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# Due Diligence and Impartiality - Supporting and Protecting our Diversity Networks

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##

## Background

Following feedback from networks we have reviewed and updated this guidance to highlight our responsibilities in respect of the work we undertake as Cross-Government Diversity networks.

As civil servants we are all expected to follow the standards of behaviour set out in the [Civil Service code](https://www.gov.uk/government/publications/civil-service-code/the-civil-service-code) in the work we undertake as networks, as well as in our day jobs. We must at all times be mindful of the core values of integrity, honesty, objectivity and impartiality (including political impartiality) underpinning the Civil Service code. These core values must be at the forefront of everything that we do, so that civil servants retain the confidence of their Ministers and so that public confidence in the Civil Service is upheld.

It is important that we retain impartiality across the Civil Service, avoiding any politicised events or groups impacting on the working life of civil servants and distracting from the very excellent work delivered by you in Cross-Government Diversity Networks, as well as the work you support within departments.

In the [Civil Service Diversity and Inclusion Strategy](https://www.gov.uk/government/publications/civil-service-diversity-and-inclusion-strategy-2022-to-2025) we clearly state that we take a zero-tolerance approach to discriminatory behaviour in the Civil Service. This process will help prevent anyone with a history of such comments from being invited to events organised by Cross-Government Diversity Networks.

When organising and promoting events we should also give consideration to the content, ensuring it is fit for purpose, offers clear organisational benefits and is in line with our obligations under the Civil Service code.

This is particularly important when engaging with individuals and external organisations. We recommend that networks conduct research on any external party invited to engage with their network, including individuals and organisations to ensure that they are not engaged in political or campaigning activities.

We recognise that it is not always clear to determine whether an activity is deemed political or if an individual has spoken against key Government policies whether that would contravene impartiality. To ensure impartiality all Cross-Government Diversity Networks must carry out due diligence checks on all external speakers invited to events, and the content of any events and communications. This includes but is not limited to:

* Networks and their members must complete such checks to avoid any invitations being issued to individuals and/or organisations that have provided adverse commentary on government policy, political decisions, approaches or individuals in government that could undermine our position on impartiality and create reputational damage. Commentary may have been made on social media or other outlets.
* The decisions regarding checks should be recorded.
* Any identified conflicts should be recorded and invitations must not be issued without obtaining clearance from your departmental Permanent Secretary or Network Senior Sponsor. Where there is any doubt you should engage the central team by emailing **[REDACTED]**
* This process applies to any events organised or promoted by Cross-Government Diversity Networks which includes an external speaker or organisation.

To help support networks in the decision-making process on whether to engage with an individual or external organisation as part of network activity, the Civil Service Inclusive Practice Team has developed a process to mitigate the risks and uphold impartiality. This guidance and its accompanying processes are designed to support our Cross-Government Diversity networks and their leaders in their approach to due diligence. As well as to protect them and their members from inadvertently conflicting with Civil Service values and exposing themselves to criticism as they carry out their duties in support of civil servants across the UK.

The team is happy to support Cross-Government Diversity Networks who are unclear on engaging with individual or external organisations, by providing assistance with due diligence checks. Networks can seek support with a Due Diligence check by completing the template in [Annex B](#_5ypxwi4oszy0) and emailing to: **[REDACTED]**

We want this process to be as simple and straightforward as possible for you to manage so we will be reviewing it regularly. If you have suggestions to help us continually improve this guidance, please send them to the **[REDACTED]**

## Purpose of guidance

We recognise there are instances where there is merit in looking outwards to others; bringing in a broader range of expertise from external organisations and individuals can help to provide a fresh perspective or lens to an issue, provide different subject matter expertise, and enables stories to be shared from a broader range of lived experiences and career journeys - all of which have the potential to enrich the working lives of our people.

The [Declaration on Government Reform](https://www.gov.uk/government/publications/declaration-on-government-reform#:~:text=The%20Declaration%20on%20Government%20Reform,to%20deliver%20better%20for%20citizens.) sets out that the Civil Service should collaborate and build partnerships with the wider public sector, private sector and community organisations, and that by bolstering dialogue between leaders from all sectors to tackle problems together, we can secure the best outcomes for citizens.

Where Civil Service organisations and its employees would benefit from bringing in external speakers to provide expert information or to share diverse stories, Cross-Government Diversity Networks are able to engage with external organisations to source speakers for network events.

This guidance sets out our recommended series of steps for considering and carrying out the appropriate checks before agreeing to any external engagement, and for responding to requests from external organisations or individuals who themselves have expressed an interest in speaking to our organisations on Diversity and Inclusion.

