

Guidance on Diversity and Inclusion and Impartiality Requirements for Civil Servants

Background

1. It is incumbent on everyone, at every level, working in government to deliver the best outcomes for our citizens, whilst maintaining the highest standards of behaviour when carrying out our roles and delivering services. As civil servants we are all expected to follow the standards of behaviour set out in the Civil Service code. We must at all times be mindful of the core values of integrity, honesty, objectivity and impartiality (including political impartiality) in 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 Ministers and so that public confidence in the Civil Service is upheld. Equally, Ministers are expected to maintain the high standards of behaviour as set out in the Ministerial Code when working with civil servants, ministerial and parliamentary colleagues and parliamentary staff.
2. We recognise that it may assist to have guidance when considering whether impartiality is impacted in the delivery of diversity and inclusion activity within the Civil Service or where civil servants may be unsure of what steps they need to follow to maintain impartiality. That is why this guidance has been developed, to help provide clarity and support to civil servants in the delivery of their work and to address areas of ambiguity. It also provides a range of examples designed to help civil servants remain impartial in areas where there may be uncertainty, or when discussing contested issues.
3. The Civil Service code sets out that all civil servants must serve the government, whatever its political persuasion, to the best of their ability in a way which maintains political impartiality, regardless of their own political beliefs. Civil servants must not allow their personal political views to determine any advice they give or their actions.
4. Although this guidance specifically references the delivery of diversity and inclusion, it applies to any work-related activity that supports the Civil Service to be more inclusive, whether that is directly supporting ministers and the government in fulfilling their duties, such as when developing and delivering policy, organising or engaging in learning and development activities or participating in staff networks.
5. The delivery of diversity and inclusion must also be compliant with the employer's obligations under the [Equality Act 2010](#).
6. This guidance has been developed to provide clarity on Civil Service diversity and inclusion and to **reinforce impartiality across the Civil Service** with advice on

impartiality in language and practice. This delivers on a key action of the [Inclusive Britain](#) action plan.

Purpose of guidance

7. This guidance is intended to support civil servants working on diversity and inclusion issues, in the delivery of the Civil Service Diversity and Inclusion Strategy, where additional consideration is required to ensure that all perspectives are discussed in an objective way whilst meeting our obligations under the Civil Service code. To deliver those commitments requires a Civil Service that can attract, retain and invest in talent wherever it is found and to deliver the best outcomes for the citizens we serve.
8. The guidance applies to all civil servants¹ and it is particularly relevant to those working on diversity and inclusion issues. This includes, but is not limited to:
 - a. managers and employees working on Diversity and Inclusion activities, such as part of diversity networks, alongside their core roles,
 - b. civil servants in general HR roles,
 - c. specialist HR roles (e.g. training or recruitment)
 - d. those with Diversity and Inclusion activity as part of their roles.
9. The guidance is also to help civil servants who are participating in Diversity and Inclusion activities.

The Civil Service code

10. The [Civil Service code](#) sets out the standards of behaviour that civil servants are expected to follow at all times. They are:
 - a. **Integrity** - putting the obligations of public service above your own personal interests
 - b. **Honesty** - being truthful and open
 - c. **Objectivity** - basing advice and decisions on rigorous analysis of the evidence
 - d. **Impartiality** - acting solely according to the merits of the case and serving equally well governments of different political persuasions.
11. Individual departments may also have their own policies and processes based on these values.

¹Civil servants working for the Scottish and Welsh Governments, and their agencies, have their own versions of the code. Similar codes apply to the Northern Ireland civil service and the Diplomatic Service. Civil servants working in non-ministerial departments in England, Scotland and Wales are covered by this code.

12. All civil servants must maintain impartiality when carrying out their responsibilities and obligations, and must not ...'act in a way that unjustifiably favours or discriminates against particular individuals or interests ' (Civil Service code).
13. The [Civil Service Management Code](#) sets out the principles and rules on participation in political activity, which departments must ensure civil servants comply with and which are particularly important for those who work in roles that would be considered sensitive. Civil servants must comply with any restrictions that have been laid down on political activity.
14. Departments must reflect these principles in their terms and conditions, as well as policies for the civil servants they employ. Further information is set out in the [Civil Service Management Code, Chapter 4, Section 4.4 Political Activities](#).

Responsibilities

15. Civil servants must at all times be guided by their obligations under the Civil Service code, and, in cases of doubt, should seek advice through their line management chain. Ultimately, Permanent Secretaries, as Accounting Officers, must be satisfied and able to publicly justify (including to Parliament), actions or approaches taken by their department.
16. Civil servants should also familiarise themselves with any relevant departmental policies relating to impartiality.

