The Greater London Authority's statutory equality obligations

Summary:

The Greater London Authority (GLA) is subject to equality obligations set out in the Equality Act 2010, which includes the Public Sector Equality Duty, and the GLA Act 1999. This paper sets out what these obligations are, how the GLA and its functional bodies are meeting these obligations, and how the London Assembly scrutinises the GLA's equality work.



Author: Kate Firth

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1 The GLA's statutory equality obligations

1.1 The Public Sector Equality Duty

The <u>Equality Act 2010</u> introduced a Public Sector Equality Duty (PSED) on public authorities and other bodies carrying out public functions. This is a statutory duty to have due regard to equality considerations. The PSED is a general duty, which is supported by specific duties set out in regulations.

The PSED applies to the Greater London Authority (GLA), and all other functional bodies in the GLA Group. As listed public authorities, the GLA and functional bodies are required by the general duty of the PSED, contained in section 149 of the Equality Act 2010, to "have due regard to the need to":

- a) eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010
- b) advance equality of opportunity between people who share a protected characteristic and those who do not¹
- c) foster good relations between people who share a protected characteristic and those who do not.²

These are often described as the 'three aims' of the PSED.

The Act sets out that having due regard to the second aim of the PSED – advancing equality of opportunity between persons who share a protected characteristic – involves having due regard 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
- 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 low³

The Act sets out 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 (the third aim) involves having due regard, in particular, to the need to

(a) tackle prejudice

¹ Protected characteristics defined in <u>Chapter 1</u> of the Equality Act 2010 are: age, disability, race, sex, religion or belief, sexual orientation, gender reassignment, pregnancy and maternity, marriage and civil partnership. Only the first aim of the PSED applies to the characteristic of marriage and civil partnership.

² Equality Act 2010, section 149(1)

³ Equality Act 2010, <u>section 149 (3)</u>

(b) promote understanding⁴

The Equality Act does not define what "due regard" means, although principles have been set out in case law, as set out in section 1.3. <u>Guidance</u> published in 2023 by the Government Equalities Office advises:

"Having due regard' means properly considering the 3 aims identified in the act, and how they relate to the function you are exercising, and then deciding what weight to give them. It is not a duty to achieve a particular outcome. The level of "due regard" considered sufficient in any particular context depends on the facts. A proportionate approach should be taken to the resources spent on duty compliance, depending on the circumstances of the case and the seriousness of the potential equality impacts on those with protected characteristics." ⁵

In Scotland and Wales, a socio-economic duty has been enacted alongside the PSED;⁶ this duty is set out in Part 1 of the Equality Act, which has not yet been enacted in England. This requires public bodies to consider how their strategic decisions can reduce unequal outcomes relating to socio-economic disadvantages.⁷

1.2 How the PSED applies to the GLA and its functional bodies

The 'GLA Group' is the term used to describe the core group of organisations overseen by the Mayor of London, including budget-setting powers. The GLA Group consists of the GLA and each of the five 'functional bodies':

- Transport for London (TfL)
- London Fire Commissioner (LFC)⁸
- Mayor's Office for Policing and Crime (MOPAC)⁹
- London Legacy Development Corporation (LLDC)
- Old Oak and Park Royal Development Corporation (OPDC).

<u>Schedule 19</u> of the Equality Act 2010 lists public authorities that are bound by the PSED. Authorities listed in Schedule 19 are bound by the PSED in respect of their public-facing and internal functions.

The GLA is listed in Schedule 19, as is TfL, the LFC, and MOPAC. Schedule 19 also includes Mayoral Development Corporations, and so LLDC and OPDC are also bound by the PSED.

⁴ Equality Act 2010, section 149 (5)

⁵ Government Equalities Office, Public Sector Equality Duty: Guidance for public authorities, 18 December 2023

⁶ Equality and Human Rights Commission, <u>Evaluating the socio-economic duty in Scotland and Wales</u>, March 2021

⁷ The Labour Party manifesto for the July 2024 General Election included a commitment to enacting the socioeconomic duty. See The Labour Party, <u>The Labour Party Manifesto 2024</u>, June 2024

⁸ LFC is responsible for running the London Fire Brigade (LFB). There is no legal distinction between the LFC and LFB.

⁹ MOPAC is responsible for oversight of the Metropolitan Police Service (MPS). The PSED applies separately to the Commissioner of Police of the Metropolis, in effect the MPS.

Organisations that are not listed in Schedule 19 that provide public functions must apply the PSED but only to their public-facing functions. ¹⁰ The Equality Act states that a public function is a function that is of a public nature for the purposes of the Human Rights Act 1999. ¹¹ The Equality and Human Rights Commission's technical guidance on the PSED states:

"In general terms, a person will be exercising a public function where it is carrying out activities on behalf of the State and which are not similar in kind to services that could be performed by private persons." 12

This includes private businesses or volunteer organisations that have been contracted by a public authority to provide public functions. The PSED is a non-delegable duty which means that the GLA and the GLA Group's functional bodies remains liable for compliance with the PSED when contracting the delivery of any public functions to other organisations.¹³

1.3 Enforcement of the PSED

If a person, or group, believes that an organisation has not complied with the PSED, their sole legal recourse is to challenge it by way of judicial review. ¹⁴ This is a claim, lodged in the High Court, asking the court to decide whether a public authority made a decision lawfully. As part of the judicial review, the court only examines whether the organisation complied with the PSED when making the decision. It does not examine the substance of the decision itself.

