

# GREATER LONDON AUTHORITY

## REQUEST FOR MAYORAL DECISION – MD3067

### Title: GLA Inclusion Programme: Delivery of Corporate Action Plan

#### Executive summary:

London is best served by a Greater London Authority that is equal, diverse, representative and inclusive. To achieve this, the GLA must have a workforce at all levels that reflects London's diversity.

The GLA's new Inclusion Programme is a top priority for the organisation, as set out in the GLA's Equality, Diversity and Inclusion (EDI) Statement which describes the foundations for a truly inclusive culture. The GLA's new EDI strategy – We Belong Here – flows from the EDI Statement and is the GLA's blueprint for accelerating our internal work on EDI, focused on accountability, our organisational culture and representation.

This MD seeks approval for expenditure for activity relating to the implementation of the Inclusion Programme in the current financial year, as well as proposed expenditure in 2023-2024 and 2024-2025.

#### Decision:

That the Mayor approves:

- expenditure of up to £221,300 in financial year 2022-23 to deliver the work set out in section 2 of this MD relating to the Inclusion Programme
- subject to approval of the GLA budget for these years, future spend of up to £736,010 in 2023-24 and £724,300 in 2024-25. as set out in section 2 of this form.

#### Mayor of London

I confirm that I do not have any disclosable pecuniary interests in the proposed decision and take the decision in compliance with the Code of Conduct for elected Members of the Authority.

The above request has my approval.

Signature:



Date:

13/12/22

## **PART I – NON-CONFIDENTIAL FACTS AND ADVICE TO THE MAYOR**

### **Decision required – supporting report**

#### **1. Introduction and background**

- 1.1. London is best served by a Greater London Authority that is equal, diverse, representative and inclusive.
- 1.2. In order to create a fairer, more equal city for all Londoners – whatever a person's race, gender, religion, sexual orientation, age, disability or socioeconomic background – the GLA must have a workforce at all levels that reflects London's diversity.
- 1.3. The success of the work of the GLA's staff is dependent on their knowledge of the lived experience of Londoners; the breadth of their perspectives; their reach into communities; and their capacity to innovate to bring about positive change.
- 1.4. This underpins the ambition of the GLA's new Inclusion Programme, which is to make sure that:
  - the GLA's workforce, in all teams and at all levels, is collectively representative of the city it serves
  - all members of GLA staff have the same, positive experience of working, progressing and feeling they belong in the GLA.
- 1.5. Delivering this programme is a top priority for the organisation, as set out in the GLA's Equality, Diversity and Inclusion (EDI) Statement which describes the foundations for a truly inclusive culture. The GLA's new EDI strategy – We Belong Here – flows from the Statement and is the GLA's blueprint for accelerating our internal work on EDI, focused on accountability; our organisational culture; and representation. The EDI strategy covers three years (2022-25) and has three strategic aims:
  - develop collective and individual accountability on EDI; all staff work towards these goals and we hold each other to account
  - grow a genuinely inclusive working culture that fosters a sense of belonging; this is one where everyone feels safe, and where everyone can be themselves, give their best work and progress their career
  - build a workforce that reflects London's diversity across all directorates and at senior level.
- 1.6. The Inclusion Programme consolidates all EDI activity into a single programme of work, including the 42 recommendations from the [Independent Review of Ethnic Minority experiences at the GLA](#) undertaken by The Equal Group, and the recommendations of the [Goss Review](#) which looked at policy and practice on workplace adjustments. Based on quantitative and qualitative evidence of structural under-representation, the priorities for 2022-23 are to make significant improvements in both race equality and disability equality; and to improve our understanding of intersectionality.
- 1.7. The Inclusion Programme's corporate action plan sets out the actions we are taking in 2022-23 to meet the three strategic aims of the EDI Strategy set out in point 1.2 above.
- 1.8. A governance structure has been established for the Inclusion Programme. Activity is overseen, and decisions are made by a steering group comprising: the Chief Officer; the Executive Director, Strategy and Communications; the Assistant Director for HR&OD; the Programme Manager; and the EDI Programme lead. The steering group is the decision-making body for the GLA Inclusion Programme. The steering group is accountable to the Corporate Management team (CMT). The Chief Officer reports progress directly to the Mayor.