Professional duties

17. The Civil Service code is a professional obligation that forms part of a standard civil servant employment contract. Failure to act in accordance with the values and standards set out in the code may relate to matters of misconduct and disciplinary action. Civil servants can raise concerns about compliance with the Civil Service code through their department's 'raising a concern' or whistleblowing policies, and where appropriate to the Civil Service Commission, in the process described [here](#).
18. All Civil Service activity must comply with the Equality Act 2010. Activities that could be unlawful under the Act create substantial legal risk for organisations. Under the Civil Service code, civil servants are required to "fulfil ...duties and obligations responsibly". This requires civil servants to take reasonable and proportionate steps to ensure that activities that they are involved in are lawful.

Supporting documentation

The Civil Service Diversity and Inclusion Strategy 2022-2025

19. The [Civil Service Diversity and Inclusion Strategy](#) 2022 sets a new approach to the delivery of diversity and inclusion, that delivers better outcomes to the citizens we serve by using a data-driven, evidence led and delivery-focussed approach. We want the Civil Service to have a truly diverse workforce and culture of openness and inclusivity. The

Civil Service Diversity and Inclusion Strategy focuses on embedding activity in a wider set of strategic priorities to improve how the Civil Service delivers for the government, civil servants and our citizens.

EDI Expenditure Review

20. The government has conducted a comprehensive review on equality, diversity and inclusion (EDI) spend across the Civil Service. Following this, the Chancellor made a commitment in his Autumn Statement 2023 to ‘considering introducing a presumption against external EDI spending and increasing ministerial scrutiny of EDI spending whilst streamlining EDI training and HR processes with a view to getting value for the taxpayer’. It is essential that all EDI activity offers value for money and is focussed on the delivery of agreed strategic priorities. EDI expenditure, which includes both direct and indirect costs through staff time, must provide value for money and provide a return on investment, be in line with the Civil Service Code and the government’s Diversity and Inclusion Strategy, and reflect any current or future guidance issued by Government People Group.

Civil Service EDI Expenditure Guidance

21. This guidance is the outcome of the EDI Expenditure Review and outlines measures to exert further effective control on EDI spend and activity across the Civil Service, providing deeper assurance and alignment with government priorities. Specifically it provides three ‘measures’ on: External Spend, Internal Efficiency and Evaluation measures to support departments to:

- a. Cease all external EDI spend in the Civil Service unless signed off and cleared by Ministers.
- b. Ensure overall EDI spend is commensurate with agreed organisational priorities.
- c. Ensure robust evaluation of any EDI activity undertaken.

This guidance complements the CS Diversity & Inclusion Strategy 2022 - 2025, and the instructions on spend within it supersedes those in the overarching Diversity & Inclusion Strategy.

Declaration on Government Reform

22. To achieve the key people priorities as outlined in the [Declaration on Government Reform](#), we need to:

- deepen our understanding of citizens in all parts of the country;
- draw on a more diverse range of experiences, skills and backgrounds, including diverse socio-economic and geographical backgrounds;
- set the standard for inclusive workplaces where people achieve their full potential;
- keep pace in areas of growing importance, including digital and technology;
- invest in training to equip our people with the skills and knowledge they need to tackle the challenges of the future;
- support and encourage multidisciplinary teams and better reward those who excel.

Inclusive Britain

23. The [Inclusive Britain](#) action plan emphasises the need for public servants (including civil servants) to recognise the diversity of opinion on contested issues, to encourage an environment that is free from bias and to ensure that language seeks to encourage unity

and inclusion.

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24. Inclusive Britain commits to ensuring that the publicly-funded sector promotes the values of tolerance and equality, with careful delineation of ideas and views which are more political in nature.

Recruitment

25. The Civil Service Commission has developed [Recruitment Principles 2018](#) which explain the legal requirement that selection for appointment in the Civil Service must be on merit on the basis of fair and open competition.

26. They also:

- Set out the circumstances in which appointments can be made as exceptions to this requirement; and
- Describe the responsibilities of departments and agencies in meeting this requirement.

27. As set out in the Civil Service Management Code, departments and agencies are free to develop their own approaches to recruitment as long as they are consistent with the Recruitment Principles. Departments must also ensure they are compliant with the Equality Act 2010.

Diversity and inclusion in the Civil Service

28. Section 5.4 of Inclusive Britain notes that:

“The complexity of issues and the contested nature of ideas and information means people will hold a variety of views, even if their shared goal is to achieve equality and fairness in society. For this reason, it is important that public servants and public institutions recognise the diversity of opinion on these issues, and encourage an environment that is free from bias. There is also a need to ensure that language seeks to encourage unity and inclusion, rather than division and grievance.”