## Due Diligence Framework

We have developed a framework to support Cross-Government Diversity Networks in their approach to due diligence and ensure they are meeting their obligations under the Civil Service code. The framework sets out the key principles which should act as the starting point when organising an event.

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## The framework is built around four key aims:

## Ensure extremist views are removed when engaging external parties

## Ensure the Civil Service is not associated reputationally with external parties

## Ensure external parties are not campaigning on or influencing government policy

## Ensure civil servants preserve their impartiality when engaging external parties.

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## **Due diligence on Cross-Government Diversity Network events framework**

## The objective of this guidance is to support Cross-Government Diversity Networks in their approach to due diligence and ensure adherence to the Civil Service code, particularly in relation to impartiality, while aligning to the Civil Service Diversity and Inclusion Strategy delivering the purpose of our networks.

## **1. Remove extremist views when engaging external parties**

## External parties that hold extremist viewpoints are not appropriate for network events. Network leaders should give this careful consideration when sourcing speakers. This might include conducting a background check that is set out further in this document.

## **2. Ensure the Civil Service is not associated reputationally with external parties**

## While external parties are entitled to their own viewpoints, it is important that the Civil Service is not seen as associating with or endorsing the views of any particular external party. There are a number of ways networks can help guard against this:

##

* Ensure guests with a wide range of views are invited to speak - either at the same event or over a period of time. Networks should give this careful consideration when designing their events, in line with impartiality requirements.
* Be clear on the purpose of the event which external parties are appearing e.g. to speak about their role or work as a subject matter expert rather than a political campaigner.
* Consider the rationale in case of challenge; how would you defend this publicly, or to a Select Committee?
* Have clear guidelines for external parties to manage expectations, advising speakers that they should use the platform appropriately (see section 3).

## **3. Ensure external parties are not campaigning on or influencing government policy**

## Network events should not be used by external parties as a campaigning platform or as a vehicle to influence government policy. Speakers should be made aware of the need for the Civil Service to preserve its impartiality. Networks organising events may want to have a briefing with speakers beforehand to understand the contents of their presentation and explain the parameters of the event.

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## Organisers should be clear on the purpose of the event and whether it is appropriate with the planned audience. For example, would a policy discussion be better had with a smaller group of relevant officials rather than a network? This links back to the need for networks to have a clear understanding of their purpose and role.

## **4. Ensure civil servants preserve their impartiality when engaging external parties**

## While civil servants may attend events because they are personally interested in the topic, they should bear in mind that they are representing the Civil Service and act in line with the Civil Service code, particularly impartiality. Civil Service attendees should therefore bear in mind:

* Not to ask questions/make comments in a way that are politically partial and express a firm personal view (in the work environment)
* Not to be critical of government policy or Ministers
* Not to ask about or comment on other audience members’ political views.

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## Decision Making Process

**This process does not negate the need to carry out appropriate checks and adherence to Departmental policy and ensure alignment to the** [**Civil Service code**](https://www.gov.uk/government/publications/civil-service-code/the-civil-service-code) **and** [**Civil Service Management Code**](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/566900/CSMC_November_2016.docx)**, with specific consideration to section 4.4 on political activities. The CS Inclusive Practice Team will support networks in the decision making process in an advisory capacity, however the decision to proceed will be for Networks to make.**

Engagement with external organisations or individuals to speak at network-led events provides the opportunity to:

* Seek external perspectives on D&I from private and public sector organisations and subject matter experts
* Share external best practice on D&I across our organisations
* Increase visibility of a broader range of diverse talent and their expertise by sharing their personal and career stories, which would add value to Civil Servants.

Prior to engaging with an individual or external organisation as part of Cross-Government Diversity Network activities please consider the following points.

1. **Set out your Network vision and event purpose**

## To ensure the event is aligned to Civil Service D&I Strategy and Civil Service values, we would recommend that networks have a clear definition of their vision and the purpose of their events from the outset.

##

We recognise that not all networks have a strategy but it may be helpful to develop one and it can help with explaining the organisational benefits of an event. This will also help prepare if you receive challenge from senior leaders or external parties on the purpose of the event.

1. **Research**

Have you conducted thorough research on the individual or organisation before engaging with them? This could include a review of corporate publications, media and news articles, social media commentary. This needs to be done at least 4 to 6 weeks before the planned event and prior to any communications being shared.

We would recommend viewing a minimum of 5 to 10 pages of search page results, looking through any notable links produced on a search page. We recognise many external individuals and organisations may comment on Government policy i.e. part of a consultation or making a statement asking Government to review policy. This is different to a sustained campaign or personal attacks of a Minister or official.

Depending on the number of results, it is recommended to review up to a period of up to 5 years. Please note this is not prescriptive but this may reveal additional information which will not have been in the media recently.

