

GLA 21-26 Affordable Homes Programme - Equality, Diversity and Inclusion requirements

June 2024 update

As set out in the GLA Homes for Londoners: Affordable Homes Programme 2021-26 [Funding Guidance](#), partners are contractually required to meet two Equality, Diversity, and Inclusion requirements within a year of their grant allocation being confirmed for development schemes. This includes (1) meeting five minimum equality, diversity, and inclusion standards, and (2), producing and publishing an Equality, Diversity and Inclusion Action Plan on behalf of the organisation. Please see below for how Westminster City Council seeks to meet these requirements.

1. Five minimum equality, diversity and inclusion standards

Minimum equality, diversity, and inclusion standard	Confirm minimum standard continue to be met
All investment partners must offer equality, diversity, and inclusion training for all employees	Yes
All investment partners must implement a zero-tolerance approach to all forms of discrimination, harassment and bullying	Yes
All investment partners must broaden recruitment channels and encourage applications from diverse and underrepresented groups	Yes
All investment partners must collect and monitor workforce data to benchmark the diversity of their workforce against the London benchmark	Yes
All investment partners must publish their gender and ethnicity pay gaps	Yes

All partners must meet the below five minimum standards:

Minimum standard	Evidence required to meet minimum standard

1.	All investment partners must offer equality, diversity and inclusion training for all employees	<p>Partners to confirm that EDI training is offered for all employees, the types of training offered and content covered, as well as how many employees take up the training on a yearly basis.</p> <p>Westminster City Council offers a vast array of equality, diversity and inclusion training for all employees every year. So far this year, 555 members of staff across the organisation have completed one or more of the courses below.</p> <p><i>The types of training offered, and content covered include:</i></p>	
		Course	Content
		Allyship	<p>This training provides colleagues with a better understanding of:</p> <ul style="list-style-type: none"> • the different minority and marginalised groups to whom we can be allies • what it means to be an effective and inclusive ally • the importance of awareness, empathy, action and authenticity when acting as an ally • the different actions that allies can take to support people from minority or marginalised groups. • how to use the ‘Open The Front Door’ communication framework to challenge inappropriate behaviour • the importance of taking on board feedback and learning from our mistakes when being an ally.
		Banter in the Workplace Creating an Environment Based on Respect	<p>This course gives a better understanding of:</p> <ul style="list-style-type: none"> • the nature of banter in the workplace • the importance of respect at work • when workplace banter can be unlawful • the risk of discrimination, bullying and harassment claims arising from inappropriate banter • what organisations can do to prevent banter from becoming a problem in the workplace.
		Basic Autism Awareness	<p>This e-learning module focuses on basic autism awareness. This module covers the key characteristics of autism, the autism spectrum and working with people who have autism.</p>
Bullying and Harassment	<p>This course covers:</p> <ul style="list-style-type: none"> • how victims can take effective action to confront people who are bullying and harassing them • what bystanders can do to intervene and challenge unacceptable behaviour 		

		<ul style="list-style-type: none"> the importance of supporting colleagues who are being bullied and harassed the responsibility of managers and team leaders to deal with the issue of inappropriate behaviour robustly and effectively.
	Cultural Awareness	<p>This course will give a better understanding of:</p> <ul style="list-style-type: none"> how we use the rules of our own culture to interpret and interact with other people the problems caused by relying on stereotypes and misperceptions the importance of treating everyone in the workplace with respect how being culturally aware can help us connect with a wider range of people what we can do to explore cultural issues intelligently and sensitively.
	Disability Confident	<p>This training will give a better understanding of:</p> <ul style="list-style-type: none"> the advantages of being disability confident why we may need to challenge our attitudes to disability the requirements of the Equality Act 2010 the most appropriate ways to work with disabled colleagues how to communicate with and serve disabled customers the types of 'reasonable adjustments' that need to be made the importance of promoting appropriate behaviour the knowledge and skills necessary to work successfully as part of a diverse team.
	Diversity Challenge	<p>This course will give a better understanding of:</p> <ul style="list-style-type: none"> what we mean by 'diversity' at work the benefits of having a diverse workforce how to actively support and manage a diverse workplace how to develop diverse products and services the responsibilities of employers and employees under the Equality Act 2010 why unwitting discrimination and harassment happens and what we can do to address it how to remove unhelpful 'filters' when recruiting and selecting people.
	First Steps into Digital Accessibility (e-learning module)	<p>This is an e-learning introductory course that focuses on why digital accessibility is important and introduces the different types of impairments to consider, including temporary and situational impairments. Key content includes:</p> <ul style="list-style-type: none"> Ensure text readability and that hyperlinks are accessible Avoid using colour alone to communicate meaning.

		<ul style="list-style-type: none"> • Use heading, list and table styles correctly for assistive technology users. • Write effective text equivalents (alt text). • Create captions using an automatic captioning tool. • Explain why transcripts are a key accessibility requirement.
	Gender Matters	<p>This course will give a better understanding of:</p> <ul style="list-style-type: none"> • employers' and employees' obligations under the Equality Act 2010 • real-life factors that support and inhibit gender balance at work • how people's needs differ depending on their gender • gender bias in employment, including for people undertaking gender reassignment • how to effectively build working relationships through organisational culture change • the knowledge and skills necessary to work successfully as part of a diverse team.
	Identifying Diversity in Others	<p>After completing this course, colleagues will understand:</p> <ul style="list-style-type: none"> • How the diversity of others benefits the workplace • How to identify the diversity in others
	Inclusion Essentials	<p>This course will give a better understanding of:</p> <ul style="list-style-type: none"> • employers' and employees' obligations under the Equality Act 2010 • real-life factors that support and inhibit gender balance at work • how people's needs differ depending on their gender • gender bias in employment, including for people undertaking gender reassignment • how to effectively build working relationships through organisational culture change • the knowledge and skills necessary to work successfully as part of a diverse team.
	Inclusive Language and Communication	<p>This course will give a better understanding of:</p> <ul style="list-style-type: none"> • why language and communication are key to creating an inclusive working culture • how exclusive language can impact on relationships, recruitment and motivation • the importance of using respectful language when dealing with people from minority groups • why our micro-messages play such a crucial role in inclusive communication.