If the court determines that the PSED was breached, it can quash the decision. It also has the power to make a declaration that an organisation has breached the PSED, if quashing a decision would serve no useful purpose.¹⁵

For example, in 2014, the High Court conducted a judicial review of Sandwell Metropolitan Borough Council's decision to include a specific residence requirement in its tax reduction scheme. The Court found that Council had breached the PSED, stating: "there is simply no evidence that the Council conducted any assessment at all of the race or gender impact." The decision was declared to have been made unlawfully.

The six 'Brown Principles', established in 2008 in a leading case on compliance with equality law, can help the courts to determine whether the PSED has been complied with. In summary, the principles are:

 decision-makers must be made aware of their duty to have due regard to the aims of the PSED

¹⁰ Equality Act 2010, section 149(2)

¹¹ Equality Act 2010, section 150(5)

¹² EHRC, Technical guidance on the Public Sector Equality Duty: England, updated April 2023

¹³ See Cabinet Office, Procurement Policy Note – <u>Public Procurement and the Public Sector Equality Duty Information Note 01/13/28 January 2013 and EHRC, <u>Technical Guidance on the Public Sector Equality Duty England</u>, 2014, p67</u>

¹⁴ Section 156 of the Equality Act 2010 states that failure to perform the duty does not confer a cause of action at private law.

¹⁵ Government Equalities Office, Public Sector Equality Duty: guidance for public authorities, December 2023

¹⁶ England and Wales High Court, <u>R (Winder) v Sandwell Metropolitan Borough Council</u> [2617], 2014

- the PSED must be fulfilled both before and during consideration of a particular policy, and involves a "conscious approach and state of mind"
- the PSED must be approached in substance, with rigour and with an open mind, and is not "ticking boxes".
- the PSED cannot be delegated away from the decision-maker
- the PSED is a continuing duty
- it is good practice for an authority to keep a record showing that it has considered the PSED.¹⁷

The Equality and Human Rights Commission's enforcement powers

The Equality and Human Rights Commission (EHRC) also has a key role in relation to the PSED. The EHRC is an independent statutory body responsible for promoting and enforcing equality and human rights legislation in Great Britain, and has the power to institute judicial review proceedings where a public authority may have failed to comply with the PSED.¹⁸

The EHRC also has the power to conduct an assessment of an organisation, ¹⁹ and to serve a compliance notice requiring the organisation to set out in writing the steps it proposes to take to address the non-compliance. ²⁰ The organisation must provide this information to the EHRC within 28 days of receiving the compliance notice.

1.4 Other duties under the Equality Act

Specific duties

The <u>Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017</u> requires public authorities to:

- publish at least one equality objective at least every four years. The objective or objectives must be "specific and measurable" and must be published in a way that is accessible to the public.²¹
- publish accessible information each year demonstrating how they have complied with the PSED with regard to people affected by their policies and practices.²²
- publish accessible information each year demonstrating how they complied with the PSED with regard to their employees.²³

Organisations covered by the specific duties are listed in Schedules 1 and 2 of the regulations. The GLA, TfL, Metropolitan Police, and the London Fire Commissioner are

¹⁷ R (Brown) v Secretary of State for Work and Pensions [2008] EWHC 3158. Note: The equality duty in Brown was the Disability Equality Duty in section 49A of the Disability Discrimination Act 1995. Later cases have confirmed that the principles in Brown also apply to the PSED in section 149 of the Equality Act 2010.

¹⁸ EHRC, <u>Technical guidance on the Public Sector Equality Duty: England</u>, 2014

¹⁹ Equality Act 2010, section 31

²⁰ Equality Act 2010, section 32

²¹ Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017, section 5

²² Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017, section 4

²³ Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017, section 4

listed.²⁴ Mayoral development corporations are not included in this list and so LLDC and OPDC do not have to comply with these duties.

The EHRC monitors compliance with the specific duties and can take enforcement action against authorities that do not comply with the specific duties.

Gender pay gap reporting requirements

The Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017 requires public authorities with more than 250 employees to publish gender pay gap information annually.

Private employers with more than 250 employees must also publish this information but they are governed instead by the <u>Equality Act 2010 (Gender Pay Gap Information) Regulations</u> 2017.

The GLA is required to publish its gender pay gap information annually. The gender pay gap is the difference between the average pay of men and women. This must be submitted by 31 March each year. ²⁵

The Government Equalities Office has published gender pay gap reporting guidance which suggests that it can be helpful for employers to publish action plans on closing their gender pay gap, although it does not explicitly recommend this.²⁶

The EHRC monitors compliance with gender pay gap reporting and can take enforcement action against organisations that fail to report on time.

In addition to publishing its gender pay gap data, the GLA and its functional bodies have also published ethnicity and disability pay gap data since 2021.