- 1.9. The expenditure proposed in this decision takes the form of both payment for services procured, depending on the nature of the work concerned, to be carried out in line with relevant GLA policies including the GLA's Contracts and Funding Code; and staffing expenditure to embed the programme, which will be approved through the Establishment Control process.

## 2. Objectives and expected outcomes

- 2.1. The table below indicates the activities planned and expenditure required across this and the next two financial years. The GLA's budgets for 2023-24 and 2024-25 are yet to be approved; therefore, the proposed expenditure in future years would not be committed until final budget approval is confirmed.

| Activity  | Full Year Costs | Proposed spend in 2022-23 | Proposed spend in 2023-24 | Proposed spend in 2024-25 |
|---|-----------------|---------------------------|---------------------------|---------------------------|
| Activity to support both race and disability equality (targeted career acceleration programmes) | £335,000        | £100,000                  | £335,000                  | £335,000                  |
| Activity to support race equality   | £68,000         | £19,000                   | £64,000                   | £60,000                   |
| Activity to support disability equality   | £74,680         | £11,300                   | £72,010                   | £64,300                   |
| Wider activity to support the strategy  | £290,000        | £91,000                   | £265,000                  | £265,000                  |
| Total   | £767,680        | £221,300                  | £736,010                  | £724,300                  |

- 2.2. The activity and spend set out above is to deliver some of the actions in our corporate EDI Action Plan, which is informed by the recommendations from the [Independent Review of Ethnic Minority experiences at the GLA](#) undertaken by The Equal Group, and the recommendations of the [Goss Review](#) which looked at policy and practice on workplace adjustments. The priorities for 2022-23 are to make significant improvements in both race equality and disability equality.
- 2.3. It is proposed to undertake activity on career acceleration, as set out in the EDI Strategy, which supports both corporate priorities of race and disability as follows:
- 2.3.1. *Scope and deliver targeted career-acceleration initiatives to tackle under-representation.* The estimated spend in this financial year is £100,000. No targeted provision is currently in place and other programme(s) were paused pending the Independent Review. The Review recommended that the GLA build a Talent Development Programme with a ringfenced dedicated budget. No budget has been provided for new initiatives in core budgets. This MD is asking for funding of £335,000 in 2023-24 and the same amount in 2024-25 for targeted career-acceleration initiatives, that will ringfence at least 50 per cent of places for Black, Asian and Minority Ethnic staff and disabled staff to address their under-representation within the organisation, particularly at Grade 10 and above, or equivalent after the pay and grading review has been agreed. This funding will be required to fund external providers to run any programmes, including costs for:
- development centres for participants – focused on Black, Asian and Minority Ethnic participants and disabled participants in particular
  - coaching for participants
  - 360-degree assessment tool

- launch event for participants and their line managers.

2.4. It is proposed to undertake activity to support race equality, as set out in the EDI Strategy, as follows:

- 2.4.1. *Let's Talk About Race extension scoping: £8,000.* The Independent Review recommended an expansion of Let's Talk About Race. One-off funding of £8,000 would fund development time including engaging with Black, Asian and Minority Ethnic staff in particular. This MD is asking for funding of £4,000 in 2022-23 and £4,000 in 2023-24. The GLA already funds equality and diversity training. As set out in point 2.7.2, we want to refresh our existing EDI related training: the evaluation of Let's Talk About Race and development of a future offer is linked to this wider refresh.
- 2.4.2. *Emotional support service – recommissioning and extension of provision.* Commissioned in response to the 'corporate asks' put to CMT by the Race Equity Network requesting investment in Black staff (supported by evidence of an underrepresentation of Black counsellors for the Employee Assistance Provider) including pastoral care, the current contract has been extended pending a recommissioning process which will be in accordance with the Contracts and Funding Code. Based on feedback during the course of the contract, we aim to extend provision to Asian and Minority Ethnic staff and also consider extension to include disabled staff. This does not currently have any core funding allocated. This MD is asking for funding of £60,000 in 2023-24 and the same amount in 2024-25.

