City of London Corporation Committee Report

Committee(s): Professionalism and Trust Committee – For information Police Authority Board – For Information	Dated: 14th October 2025 10th December 2025
Subject: Equity, Diversity, Inclusivity 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

With all of our Equity, Diversity, Inclusivity (EDI) Strategy actions now well underway, the Inclusivity, Culture and Organisational Development (ICOD) team continue to make progress against our Implementation Plan, 3 substantial actions have been completed this period and are described within this paper.

Since the last reporting period, we have evolved our work on evaluation to incorporate measures to better understand the impact of our initiatives, by the first quarter of next year this will also include behavioural change. A summary is provided of the Inclusivity Programme, delivered to 227 participants over this period. Challenges relating to attendance / compliance have been identified and are being addressed via our internal governance and scrutiny channels. Also delivered at our EDI Strategic Board was a further 'problem statement' around forcewide completion of Equality Impact Assessments (EIAs). Again, recommendations have been approved and plans are underway to tackle this concern robustly.

The latter months of 2025 will see some significant events taking place for CoLP, reflecting our ongoing commitment to EDI. October will see us hosting the National Black Police Association conference, taking place at venues within the Guildhall over a 3 day period, where we will be welcoming over 300 guests from across Policing. We are also planning a number of listening circle events over the forthcoming months to help us understand some cultural issues in force as well as addressing the impact of National unrest for certain groups. We will also be progressing our priority work on Business Analysis, with dedicated support in place to help us better understand our work on demand and capacity.

**Performance against 2025-26 prioritisation**

Stemming from our EDI Strategy, there are 76 actions across four priority pillars, 28 (37%) of these had 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 had been consulted on widely, including with PTC members, and was signed off by our Chief Officer Team.

Since the last reporting period, all of these actions are now underway. However, we have revisited our forecast as part of our recent business planning exercise and suggest that a more realistic forecast would lead to the 28 'high priority' actions being completed slightly later than planned, by the first quarter of 2026 rather than final quarter of 2025.

Significant pieces of work completed this quarter include publication of our Public Sector Equality Duty report (as part of our Statutory Obligations), review of the Staff Networks, and the delivery of EDI training to our Senior Leadership team. Our risk remains around delivery of our commitment to developing a robust evaluation framework. While this action has been progressed, this has been at a slower pace than anticipated.

Delivery Overview and Progress Status this Quarter

Actions status	Q1 (Actual)	Q2 (Actual)	Q3 (Forecast)	Q4 (Forecast)	Q1 2026
Completed	4	7	12	23	28
In progress	20	21	16	5	0
Not started	4	0	0	0	0