29. Civil servants must always be guided by the core values of objectivity and impartiality set out in the Civil Service code, when carrying out work in diversity and inclusion. As stated in the Civil Service Diversity and Inclusion Strategy, to mainstream diversity and inclusion and embed activity successfully into our everyday delivery we know that support systems, networks and communities (individuals, teams, HR leads, Champions, Staff Networks and leaders) will need to work collectively and collegiately, embodying Civil Service values to encourage unity. Unity means cohesion, mutual tolerance, and respect for the validity of other’s beliefs. It does not mean homogeneity or conformity of belief or views, and there is not an expectation to think as one.

30. This includes:

- a. Recognising that whilst all civil servants must have a shared goal to tackle discrimination and prejudice, views on how to practically address issues relating to diversity, and inclusion are varied. Civil servants should consider the full

range of widely held views within a specific debate or controversy. It may be

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necessary to seek out alternative views that are not represented within the organisation or group.

- b. Not presenting subjective views or theories relating to diversity, and inclusion as accepted fact or as the position of their organisation.
 - c. Not presenting their own personal views as the position of the organisation.
 - d. Not promoting particular views of theories relating to diversity, and inclusion where these could reasonably be seen as partisan and/or political.
 - e. Not misrepresenting or unfairly characterising the views of others, either intentionally or through a failure to consult appropriately.
 - f. As far as possible, policy should be supported by a robust evidence base. Data collection should be proportionate and relevant to the specific task.
 - g. Not showing favour to a specific policy position or course of action on the basis of their own views or those held by members of a specific group.
 - h. Ensuring that due consideration is given to robust evidence that may contradict existing views held relating to diversity, and inclusion.
 - i. Not being influenced by improper pressure from others, including internal and external parties or organisations.
 - j. Always acting in a way that is professional and that deserves and retains the confidence of all those with whom you have dealings. Avoid stating a belief or view in such a way as to cause others to reasonably doubt that they will be treated fairly.
31. 'Partisan', 'political', and 'contested' views are generally considered as those which are divisive in nature, based on a particular political ideology or movement, and for which there is no objective consensus. Advocacy of such views does not have to be limited to political parties and could also be led by campaign groups, lobbyists and charitable organisations on a wide range of matters such as economic and social issues at a local, national or international level.
32. Where it is not clear what constitutes a partisan, political or contested view, we strongly recommend that civil servants seek advice from colleagues, line managers, and if necessary, senior managers. In diversity and inclusion delivery, civil servants need to ensure individual personal and political views do not, and are not perceived to, influence our advice or actions. We are committed to taking a zero-tolerance approach to bullying, harassment and discrimination and grow a culture that welcomes challenge and demands rigour in how we assess delivery for citizens.

Discussing contested views

33. The complexity of issues and the contested nature of ideas and information means that people will hold a variety of views. Where necessary for the purposes of the

organisation, it must be possible for civil servants to discuss these views without fear of social or professional repercussions, whilst complying with their duties in accordance

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with the values and standards of behaviour set out in the Civil Service code, and without violating another person's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment. These constraints are not in tension, but it requires care to ensure that all are fulfilled.

34. It is unlikely to be a breach of the code for a civil servant to:

a. Present a view or belief for discussion

b. State or present a view or belief with the sincere intention of ensuring impartiality or balance.

35. The right to express personal beliefs is important but not absolute. A statement of belief may constitute harassment if it is unwanted conduct related to a protected characteristic (e.g. race, sex or sexual orientation) and has the purpose or effect of violating another person's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment for that person. There will be circumstances where a statement of view or belief, even one which others may find extreme or offensive, may be necessary and appropriate in the workplace in order to facilitate free and frank exchange of views when formulating advice, developing policy and to support good decision making. Such discussions, when conducted in a professional and respectful manner, are unlikely to constitute harassment. This could include, for example, presenting a view or belief for discussion as part of policy development or considering views of stakeholders following consultation.

36. For further information on protected beliefs, please refer to section 10 of the Equality Act 2010.

Use of language in official publications and correspondence

37. Civil servants must be mindful in their use of language when writing about diversity and inclusion, communicating with colleagues and providing services to the public. Language and its usage is constantly evolving, it is important that we follow government policy and guidelines (see below). At the same time, we should also be mindful of individual preferences and how people describe themselves.

38. For example, when writing about race and ethnicity, the government has stopped using the term 'BAME' because it merges several distinct ethnic minority groups into one large group, which can lead to misleading assertions and interpretations of data.