2.5. It is proposed to undertake activity to support disability equality, as set out in the EDI Strategy, as follows:

- 2.5.1. *Changes to our Occupational Health (OH) service.* The Goss Review looked at our policy and practice on workplace adjustments, as well as the experience of disabled staff, and made a series of recommendations to reform the GLA's OH service. Transport for London (TfL) currently provides the GLA's OH service. Options are being explored to determine next steps but based on comparative analysis this is expected to be £22,000. This MD is asking for additional funding of £22,000 in 2023-24 and the same amount in 2024-25.
- 2.5.2. *Centralised budget for workplace adjustments.* This was also a recommendation in the Goss Review. Currently there is low awareness across the organisation about the Workplace Adjustment Policy. Current budget provision is too low at £20,000 for a centralised budget to provide for the costs of adjustments for the whole organisation based on our population. This MD is asking for additional funding of £30,000 in 2023-24 and the same amount in 2024-25.
- 2.5.3. *Next steps for phase 2 of disability training for managers.* The GLA does not currently have a standalone disability equality training programme. Disability equality is a corporate priority within the EDI strategy; without a distinct training programme we are less able to improve awareness. Seven sessions were piloted with managers last year. The roll-out of the programme to all managers is proposed to begin in December 2022 with seven sessions scheduled to the end of this financial year which will train up to 84 managers at a cost of £5,480. This MD is asking for additional funding of £14,190 for 2023-24 which will provide for the remaining sessions required to train the total number of managers in the GLA. This MD is also asking for additional funding of £6,480 in 2023-24 which will fund eight additional sessions to address churn in the manager population during that year.
- 2.5.4. *EDI-related memberships not currently funded through core funding.* Business Disability Forum membership is not currently funded through core budgets, whereas memberships of other equality, diversity and inclusion related organisations are captured in our budgets. This addresses a gap whereby we did not have a live membership of an organisation that could provide advice and best practice on disability equality to ensure the GLA supports an inclusive culture. This MD is asking for additional funding of £5,820 in 2023-24 and the same amount in 2024-25.

- 2.6. While addressing race equality and disability equality are priority areas within the EDI strategy, We Belong Here, work to implement the strategy includes activity across other areas of equality. This work includes but is not limited to:
- reviewing the GLA's learning provision for staff on EDI
  - work to increase our understanding of intersectionality within the organisation
  - organising corporate events to celebrate and raise awareness of EDI
  - work to support the GLA's ongoing continuous improvement on LGBTQ+ inclusion, responding to Stonewall's feedback through their benchmark, the Workplace Equality Index
  - work to increase understanding of social mobility within the organisation, for example, exploring monitoring socio-economic background and any associated pay gaps.
- 2.7. It is proposed to undertake wider activity to support delivery of the EDI strategy and corporate action plan as follows:
- 2.7.1. *Inclusion programme support embedded at directorate level.* The Independent Review recommended provision of dedicated EDI resource at directorate level. It is proposed that 50 per cent of a G8 role will be dedicated to each directorate to support coordination and consistency of implementation of the EDI strategy at directorate level. This constitutes four G8 roles each covering two directorates that could be filled internally, and could be short-term over two years. There are risks that this role could be utilised inappropriately. To mitigate this risk, we propose directorates identify an Assistant Director to lead for the directorate on EDI, supporting this Inclusion Programme embedded resource from a leadership perspective. This MD is asking for funding of £240,000 in 2023-24 and the same amount in 2024-25.
- 2.7.2. *Refresh existing EDI-related training.* Corporate mandatory EDI-related training includes 'Dignity and Inclusion', 'Public Sector Equality Duty', 'Recruitment and Selection' and 'Inclusive Managers' – all funded from existing budgets. This provision must be reassessed following evaluation of the Let's Talk About Race roll-out. These existing budgets will be used to fund the development of replacement provision, working with providers to update training, including to ensure our package of learning for staff fully reflects coverage of bias and its impact on behaviours and decision-making.
- 2.7.3. *Internal communications and campaign support.* Internal communications support is vital to support the implementation of the EDI strategy and there is currently insufficient support. This funding would help fund internal events, external facilitators, creative content to share workplace and career stories internally and externally. This will increase our shared understanding of the diversity and lived experience of our staff, enabling us to support a safe, open and welcoming work environment. This MD is asking for funding of £25,000 in 2023-24 and the same amount in 2024-25.