		<p>Inclusive Leadership for People Leaders</p>	<p>This course will give a better understanding of:</p> <ul style="list-style-type: none"> • the benefits of being an inclusive organisation • the key traits of inclusive leadership • the skills necessary to become an inclusive leader • why inclusive leaders and inclusive teams are more effective • how to build an inclusive culture • the importance of building inclusive relationships • how tackling the impact of unconscious bias in the workplace leads to better decision-making.
		<p>Leading A Diverse Workforce, Part One Leading A Diverse Workforce, Part Two</p>	<p>At the conclusion of this course staff will have learnt that:</p> <ul style="list-style-type: none"> • Knowledge of diversity and its value to the workforce • Ability to recognize the different types of diversity in Westminster as well as why that diversity is critical for success
		<p>Maternity and Paternity</p>	<p>This course will give a better understanding of:</p> <ul style="list-style-type: none"> • the law regarding maternity and paternity • the business and societal factors that demand best practice when managing maternity and paternity • how to develop awareness of the issues surrounding maternity and paternity • how to manage maternity and paternity transitions effectively • how to apply a simple and effective framework to underpin and support planning, communication and negotiations.
		<p>Menopause at Work</p>	<p>This course will give a better understanding of:</p> <ul style="list-style-type: none"> • the different stages and symptoms of the menopause • how symptoms can impact on work and relationships • long-term post menopause health risks • treatments and lifestyle changes that can help to alleviate menopause and perimenopause symptoms • reasonable adjustments in the workplace to support people going through the menopause and perimenopause.
		<p>Neurodiversity: An introduction</p>	<p>This training will give a better understanding of:</p> <ul style="list-style-type: none"> • the meaning of the term 'neurodiversity', the various ways that it can impact on people, and an overview of the main associated conditions or differences • whether neurodivergence is a disability and the role that external factors play

		<ul style="list-style-type: none"> the importance of creating reasonable adjustment plans and management performance strategies for neurodivergent thinkers the need to support carers of neurodivergent thinkers in the workplace.
	Sexual Orientation	<p>This course will give a better understanding of:</p> <ul style="list-style-type: none"> what the Equality Act 2010 says about sexual orientation why certain behaviours are inappropriate and offensive the types of prejudice that lesbian, gay or bisexual people can face why you can't always be sure of someone's sexual orientation, and therefore should not make assumptions the knowledge and skills necessary to work successfully as part of a diverse team how to create a working environment based on respect.
	Tackling Race Bias at Work	<p>This training will give a better understanding of:</p> <ul style="list-style-type: none"> the changing nature of racism how racial bias, prejudice and discrimination manifest themselves in the workplace the impact of racial and religious stereotypes how to find out the extent to which racial bias is a problem in organisations key steps for leaders, HR teams and Learning and Development departments to take in tackling racism and race bias.
	The effective bystander	<p>This training will give a better understanding of:</p> <ul style="list-style-type: none"> why it's important for bystanders to take action when they witness inappropriate behaviour some common obstacles to effective intervention key intervention strategies and when to use them.
	The impact of micro-behaviours in the workplace	<p>This training will give a better understanding of:</p> <ul style="list-style-type: none"> the nature of micro-behaviours and the micro-messages we send the impact of micro-inequities (negative micro-behaviours) in the workplace how our micro-behaviours can reflect our unconscious bias how using positive micro-messages (micro-affirmations) can help to improve employee engagement, enhance performance, unlock creativity and help build collaborative, cohesive teams.
	The Multi-Generational Workforce: Tackling Age Bias	<p>This training will give a better understanding of:</p> <ul style="list-style-type: none"> the potential impact of age bias on recruitment, development and training, and on interpersonal relationships in the workplace why an age-diverse workforce can give our organisation a healthy combination of fresh thinking, new ideas, stability and experience

		<ul style="list-style-type: none"> • why it's important to understand the different generations in the workplace, what shaped them and what motivates them • how cross-generational initiatives such as reverse mentoring and multi-generational team-working can help to tackle age bias and support better staff development and employee relations.
	Trans and non-binary awareness	<p>This training will give a better understanding of:</p> <ul style="list-style-type: none"> • people's personal experiences of being trans and non-binary • key terminology around gender identities and the gender spectrum • gender transitioning and change of gender expression • inappropriate language and behaviour that trans and non-binary people can encounter • inappropriate language and behaviour that transgender people can encounter • how to behave appropriately and respectfully towards trans and non-customers, clients and colleagues.
	Transgender awareness	<p>This training will give a better understanding of:</p> <ul style="list-style-type: none"> • people's personal experiences of being transgender • key terminology around gender identities and the gender spectrum • what we mean by 'binary' and 'non-binary' gender identities • what gender transitioning and gender-affirming surgeries can involve • inappropriate language and behaviour that transgender people can encounter • how to behave appropriately and respectfully towards transgender people • appropriate language and forms of address • how the law protects transgender people in the UK and Europe.
	Unconscious Bias	<ul style="list-style-type: none"> • At the conclusion of this course colleagues become more aware of unconscious bias and how it can affect decision making. <p>All people leaders (managers and those with recruitment responsibility) are mandatorily required to undertake unconscious bias training and inclusive recruitment training which covers:</p> <ol style="list-style-type: none"> 1. Identify The Westminster Way inclusive recruitment processes. 2. Our role as a Disability Confident employer and what adaptations and responsibility that means for you. 3. Learn how to positively challenge a colleague on non-inclusive practice.

