

City of London Corporation Committee Report

Committee(s): Professionalism and Trust Committee – For information	Dated: 2 nd December 2025
Subject: Equity, Diversity, Inclusivity (EDI) Update	Public report: For Information
This proposal: <ul style="list-style-type: none"> • delivers Corporate Plan 2024-29 outcomes 	People are safe and feel safe
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of:	Commissioner of Police
Report author:	Det Supt Kate MacLeod

Summary

Over the last reporting period, the ICOD team have progressed our work on 'measurement', working with colleagues in our Strategy, Planning and Service Improvement Team to produce a meaningful template, working collaboratively across the force to mitigate our data challenges. A full update on this work is provided at the second half of this paper.

Delivery against our EDI strategy (see Appendix A) continues, key achievements during this period include a review of our Equality Impact Assessment processes and a National Peer Review of some of our 'Violence Against Women and Girls' actions.

Recent internal boards- our EDI Strategic Board (3rd November) and EDI Delivery Board (17th November)- have focused on our forcewide response to the Panorama Documentary, our Staff Networks and Associations Review, along with the ongoing delivery of 'Our People - Inclusivity Programme'. Challenges relating to attendance continue to be addressed via our internal governance and scrutiny channels.

Over this period, we have also provided an update 'one year on' for the Corporation EEDI Sub-Committee.

Performance against 2025-26 prioritisation

A reminder of our EDI Strategy, including what we have agreed to deliver the full 3 years, can be found at Appendix A. With all of our ‘high priority’ actions underway as we move into Quarter 3, we have been able to revisit our original forecast to ensure we are still on track to meet our targets for our first year of delivery. As previously explained, 5 of our actions will be completed slightly later than originally planned-taking us into the first quarter of 2026. Of the 76 actions, 28 were prioritised for delivery in 2025/26, half of these have now been completed. Appendix B shows the detail behind these actions, along with an accompanying ‘RAG’ rating.

Notable pieces of work completed this quarter include a full review of our ‘Equality Impact Assessment’ process, delivery of our Inclusivity Programme (with focus on ‘black history month’ and National Peer Review of our Violence Against Women and Girls Action Plan. Our risk remains around delivery of our commitment to reporting against the measures as detailed in our Strategy alongside developing a robust evaluation framework alongside.

Delivery Overview and Progress Status this Quarter

Actions status	Q1 (Actual)	Q2 (Actual)	Q3 (Actual)	Q4 (Forecast)	Q1 2026 Forecast)
<i>Completed</i>	4	7	14	23	28
<i>In progress</i>	20	21	14	5	0
<i>Not started</i>	4	0	0	0	0

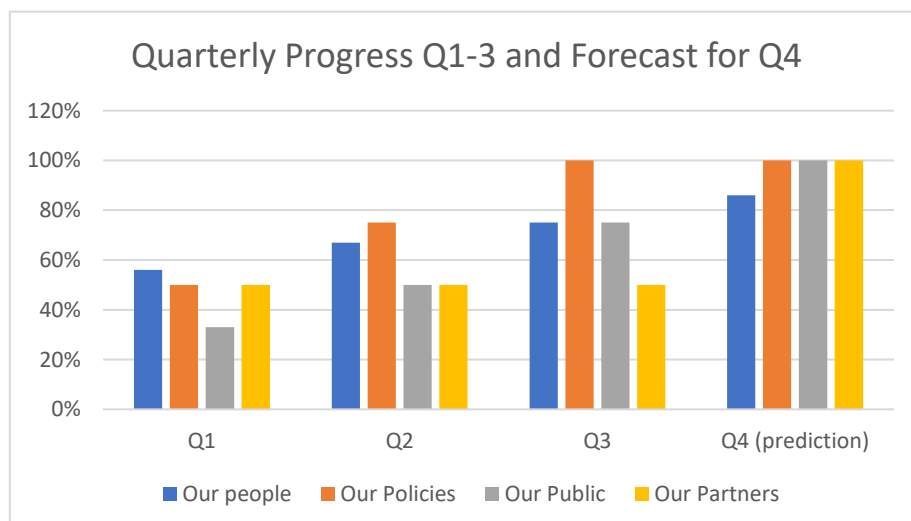


Progress by Pillar and by Quarter

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	Q2	Q3	Q4 (Forecast)
<i>Our People</i>	56% (18 total actions: 3 completed, 14 in progress, 1 not yet started)	67% (18 total actions: 6 completed, 12 in progress)	75% (18 total actions: 9 completed, 9 in progress)	86% (18 actions, 13 completed, 5 ongoing)
<i>Our Policies</i>	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)
<i>Our Public</i>	33% (6 total actions: 0 completed, 4 in progress, 2 not yet started)	50% (6 total actions: 6 in progress)	75% (6 total actions: 3 completed, 3 in progress)	100% (6 actions, all completed)
<i>Our Partners</i>	50% (2 total actions: 2 in progress)	50% (2 total actions: 2 in progress)	50% (2 total actions: 2 in progress)	100% (2 actions, all completed)