Reasonable adjustments for disabled people

The Equality Act sets out a duty to anticipate the needs of and make reasonable adjustments for disabled people. ²⁷ The duty includes three requirements. These are to "take such steps as it is reasonable to take" to:

- avoid putting disabled people at a substantial disadvantage where a provision, criterion or practice would put them at that disadvantage compared with people who are not disabled
- remove, alter or provide means of avoiding physical features where those features put disabled people at a substantial disadvantage compared with people who are not disabled

²⁴ Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017, Schedule 1

²⁵ Government Equalities Office, <u>Gender pay gap reporting: guidance for employers – When to report</u>, updated 9 January 2024

²⁶ Government Equalities Office, <u>Gender pay gap reporting: guidance for employers - Overview</u>, updated 9 January 2024

²⁷ A person meets the threshold of being disabled under the Equality Act 2010 if they have a physical or mental impairment that has a 'substantial' and 'long-term' negative effect on their ability to carry out normal daily activities – see section 6

• provide an auxiliary aid where disabled people would, but for the provision of that aid, be put at a substantial disadvantage²⁸

Whether an adjustment is considered reasonable depends on the circumstances. The EHRC has stated that considerations that should be taken into account include effectiveness, practicability and affordability.²⁹

Prohibition of discrimination, harassment and victimisation

The Equality Act prohibits discrimination, including direct and indirect discrimination, harassment and victimisation:

- Direct discrimination occurs when a person or organisation treats a person or group
 of people less favourably, because of a protected characteristic that they have, are
 perceived to have (known as discrimination by perception), or because they are
 associated with someone have a protected characteristic (known as discrimination by
 association) than they treat those without a protected characteristic.³⁰
- Indirect discrimination occurs when a person or organisation applies a "provision, criterion or practice" which puts one group of people sharing a protected characteristic at a disadvantage compared to other groups. The Act provides that indirect discrimination can be lawful if it is a "proportionate means of achieving a legitimate aim".³¹ This is known as objective justification.

1.5 GLA Act 1999

There are other specific equality requirements placed on the GLA in the GLA Act 1999.

The Act requires that the GLA has "due regard to the principle that there should be equality of opportunity for all people" in the exercising of its powers, in the formulation of policies and proposals to be included in strategies, and in the implementation of strategies.³² It also requires the GLA to report annually on its equality work.³³

The GLA Act also requires that the Mayor of London publish a health inequalities strategy³⁴ as well as for all of the Mayor's strategies to take into account "health inequalities between persons living in Greater London".³⁵ It does not require the GLA to publish an equality strategy.

²⁸ Equality Act 2010, section 20

²⁹ EHRC, Statutory Code of Practice - Services, public functions and associations, 2011, pp97-98

³⁰ Equality Act 2010, section 13

³¹ Equality Act 2010, section 19

³² GLA Act 1999, <u>section 33 (1)</u>

³³ GLA Act 1999, <u>section 33 (2)</u>

³⁴ This requirement was introduced by the GLA Act 2007, which inserted sections <u>309E</u>-<u>309H</u> into the GLA Act 1999.

³⁵ GLA Act 1999, section 41 (4)

2 How the GLA is fulfilling its statutory equality obligations

2.1 Equality, Diversity and Inclusion Strategy and equality objectives

In May 2018, the GLA published <u>Inclusive London: The Mayor's Equality, Diversity and Inclusion Strategy</u> (the EDI Strategy).

The strategy is comprised of six key parts:

- a great place to live
- a great place for young people
- a great place to work and do business
- getting around
- a safe, healthy and enjoyable city
- leading by example.

The EDI Strategy set 39 equality objectives to be achieved over the four years to 2022.³⁶ It states: "On some of these [objectives], work can be led by the Mayor, but many require support and action from national and local government."³⁷

As discussed in section 1.4 above, public authorities have a statutory duty to publish equality objectives every four years. This requirement was met by the publication of the 39 objectives in May 2018. The GLA did not meet the requirement to publish new objectives within four years, but did publish a <u>new set of 14 equality objectives</u> in November 2022, replacing the previous 39 objectives. These are set out in the table below.

Table 1: GLA's equality objectives, November 2022³⁸

Objective 1	To increase the provision of genuinely affordable homes for the benefit of those groups and communities that are most likely to live in overcrowded, poor quality or unaffordable housing.
Objective 2	To increase the number of homes that meet Londoners' diverse housing needs including, year-on-year, the pace of provision of affordable specialist and supported housing.
Objective 3	To address the specific barriers that prevent some rough sleepers exiting rough sleeping and rebuilding their lives.
Objective 4	Improve Londoners' air quality and access to green space and lower the city's carbon emissions so that inequalities in exposure to harmful pollution and climate risks are reduced.
Objective 5	To ensure that investment in London's high streets is delivered in a way that can benefit the most deprived parts of London and can meet the

³⁶ GLA, Inclusive London: The Mayors Equality, Diversity and Inclusion Strategy, May 2018, pp10-16

³⁷ GLA, Inclusive London: The Mayors Equality, Diversity and Inclusion Strategy, May 2018, p5

³⁸ GLA, The Mayor's Equality, Diversity and Inclusion Strategy Objectives, November 2022

	expressed priorities of society's most marginalised or underrepresented groups.
Objective 6	To address the specific barriers faced by those groups of Londoners most likely to experience financial hardship, helping them understand and access their entitlements and available support.
Objective 7	Remove the barriers preventing children and young Londoners from realising their potential now and in later life.
Objective 8	To help Londoners at risk of marginalisation in the labour market to get the skills and support they need to secure good quality jobs.
Objective 9	To ensure London's workforce reflects its population at all levels and in all sectors.
Objective 10	To increase the number and proportion of diverse-owned businesses within the Mayor's main supply chain.
Objective 11	To support those most at risk of digital exclusion by promoting a consistent approach to addressing access needs, and upskilling those lacking basic digital skills.
Objective 12	To address the reasons for health inequalities that cause some groups to experience poorer physical and mental health outcomes.
Objective 13	That Londoners from all walks of life feel heard, and see themselves reflected in the public realm.
Objective 14	To ensure London's diverse communities have the knowledge, networks, and volunteering opportunities they need to thrive.

