Disability Forum and Police Race Action Plan). Our new OD Practitioner joined the team earlier this month and will have a strong focus on evaluation and measuring our impact.

10. We have also changed our approach to our internal EDI Boards where we continue to move away from narrative updates and discussion, towards evidence-based issues and tangible outcomes. By way of example, our recent Problem Statement Pack can be found at Appendix 3 and focuses on 3 key 'problem statements' which align to commitments made within our Strategy. By drilling down to three areas we aim to generate targeted action and have more impact.

11. The full Performance Framework can be found at Appendix 4.

Increasing Talent and Improving Culture

12. We are running a series of initiatives that align to the identification and progression of talent from our under-represented groups alongside taking steps to better understand and improve our culture. This board have previously been updated on our commitment to deliver Cultural Audits, our 'pilot' has now been completed, and we are in the process of producing a 'Team Cultural Audit Toolkit'. This toolkit will outline the triggers that identify the need for a cultural audit and provide guidance for delivery, thereby reducing pressures on the ICOD team by enabling others to lead.   We will report on progress next quarter.

13. Our ICOD team also lead on the implementation of 'Insights Discovery', this is a tool designed to build stronger teams by facilitating effective team dynamics, improving communication and enhancing collaboration, thereby supporting multiple strands of the 'Our People' pillar of our Strategy. We have trained 10 internal 'Insights Practitioners' who will deliver up to 10 events a year, these may form part of our 'solutions' when addressing findings from our cultural audits.

Insights delivery is also a key part of our leadership development programmes, including Positive Action Leadership (PALs), Leading With Impact (LWI) along with our fast-track programmes. Furthermore, our staff survey undertaken in March of this year requires all Supervisors to produce 'improvement plans' based on their results, it is anticipated that demand for Insights Workshops will peak as a result.

Delivery of Inclusivity Programme

14. As part of our continued commitment to deliver our Inclusivity Programme, 10 events have been delivered to 384 attendees during quarter 1, a detailed evaluation document of these sessions can be found at Appendix 3, but as an overview: -

    - 3 x 'Mentivity' 1-day inputs for frontline officers on understanding black history and our impact as police officers using stop & search / use of force powers.
    - 3 x Active Bystander half-day inputs to build confidence and awareness of our requirement to challenge inappropriate language and behaviours.
    - 2 x Ethical Dilemmas Training Sessions, presenting challenging policing scenarios to discuss and debate.
    - 'Focus on… Equality, Justice and Racial Disparity', hybrid event delivered 13th February by external speaker.
    - 'Focus on… Stammering', online event delivered 28th March by external speaker.

15. We aim to build upon our basic evaluation metrics prior to the next meeting of this board, as per the prioritisation of our 'Evaluation' thematic but also our commitment to evolve this programme. Alongside this, we need to examine our 'compliance' as a mandatory training programmes to be completed every 6 months.

Senior Leadership Involvement

16. A significant focus of our feedback from Inclusive Employers was on the need for our Senior Leaders to promote EDI throughout their respective business areas. In our bid to become one of the most inclusive and trusted Police Services, we have made a series of commitments which need to be embraced by all of our officers and staff, but especially those role models of higher rank and grade.

17. At our strategy launch, we asked that our leadership team openly pledge their commitment by outlining what they would be doing to support our ambitions in this area. At our Senior Leadership Forum in May, we took the opportunity to update and review these, as well as ensuring our new joiners and recently promoted officers participated. The force's emphasis on EDI was cemented

further when we invited guests from Inclusive Employers to present at this forum. They provided our leadership team with feedback on our standard award and included some benchmarking detail from across other forces / sectors. They also described areas where our Senior Leaders can help create an environment to not only maintain our Silver but progress towards Gold.

18. Finally, as part of our commitment for leaders to complete relevant EDI training, we have partnered with the University of Exeter to create a programmed entitled 'Worldviews in the Workplace: Intercultural Awareness & Communication'. This will equip attendees with the knowledge and skills to embed intercultural awareness and religious literacy within our senior teams. This will take place in June for 30 Senior officers and staff, a full programme of evaluation and next steps will follow.

Notable national issues and developments

Supreme Court Ruling on Gender

19. On 16 April 2025, a judgment by the Supreme Court ruled that the terms 'woman' and 'sex' in the Equality Act 2010 refer only to a biological woman and to biological sex, and do not include transgender women who hold gender recognition certificates (GRCs). It is anticipated that this judgment will have far-reaching ramifications and lead to greater restrictions on access to services and spaces. The Equality and Human Rights Commission (EHRC) is expected to produce a new statutory code of conduct by the end of June for Ministerial approval, interim guidance has been made available, generating a mixed reception. At the time of writing, the National Police Chiefs Council (NPCC) has not issued guidance to forces while it considers the implications of the ruling.

