











Fox Williams recommendations

 Completed
 To be completed after the EGM

Recommendation	Status	Update
<p>Ensure the remit of the Chief People Officer (CPO) is clearly defined along with the roles of the rest of the HR team, so that the CPO can focus on providing oversight and strategic input, rather than operational matters.</p>		<p>CPO role scoped and interim CPO appointed.</p>
<p>HR appear respected and trusted by junior staff but consider ways this can be built with ExCo and senior managers, so the default is to involve them.</p>		<p>Policies and procedures have been revised. New norms will be embedded through training to be delivered later this year and our progress measured, through staff surveys.</p>
<p>Ensure the Chief People Officer role has clearly defined objectives and KPIs.</p>		<p>CPO objectives agreed.</p>
<p>Consider whether the current structure of the HR function meets the needs of the business, given any changes which may be introduced in the wake of these allegations.</p>		<p>The structure of the HR function will be considered as part of the CBI's future operating model</p>
<p>Ensure ExCo gives appropriate focus to HR matters, for example, through objective setting for the Director General (DG).</p>		<p>People issues will be discussed by ExCo weekly. A monthly deeper dive into people and culture will be facilitated by updated metrics and KPIs.</p> <p>The DG has a new 'people and culture' objective.</p>
<p>Consider whether an audit (perhaps annually) of complaints and allegations should take place to ensure that these are being dealt with quickly and appropriately. Any lessons learned from this audit can be shared with the Board for discussion and benchmarked against the staff surveys.</p>		<p>Lessons learned from recent and current cases have been discussed with the Board and benchmarked externally. An audit will take place at the end of each year, with lessons learned shared with the Board.</p>
<p>Consider the appointment of a Chief Risk Officer (CRO) to independently assess risks to the business and be independent of the Director General in making those assessments.</p>		<p>Management of risk at the CBI will be the formal responsibility of the Chief Financial Officer. They will report risks directly to the Audit and Risk sub committee of the CBI Board. This setup will also be within the scope of the governance review reporting to the Board in July 2023.</p>
<p>If a CRO is appointed, consider whether they should report to, or have a direct line to, the President of the CBI so that if an allegation is made against the Director General, the CRO is of sufficient seniority and independence to take the complaint or allegation forward.</p>		<p>A new process for considering allegations against the Director General has been agreed and incorporated into relevant policies and guidance to staff.</p>

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Consider reviewing the parameters of the Audit and Risk Committee to ensure that people-related risks are considered and dealt with.		Parameters of the Audit and Risk Committee include people-related risks. This will be a key part of the role of the new Chair of the Committee.
Consider whether the risk register ought to record serious complaints and allegations which could be a strategic and/or operational risk to the business.		ExCo will consider whether to add any complaints to the risk register as part of their monthly focus on HR matters.
Consider how the new Director General engages with all stakeholders in the business so that both senior and junior staff feel they are approachable. For example, through objective and KPI setting for the Director General.		New 'people and culture' objective set for the Director General, to be reviewed again as the Culture Review progresses.
Look at the CBI's structure and control in terms of layers and spans, and consider whether a restructure is needed to ensure effective dissemination of information.		The CBI's structure and control will be considered as part of the CBI's future operating model.
Consider whether regular training should be provided to managers (at least annually) on how to deal with complaints and allegations effectively. Consider whether training should also include managers being able to spot bullying, harassment, and other inappropriate behaviour.		A training-needs assessment, taking account of recently revised policies and processes and including feedback from managers on their confidence using them, has informed an agreed scope for training to be delivered. All staff have completed an e-learning module on equity, diversity and inclusion, including bullying, harassment and discrimination.
Consider investment in general management training to upskill managers, particularly if new team structures are put in place.		A training-needs assessment, taking account of recently revised policies and processes and including feedback from managers on their confidence using them, has informed an agreed scope for training to be delivered.
Consider whether regular training should be provided to all staff (including ExCo and the Board) on bullying, harassment, sexual misconduct, and other inappropriate behaviour to ensure staff are aware of the relevant policies and that such behaviour will not be tolerated.		A training-needs assessment, taking account of recently revised policies and including feedback from staff at all levels on their confidence using them, has informed an agreed scope for training to be delivered. A training course has been delivered for all Board members and ExCo on harassment and misconduct.
Consider the effectiveness of the CBI's performance appraisal process for managers and ensure there are KPIs around how they deal with employee relations within their team.		Managers at every level of the CBI will have a new 'people and culture' objective appropriate to their seniority. Evaluation of this objective will include 360 feedback.