The GLA's website includes additional information for each objective, outlining the key policies and programmes that relate to it, as well as how the impact of the objective can be tracked.

The Mayor did not publish a new or updated EDI Strategy alongside the new objectives. There is no statutory requirement to publish an equality strategy. The Mayoral Decision on the new objectives stated: "Further work is needed to incorporate these objectives into a strategic document, which is intended to be published in early 2023." ³⁹

The London Assembly's GLA Oversight Committee asked GLA officers in January 2023 when a refreshed EDI Strategy would be published. Dr Debbie Weekes-Bernard, Deputy Mayor for Communities and Social Justice, told the Committee that it would be published in Spring 2023.⁴⁰ At the time of writing, a new strategy has not been published.

2.2 The Mayor's Equality, Diversity and Inclusion Advisory Group

The Mayor's <u>Equality</u>, <u>Diversity and Inclusion Advisory Group</u> is tasked with shaping, influencing and guiding the Mayor's Equality, Diversity and Inclusion Strategy and

³⁹ Mayoral Decision 3054, <u>Updating the Mayor's Equality, Diversity and Inclusion objectives</u>, 21 November 2022, n2

p2 ⁴⁰ London Assembly GLA Oversight Committee, <u>Meeting transcript</u>, 12 January 2023, p2

influencing the work of the London Partnership Board. Its membership includes appointed representatives representing people from different groups across London. It is chaired by the Deputy Mayor for Communities and Social Justice, Dr Debbie Weekes-Bernard.

It held its first formal meeting in February 2019 where it agreed a <u>Terms of Reference</u>. Meetings are held twice per year.

As of July 2024, the Group's most recent meeting was in February 2024. At this meeting, it was confirmed that all members' appointments would expire at the end of the Mayoral term and decisions around the continuation of the Group and its membership would be made in the new Mayoral term.⁴¹

The GLA has advised that as of July 2024, the group's Terms of Reference is being revised and a process is underway to appoint a refreshed set of members.⁴²

2.3 Monitoring and reporting

Data

In 2018, <u>a set of 23 EDI measures</u> was published on the London Datastore to accompany Inclusive London, the Mayor's EDI Strategy. The measures were across five themes that mirrored the Strategy's main chapters: children and young people, housing, work and income, transport and crime, health and participation. The majority of the measures are broken down by ethnicity and gender. Some of the measures are also broken down by other protected characteristics including disability, age, sexual orientation and religion. Some of the measures are also broken down by socio-economic characteristics (which are not protected characteristics under the Equality Act) such as eligibility for Free School Meals status, income and education levels.

The EDI measures were updated on an annual basis with the final update being in 2020. shortly after the onset of the COVID-19 pandemic.

In late 2020, as part of its response to the COVID-19 pandemic, the GLA published the <u>London COVID-19 Resilience Dashboard</u> on the London Datastore. This dashboard includes a set of measures on narrowing inequalities. It includes nine measures across the themes: employment, education, health, digital and environment. The measures have not been updated since 2021.

The GLA has advised that a new set of EDI measures, to align with the 14 equality objectives published in 2022, will be published later in 2024.

Annual equality report

The Mayor publishes an annual equality report. In May 2024, the most <u>recent report, for 2020-2022</u>, <u>was published</u>. Unlike in other years, this report covered a two-year period.

⁴¹ GLA Equality, Diversity and Inclusion Advisory Group, Minutes, 8 February 2024, p2

⁴² Information provided by GLA, June 2024

The report states that its publication is in fulfilment of the GLA's duties under the Equality Act and the GLA Act. 43

The 2020-2022 report summarises the actions taken to deliver each of the 39 equality objectives that were set in 2018. It also includes an appendix setting out data against the 23 equality indicators established in 2018 and the additional nine equality indicators established as part of the COVID-19 Resilience Dashboard in 2020. The appendix states that it is the most up-to-date data as at March 2022.

The London Assembly's GLA Oversight Committee raised several concerns about the performance measures in the 2020-2022 Annual Report in a letter to the Mayor in January 2024. These were that different measures covered different time periods which made it difficult to compare overall performance, some measures only covered partial periods of the EDI Strategy's scope, some measures covered periods outside of the EDI Strategy's, and the narrative did not always accurately reflect the data presented.⁴⁴

Gender, ethnicity and disability pay gap reporting

As set out in section 1.4, the GLA is required to publish gender pay gap data. Since 2017, the year that the regulations were introduced, the GLA has published ethnicity pay gap data alongside its gender pay gap data. Since 2021, the GLA has also published disability pay gap data. The GLA also publishes an accompanying pay gap action plan. The GLA and its functional bodies report on their pay gap data separately.

Workforce diversity reporting

As set out in sections 1.4, the GLA is required to publish information annually about how it is complying with the PSED in regard to its employees.

The GLA produces a report on its workforce every six months and presents it to the GLA Oversight Committee. The report does not include information about staff belonging to the GLA's functional bodies.

Reports published by the GLA include a breakdown of the GLA's workforce by protected characteristic, as well as recruitment and salary range data by protected characteristic. The reports also include information about equality initiatives at the GLA.