20. Conscious of the importance of transparent and clear communication to both our colleagues and our communities, CoLP have taken the decision to not stand back from talking about this issue, balancing this with the need for official guidance and avoiding knee-jerk messaging. Locally, there is recognition within CoLP that the ruling will provoke strong and conflicting feelings- both personally for trans colleagues and the wider community, but also for our operational colleagues and how the ruling impacts working practices. Ensuring that everyone at CoLP has access to accurate information, and that regardless of sex, gender or preferred gender-identity; all colleagues are respected and fully supported is our immediate priority. In support of this, a working group has been established, led by Professionalism & Trust, with cross-force representation and including our Staff Networks. Several fast-time actions have been completed (including those around internal messaging, welfare and monitoring of community tensions). Others remain in progress around policy and procedure as we await national guidance.

Police Race Action Plan (PRAP)

21. The annual PRAP conference took place on 2nd May with attendees from across UK Policing, including wider NPCC attendance, as well as representation from Senior Leaders within CoLP. Keynote speakers provided updates on progress against the plan (which varies considerably from one force to another), the new 'anti-racism commitment for policing' which was launched in March 2025 and general accountability. A number of prominent speakers leant weight to the age-old adage of 'what gets measured gets done', proposing that future Policing inspections need to incorporate more measures on EDI generally and PRAP outcomes specifically.

22. A follow up meeting took place locally with Senior Leaders from the National PRAP and our ICOD team to discuss our progress against the plan and next steps. We will be required to complete a self-assessment using a soon-to-be-released 'maturity matrix' later this year so will be ensuring this is incorporated into out workplans. The establishment of our PRAP working group will help deliver and monitor progress against any resulting actions.

National Talent Development Strategy (NTDS)

23. Created by the College of Policing, this new strategy aims to help forces grow their leadership capacity, planning and investing in talent at every level. The NTDS aims to introduce a consistent approach to talent development across all forces and is dedicated to supporting leadership development, promotion and progression for everyone in policing, ensuring that those who demonstrate potential are: (a) recognised, (b) able to progress, and (c) equipped with the skills they need to be successful. There is an expectation on all forces to complete 6 strands of activity including appointing sponsorship, utilising positive action, identifying under-represented talent and enhancing talent mobility.

24. The roll out of this strategy will require input from across the force, much will be led by HR, a working group is already in place to help us plan our response. Existing programmes within CoLP, including our Positive Action Leadership Scheme (PALS) and Sponsorship Schemes, will need to evolve to capture some of these outputs. Somewhat reassuringly, this does align to our EDI Strategy and priorities for this year. However, there are clearly some new areas of work which, going forwards, will require more substantial involvement from ICOD.

Ownership of 'Wellbeing' Portfolio

25. Until early 2025, this portfolio was coordinated by a CoLP Chief Inspector as an addition to their day job, with oversight from a Chief Officer Sponsor. In acknowledging the significant breadth of this work going forwards and the

requirement for more focused action, discussions have taken place to identify where future activity should be led.

26. Due to the subject matter, it is difficult to determine a 'clear' owner, with many actions cross-cutting multiple departments, including HR and Professionalism and Trust. As such, it has been agreed that HR and Professionalism & Trust will jointly hold the responsibility for the Wellbeing Portfolio. This approach will support the delivery of the National Police Wellbeing Strategy by creating, promoting, and maintaining the conditions for all who work in policing to live healthy lifestyles in healthy environments, thereby reducing injury, illness and suicide to maximise wellbeing, work ability and a sense of belonging. It is hoped that this will also help to support national initiatives to recruit and retain Officers and Staff. Progress will be monitored against five priority areas: (a) Recruit Well, (b) Train Well, (c) Live Well, (d) Work Well, and (e) Leave Well.

27. Work is required to fully understand the impact that this will have on demand and capacity within the ICOD team. However, it is anticipated that we will feature strongly within the 'Train Well' and 'Work Well' elements of the plan which incorporate trauma resilience, neurodiversity support, physical and psychological needs of colleagues and stress at work. Conscious that this does not currently form part of our EDI Strategy or workplan, we are aware that this is inextricably linked to our inclusivity objectives and are therefore mindful of this additional pressure.

Appendices

Appendix 1: ICOD Priorities and Deliverables Paper Update

Appendix 2: EDI Problem Statement Pack

Appendix 3: Inclusivity Programme Evaluation Pack JAN-MAR 2025

Appendix 4: EDI Full Performance Framework