		<ol style="list-style-type: none"> 4. Prepare for and conduct a fair and inclusive interview, focusing on the behaviours needed for success. 5. Raise your awareness of gender bias in job descriptions and gain tools to check the language. 6. Recognise the responsibilities of a panel member during an interview. 7. Understand unconscious bias and mitigate the impact on how and who we recruit.
	Understanding Unconscious Bias	<p>This training will give a better understanding of:</p> <ul style="list-style-type: none"> • how and why people are biased • how unconscious bias can impact on the workplace and on working relationships • what we can do to reduce or eliminate bias from our decision-making process • how to address bias in specific situations, such as recruitment and performance management.
	What is Diversity and Inclusion?	<p>After completing this course, staff will understand:</p> <ul style="list-style-type: none"> • The difference between diversity and inclusion • The definitions of diversity and inclusion • The value of knowing your own diversity as well as that of others
	Working with the Equality Act	<p>This course will give a better understanding of:</p> <ul style="list-style-type: none"> • the provisions of the Equality Act 2010 • what constitutes protected characteristics under the Act • the seven types of discrimination covered by the Act • the business benefits of an inclusive workplace • how to recognise and challenge inappropriate behaviour • how to provide an inclusive and accessible customer service.
	Working with the Modern Slavery Act	<p>This module is designed to raise awareness of modern slavery and human trafficking and to help staff recognise their role in identifying and reporting concerns. It includes sections on the laws and regulations associated with modern slavery, some of the indications to watch out for and advice and guidance for dealing with both child and adult victims.</p>

		<p>Your Unique Diversity in the Workplace</p>	<p>After completing this course, staff will understand:</p> <ul style="list-style-type: none"> • How their unique diversity benefits the workplace • How to identify their unique diversity • What are the various unique attributes of themselves and others
		<p>Outside of the courses above, Westminster City Council has also made the Inclusive Recruitment course a mandatory module for staff. The course is all about actively recognising diversity and embracing a wide range of qualities and perspectives that candidates can bring to the organisation. It's not simply about recruiting people from underrepresented backgrounds or with disabilities in an effort to tick a box. Over the last two years 1,200 members of staff have been trained.</p>	
<p>2.</p>	<p>All investment partners must implement a zero-tolerance approach to all forms of discrimination, harassment and bullying</p>	<p>Partners to provide evidence of an organisational policy which evidences a zero-tolerance approach, which should set out objectives and how these are going to be met.</p> <p>Westminster City Council does not tolerate any form of discrimination, harassment or bullying. Although the term 'zero tolerance' is not used in our policy, the code of conduct simply uses a different style of language which states that:</p> <p><i>"We treat others with respect, fairness, and dignity. We will not allow any kind of discriminatory behaviour, harassment or victimization. If we see anyone behaving in this way, we will challenge in a professional manner."</i></p> <p>Similarly, the Council's policy on Discrimination, Bullying and Harassment states that:</p> <p><i>'The Council is committed to creating a work environment where everyone is treated with respect and dignity. We will not tolerate any kind of discrimination, bullying or harassment.'</i></p> <p>The Council's policy on Discrimination, Bullying and Harassment sets out the guidance and support available for employees or managers who encounter these during their work. It also outlines the Council's objectives regarding discrimination, bullying and harassment, and how these will be met, including expected standards, employee and line manager responsibilities, and ways of dealing with discrimination, bullying and harassment. External parties are unable to access the Council's policy on DBH, and so this has been attached as a document.</p>	
<p>3.</p>	<p>All investment partners must broaden recruitment channels and encourage applications</p>	<p>Partners to confirm the current recruitment channels that they use and describe how they will expand on this to encourage applications from diverse and under-represented groups. Partners are</p>	

	<p>from diverse and under-represented groups.</p>	<p>encouraged to monitor the effectiveness of these efforts and review them in light of their workforce data over time.</p> <p>Westminster City Council currently uses the following recruitment channels:</p> <ul style="list-style-type: none"> • Timewise (encourages applicants seeking flexible and agile working opportunities) • Vercida (provides access to more BAME job seekers) • Our SEND team currently work closely with the local Job Centre Plus (modifies job applications to encourage disabled job seekers) • Westminster holds provider network meetings once a month bringing together the various charities and social enterprises across the borough to share resources and promote recruitment opportunities. • Westminster has partnered with Westminster College to offer disabled residents with learning disabilities internships with eventual full time work opportunities. <p>These channels encourage applications from diverse and under-represented groups. The channels in use are currently monitored by Julianna Wesson our Strategic Resourcing Recruitment Lead who may adapt channels depending on various factors from pay gap data to representation.</p>
<p>4.</p>	<p>All investment partners must collect and monitor workforce data to benchmark the diversity of their workforce against the local area of their organisation.</p>	<p>Evidence of data having been collected, and of it being monitored on an annual basis (as a minimum), with a summary of how this compares to the London benchmark.* Partners are encouraged to provide information about how this data will inform their practices and their approach to advancing EDI in their own organisations.</p> <p>The Workforce Data Equality Guide and Workforce Data Equality – London Benchmarking Tool in particular (both found here and listed in the resources below) can support partners in delivering this.</p> <p>Westminster City Council collects and monitors workforce data to benchmark the diversity of our workforce against our local area. Most recently, the Strategic Workforce Data Lead reported our progress to the audit and performance committee. The results are below:</p>