2.4 Equality Impact Assessments

Equality Impact Assessments (EQIAs) are a non-statutory tool commonly used by public sector bodies to fulfil their statutory equality commitments and demonstrate compliance with the PSED. EQIAs generally assess the positive and negative effects that a policy or decision may have on groups of people sharing protected characteristics and consider how any negative effects could be mitigated. The Equality Act 2010 does not require the use of EQIAs.

⁴³ GLA, Mayor of London's Equality Report 2020-22

⁴⁴ London Assembly GLA Oversight Committee, <u>Letter to the Mayor re: GLA Equality, Diversity and Inclusion Strategy, 30 January 2024</u>

The GLA has advised that is currently completing a programme of work to refresh its approach to EQIAs. Revised guidance is currently being promoted across the organisation to remind all staff about the GLA's statutory responsibilities under the Equality Act, increase knowledge and confidence when completing EQIAs and to maintain the standard and quality of completion.

The GLA takes an intersectional approach when considering the impact of its decisions. Staff are required to go beyond statutory requirements and consider impacts on other groups including migrants and refugee Londoners, young carers, young people with special educational needs and disabilities and the impacts of socio-economic disadvantage. Additional supplementary staff guidance is being produced to provide additional information and support when considering the impacts on characteristics that are not protected by Equality Act.

The GLA does not have a dedicated webpage where it publishes its EQIAs. Generally, the GLA's EQIAs can be found as separate documents accompanying Mayoral strategies or accompanying specific decisions around programmes. For example, see Homes Programme 2021-2026 Equality Impact Assessment. The GLA provides guidance and tool for officers completing EQIAs.

In November 2022, the Mayor was asked whether he thought there was scope to improve the Equality Impact Assessments in the planning system. He responded:

"The GLA is subject to the Public Sector Equality Duty and undertakes Equality Impact Assessments both in developing London Plan policy and guidance and considering equality impacts arising from referable planning applications. My London Plan 2021 - which aims to achieve positive impacts on protected groups - was subject to an Integrated Impact Assessment which included Equalities Impact Assessment. I consider our approach to Equality Impact Assessments in the planning system to be robust, being approached iteratively to ensure consideration of impacts on an ongoing basis. GLA Planning officers have completed training on equality issues and Equality Impact Assessments and make use of resources including templates, case law updates, process notes and an inclusive language guide to support them in this. Nonetheless I welcome the question, as it is important to ensure that our internal processes, planning or otherwise, support the best outcomes and we keep these under review."⁴⁵

2.5 Workforce focused equality initiatives

The GLA published a three-year workforce EDI Strategy in 2022: <u>We Belong Here 2022-2025</u>. The Strategy sets three goals:

- Develop collective and individual accountability on equality, diversity and inclusion. 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.

⁴⁵ Questions to the Mayor, <u>Equality Impact Assessments</u>, Reference: 2022/4115, 17 November 2022

• Establish a workforce that reflects London's diversity across all directorates and at senior level.

It is accompanied by an annual EDI Action Plan. The most recent published was for 2023-2024: Corporate EDI Action Plan 2023-2024

In 2018, the GLA published the <u>GLA Group Diversity and Inclusion Action Standard</u>. It is focused on the GLA Group organisations' role as employers and states that it focuses on actions the organisations can take to "achieve a truly diverse workforce reflective of London, and develop inclusive cultures in which all groups can flourish". The Standard sets out goals that the GLA Group organisations should aim for under five themes:

- Diversity and inclusion foundations
- Workforce representation
- Recruitment
- Career development and reward
- Inclusive culture.

It asks each organisation to "go back to it at least once a year and check your progress against it". 46 There is no information publicly reported about how the Standard is being used.

3 How functional bodies fulfil statutory equality obligations

As discussed in section 1.2, the GLA's functional bodies are also subject to statutory equality obligations. This section highlights information available from each of the functional bodies on how they have done this.

3.1 Transport for London

TfL publishes a range of documents relating to equality on a dedicated webpage, such as gender, ethnicity and disability pay gap reports and some EQIAs.⁴⁷ It also publishes some EQIAs separately alongside the decisions or proposals they relate to.

In June 2023, TfL published a workforce strategy – <u>Action on Inclusion Creating an inclusive workforce.</u> In February 2024, TfL published a customer inclusion strategy – <u>Equity in Motion.</u>

Equality objectives

TfL set 13 equality objectives for the period 2021-2025.⁴⁸ TfL's equality objectives are set out in the table below. The set includes externally and internally focussed objectives.