1. **Key findings**

After you have conducted your research, what are your conclusions? You only need to record your decision and be mindful when storing information that it needs to be compliant with GDPR.

Is there any indication that shows this individual is involved in political commentary and campaigning activity that would impact the impartiality of the Civil Service? If yes, do not engage any further. If you are unsure but still wish to engage, seek advice from the CS Inclusive Practice Team.

1. **Assurance process**

You may wish to seek advice from your Network Executive Committee before proceeding with engagement. We recommend seeking appropriate sign-off for all Network Events by a Senior Civil Servant as a minimum, this may be a Senior Network Champion or Sponsor and on some events you may need to make a Permanent Secretary aware. You may also wish to consider engaging HR, D&I teams and Press Office. If your network does not have an SCS sponsor, the CS Inclusive Practice Team can support.

If you have any reservations about engaging with them or require additional assurance, please seek advice from CS Inclusive Practice Team: **[REDACTED]**

We will seek to respond within 5 working days, if an urgent response is required please flag this in your email.

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## Key Considerations

|  |  |  |
| --- | --- | --- |
| **Are you planning on engaging with an individual or external organisation?** | If yes, have you conducted a background check for due diligence. | If no, no further action is required. |
| **Have you conducted background checks on the speaker or organisation?** | Ensure that you carry out a search well in advance.  |  |
| **Have you identified any conflicts?** | If yes, please seek advice from CS Inclusive Practice, before taking any further action. |  |
| **Are you aware of any previous engagements with this individual or organisation?** | If yes, what was the nature of the previous engagements? |  |
| **Do you still have concerns about engaging with the individual or organisation?** | If yes, please seek advice from CS Inclusive Practice before taking any further action. |  |
| **Have you sought clearance from a senior leader or Network sponsor?** | If yes, please retain records of this. | If no or if you do not know the appropriate senior sponsor, please seek advice from CS Inclusive Practice. |
| **Is it possible to run this event without inviting this speaker?** | If yes, you may wish to consider changing the event to avoid any risk of impartiality. | If not, please seek advice from CS Inclusive Practice. |

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## Annex A: Event Checklist

Prior to engaging with an individual or external organisation, we recommend that you use this checklist to ensure key considerations are followed.

|  |  |  |
| --- | --- | --- |
| **Key actions** | **Status** | **Date Completed** |
| **Before event** |  |  |
| What is the purpose of the event? |  |  |
| What are the key outcomes of this event? |  |  |
| Who is the audience? |  |  |
| How have you ensured that attendees are civil servants? For example, ensure they use a gov.uk email. |  |  |
| Do you need to make Press Office aware? |  |  |
| Completed Due Diligence check |  |  |
| Clearance from Senior Leader/Network Sponsor |  |  |
| Briefed speaker on event and outlined expectations i.e. Government position/policy |  |  |
| Outlined expectations for attendees i.e. behaviour, respecting each other. |  |  |
| **During event** |  |  |
| How will you manage comments/questions from the audience? |  |  |
| For online events is the chat function enabled? If so, will it be actively monitored and managed?  |  |  |
| **After event** |  |  |
| Have you recorded the event and are you planning to share it with attendees?  |  |  |
| Are you planning any evaluation with attendees? |  |  |

## Annex B: Due Diligence Referral Template

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| **Network Details** |
| **Network(s) organising the event** |  |
| **Name and contact details of individual organising the event** |  |
| **Name and contact details of individual completing due diligence check** |  |
| **Purpose of engagement***Please include a brief description of the purpose of engagement with this individual or organisation. Is it part of a programme or a one-off event?**Was there something specific that triggered it?* |  |

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| --- |
| **Event Details** |
| **Title of event** |  |
| **Date and time of event** |  |
| **Event details** *Brief description on the format i.e. in person or virtual, and topics to be discussed. Include the agenda and timings here if possible.* |  |
| **List the Organisation and provide details of individual Speaker(s)***Please include details of both the organisation and individuals that will be engaged.* |  |
| **Related Costs***Please outline any costs to be paid to the organisation/speaker(s).* |  |

|  |  |  |
| --- | --- | --- |
| **Due Diligence check** | **Summary of findings** | **Date Action Completed** |
| **Speaker name***Include all names known by (particularly if they write or use social media under a pseudonym)* |  |  |
| **Summary of research***Include brief summary of reasons for submitting to CS Inclusive Practice Team* |  |  |
| **Repeat the process for each organisation/speaker using copy and paste to create new rows** |
| **CS Inclusive Practice Check** | **Findings of checks** | **Date Action Completed** |
| **Recommendation***Summary of findings of any additional checks carried out and recommendation.*  |  |  |