### 3. Equality comments

- 3.1. Under section 149 (1) of the Equality Act 2010 "the 2010 Act", the GLA must have due regard to the need to eliminate unlawful discrimination, harassment and victimisation, and any conduct that is prohibited by or under the 2010 Act; to advance equality of opportunity; and foster good relations, between people who share a protected characteristic and those who do not. Protected characteristics under the 2010 Act are: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation, and marriage or civil partnership status (the duty in respect of this last characteristic is to eliminate unlawful discrimination only).

- 3.2. Section 149 (3) provides that having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to— (a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic; (b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it; (c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.
- 3.3. Section 149 (4) provides that the steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.
- 3.4. Section 149 (5) provides that having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to— (a) tackle prejudice, and (b) promote understanding. Section 149 (6) provides that compliance with the duties in this section may involve treating some persons more favourably than others; but that is not to be taken as permitting conduct that would otherwise be prohibited by or under this Act.
- 3.5. Under section 33 of the Greater London Authority Act 1999 ("GLA Act"), the GLA is required to have in place arrangements to ensure that due regard has been had to equality of opportunity for all people in the exercise of the Mayor's general powers, as well as in the formulation and/or implementation of the statutory strategies he must publish under section 41 of the GLA Act.
- 3.6. The proposed activities sit alongside and support the delivery of the Mayor's updated Equality, Diversity and Inclusion Objectives set out in MD3504 by addressing the EDI objectives for the GLA as an employer through its workforce EDI strategy, We Belong Here. This strategy highlights three strategic objectives as key to achieving the outcome of a GLA that is diverse, equal, representative and inclusive. These proposed activities and the process through which they will be implemented set out the GLA's commitment to meeting its statutory obligations.
- 3.7. The funding proposal sets out how this additional funding will contribute to addressing these objectives. They are also further broken down to highlight how they are designed to contribute positively to the experience of Black, Asian and Minority Ethnic staff, and disabled staff. Implementation of We Belong Here prioritises race equality and disability equality based on both quantitative and qualitative evidence, including workforce data, pay gap data, the Independent Review and the Goss Review.
- 3.8. These proposals are designed to have a positive effect on the experiences of Black Asian and Minority Ethnic staff, and disabled staff, in a range of ways based on targeted activity – in terms of access to emotional support, career-acceleration activities, and improved quality of service from OH. The proposals also include activity to work with all staff in several ways to improve our working culture through raising collective awareness and understanding, accountability for decision-making and internal communications.
- 3.9. We will be using different sources of data to help evaluate the effectiveness of this activity, including through:
- a corporate performance framework that monitors representation of Black, Asian and Minority Ethnic staff, disabled staff, and women – including at G10 and above, and within the Senior Leadership team
  - tracking outcomes by diversity of the recruitment process
  - dialogue with staff at the new Our Moment staff forums, starting in September 2022



- working with directorates to monitor their EDI Essentials records and performance against their diversity and inclusion action plans.

3.10. We are at an early stage of implementation of the EDI Strategy. We know that key to the success of the programme's activities is real change in the experiences of staff. The Inclusion Programme steering group is tracking progress regularly; and the Diversity and Inclusion Management Board, and the Our Moment staff forums, provide regular opportunities to hear and respond to staff voices on the impact of this activity.