The following graph shows the same progress pictorially, with actual progress for the first three quarters and forecast for the latter one:



2025/26 actions completed this quarter	Summary of results
7.1 A cultural audit process to be designed and agreed, pilot undertaken	<i>Pilot is now complete. The cultural audit is now due for evaluation and review (action 7.2)</i>
11.6 Review of Equal Opportunities Policy	<i>This has been completed through a revised EIA process and form.</i>
15.2 – Review of all national plans to ensure adequate capture.	<i>ICOD are now linked in with all national groups and continue to review new policies to ensure alignment.</i>
15.3 Ongoing actioning and monitoring of National VAWG Plan via internal governance and external assessment	<i>COLP have recently been peer reviewed by the National VAWG Team, update included in this paper</i>

Update on Key Developments

Equality Impact Assessments (EIA) Review

Members were previously given an update on our current position with EIAs, following a recent review conducted by ICOD which found that many of our SOPs had been published without EIAs. Of a total of 234 SOPs, 44 had been published without any EIA and 60 had been published with a 'no EIA required' caveat.

In addition to raising this at our own internal Strategic Board, we have since taking a forward a number of actions for improvement, including streamlining the process flow and designing a new form which is more user-friendly. This was presented and ratified at our EDI Delivery Board in November.

We have also created a cadre of 'single points of contact' spread across all Directorates to support the wider force, with members of HR, Change Portfolio and Strategy Teams completing training on the EIA process. This provides additional resource to assist ICOD in quality assuring and sign off. An additional 'train the trainer' course, due for delivery shortly, will provide further resilience.

Our focus is now on ensuring consistent messaging so that people understand what is required from them when any new change of process is initiated, and we can signpost them accordingly via our refreshed EIA 'Sharepoint' site.

Refresh of 'Our People- Inclusivity Programme' for 2026

The last quarter saw a scaled back delivery of our Inclusivity Programme, taking advantage of the holiday period to plan for 'Black History Month' in October, along with our programme of activity for 2026. Sessions on 'Understanding Extremist Ideologies'

and 'Focus on Schizophrenia', to align with World Mental Health Day, have been delivered and evaluation can be found at Appendix C.

Going forwards, November will have seen a flurry of activity, including a series which ICOD have partnered with our Counter Terrorism Team to deliver to coincide with CT Prevent Week- these included sessions on Extreme Right Wing and Prevention of Extremist Violence. Alongside this we have planned activities and messaging for White Ribbon Day, Anti-Slavery and Addiction in Policing.

Finally, members will recall our work on ensuring mandatory attendance and compliance. This was discussed again at the November EDI Delivery Board and a verbal update on progress can be provided.

Cultural Audit

Following the Cultural Audit pilot, key stakeholders provided feedback and the ICOD team put together a toolkit that outlined the core principles of undertaking a team cultural audit at CoLP and the steps required. An independent team were commissioned to undertake their own cultural audit using this toolkit, this has highlighted some further challenges and a full review is now underway. The main themes for learning include resourcing and timeframes. The methodology outlined in the toolkit is effective; however, resourcing and timing are crucial to maintain the integrity of the approach and ensuring both psychological safety and effective outcomes from interviews. The current review will identify teams where an audit is deemed necessary and what resources are required to deliver them.

Staff survey

We have now delivered three full surveys and two pulse surveys via our partnership with 'Any 3'. The final part of our three-year contract will be completed once we have undertaken the pulse survey following our March 25 full survey, this will take place in January 2026. Our engagement score has increased from 66% - 76% over that period which Any 3 say is exceptional; not only have we maintained our score, but we have also increased it from Sept 24. This illustrates that the work done to date across the Force has had an impact on the total workforce.

ICOD have committed to being proactive in supporting the delivery of improvement plans. This has not previously been achieved in force. We have taken a multifaceted approach to this; we have given clear communications about our expectations, and we have put mechanisms in place to support Managers to realise their improvement plans. Once we have completed the next Pulse survey we will have completed our 3-year contract with Any 3. We have already reviewed some survey providers and with the development of 'AI' and their ability to develop more intuitive and comprehensive action plans, it would be beneficial to go out to tender for our next roll out of Surveys. There is also an opportunity for fiscal savings. Prior to tender, we will research the

frequency of future surveys and what we want to measure over the next three years with a proposed date of Sept 2026 for our next full survey.