**Progress Status of 2025/26 Commitments Q2**
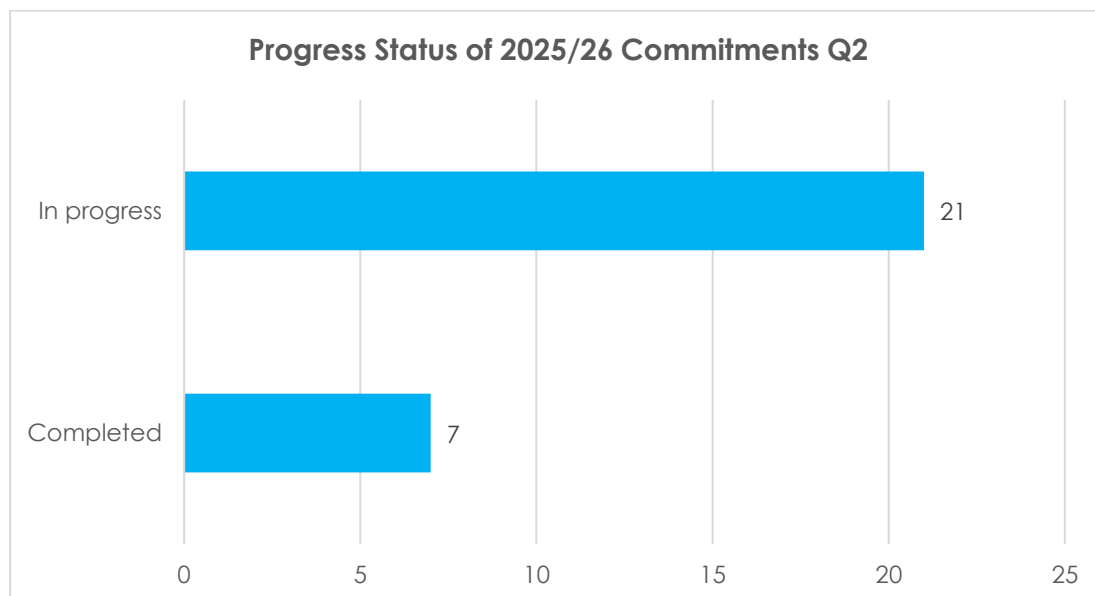
Progress by Pillar and by Quarter

The following progress table 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 (Actual)	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)	86% (18 actions, 13 completed, 5 ongoing)
Our Policies	50% (2 total actions: 1 completed, 1 not yet started)	50% (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)	50% (6 total actions: 6 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)

The following graph shows the same progress pictorially, with actual progress for the first two quarters and forecast for the latter two.

Quarterly progress for Q1 & Q2 and forecast for Q3 & Q4
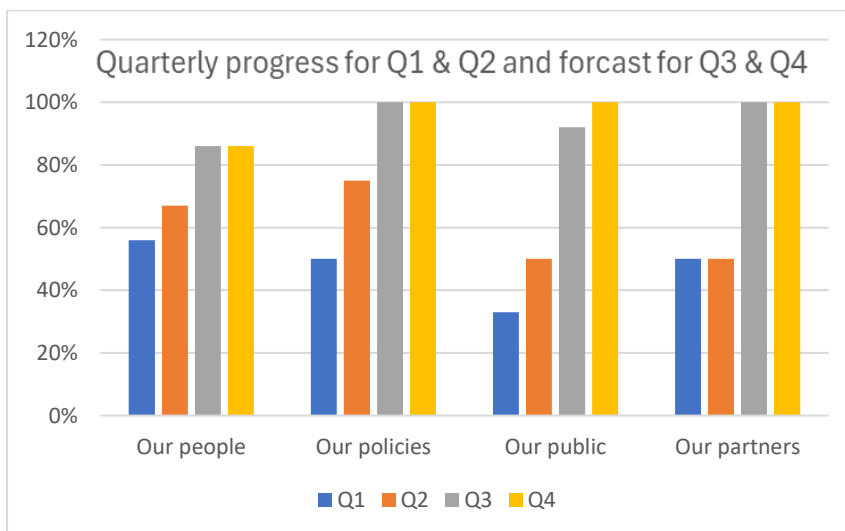
2025/26 actions completed this quarter	Summary of results
4.1 Content and Timetable for leadership training to be agreed	*Senior leadership training delivered by Exeter University, 'worldview.' Police leadership programme being rolled out.*
11.1 Complete a review of staff networks	*This review and report has been completed and delivered to the EDI boards.*
2.8 Delivery against statutory requirements (including PSED)	*PSED report completed and gender pay gap updated (1.6%)*

Update on Successes, Issues and Risks

Ongoing delivery of Our Inclusivity Programme

Since the last board, 10 sessions have been delivered to 227 people, a breakdown of these follows, with more detail relating to learning outcomes to be found on page 2 of Appendix A.

- Understanding Extreme Ideologies (55 attendees)
- Focus on Deaf Awareness (55 attendees)
- Ethical Dilemmas (8 attendees)
- Focus on Bi-Polar (41 attendees)
- Focus on Andropause (68 attendees)

During this reporting period, we have also created a new evaluation form which includes both Level 1 and Level 2 feedback. As such, we are moving beyond capturing that which is simply reactionary to also incorporate knowledge shift and behavioural change (events which took place prior to 11th June were evaluated using the old format). Our new approach to evaluation is presented at Appendix A in its entirety. We are now able to quantify the knowledge gain of our participants, our next steps are focusing on how we capture resultant change in action, attitude (with follow up conversations) and then onwards to impact.