#### 4. Other considerations

##### *Key risks and issues*

4.1. Risks are assessed and managed on a programme basis, with each piece of work required to set out risks and mitigations as part of the project initiation. Performance is reported quarterly against key performance indicators as part of the GLA's corporate performance management process. At the time of writing, the major risks are as follows:

| <b>Risk</b>   | <b>Mitigation</b>   |
|---|---|
| Challenges in finding appropriate organisations to submit tenders for projects.                         | The HR EDI team have a good understanding of the links with providers in the EDI space; strong knowledge of the sector; and links with networks and stakeholders, enabling them to ensure a broad range of potential contractors are approached, while drawing on TfL's procurement expertise and frameworks. |
| Organisations commissioned and funded to carry out work fail to deliver to expected quality or to time. | Clear and specific parameters for delivery will be set and where applicable reflected in contracts with service providers with regular milestones to check progress. Programme governance will closely monitor delivery.  |

##### *Links to Mayoral strategies and priorities*

4.2. This programme is about the GLA's internal EDI activity and seeks to deliver on the EDI Strategy and the EDI Statement for 2022-23. This is a high priority for the organisation and is endorsed by the Mayor.

##### *Impact assessment and consultations*

4.3. The drafting of the EDI strategy was informed by the views of members of the Diversity and Inclusion Management Board, including staff networks and UNISON. Along with the corporate EDI action Plan for 2022-23, it draws on and consolidates the recommendations of the Independent Review of Ethnic Minority experiences at GLA, the Goss Workplace Adjustments Review, priorities from the GLA pay gap action plan, and staff survey results. Regular programme updates are being shared with the Diversity and Inclusion Management Board, the Race Equity Action Group and the Joint Consultative Committee. Individual projects and activity will include consultation with staff and impact assessments in line with accepted GLA processes and protocols, and again will be closely monitored by the steering group.

4.4. In order to effectively target and successfully measure success of the Inclusion Programme's activity, a range of data will need to be analysed, including diversity data collected from staff. All data will be handled in accordance with UK data protection legislation and UK GDPR. There are no known conflicts of interest to note for any of those involved in the drafting or clearance of this decision.

## **5. Financial comments**

- 5.1. This report proposes expenditure of £221,300 in 2022-23, £736,010 in 2023-24 and £724,300 in 2024-25 to deliver the work set out in section 2 of this MD relating to the Inclusion Programme. This will be funded from the Chief Officer's Transformation Budget over 2022-23 to 2024-25.
- 5.2. Although future years budgets are subject to the approval of the final GLA:Mayor budget in March 2023 and 2024, the funding for the Transformation Budget is in the approved draft GLA:Mayor budget for 2023-24 and its plan for 2024-25. Therefore it is proposed that the Inclusion Programme proceeds at risk and commitments are entered into now, rather than awaiting the formal approval of the GLA: Mayor budget in March 2023.
- 5.3. To mitigate any risk of the programme not being sufficiently resourced in future years to cover costs following the budget setting process, all contracts and grant agreements will include the usual break clauses that could potentially be exercised if required. All appropriate budget adjustments will be made.