⁴⁶ GLA, GLA Group Diversity and Inclusion Standard, January 2018, p3

⁴⁷ TfL, <u>Diversity and Inclusion publications</u>

⁴⁸ TfL, Our Equality Objectives, November 2021

Table 2: TfL's equality objectives, November 2021 49

Objective 1	We must ensure our transport network is inclusive of everyone, with consistent customer service which considers all aspects of diversity and social impact, enabling social mobility through access to opportunity.	
Objective 2	Ensure customers have the information they need to travel, focusing on those who may be currently underrepresented or have more acute barriers. Plus, make sure our marketing and communications are representative of London's diversity.	
Objective 3	Improve the accessibility and inclusivity of London's transport vehicles, infrastructure and our estate, prioritising customers and colleagues currently excluded or finding access difficult and unwelcoming.	
Objective 4	Ensure travel in London is safe and people aren't disproportionately impacted or deterred from travelling or working on our network because of safety concerns linked to a protected characteristic.	
Objective 5	Ensure our transport system and approach to urban planning promotes and improves the health of all Londoners. Take action to close gaps in health inequalities between groups, and support the physical and mental wellbeing of our colleagues.	
Objective 6	Hardwire inclusivity into our decisions and continue to build our leaders' knowledge and understanding of diversity and inclusion to enable them to take personal accountability for making customer centric, inclusive decisions and drive an inclusive culture.	
Objective 7	Through procurement, funding and influence, ensure more of our partner organisations, suppliers and the wider industry have inclusion as a core value. In addition, work with external organisations to learn lessons and embed best practice.	
Objective 8	Ensure we offer value for money for all Londoners and that our fare structure and concessions are fair, clear and well communicated.	
Objective 9	Effectively inform, develop and deliver our strategies, services and programmes, by aiming to carry out representative and proportionate engagement with London's diverse communities. Plus, make sure our approach is accessible and inclusive.	
Objective 10	Increase the diversity of our organisation at every level, so that it better reflects the diversity of London.	
Objective 11	In light of our new internal Vision and Values, we will ensure an unwavering commitment to enhancing the recruitment, retention, and career development of our internal talent, with the overall aim of being an employer of choice.	
Objective 12	In response to our annual Viewpoint survey and listening sessions, we will embed a fairer and more inclusive culture, where colleagues feel supported to be their authentic self and where leaders create a peoplecentric, inclusive environment.	
Objective 13	Explore and invest in the future skills of our organisation to ensure we create a diverse talent pipeline that will enhance our ability to meet ours and the Mayor of London's objectives.	

⁴⁹ TfL, <u>Our Equality Objectives</u>, November 2021

Publication of equality information

As set out in section 1.2, TfL is subject to the specific duties set out in the Equality Act to publish information annually demonstrating how it has complied with the PSED, with regard to people affected by its policies and functions, and with regard to its employees.

Between 2017-18 and 2019-20, TfL published an annual 'Diversity and Inclusion Impact' report, which reported both on people affected and employees.⁵⁰ Prior to 2017-2018, TfL reported this information in two separate reports.

TfL <u>publishes</u> its ethnicity and disability pay gap data, alongside its gender pay gap data.

3.2 MOPAC and the Metropolitan Police Service

MOPAC is responsible for oversight of the Metropolitan Police Service (MPS). The PSED applies to both MOPAC and the Commissioner of Police of the Metropolis (in effect the MPS).

Strategy and commitments

MOPAC has published a <u>Equality and Diversity Statement of Commitment</u>. It commits to holding the MPS Commissioner "to account for the exercise of his duties relating to equality and diversity" and ensuring equality and diversity are embedded into policing.⁵¹ It sets out 11 ways it will demonstrate this commitment.

The MPS has published a <u>Strategy for Inclusion</u>, <u>Diversity and Engagement 2021-2025</u>. The Strategy sets 16 commitments, including internally and externally focused commitments, and is accompanied by an annual action plan. The commitments are set out in the table below.

Table 3: MPS inclusion, diversity and engagement commitments 2021⁵²

Commitment 1	We will confront those who cause pain and fear through hate crime.
<u> </u>	
Commitment 2	We will work proactively with communities to reduce violence by building trust.
Commitment 3	We will work with partners to reduce the criminal victimisation of those who are most disadvantaged.
Commitment 4	We will work with partners to increase opportunities to divert people away from offending.
Commitment 5	We will ensure that every ward has a ward panel which people can engage with online.
Commitment 6	We will transform our two-way communication with public.
Commitment 7	We will engage with, understand and celebrate all of London's communities.
Commitment 8	We will make relevant equalities information available to all.

⁵⁰ TfL, Diversity and inclusion publications, accessed July 2024

⁵¹ MOPAC, Equality and Diversity Statement of Commitment, accessed 17 July 2024

⁵² MPS, Strategy for Inclusion, Diversity and Engagement 2021-2025, November 2021

Commitment 9	We will work with communities and partners to achieve our recruitment, retention and progression aspirations for those from under-represented groups.
Commitment 10	We will work to ensure that our people feel included and that they are treated with fairness and respect.
Commitment 11	We will continue to reduce disproportionality in our internal processes.
Commitment 12	We will improve the inclusion and confidence of our Disabled officers and staff members.
Commitment 13 We will develop a generation of inclusive leaders.	
Commitment 14	We will improve our response to complaints from the public.
Commitment 15	We will make community engagement central in our use of powers.
Commitment 16 We will increase transparency and understanding of our use of powers.	