		<p>3.2. Ensuring WCC workforce is representative of Westminster as a City</p> <p>Planning is undertaken at directorate level to understand any impact of changes in legislation or service priorities. HR Business Partners work with senior teams to understand trends including turnover and recruitment and to plan for any foreseeable changes in numbers/type etc. of resources.</p> <p>The workforce of Westminster is increasingly representative of the City as a whole. For example, the last information available shows WCC residents declaring as 60.2% White and 39.9% B.A.M.E. Whereas 52.4% of WCC employees define themselves as White and 38.4% as B.A.M.E (the remainder not declaring). The proportion of B.A.M.E. staff in the Council has increased from 33% only 3 years ago. Work to ensure our workforce reflects our resident make up is ongoing and a constant focus.</p> <p>In respect of gender, 47.3% of Westminster's resident population is female and 57.4% of Westminster City Council employees are female. This gender split is consistent with other local authorities with similar outsourced contracts (for example waste).</p> <p>Career advancement is key to this happening, the most common approach is to advertise opportunities (new roles, vacancies, secondments) and interested applicants take part in an assessment process which starts with a formal expression of interest and concludes with an interview. Positive action, which ensures a diverse shortlist, is applicable to all band 4 and 5 roles and results of this are reported to the Executive Leadership Team each month. Staff on graduate or apprentice entry schemes coming to the end of their programme can apply for internal vacancies up to band 4 with a guarantee of an interview if they meet the job requirements. We don't have the systems in place to monitor individual career trajectories but do have a detailed recruitment guide, which strives to ensure equality of opportunity is evident.</p> <p>In addition, how we understand and meet skills gaps happens in a number of ways which includes gathering business intelligence, scanning the external horizon and feedback from staff networks and champions groups. For example, in March 2020, we consulted with different parts of the organisation and identified a gap in existing and future needs in the fields of data analysis, project management, software engineering, digital marketing and data. We identified apprenticeships as an opportunity to fill this gap and were able to utilise the apprenticeship levy to fund the qualifications that employees would undertake. By taking a structured approach, with targets, a series of apprenticeship qualifications were made available to employees that would help them upskill, cross-skill and/or reskill and ultimately enhance their career prospects. Another example is in collaboration with the ABLE network we have offered Neuro Diversity Understood, Autism Awareness and Digital Accessibility training.</p> <p style="text-align: center;">2 Page 72</p> <p>Click here to access the full report which has been published both internally and externally.</p>
5.	<p>All investment partners must publish their gender and ethnicity pay gaps.</p>	<p>Westminster City Council currently collects and publishes (both internally and externally): Gender and Ethnicity Pay Gap Data</p> <p>Westminster City Council has laid out a 3-year action plan that aims to close all pay gaps by 2025 through the following measures:</p> <ul style="list-style-type: none"> ● Launch a new Inclusive Mentoring Scheme. ● Design and implement clear career opportunities for employees in Bands 1-4. ● Expand the scope of Positive Action hiring for gender/ethnicity to pay bands where there is under-representation. ● Communicate pay and steps for internal roles. ● Encourage People Leaders to support part-time and flexible working employees. ● Take pro-active steps to utilise the “tie-break” in the Equalities Act 2010 that allows the appointment of diverse candidates where there are two candidates of equivalent merit and under-representation can be shown.

		<ul style="list-style-type: none"> • Focus recruitment on hiring for potential, giving talented candidates the opportunity to develop. • Senior Leaders to be accountable and to consider increasing the pay of B.A.ME and female employees to be equal to white and male employees, particularly in the lower steps of the pay bands. • Refresh the Talent Management scheme to support career progression. • Continue to work with Strategy and Intelligence to conduct financial modelling to address our pay gaps.
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2. To produce and publish an Equality, Diversity and Inclusion Action Plan for their organisation.

- **Partners are also required to develop, publish and implement an EDI Action Plan. These plans must include a minimum of one action or initiative for each of the following three themes:**

Theme 1: Organisational equality, diversity and fairness

- Actions under this theme should support long-lasting and meaningful organisational change that advance equality, diversity and inclusion of organisations in the housing sector.
- This includes: promoting best practice in employment by ensuring workers are treated and paid fairly; ensuring equal access to development opportunities and that all staff are supported to achieve their full potential; tackling discrimination and bias, and advancing equality, diversity and inclusion to make every employee feel valued.

Theme 2: Sustainable and diverse supply chains

- Actions under this theme should support both the objectives of ensuring that environmental, social and economic sustainability are promoted throughout organisations' activities and supply chains, and encouraging diversity through procurement activities.

Theme 3: Working together with Londoners

- Actions under this theme should amplify the voices of residents and Londoners, especially those that are under-represented or face significant housing-related inequalities. Actions should form a legacy of early, pro-active and routine engagement with Londoners and for this to result in homes that are designed to meet the diverse needs of London's diverse communities.
- Partners are expected to develop actions and initiatives under this theme that will address barriers to inclusion. Engagement needs to be appropriately resourced, included from the earliest stages of the development process and ongoing. It is important to consider how to reach people across

communities of geography and identity. This includes being pro-active about the methods and approaches used to reach the people they need to, and not relying on easier-to-reach groups as being sufficient.