## **6. Legal comments**

- 6.1. The foregoing sections of this report indicate that the decisions requested of the Mayor concern the exercise of the GLA's general powers; falling within the GLA's statutory powers to do such things considered to further or which are facilitative of, conducive or incidental to the promotion of social development in Greater London; and in formulating the proposals in respect of which a decision is sought officers have complied with the GLA's related statutory duties to:
  - 6.1.1. pay due regard to the principle that there should be equality of opportunity for all people
  - 6.1.2. consider how the proposals will promote the improvement of health of persons, health inequalities between persons and to contribute towards the achievement of sustainable development in the United Kingdom
  - 6.1.3. consult with appropriate bodies.
- 6.2. Section 149 of the 2010 Act provides that the Mayor must have due regard to the need to eliminate unlawful discrimination, harassment and victimisation, and any conduct that is prohibited by or under the 2010 Act; to advance equality of opportunity; and foster good relations between people who share a protected characteristic and those who do not. Section 3 sets out the duty in full. This decision sets out how the expenditure will assist in supporting these obligations.
- 6.3. Section 33 of the GLA Act provides that the GLA is required to have in place arrangements to ensure that due regard has been had to equality of opportunity for all people in the exercise of the Mayor's general powers, as well as in the formulation and/or implementation of the statutory strategies he must publish under section 41 of the GLA Act.
- 6.4. All procurements of services and supplies contemplated by section 2 of this report must be procured in accordance with the GLA's Contracts and Funding Code (the "Code") and, where the value exceeds £150,000, in accordance with the Public Contracts Regulations 2015 (the "Regulations"). Furthermore, the officers must liaise with Transport for London's procurement and supply chain team, which will determine the detail of the procurement strategy to be adopted in accordance with the Code and the Regulations. Officers must ensure that appropriate contractual documentation be put in place and executed by chosen service provider/supplier and the GLA before the commencement of the attendant services or supplies.



- 6.5. Positive action in employment law is permitted in express situations, backed up by statistics, where an employer has a legitimate aim to tackle an inequality in an under-represented group. In taking positive action the GLA is advised to engage with the Employment Law team in order to ensure the action taken is fair and proportionate.

## 7. Planned delivery approach and next steps

| Activity  | Timeline                   |
|---|----------------------------|
| Programme delivery start date (using existing budgets)              | October 2022               |
| Delivery of projects  | December 2022 – March 2023 |
| Review of programme delivery/action plan and priorities for 2023-24 | March 2023                 |
| Review of programme delivery/action plan and priorities for 2024-25 | March 2024                 |
| Delivery end date   | March 2025                 |
| Project closure   | March 2025                 |

### Appendices and supporting papers:

Appendix 1: GLA Equality, Diversity and Inclusion Statement

Appendix 2: We Belong Here: GLA Workforce Equality, Diversity and Inclusion Strategy 2022-2025

### Public access to information

Information in this form (Part 1) is subject to the Freedom of Information Act 2000 (FoIA) and will be made available on the GLA website within one working day of approval.

If immediate publication risks compromising the implementation of the decision (for example, to complete a procurement process), it can be deferred until a specific date. Deferral periods should be kept to the shortest length strictly necessary. **Note:** This form (Part 1) will either be published within one working day after it has been approved or on the defer date.

### Part 1 – Deferral

#### Is the publication of Part 1 of this approval to be deferred? YES

If YES, for what reason: To ensure best value in the procurement process for the services that are being commissioned.

Until what date: February 2023

### Part 2 – Sensitive information

Only the facts or advice that would be exempt from disclosure under the FoIA should be included in the separate Part 2 form, together with the legal rationale for non-publication.

Is there a part 2 form – NO

### ORIGINATING OFFICER DECLARATION:

Drafting officer to  
confirm the  
following (✓)

#### Drafting officer:

Ruth Morgan has drafted this report in accordance with GLA procedures and confirms the following:

✓

#### Sponsoring Director:

Mary Harpley has reviewed the request and is satisfied it is correct and consistent with the Mayor's plans and priorities.

✓

#### Mayoral Adviser:

David Bellamy has been consulted about the proposal and agrees the recommendations.

✓

#### Advice:

The Finance and Legal teams have commented on this proposal.

✓

#### Corporate Investment Board

This decision was agreed by the Corporate Investment Board on 12 December 2022.

### EXECUTIVE DIRECTOR, RESOURCES:

I confirm that financial and legal implications have been appropriately considered in the preparation of this report.

Signature

Date

D. Gove

12 December 2022

### CHIEF OF STAFF:

I am satisfied that this is an appropriate request to be submitted to the Mayor.

Signature

Date

D. Bellamy

12 December 2022