Inclusivity Programme and Compliance

We have also been able to advance our work on our Inclusivity Programme compliance rates this quarter. It is mandatory for all of our officers and staff to complete one module every 6 months as minimum, but we have not previously had the systems in place to effectively record or report on attendance. We identified that this was an issue when completing a review of our data earlier this year, the need to ensure effective compliance was also highlighted within feedback from our 'Inclusive Employers' accreditation, which stated we need a more robust, forcewide approach to monitoring participation levels.

Appendix B includes the most recent 'Problem Statement' pack which we presented at our EDI Strategic Board in August, these 'statements' are driven not only by our EDI Strategy, but also draw on themes identified from our staff survey, cultural audits, Staff Networks and other sources.

To inform this pack, we conducted a thorough, manual trawl of our data and found that the Programme attendance figures are a concern, with forcewide compliance sitting at 32% (a total of 491 colleagues had completed two modules in 2024/25). However, this must be strongly caveated with the limitations on the recording of our data. For example, we have since been made aware of many colleagues who had attended or 'watched back' online programmes but had not followed steps to ensure this was captured on our training recording systems.

When we drilled down further into the data, we found some interesting trends:-

- Officers from frontline roles were less likely to complete the modules than other areas
- Officers were less likely than staff to complete modules
- More junior officer / staff ranks were less compliant, as were those with less than one year of service
- Males had lowest compliance across all directorates, ethnicities and employee types

We have made a series of recommendations to address these concerns, including improving accessibility, asking specific departments to create training improvement plans and ensuring the data is monitored within our governance structure. Alongside this, we are also improving our forcewide communication on how to complete modules and clarifying the process for recording attendance.

Business Analysis

A business case was submitted to our Chief Officer Team earlier in the year requesting dedicated analytical support to help the ICOD team better understand our demand and capacity. The nature of much of our work in this space is non-transactional and difficult to quantify, as is the resultant impact. As a result of this request, a full-time Business Analyst was committed to Professionalism and Trust over a 6 month period to provide structured support in helping us understand our capabilities.

Whilst ICOD are the initial focus, a systems-thinking approach means that workstreams and outcomes will not be considered in isolation but as part of a connected system where our activities, outputs and challenges influence- and are influenced by- other teams and directorates. This approach to understanding our demand supports our internal business planning process and refreshed operating model following the Corporate Services Review. The 'slide grab' below shows the intended outcomes for this piece of work.

Evidence-Based View of Demand & Capacity

CITY OF LONDON POLICE
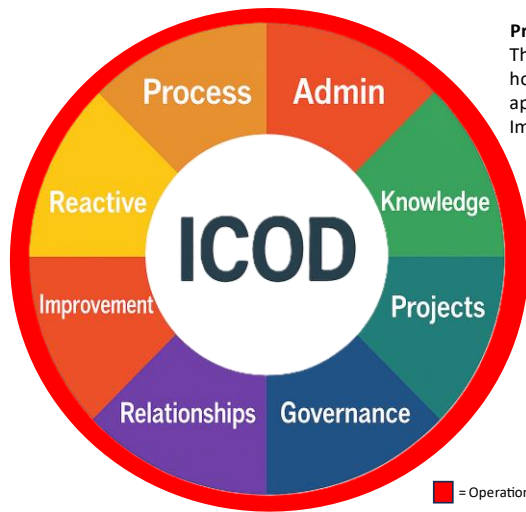
Problem Statement:
The team is managing a diverse workload but lacks a clear picture of demand, how effort aligns to value & where inefficiencies may lie. A structured approach is needed to understand the work the team does and opportunities to Improve. This will be achieved through a capability review.

