

Civil Service Equality, Diversity and Inclusion Expenditure Guidance

Introduction

1. This guidance outlines measures to enact greater control over Equality Diversity and Inclusion (EDI) spend and activity across the Civil Service, providing assurance and alignment with government priorities. This guidance supersedes any previously issued guidance or policy governing EDI spend and should be read alongside the Civil Service Diversity and Inclusion Strategy 2022 - 2025.
2. This guidance is primarily for the civilian members of the Civil Service workforce. This builds on the merit principle, the Inclusion at Work Panel report, advances our Levelling Up missions, and focuses on meeting our statutory obligations.
3. Specifically, it provides three broad measures on: **External Spend**, **Internal Efficiency** and **Evaluation** measures to support departments to:
 - a. Cease all external EDI spend in the Civil Service unless cleared and authorised by Ministers;
 - b. Ensure overall EDI spend is commensurate with agreed organisational and Civil Service priorities;
 - c. Ensure robust evaluation of any EDI activity undertaken in the Civil Service.

External Spend Measures

4. There should be no external EDI spend in the Civil Service unless cleared and authorised by Ministers. Any exception requires Ministerial clearance and authorisation on advice from officials. For ALBs, the same process applies, except the Principal Accounting Officer, in consultation with the Board, must authorise the expenditure.
5. All exemptions granted must be centrally recorded with the Government People Group (GPG) in the Cabinet Office. To ensure transparency expenditure will be published annually in the Annual Report and Accounts of each department and through a Cabinet Office publication at the end of the reporting cycle.
6. Ministers may choose to delegate exemption decisions to Permanent Under Secretaries. Such decisions should not be delegated to any other official. Any delegations from ministers to officials with regards to EDI expenditure should be recorded centrally with GPG and reported regularly to the Minister for the Cabinet Office for oversight.
7. External spend includes that relating to:

- a. Benchmarks and accreditation schemes
 - b. External organisational memberships
 - c. Use of consultancy
 - d. Use of externally provided learning and development
 - e. Events
8. When approaching EDI activity, the default must be to use internal resources and best practice in departments and across government. To enable this, GPG will facilitate greater sharing of learning across the system to enable this first step, using the Civil Service Learning platform.
9. Should there be a specific need to operate beyond spend control, it must be accompanied by robust rationale with evidence on why this work cannot be undertaken internally. This must address the value for money case and return on investment, within the Civil Service's organisational goals.
10. Spend on external benchmarking and accreditation schemes is within scope of the spend control. This supersedes the policy on authorisation originally set out in the Civil Service Diversity and Inclusion Strategy 2022 - 2025.
11. Purchase of memberships to external D&I organisations, albeit without engaging in benchmarks, is also within scope of spend control of external expenditure.
12. Where Civil Service organisations choose to engage external EDI consultants, commission bespoke L&D interventions or fund D&I staff network activity the spend control on external expenditure also applies.
13. All decisions on departmental internal workforce policies and procedures should be made through the appropriate departmental governance structures. External advice can be considered as part of this process, where the evidence shows it supports departmental objectives. Any purchase of external advice is subject to the same control on external spend detailed above and should be put to Ministers for clearance and authorisation.
14. Any advice and guidance provided by external organisations should be quality assured by the relevant HR experts who will wish to assure themselves it is:
 - a. legally sound and in line with the Equality Act 2010.
 - b. aligns with the Civil Service Code and Values, including impartiality, and
 - c. is objective, based on quality evidence and insight.
15. In the circumstance where external EDI spend is granted, Departments must adhere to their own procurement procedures.

16. Any grant funding of EDI related activity must adhere to the spend control set out above. It must also comply with the Grants Functional Standard and minimum requirements for general grants.¹
17. Effective contract management is essential to ensure departments are getting the most out of their services. When undertaking reviews and evaluating service provision, departments should consider:
 - a. Access to and capability of the service's account manager
 - b. Quality of the products and expert resources provided, including alignment to the Equality Act 2010
 - c. Quality of any advice and guidance provided, including alignment to the Equality Act 2010
 - d. Access to and value gained from experts.