Partners are required to have developed, published and begun to implement their EDI Actions Plans within 12 months of their funding allocation being confirmed. Partners should provide a link to their published Action Plan and be able to describe how they have begun to implement it. Partners will need to provide a progress update on their Action Plans annually following this – the progress updates will need to be published and are for GLA internal scrutiny.

The Action Plans must set out the actions Partners are taking to meet their objectives. Area Managers, who manage relationships with the Mayor’s housing delivery partners, will review the published Action Plans to ensure they provide detail on the objectives, current baseline positions, the actions and tasks required to meet those objectives and target dates for when they will be met, and measures of success. These are set out in the template provided [here](#) that Area Managers will work with to determine whether Action Plans meet the funding conditions. Partners are welcome to complete this with the relevant information and submit to the GLA if they wish.

EDI Action Plan

Objective	Current Position/baseline	Action/Task	When	Measure of Success	Progress as of June 2024
<p>Theme 1: Organisational equality, diversity and fairness</p> <p>Westminster city council is looking to improve organisational effectiveness in equality, diversity and fairness through our recruitment and engagement practices. This can be seen through the creation and implementation of our award winning “Be all kinds of Extraordinary Branding”. Developed in 2021, Through our continuous community relations, we received feedback that we needed to be more visible in the local community to attract a wider array of talent. The campaign invited colleagues across the organisation who not only reflected our local communities e.g. Global majority, disabled etc. but had performed exceptional feats. It targeted local people through our online job boards and via our Job Centres.</p> <p>A year on, and the campaign has:</p> <ul style="list-style-type: none"> • Led to a 50% increase in global majority applicants at middle manager level. • Reached over a thousand residents through social media platforms such as YouTube. <p>We will continue to hone the brand and ensure it reaches as many candidates as possible.</p>					

<p>By end of 2025 we will be representative of the communities we serve at all levels in the organisation.</p>	<p>At present 60.2%WCC residents have declared as being White and 39.9% B.A.ME. Whereas 52.4% of WCC employees define themselves as White and 38.4% as B.A.ME</p> <p>In respect of gender, 47.3% of Westminster’s resident population is female and 57.4% of Westminster City Council employees are female.</p>	<p>Collect staff responses on how we can improve through the confidential ‘Our Voice Survey’.</p> <p>Reach out to more sector specific BAME groups e.g. National Black Governors Network (NBGN).</p>	<p>The survey takes place every year.</p> <p>Reaching out to different BAME groups is an ongoing commitment.</p>	<p>See a 5% increase in the number of BAME staff in 3 years.</p>	<p>JUNE 2024 - 44% Global Majority, 49% White</p>
<p>Continue to increase the number of B.A.ME and women in the senior leadership Team</p>	<p>Currently 45% of Women and 26% of B.A.ME are in leadership we would like to increase those statistics by respectively 40% of B.A.M.E employees and 58% of women in senior leadership roles by 2025.</p>	<p>Refresh the Talent Management scheme to support career progression.</p> <p>Create a quarterly overview to record recruitment data, shortlisting and applicants.</p>	<p>The training is currently under consideration by senior leadership.</p> <p>Use positive action consistently as we have been doing.</p>	<p>That we see steady progression in our workforce data of BAME and women in senior leadership positions.</p>	<p>JUNE 2024 - 34% Global Majority Senior Leadership, 52% Women</p>

By 2025 we will have 93% staff sharing their personal data.	Only 90% of staff have declared their data so we are unable to provide well rounded support.	By promoting the Data collection animation. Utilising the staff networks to encourage staff. Get feedback on why people are hesitant to provide their data.	The data collection animation will have a year round campaign plan starting from December 2022. Have the Networks promote the importance of data sharing year round.	3% Increase in the numbers of employees declaring their protected characteristics.	JUNE 2024 - 93% have shared gender/ethnicity data
Design and implement clear career opportunities for employees in Bands 1-4.	Heads of service at present do not necessarily need to create career opportunities. This target goes further than succession planning as people leaders are responsible for outlining specific roles, pay and directing their teams to be aware of the details.	All people leaders will be responsible for adding his action to their action plans. All people leaders must have this completed by the end of 2023.	This action will be completed by the end of 2023.	Members of staff will feedback on if they have been made aware of career opportunities from bands 1-4 on via staff feedback. Clear career opportunities available within for each Directorate measured by job opportunities on IBC and through the acting up process.	JUNE 2024 - Each directorate has EDI action plans in place which includes supporting career progression for their workforce. As part of the Corporate Equitable and Inclusive Council programme, the Talent workstream programme is focused on developing a new career programme framework, making succession planning more robust to support career progression and improve representation at senior levels.
Objective	Current Position/baseline	Action/Task	When	Measure of Success	Progress as of June 2024

Theme 2: Sustainable and diverse supply chains

Westminster City Council's Procurement Team are working closely and collaboratively with the GLA on supplier diversity and other boroughs across London. WCC Procurement have recently sat on the Steering Group of the London Responsible Procurement Work that is chaired by the GLA.

Please note that the below objectives have been formulated under the new Labour administration at Westminster City Council. These are currently being circulated amongst leadership and due to be endorsed during Autumn.

Please note that Westminster City Council does not currently hold data on current position/baseline for sustainable and diverse supply chains. The Procurement Team is currently implementing a new e-procurement and contract management platform which will help to collate the data in the near-future for the below objectives.