Expected Outcomes of the Capability Review
- The ability to identify pressures & imbalances
- The ability to show effort versus value
- The ability to identify opportunities for improvement
- Better and more informed planning
- Better and more informed prioritisation
- Better and more informed resource utilisation
- A better 'customer' experience
- A stronger contribution to achieving the policing plan priorities

ICOD — Process, Admin, Knowledge, Projects, Governance, Relationships, Improvement, Reactive

■ = Operational Demands

A trusted and inclusive police service, keeping the City of London safe and transforming the national policing response to fraud, economic and cyber crime

Initial observations suggest a number of areas which, with additional focus, could improve our productivity and lead to efficiency savings including, but not limited to:-
- Forcewide awareness of ICOD services and future engagement planning
- Improving tasking and co-ordination functions
- Increasing access to / more efficient handling of data

Once the review has been completed we will be able to share further detail at this Committee.

Listening Circles

We are conscious that a number of external events are impacting on policing in the current climate. The recent Supreme Court Ruling on Gender, ongoing political tensions around Immigration and International Conflicts continue to impact not only our operational delivery but also our internal culture and sense of well-being.

We have previously used 'listening circles' to good effect in our force, our approach being recognised nationally by the UK Police Federation as innovative practice[1]. Listening Circles aim to provide a non-judgmental space for employees to speak about and share experiences about a particular issue. The purpose is to understand concerns and discuss tangible solutions to enhance the working environment.

On 16 April 2025, the Supreme Court reached a legal ruling that the terms 'man', 'woman' and 'sex' contained in the Equality Act 2010 refer to biological sex. The national police chief's council shortly afterwards released Interim Guidance on searching by transgender officers and employees of the police and the searching of transgender detainees. Since the ruling, Professionalism and Trust has been leading working groups to ensure we are meeting our legal obligations, at the same time supporting colleagues to ensure this ruling has thoughtful interpretation.

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[1] Listening circles empower female officers and staff to help drive change

Through this group, it was raised that a Listening Circle would be useful. Taking place on 8th July, it was opened by our Commissioner and attended by over 20 colleagues. Key themes included future use of gender neutral facilities (including changing rooms and showers), preservation of safe spaces for women and concerns around inadvertent 'outing' of trans colleagues. A number of actions are being taken forward, including those relating to Policy reviews and also our Future new Estate.

Over this reporting period we have also delivered a listening circle for those who have been on extended periods of leave. This event was open to men, women and non-binary colleagues to better understand experiences of those on maternity and paternity leave, also supported by our Parenting Support Group Sponsor (and therefore linked to our actions on supporting our Staff Networks and Associations). The feedback has been positive and a number of actions taken forward- again, largely relating to improvements in policy and procedure.

Finally, ICOD have been supporting the work of our Professional Standards Department (PSD) on developing a future listening circle focusing on female colleagues who have experienced and/or witnessed inappropriate behaviour by men in the workplace. As we continue to refine our internal performance frameworks and indicators across our areas of work, part of this focus is on ensuring better connectivity between our areas to identify themes and put in place joint solutions; this initiative being a working example.

Training for Senior Leaders

A critical area of feedback from our Inclusive Employers accreditation, and one where they identified that some relatively simply short-term gains could be achieved, was around the awareness and training of our Senior Leadership Team on EDI. Although there were no immediate needs were identified as part of their assessment, they did note that some awareness training, pitched at the right level, could help our leaders understand the benefits of understanding EDI (including return on investment), to help enhance their engagement with our EDI Strategy and overall ambition to become one of the most inclusive and trusted forces in UK policing..

Working with Exeter University, ICOD designed a half-day programme which was delivered across 2 sessions to 23 delegates in July. It aimed to:-

- Develop awareness of the main theories and research into intercultural awareness and communication
- Explore participants own self-identity and worldviews
- Consider the diversity of worldviews
- Consider how bias and privilege may exist both consciously and unconsciously
- Explore workplace specific assumptions and expectations
- Develop skills to support intercultural communication in the workplace
- Explore ways to resolve miscommunications and work well together

We are currently evaluating this work and deciding our next steps to ensure this learning is embedded and continuous. However, initial observations show a significant knowledge gain of approximately 40%. We continue to work with Inclusive Employers on quantifying our 'return on investment' which we believe will act as a helpful motivator in this area.