Action Plan for Transparency, Accountability and Trust in Policing

In November 2020, the Mayor published his Action Plan for Transparency, Accountability and Trust in Policing. The Plan sets out the Mayor's ambition "to provide a police service that has the confidence of all Black Londoners".53 To accompany the Plan, MOPAC has produced a dashboard "to audit race equality across the key aspects of the Action Plan: Public Perceptions, Stop & Search, Use of Force, Workforce – as well as pulling together key wider data sets that explore disproportionality".54

Casey Review

MPS has been the subject of widespread scrutiny in recent years in relation to equality issues. In February 2022, The Baroness Casey of Blackstock DBE CB was commissioned by the former MPS Commissioner to "undertake an independent review into the standards of behaviour and internal culture of the Metropolitan Police Service and make recommendations on the actions required. The review was commissioned following the "grave levels of public concern" following the kidnap rape and murder of Sarah Everard by a serving Met officer, and other incidents which were undermining public confidence in the MPS.56

Baroness Casey's final report was published in March 2023. Baroness Casey found the MPS to be institutionally racist, sexist and homophobic, and in need of radical reform. The report highlighted that for the MPS "tackling discrimination is a legal and operational imperative for the Met".57

There were eight overall conclusions:

1. There are systemic and fundamental problems in how the Met is run.

MOPAC, <u>Action Plan for Transparency</u>, <u>Accountability and Trust in Policing</u>, 13 November 2020
 MOPAC, <u>Mayoral Action Plan Dashboard – Transparency</u>, <u>accountability and trust in policing</u>, <u>accessed</u> 17

⁵⁵ Baroness Casey Review, Final Report, March 2023, p26

⁵⁶ Baroness Casey Review, Final Report, March 2023, p26

⁵⁷ Baroness Casey Review, Final Report, March 2023, p17

- 2. The Met has not managed the integrity of its own police service.
- 3. The Met's new leadership represent a welcome change of tone and approach. However, deep seated cultures need to be tackled in order for change to be sustained.
- 4. Londoners have been put last.
- 5. London's women and children have been left even further behind.
- 6. The Met lacks accountability and transparency.
- 7. Discrimination is tolerated, not dealt with and has become baked into the system.
- 8. The Met is in danger of losing its way consent is broken. 58

The MPS accepted all 16 recommendations in the review's final report, including the establishment of the <u>London Policing Board</u>. ⁵⁹ The review said that the MPS and the Mayor should commission independent progress reviews after two and five years "so that Londoners can have trust and confidence that reform is taking place." ⁶⁰

The MPS also published A New Met for London 2023-2025, in July 2023, as part of its response to the Casey Review. This sets out a plan for reforming the MPS and includes the below commitments in the area of 'culture change':

- We'll reset out values and the way we work
- We'll uphold the highest standards and remove those who don't meet them
- We'll change how we work with communities so they're confident we treat them fairly
- We'll become a more diverse and inclusive organisation. 61

Publication of equality information

As set out in section 1.4, MOPAC and the MPS Commissioner are subject to the specific duties set out in the Equality Act to publish information annually demonstrating how it has complied with the PSED, with regard to people affected by its policies and functions, and with regard to its employees.

The MPS <u>publishes a data report</u> on the diversity of its workforce each month.

MOPAC and MPS report separately on their gender, ethnicity and disability pay gaps. MOPAC's most recent published <u>pay gap report</u> is for the year 2022-2023. MPS's most recent published <u>pay gap report</u> is for the year 2023 and includes an action plan for reducing the gaps.

3.3 London Fire Commissioner

The LFC is responsible for running the LFB. In 2023, the LFB published 'a set of guiding principles' called <u>Our Values</u>, which included equity as a value, stating "We treat everyone fairly according to their needs". ⁶² The set of values were co-designed with staff and communities.

⁵⁸ Baroness Casey Review, Final Report, March 2023, pp11-17

⁵⁹ MPS, Letter from Sir Mark Rowley QPM to Baroness Casey of Blackstock DBE CB, 17 October 2022

⁶⁰ Baroness Casey Review, Final Report, March 2023, p24

⁶¹ MPS, <u>A New Met for London 2023-2025</u>, 18 July 2023

⁶² LFB, Our values, accessed 17 July 2024

In 2021, LFB published Our Togetherness Strategy. The strategy states that it:

"underpins and enables the Transformation Delivery Plan for the Brigade. It sets out how we will achieve our ambitious goals to improve diversity and inclusion across the Brigade for our staff, our communities and for London." ⁶³

It sets goals under four pillars:

- Building a culture of belonging
- Being inspired by difference
- Being at the centre of London and our communities
- Delivering excellence through inclusion

The LFC published its statutory Community Risk Management Plan, <u>Your London Fire Brigade 2023-2029</u>, on 1 January 2023. This is the key organisational strategy setting out the overall direction for service delivery and how LFB will address the risks London faces. The CRMP includes a focus on delivering an inclusive culture at the LFB, stating:

"We also want to build a workforce that better reflects and understands London's communities, support the proper provision of services according to need and create opportunities for more integration within our communities".⁶⁴

The Plan also sets specific equality and diversity focused Key Performance Indicators including on staff composition and pay gap. It also refers to the development of a social impact tool to enable the LFB to measure the impact it has on communities.⁶⁵

Independent culture review

Like the MPS, LFC has also been subject to widespread scrutiny of issues relating to equality and diversity in recent years.

In August 2020, trainee LFB firefighter Jaden Matthew Francois-Esprit took his own life. An internal investigation into the support available to Jaden Matthew Francois-Esprit recommended a wider, external review of LFB's culture. 66 As a result, the LFC commissioned an Independent Culture Review of LFB. Nazir Afzal OBE was appointed to lead the Review in November 2021, gathering evidence over ten months of people's experience of the working environment and wider culture at LFB. 67 The Independent Culture Review of LFB was published in November 2022 and made 23 recommendations.