<p>INCREASE supply chain equality, diversity and inclusion</p>	<p>N/A</p>	<p>A clear description on what equality, diversity and inclusion means to Westminster City Council and where relevant, contract specific requirements on ensuring/improving ED&I through the delivery of the contract</p> <p>Supplier has an appropriate ED&I/HR point of contact who as part of their role can report on gender pay gaps including action taken to address any gaps</p>	<p>N/A</p> <p>Verify within 3 months of contract start (suppliers with 250+ staff, contracts over 12 months of £2m+)</p>	<p>% (by spend) relevant contracts with ED&I criteria reduction criteria incorporated</p> <p>% average gender pay gap amongst our top 50 contractors</p> <p>(by spend) supply chain involved in ED&I best practice group</p> <p>No. people with learning disabilities on work placements within our supply chain</p>	<p>JUNE 2024 -</p> <ul style="list-style-type: none"> The team integrates diversity and inclusion evaluation criteria in most tenders, focusing on those elements of highest risk or greatest impact. We assess how suppliers will address under-representation of their workforce, especially when they are delivering front-line services to residents or are designing assets or services for them. Work has been undertaken this year
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		<p>Evaluate bidder approaches to ensuring a culture of ED&I within the arm of the organisation delivering our contract</p> <p>Assess how bidders will ensure appropriate representation of project teams/ staff workforce delivering the contract and/or an understanding of Westminster's diverse demographics.</p> <p>Integrate award criteria on creating work placements, part or full time roles for people with learning disabilities</p>	<p>Quarterly monitoring of commitments within tender offer, alongside verification of selection criteria above.</p> <p>Quarterly monitoring of commitments within tender offer, alongside verification of selection criteria above.</p> <p>Quarterly monitoring of commitments within tender offer, alongside verification of selection criteria above.</p>	<p>We will also seek feedback from members of the ED&I best practice group and other fora such as the Future of Westminster Commission on how we may continue to improve our approach.</p>	<p>with partners MSDUK (minority supplier development UK) to host meet the buyer events and other supplier readiness initiatives with global majority led businesses, which are then onboarded onto our own programme for bespoke support – this is covered in more detail in objective 4.</p> <ul style="list-style-type: none"> • All staff have undertaken unconscious-bias training, with specific mandatory modules for those recruiting, as well as recent anti-racist training delivered in person by specialist trainer Rosemary Campbell-Stephens. • The council has continued its partnership with Unity Kitchen to provide catering services at our City
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					<p>Hall. Unity Kitchen is a social enterprise run by the Camden Society, training and employing people with disabilities to become the baristas, chefs, and service stars of the future. Currently, approximately 30% of the catering staff at City Hall have been diagnosed with a learning disability. We are pleased to offer a safe and secure environment for our catering staff to develop essential life and social skills.</p> <ul style="list-style-type: none">• At the tendering stage, this was the first time that 30% of the total contract weightings was allocated to responsible procurement. This was assessed across four areas: Environmental Food Policy, Staff Diversity
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					<p>and Recruitment, Management Capacity through safeguarding, and Sourcing of Food. This procurement exercise highlights the importance of responsible procurement and underscores the council's commitment to fostering inclusive and diverse practices in all areas.</p> <ul style="list-style-type: none">• The Procurement team have taken on three supported interns, which has helped the team gain a better understanding of reasonable adjustments that may need to be made by suppliers when we encourage this through tenders. <p>Future focus and continuous improvement</p>
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					Through supplier relationships we can properly explore companies that would be best placed to deliver supported interns and new recruits with learning disabilities.
INCREASE↑ partnership with contractors to strengthen local communities	N/A	<p>Standard wording in specifications/ scopes of work on why and how we, as a public authority, seek social value in tenders</p> <p>Supplier has a social value/CSR point of contact who:</p> <ul style="list-style-type: none"> engages with client teams so they can be signposted to current projects, community or school initiatives etc. supports the fulfilment social value commitments 	<p>n/a</p> <p>Verify within 3 months of contract start (contracts over 3 months of £100k+ that include social value criteria</p>	<p>To measure our success in the short term, we will report on % (by spend) relevant contracts with social value criteria incorporated that focuses on longer term community cohesion/ legacy projects and total annual value of financial or resource donations and no. volunteering hours provided, in the medium term, we are working with colleagues in our strategy and intelligence team to develop a system of measuring impact as well as outputs of social value delivery. This will involve detailed collaboration with</p>	<p>JUNE 2024 -</p> <ul style="list-style-type: none"> The Responsible Economy's Responsible Business team have worked closely with our Communities team, who in turn work with Westminster's VCSEs, to develop a Portfolio of projects that local businesses, suppliers, and developers can contribute to as part of their corporate social responsibility, social value or section 106 offers. This Portfolio is now being shifted from e-newsletters to a