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<p>Fox Williams understanding is that the HR Business Partners are responsible for liaising with managers across the business in order to identify potential concerns and risks. Consider the effectiveness of the current approach in eliciting relevant and material information and reporting it appropriately.</p>		<p>New guidance has been drafted explaining the role of HR Business Partners within the CBI, what is expected of them and how managers are expected to interact with them.</p>
<p>Consider introducing a process/ protocol for escalating and dealing with complaints about Board members, including the President.</p>		<p>New approach agreed and incorporated into policies and guidance for staff.</p>
<p>Consider ways to build a feedback culture where anonymous feedback has relevance and impact.</p>		<p>The CBI's anonymous feedback mechanism is being regularly communicated, with reporting mechanisms now in place to escalate cases to ExCo/Board through the Chief People Officer. Co-created values and re-introducing mandatory behaviours as part of objectives will place greater emphasis on behaviours across the organisation and ensure people-related issues and feedback are given greater prominence within management.</p>
<p>Align practice to policies, and consider if policies and processes are drafted to provide flexibility – is the fact that employees fear a formal investigation under the policy a disincentive to raise complaints.</p>		<p>Policies have been revised. New guidance has been user tested with managers to ensure that they are confident putting policies into practice. New training will help to embed these changes.</p>
<p>Maintain and monitor the confidential reporting option so that complaints can be recorded anonymously and people have confidence that complaints will be dealt with, particularly given the nature of the CBI's workforce means that people may not feel empowered to raise concerns.</p>		<p>A confidential reporting mechanism is in place and is regularly communicated.</p>
<p>Ensure that HR and line managers are confident that when complaints are raised, whether formally or informally, they can effectively filter those and take appropriate action depending on the seriousness of the complaint. In particular, it would be helpful to have guidelines on what is to be considered when determining whether a complaint or allegation is sufficiently serious to escalate.</p>		<p>Policies have been revised. New guidance is being developed, informed by user testing with managers, to ensure that they are confident putting policies into practice and there are clear guidelines on escalation. New training will help to embed these changes.</p>

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Consider whether complaints and allegations should be a standing agenda topic at Board and/or ExCo meetings.		Complaints and allegations will be a regular agenda item on a new Board 'people and culture' sub committee and considered monthly by ExCo.
Consider how management information relating to complaints and allegations can be shared with ExCo and the Board. For example, consider whether the Chief People Officer should be reporting serious complaints and allegations (bullying, harassment, sexual misconduct, etc.) to ExCo on a regular basis, and/or should be providing information to the Board regarding the number of complaints received and the nature of those complaints (e.g. bullying, harassment, sexual misconduct, racism, etc.).		A new dashboard has been implemented to give better visibility of cases and trends in cases to ExCo and the Board.
Consider how the HR tracker is used to record/gather information and the nature of issues that should be recorded on it.		The tracker has been updated to include cases of all level of severity, including cases that require no formal action.
Ensure there is a record of the complaints made both to line managers and HR and the actions that have been taken to ensure consistency of approach and the ability to identify trends to facilitate early intervention.		Policies have been updated to clarify when managers must notify HR. Monthly reporting will enable trends to be assessed by HR and ExCo. Consistency of approach will be improved through stronger links between managers and HR.
Assess and consider whether the questions in the surveys are appropriate for capturing concerns.		The questions in our annual employee opinion survey, more regular pulse check surveys, exit interviews and new starter '3 months in' survey have been reviewed and will be reviewed again later this year to take account of the work of the culture review.
As part of Jill Ader's Culture Review consider why the policies are not being used and what changes are needed to encourage reporting to enable poor conduct and behaviours to be addressed.		As part of their deep listening exercises Principia identified reasons why policies were not being used and their recommendations will be implemented in full. This will include strengthening organisational governance and oversight of people, conduct and culture, including re-introducing mandatory behaviours as part of objectives to place greater accountability on individuals for their behaviour.
A key aspect of this review will be to consider what steps are needed to build confidence there will not be negative consequences if a complaint is made. This might include learnings from members who have effected such changes in their businesses.		We are developing a strong values foundation, codified into clear conduct expectations and behavioural norms which the leadership team will reflect and reinforce. We will learn from others, including external experts, to ensure we rapidly build staff trust that complaints will be addressed and not generate adverse consequences.

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<p>Consider what training is needed so employees have clarity on what type of issue each process is used for.</p>		<p>A training-needs assessment, taking account of recently revised policies and including feedback from staff at all levels on their confidence using them, has informed an agreed scope for training to be delivered.</p>
<p>Consider putting in place a formal process for escalating complaints and allegations to the Board and ExCo. This might include when it will be appropriate to escalate these issues to the Board or ExCo, who is required to report this, and what considerations are to be considered when determining whether a complaint or allegation is sufficiently serious to escalate to ExCo or the Board.</p>		<p>Nature of complaints to be escalated has been agreed with ExCo and the Board. Policies and guidance to staff have been updated to reflect that.</p>
<p>Ensure that a drugs and alcohol policy is introduced, and guidelines are issued in the same way as they are for external events (e.g. the bullying and anti-harassment third party policy). In respect of the bullying and anti-harassment third party policy, ensure that incidents are fully investigated in line with the policy.</p>		<p>A new alcohol and drug misuse policy is being developed in parallel to a wider review of the role of alcohol at CBI staff social and member events.</p>
<p>Review policies to ensure they are flexible enough to allow for different solutions and outcomes on a case-by-case basis, in order to avoid the perception that policies are simply not followed.</p>		<p>To close the perception gap, policies have been updated to explain the allowed for different solutions. Training has been scoped to give all staff confidence in, and confidence using, these policies.</p>
<p>Review relevant policies to ensure that they are appropriate and ensure that all the relevant policies align together and reflect revised reporting lines (should they be introduced).</p>		<p>Policies have been revised. New guidance has been developed, informed by user testing with managers, to ensure that they are confident putting policies into practice. New training will help to embed these changes.</p>