Internal Efficiency Measures

18. Internal measures are important to promote efficient and effective EDI practice, which aligns to Government priorities. To ensure EDI spend in the Civil Service is commensurate with agreed organisational priorities the following measures must be considered:
 - a. **Centralised Civil Service EDI Guidance for Departments and ALBs:** Where practicable HR and staff guidance on EDI related issues will be provided by Cabinet Office, Government People Group (GPG) for the Civil Service and ALBs. This guidance will be published on [GOV.UK](https://www.gov.uk). This will promote consistency, improve the promulgation of best practice and reduce inefficiencies preventing duplication of resources to deliver similar products; limiting any risk of conflicting, ineffective or malpractice, conflicting with impartiality or the Government position on broader equality legislation. GPG provides departments with model policies, which are legally compliant and exemplars of good practice. The GPG suite of model policies covers a range of employment topics, supporting departments, employees and managers in addition to aiding the effective implementation of departmental HR strategies across Government. This includes expert guidance on key EDI matters. Departments have delegated authority to adopt, or align to the model policies and for their own policy implementation. Drawing on GPG model policies enables greater consistency and fairness across Government, as well as helping to protect departments against legal claims.
 - b. **Consolidation of EDI learning onto Civil Service Learning:** All suitable content, relevant across Government, will be consolidated on Civil Service Learning. This will stop duplication and generate savings. The [spend control](#) process requires departments to use the existing training or commission new training via the Learning Frameworks. If the training cannot be commissioned

¹ The Grants Functional Standard and minimum requirements for general grants are published on gov.uk, here: <https://www.gov.uk/government/publications/grants-standards>.

via the Frameworks, it must follow departmental procurement rules and the external EDI spend control detailed above.

c. Incorporate standalone EDI staffing roles into broader HR:

The responsibility for EDI delivery should be embedded into HR professionals' broader accountabilities. The CS D&I Strategy frames an approach where diversity and inclusion is not an end in itself, but an integral means of delivering better outcomes for our citizens. To deliver this, and move away from tokenistic, albeit well-intentioned actions, to produce truly transformative delivery our HR professionals are required to take ownership of EDI and focus the approach against the key areas of an employee lifecycle that make the biggest impact for all our people: recruitment, talent management, learning & development, leadership, culture and tackling bullying harassment and discrimination when it occurs.

19. The Civil Service will consider these measures, at the Centre and in departments and ALBs, as part of professionalising the approach to EDI delivery and improving the value for money and return on investment.
20. Notwithstanding the key measures being established in this guidance, we will protect and exempt disability related expenditure particularly work to deliver on the Government's National Disability Strategy (2021) and the Disability Action Plan (2024). Departments are expected to continue to work to support disabled civil servants to thrive at work and improve the everyday lives of all disabled people.

Evaluation Measures

21. All EDI activity undertaken internally or through approved external spend should be subject to robust evaluation.
22. An Independent Report published in March 2024 on the [Inclusion at Work Panel's recommendations for improving diversity and inclusion \(D&I\) practice in the workplace](#) made the case for why a new approach to D&I in the workplace is needed. However, the report also outlined some well intentioned practices that had proven to be counterproductive and, in some cases, unlawful and the key for employers was not to outsource or delegate this to those with potentially conflicting incentives. Development and implementation of evaluation of EDI is key in this.
23. The Civil Service D&I Strategy committed to 'deliver evaluation frameworks, underpinned by data, to support departments and professions to evaluate effectively their diversity and inclusion interventions and programmes'.
24. This is in line with the Inclusion at Work panel endorsement of a new framework which sets out criteria employers might apply to their D&I practice, for effectiveness and value for money.

25. EDI evaluation frameworks will seek to embed and promote a structured approach to the evaluation of EDI. It is aimed to support HR professionals delivering EDI activity. It ensures value for money is at the forefront of any EDI activity
26. The Government cares about how taxpayers' money is spent, wanting value for money for the delivery of public services. In July 2023, the Government Efficiency Framework was published to this end. The same applies to internal policy and services, delivered for the CS workforce.
27. The implementation of evaluation principles, ministerially steered as set out above, is expected to influence the way EDI is delivered in the CS, and departments are asked to work through changes in designing, monitoring and evaluating their EDI policies and interventions, including questioning, and testing, assumptions made about EDI.
28. To support evaluation, the government has, among others:
 - a. Published guidance on evaluation in [The Magenta Book](#)
 - b. Set up the [Evaluation Task Force](#) based in the Cabinet Office and HM Treasury
 - c. Set up the [Evaluation and Trial Advice Panel \(ETAP\)](#)
 - d. Established the [What Works Network](#)
 - e. Committed to support departments in improving evaluation.

Summary

29. When executed well, activity on EDI brings value to the organisation. It can support efforts to attract and retain diverse talent from across all communities, promote exacting standards in leadership, and ensure value for money from talent and learning and development offers. This promotes a return of investment in initiatives around people delivery, for example, when seeking to address under-representation, tackle bullying, harassment and discrimination or deliver fair reward.
30. The measures set out in this guidance are to support the Civil Service achieve its aims effectively. This government is committed to Levelling Up by driving improvements in the day-to-day lives of all citizens, spending taxpayers' money with care and providing excellent services. To deliver those commitments requires a Civil Service that can attract, retain and invest in talent wherever it is found. It is for this reason that we want the Civil Service to have a truly diverse workforce and culture of openness and inclusivity, as a means of delivering better outcomes to the citizens we serve.