		<p>report on outputs/outcomes of the above</p> <p>Assessment of offers of skills, time, resources, event participation and/or sponsorship of community projects aimed at strengthening local communities</p> <p>A range of types of offer and relevant partners will be provided, but bidders may also choose their own way of delivering this objective for Westminster residents</p> <p>Scores will depend on the proposed mechanisms, the nature of the offer and how bidders plan to evidence delivery</p>	<p>Quarterly monitoring of commitments within tender offer, alongside verification of selection criteria.</p> <p>Quarterly monitoring of commitments within tender offer, alongside verification of selection criteria.</p> <p>Quarterly monitoring of commitments within tender offer, alongside verification of selection criteria.</p>	<p>teams across the council who have front-line roles, engaging with our communities to seek feedback on real and ever changing need and measuring the success of our approach through e.g. satisfaction surveys, representative panels etc.</p>	<p>live platform, which our suppliers looking for live ideas of how they can contribute to supporting our VCSE can search by theme, locality, or demographic. This platform is due for launch by the end of 2024.</p> <ul style="list-style-type: none"> • After trying and testing a series of resident engagement initiatives to leverage targeted and relevant social value outcomes, we have established an approach that seems to be optimal, especially for regeneration schemes. This involves developing social value priorities for a specific area in collaboration with resident representatives and
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					<p>local VCSEs and including these as a vision statement within the tender pack. Bidders are not only asked to reference this social value vision within their written response, they are also scored separately for a presentation of their intended approach to a panel of residents, alongside approaches to other relevant aspects such as community engagement, disruption mitigation etc. This panel then provide one moderated score which feeds into the overall supplier evaluation.</p> <p>Future focus and continuous improvement</p>
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					<ul style="list-style-type: none"> Attend meet the VCSE meetings organised by our colleagues in Responsible Economy, to get a better understanding of what they do, what they need help with Increase use of the Community Investment Portfolio portal, especially where suppliers are looking for new ideas for delivery.
INCREASE spend with and support for target organisations	N/A	<p>Standard wording in specifications/ scopes of work on why we, as a public authority encourage spend with and support for local entrepreneurs, micro small, minority-led businesses, social enterprises & VCSEs</p> <p>Supplier is able to report on spend with</p>	<p>N/A</p> <p>Verify within 6 months of contract start (all</p>	<p>Our success will initially be measured by gathering data on % (by spend) relevant contracts with criteria on supporting/ spending with target organisations, % and £ overall spend with target organisations and total annual no. hours support given to target organisations and total no. organisations</p>	<p>JUNE 2024 -</p> <ul style="list-style-type: none"> We were awarded supplier readiness funding via the Government's UKSPF programme, which allowed us at the end of 2023 to recruit two temporary staff into the procurement team and one to the social value team.

		<p>SMEs, VCSEs, and minority led suppliers and where they are based</p> <p>Assess how and to what extent the bidder intends to provide business shadowing opportunities, mentoring, training and access to networks for target organisations</p> <p>Evaluate how and to what extent the bidder commits to channelling sub-contractors spend through target organisations</p>	<p>contracts over 12 months of £5m+)</p> <p>Quarterly monitoring of commitments within tender offer</p> <p>Quarterly monitoring of commitments within tender offer</p>	<p>supported. We will also gather feedback on our approach from through a continued series of engagement events aimed at our target organisations, with follow-up satisfaction surveys to gauge the success of our approach and identify areas for improvement</p>	<ul style="list-style-type: none"> • This team has injected real focus into our supplier diversification agenda, and they are identifying, engaging with and supporting over 150 businesses. Over the last quarter alone, 200 attendees have participated in a series of targeted events delivered by WCC and our suppliers. These have included: • 3 Business Planning workshops for start-ups as well as separate sessions for those wishing to scale up • 2 sector-specific meet the buyer events • 3 bid writing workshops • Supplier-led social media training • 2"introduction to public
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					<p>procurement" training sessions</p> <ul style="list-style-type: none">• 2 responsible procurement training sessions to bidders interested in home care and housing needs contracts <p>Future focus and continuous improvement</p> <ul style="list-style-type: none">• Between now and when the UKSPF funding ends in March 2025, we will strive to demonstrate the impact that these team members have made and consider options for when the external funding has ended
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<p>INCREASE sustainable procurement & supply chains</p>	<p>N/A</p>	<p>Sustainable procurement criteria relevant to the contract e.g. prohibition of glyphosate, sustainable timber, energy efficiency standards, responsibly sourced soy and palm oil etc.</p> <p>Supplier has taken basic steps to minimise the main environmental impacts of its business.</p> <p>Supplier has a point of contact whose remit is to reduce environmental impacts including greenhouse gas emissions, local air pollution and waste.</p> <p>Supplier has a system to collect data on greenhouse gas emissions, local air pollution and waste</p>	<p>Ad-hoc/ verification through operational contract management</p> <p>Verify within 3 months of contract start (all contracts over 6 months of £100k+)</p> <p>Verify within 3 months of contract start (all contracts over 12 months of £500k+)</p>	<p>Our success will be measured by obtaining data on % (by spend) new relevant contracts with sustainable procurement/ biodiversity/ resilience criteria/ supplier sustainable development criteria incorporated and % (by spend) contractors with sustainable procurement policies implemented, selection criteria for subcontractors based on environmental performance and/or supplier sustainability training programmes in place</p>	<p>JUNE 2024 -</p> <ul style="list-style-type: none"> • Responsible Procurement training for SMEs being rolled out as part of the UKSPF funded Supplier Readiness Programme and as part of market testing and engagement exercises for strategic tenders. • Undertaken a review (EU GPP – Topten, Defra GBS, Industry standards) and are currently compiling a toolkit which will be refreshed each year. • The above has been suggested as an action to feed into the Climate Team’s ‘Response to the Ecological Emergency’. • Contributed to the Sustainable City Charter within Sustainable Procurement section.
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		<p>Assessment of robustness and implementation of supplier sustainable procurement policy</p> <p>Assessment of supplier management and upskilling of supply chain in relation to environmental sustainability</p>	<p>Verify within 6 months of contract start (all contracts over 12 months of £500k+)</p> <p>Quarterly monitoring of commitments within tender offer</p> <p>Quarterly monitoring of commitments within tender offer</p>		<ul style="list-style-type: none"> • Met with Earthworm Foundation, a supply chain traceability charity that conduct supply chain research projects for companies like Nestle in order to vet the ethicality of material sourcing from the root- they provided information on routes Westminster City Council could take to begin their own sustainable and responsible supply chain tracing exercise, including identification of risk materials and appropriate certification credentials we can ascribe to ensure that our products and our contractors' products meet certain acceptable thresholds. • Examples of this type of material-focussed procurement
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					<p>approach evidenced through RP team's input to ICT asset refresh tender, wherein we advised on the most suitable laptop types to spec for based on reusability of parts, materials, repairability and potential planned obsolescence, also reflecting circular economy principles</p> <p>Future focus and continuous improvement</p> <ul style="list-style-type: none">• Work to develop a sustainable Procurement Policy this will form part of standard specification.• Create a sustainability framework for built environment work with internal team and suppliers to
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					identify best practice
Objective	Current Position/baseline	Action/Task	When	Measure of Success	Progress as of June 2024
Theme 3: Working together with Londoners					
Commitment to monitoring Social Value agreements and resulting impacts across all schemes and working with Developers to add additional value which residents can benefit from i.e. supported events, workshops and training.	At present we monitor social value commitments and have started work with locals to build a picture of their priorities which are outside of the contractual agreements but can be used to lever further value for local people.	Agree the list of community priorities, work with developers, BIDs and other suppliers to match support in the community.	This action will be completed by the end of 2022.	Any additional support agreed to take place in the local community over and above than that set out in the Social Value Contract will demonstrate a successful outcome.	JUNE 2024 - We have established community priorities for Ebury and Church Street which have fed into two new contracts. One a joint venture for Site A Church Street and the second phase Ebury. Residents for both these schemes have been involved in the evaluation process for Social Value scoring bids. These social value activities are currently taking place. At Ebury at the remaining phase 1 contract a community chest has delivered 74k in grant for community projects over the Summer 24.