Reinvigorating our Youth Independent Advisory Scrutiny Group (YIASG)

We have reviewed and amended our YISAG 'Standard Operating Procedure' (SOP), once the Equality Impact Assessment has been finalised we will be on a position to publish this. We continue to see a good representation of attendees at the meetings and are currently running a recruitment campaign at City-based schools and youth clubs in order to attract even more.

On 9th April 2025, six YIASG members went to Gravesend, the base for National Public Order training. The purpose of this trip was to explain how police deal with protest and other public order incidents in order to get their views and feedback after witnessing our tactics firsthand. Their insights, which were passed to both the Metropolitan Police Training Centre lead and our own Public Order teams who were also in attendance, were received positively.

On 5th June, the group attended a CoLP Cyber Security Workshop, where they were asked to critique a presentation used by our teams to help improve awareness and education in schools. They provided feedback in person and also using Microsoft Teams forms post event, commenting that they had benefitted from learning more about security of personal data and the risks of social media. Furthermore, our Cyber team reported that the feedback was incredibly valuable in ensuring the correct pitch and level of detail, noting that the participation of the YIASG 'will contribute to improving national security and ultimately help keep the public safe'.

It is important that we maintain this momentum as we make strides in the 'Our Public' strand of our EDI Strategy.

Risks and Challenges

Responding to Emergent Issues

Although we now have a clear plan of action to complete to deliver against our EDI Strategy ambitions, this can be challenged when the need arises to respond to events outside of our control, such as the Supreme Court ruling on gender definition or recent anti-immigration protests. While we complete a 'PESTELO' analysis, much of our work in this area is difficult to predict. The shift changes around the popularity of EDI externally are significant- although our commitment remains solid.

Our progress against the Police Race Action Plan continues and will be showcased in part when we host the National Black Police Association conference in October. At the same time, the National Team are asking all forces to complete a 'maturity matrix'

between now and September 2026. They acknowledge that this is a considerable piece of work requiring analytical support. A visit to CoLP from the NPCC Lead for this, ACC Sarah Johnson, took place in September and we were able to discuss requirements and expectations. It is suggested that future HMICFRS Inspections will use the return produced by forces to inform progress against all things EDI- so again, an important piece of work which will need to be reflected in our plans.

Outstanding Equality Impact Assessments (EIAs)

ICOD have been made aware that many of our SOPs have been published without EIAs or, where they have, on occasion, these are not fit for purpose. Of a total of 234 SOPs, 44 have been published without any EIA and 60 have been published with a 'no EIA required' caveat. On identification of this issue, ICOD raised this as one of our quarterly Problem Statements requiring action (see page 6 of Appendix B) at our internal EDI Strategic Board. A number of recommendations were agreed and are now in train to address this issue including delivery of training on how to complete EIAs, refreshing the EIA template (benchmarking this with the Corporation), improving forcewide knowledge of the process and ensuring all understand their responsibilities in this area.

Measurement our Impact

At the last PSIC board meeting, we agreed that we would start reporting against the metrics, as detailed (and previously signed off) within our EDI Strategy. We will continue to closely monitor and identify any issues which we need to address and/or themes requiring further attention. While we are not yet able to report on all of the metrics, the pack at Appendix C provides the first iteration of this.

We have been explicit in stating that 'Measurement', albeit a priority for us, is not something we will be able to do extensively until our second year. As such, this remains a work in progress.

Appendices

Appendix A: Inclusivity Programme Evaluation Pack April-June 2025

Appendix B: EDI Problem Statement Pack, August 2025

Appendix C: EDI Strategy – Measurement Pack DRAFT October 2025