Key milestones

Pulse Survey January 2026- We have set up bi weekly meetings with Any 3 and HR to ensure the organisation structure is up to date and review the question set and emails required for the launch. We are meeting with Internal Comms in November to create the communication strategy for January in readiness for the launch in January.

Future Survey- We need to establish the focus and frequency of future surveys and will be meeting with Strategy and Planning and the Change Portfolio office to review our Policing Plan and EDI Strategy in November. We have identified potential survey providers and have established the procurement process required. We will present what each provider can offer and the scope of future surveys to the January EDI Strategic Board in readiness for the tender process in the New Year.

Insights

The City of London Police have funded the implementation of 'Insights Discovery', supporting our Policing Plan commitment to invest in the development of our workforce. We trained 10 in house facilitators in 2024 and an additional 7 in 2025. Insights Discovery has played a role in building stronger teams by providing valuable insights into team members' individual personalities, communication styles, and strengths. Understanding and leveraging these insights can facilitate effective team dynamics, improved communication, and enhanced collaboration.

During Quarter 2 we delivered an Insights Workshop to our PALs (Positive Action Leadership Scheme) cohort and 'Leading with Impact' programme, we also delivered one to the Staff Office. After the event, we send the team information on how they can use the knowledge they have learnt and arranged a follow up three months later.

Going forwards, we have capacity to deliver up to 2 workshops per quarter. Each participant gets an Insights Discovery report which outlines their preferred communication style and the impact that this has on others, this is a useful document for people to share as a team and with their Manager. In addition to improving team dynamics, we hope to see longer term impacts on sickness rates, grievance data etc; this is being factored into our approach to measurement and evaluation.

Violence Against Women and Girls (VAWG) Peer Review

ICOD continue to co-ordinate the delivery of our National VAWG Action Plan, much of this work sits across a number of Directorates, especially Professionalism & Trust, Local Policing and Specialist Operations.

In recent months, the National Centre for Violence Against Women and Girls and Public Protection (NCVPP) assessed the Force's response to Op Soteria, a Home Office funded initiative aimed at improving policing's response to rape and sexual assault investigations. Their assessment highlights National learning but also provides a bespoke report for CoLP which includes a summary of the Force's position from the previous 2023 Self-Assessment, alongside feedback on key strengths and areas of development.

Next steps require the force to agree a 'Transformation and Implementation Plan', which is due for sign off by the Chief Officer Team by the end of February 2026. This plan will provide a mechanism for driving systemic change by embedding the Operation Soteria principles into the force and acting as a roadmap for everyone working in this area. The plans are a living document which are updated annually and demonstrate that the force is committed to achieving a capable, confident, and reflective workforce equipped with insight and informed knowledge which can then be applied in practice.

Risks and Challenges

Focus on Measurement and Impact

With a short interim period between the previous PTC board and this, combined with feedback from members in October, decision to focus on the 'measurement' aspect as this remains one of our key challenges and has been the focus for the team over the last month.

We have produced an implementation framework and action plan to support our Strategy. However, we acknowledge we have some data gaps which help us fully understand the journey of colleagues from under-represented groups and the impact of our activities which help us move closer to our mission. To ensure we can monitor – and tell a coherent story about - progress against our EDI ambitions, we need a consolidated dashboard that is strategic (tied to our ambitions), meaningful (explains barriers, journeys disproportionality) and quantifiable (a single view of our workforce, culture and service delivery data with ratios, trends, gaps and benchmarks). It needs to enable us to use insights to target interventions where barriers are greatest and measure their effectiveness. Appendix D provides members with an insight in to what we are progressing, working closely with our Strategy Team.

Alongside this, we will also try to ascertain which activities are 'moving the dial' (tracking activities and their impact) and making the most difference. For example, by comparing areas 'with vs without' intervention to measure impact and return on investment. In the longer term we could aim to use the data sitting behind the Dashboard as an early warning system helping us highlight problems before they escalate by tracking trend data over time and building models to flag when indicators deviate from the expected. This would enable leaders to intervene earlier with tailored solutions.

To deliver the Dashboard (including overcoming the challenges above) have agreed, with support from our Chief Officer Team, that this work needs to be prioritised over

other commitments (considering multiple priorities and limited capacity). Going forwards, we also need to consider further investment in technical, analytical and evaluation capacity / capability – and an agreement for staged delivery in line with this.

Appendices

Appendix A: CoLP EDI Strategy 2024-2027

Appendix B: EDI Strategy- Year 1 Priority Actions

Appendix C: Inclusivity Programme Evaluation Pack July-Sept 2025

Appendix D: Mock Up EDI Dashboard (DRAFT)

Det Supt Kate MacLeod