39. In relation to sex and gender identity, civil servants may choose to include their pronouns or titles in any email signature. However, this should be a personal and voluntary decision and no civil servant should be treated adversely for choosing or not choosing to do so.

40. The government's position on the use of gender-neutral language in legislative drafting was set out in a [Ministerial Statement of 23 May 2022](#). It remains appropriate to use sex-specific language where such language communicates the desired policy outcome. This may include, for example, references to the needs of men and women respectively, or areas of policy where biological sex is a relevant or pertinent concept.

41. For disability, describe the person before their disability (for example, a woman with arthritis), as this reduces negative stereotypes. However there are exceptions to this, and some people with a disability may describe themselves with a disability-first definition.
42. When writing about age, consider whether this is required and only refer to someone's age if it is relevant. For example, if a person needs to be over 18 to access a service, then it would be important to specify their age.
43. Civil servants should also refer to [guidance](#) on completing assessments under the Public Sector Equality Duty, ensuring compliance and data collection is not disproportionate to the aims of meeting legal obligations.

Further sources of advice

44. The government has previously issued [guidance](#) advising against the unnecessary translation of documents into foreign languages.
45. The Race Disparity Unit has issued [guidance](#) on how to write about ethnicity to enable more accurate and responsible communications. There is also [guidance](#) for communicating with or writing about disabled people.
46. Civil servants may also wish to seek advice from departmental Communication Teams and refer to departmental guidance on propriety. The Government Communication Service (GCS) has also developed [guidance](#) on best practice in communication for government communicators.

Network activities and running events

47. When cross-government diversity networks organise events and develop content, it is important to ensure these are fit for purpose, offer clear organisational benefits and are in line with obligations under the Civil Service code. It is particularly important when engaging with external individuals and organisations to ensure that they are not engaged in activities that could contravene impartiality.
48. Event chairs or moderators must play an active role during events to ensure that the Civil Service code is upheld. For example, it may be necessary to ensure that an alternative perspective is presented if something is said that is not impartial. Chairs should consider what training they require in advance of the event to ensure that they are able to fulfil this responsibility.
49. Civil servants involved in the running of a network or event should consult any relevant central guidance to ensure they follow appropriate processes. They should also consider any departmental policies and guidance.

Learning and development activity

50. Civil servants should consider the business rationale for running training or events, identifying any potential risks or considerations prior to engaging with providers or external parties. Learning and development can be used to improve understanding, where this has

benefit to the organisation. However, learning and development, and other educational activities, should not encourage or require someone to accept a belief or view.

51. Inviting external speakers to speak or organising a training event with an external partner could be considered official endorsement of that speaker or training provider. Civil servants should be particularly careful when inviting external speakers or using training materials or resources that are not part of the new and refreshed leadership and management or formal departmental diversity and inclusion training products.
52. It is recommended that using an evidenced-based approach when commissioning or designing any training or developmental events will minimise any risk to the department's position and reputation. This means being very clear about the business outcomes and having concrete indicators of success.
53. Any potential learning should also be reviewed to consider whether, without specific additional context, the resource may undermine a balanced presentation or promote partisan political views.
54. We encourage civil servants to follow departmental policies and guidance on running Learning and Development events using external parties and to gather evidence that their resources are effective in promoting the intended behavioural change.
55. For example, the CS became aware of an academic review on the effectiveness of Unconscious Bias training that had been widely used across many sectors and in the Civil Service for a number of years. An internal review was conducted to analyse the impact of the training. The evidence showed that such training did not lead to the intended positive behavioural change because it raised awareness without providing strategies to behave differently. As a result Unconscious Bias training was withdrawn from the learning offer and alternative, evidence-based approaches identified.
56. It is also important to consider impartiality when receiving ad hoc communications from suppliers.
57. For example a training supplier approached a department offering a cutting-edge approach to reducing discrimination. The Learning & Development Lead conducted a review of their website, found a lack of evidence to support the claims, and a vagueness that raised concerns about the impartiality of the supplier's agenda. Following this review, the offer of learning was declined.
58. The Civil Service EDI Expenditure Guidance should be consulted when considering learning and development spend.

Communications

59. Civil servants should also consider use of impartial language in all forms of communications. This includes invitations to events, social media, public displays, banners and posters in public view as well as emails to external stakeholders. Civil servants should also ensure they refer to relevant policies on [social media](#) usage.
60. Further advice should be sought from departmental communications teams.

Further information

61. Civil servants seeking further advice may wish to approach their relevant departmental Policy lead or HR Team.