<p>Prioritising the health and wellbeing of residents in the brief of a project at the outset</p>	<p>We are undergoing the feasibility for the delivery of a new Health & Wellbeing Hub in Church Street and are ensuring that residents can take place in these early discussions and planning right from the beginning so that their voice is heard throughout the development of the scheme.</p>	<p>Work with the councils Communities Dept to identify and help plan the resident engagement & involvement in the decision proposal and agree a plan for moving forward</p>	<p>This action will be completed by the end of 2022.</p>	<p>Resident involvement in the co-delivery of the new hub.</p>	<p>JUNE 2024 -</p> <p>Health and Wellbeing Hub requirements and operation Model is currently under further assessment. We are aiming for the new model to be proposed by end of Q1 2025. Progress update will be provided in the next EDI annual update.</p>
<p>Ensuring that residents' voices are represented in governance and decision making, such as residents' forums and Board membership. Support for specific diverse residents forums, such as LGBTQ+ resident forums, can encourage underrepresented voices to be heard in a safe space.</p>	<p>N/A</p>	<p>Meeting with our resident-led Board (Community Futures Group) on a monthly basis to discuss all areas of the regeneration project at Ebury. The Community Futures Group is made up of the members of the local community, and opportunities to join the group are promoted to all residents. The Group provide feedback on different areas of the project including design proposals.</p> <p>The Community Futures Group will</p>	<p>Monthly</p>	<p>Local residents and businesses are involved, and their voices are heard, in all areas of Ebury regeneration project.</p>	<p>JUNE 2024 -</p> <p>The Community Partnership Group continues to meet at Ebury. They have been involved in S105 consultation for a new estate management provider with all residents of the estate. As phase 1 of Ebury completes they are visiting the new building and being engaged on viewings/service charge and timescales.</p> <p>At Church Street the community regeneration group continues to meet. They have visited other schemes, been engaged with the Joint Venture partner Mount Anvil and have been involved in the delivery of social value tasks. A new</p>

		<p>expand in Q4 to include local businesses and residents living in surrounding areas. This will ensure that the group is representative of the local community.</p>			<p>resident engagement office has opened on Church Street to increase participation and involvement from the local community</p>
<p>Maximising opportunities to take a meaningful and participatory approach to working with diverse community groups and organisations when designing and delivering affordable homes</p>	N/A	<p>Working with residents and stakeholders to collect feedback for the Reserved Matters application for Ebury Phase 2 (May 24).</p> <p>This will be achieved through various consultation events and workshops</p>	<p>May 24th 2023</p>	<p>Resident and stakeholder feedback is collected during consultation events and workshops.</p>	<p>JUNE 2024 -</p> <p>At Ebury we have engaged on the RMA, S105 housing consultation on estate management service and recently a local lettings consultation (July 24)</p> <p>These involved in person workshops, translation of materials, one to one appointments and presentation sessions. Residents were also supported by the ITLA service during the process for independent support from the council</p>

<p>Prioritising the health and wellbeing of residents in the brief of a project at the outset.</p>	<p>N/A</p>	<p>Energy bills are lowered for residents as a result of the sustainable features of the new homes at Ebury regeneration project.</p>	<p>First set of new homes to be delivered at Ebury in May 24.</p>	<p>Lower energy bills for residents and improved wellbeing. Low energy lighting, smart metres, low water use fittings, air quality systems, private balcony for outside space provided in every new home.</p>	<p>JUNE 2024 - first set of new homes to be delivered at Ebury now forecast to be Winter 2024. A progress update on the energy bills can therefore be provided in next year's annual EDI review.</p>
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