Nazir Afzal stated that the review found evidence "that supports a finding that LFB is institutionally misogynist and racist". ⁶⁸ It found "dangerous levels of ingrained prejudice against women and the barriers faced by people of colour spoke for themselves." ⁶⁹ Nazir Afzal stated that LFB "needs to do more to protect its own people and give them the help they need to experience dignity in the workplace and be able to thrive in a job they love." ⁷⁰

⁶³ LFB, Our Togetherness Strategy, accessed 17 July 2024

⁶⁴ LFB, Your London Fire Brigade: 2023-2029, 1 January 2023, p54

⁶⁵ LFB, Our Plan to Keep London Safe 2023-2029 Measuring Our Success, May 2022, p7

⁶⁶ LFB, Reviewing our Culture, 27 July 2021, p3

⁶⁷ Nazir Afzal OBE, <u>Independent Culture Review of London Fire Brigade</u>, November 2022, pp1-3

⁶⁸ Nazir Afzal OBE, Independent Culture Review of London Fire Brigade, November 2022, p78

⁶⁹ Nazir Afzal OBE, Independent Culture Review of London Fire Brigade, November 2022, p78

⁷⁰ Nazir Afzal OBE, <u>Independent Culture Review of London Fire Brigade</u>, November 2022, p79

In response to the publication of the review, Commissioner Andy Roe KFSM announced immediate action as part of a long-term programme to improve the LFB culture. Actions taken by the LFC in response to the review included:71

- launch of new "Brigade values"
- independent staff complaints service introduced⁷²
- new, in-house Professional Standards Unit established
- historic review of discrimination, bullying and harassment cases from the last five years
- a new support hub for staff launched
- establishment of an advisory panel on culture with an independent chair
- independent review of LFB People Services

Publication of equality information

As set out in section 1.2, the LFC is subject to the specific duties set out in the Equality Act to publish information annually demonstrating how it has complied with the PSED, with regard to people affected by its policies and functions, and with regard to its employees.

The LFB publishes a bi-annual report which includes information on the diversity of its workforce. The most recent <u>report</u> published is for quarters three and four of 2023-24.

LFB <u>publishes</u> its ethnicity and disability pay gap data, alongside its gender pay gap data.

3.4 LLDC

LLDC published its <u>Equality and Inclusion Policy</u> in May 2012. It has not published an updated version since. The strategy set out five 'equality and inclusion' objectives, as set out in the table below.

Table 4: LLDC's equality and inclusion objectives, May 2012⁷³

Objective 1	Create an accessible and inspiring new place which embeds the highest standards of inclusive design as the park is transformed and begins to open.
Objective 2	Use procurement to maximise the positive opportunities the legacy development creates for the diverse communities of east London.
Objective 3	The development corporation will embody the change, setting the standard for our partners by delivering flagship internal projects to promote inclusion and recruit a diverse workforce.
Objective 4	Deliver a lasting legacy of heritage from the paralympic games which promotes elite disability sport and community sport for disabled people.
Objective 5	Develop projects which foster cohesion and integration between the future residents of Queen Elizabeth Olympic Park and its neighbours

⁷¹ LFB, <u>Improving our workplace culture</u>, accessed 17 July 2024; LFB, <u>Our values</u>, accessed 17 July 2024; LFB, <u>Establishment of an Advisory Panel following Culture Review and appointment of Independent Chair</u>, 23 August 2023; Information provided by LFB, April 2024

⁷² The independent complaints service was an initial response to the review, later replaced by the Professional Standards Unit.

⁷³ LLDC, Equality and Inclusion Policy, May 2012

Since then, LLDC has developed its People Strategy for 2021–2025,⁷⁴ which maps out how it will foster greater equality, diversity and inclusion. It states:

"...at the heart of our vision for this refreshed People Strategy is the desire to help our people thrive and contribute to the future success of one of the most exciting projects in London. We'll do this by delivering against our commitment to creating a truly inclusive place to work, ensuring that we foster inclusive practices and an inclusive cultural mindset in everything we do, and working collaboratively with our people to achieve the stated objectives of our People Strategy."

The strategy is underpinned by various action plans, including the <u>Equity</u>, <u>Diversity and Inclusion Action Plan for 2023/24</u>. This action plan highlights how LLDC will advance an inclusive culture and establish a diverse workforce to better reflect the communities it serves. Actions align with four strategic themes: inclusive culture; leadership; recruitment and supporting talent from within.

Publication of equality information

As set out in section 1.2 the LLDC is not required to publish equality objectives or annual equality information as per the specific duties set out in the Equality Act.

LLDC <u>publishes</u> its ethnicity and disability pay gap data, alongside its gender pay gap data.

3.5 OPDC

OPDC published its <u>Equality</u>, <u>Diversity and Inclusion Strategy and Action Plan 2022-2027</u> in 2022. In this, the Chief Executive David Lunts states:

"Our Equity, Diversity and Inclusion vision is to be an organisation which identifies, prioritises, enables and champions equitable opportunities for everyone – both staff and our communities – regardless of background, race, age, gender identity, gender expression, sexual orientation or ability."

It sets eight objectives in total, four are internally focused and four are externally focused. These are set out in the table below.

Table 5: OPDC equality, diversity and inclusion strategy objectives, 2022⁷⁶

	Internal objectives
Objective 1	Create a culture of equity and connection.
Objective 2	Deliver equitable learning and development.
Objective 3	Embed inclusive recruitment.
Objective 4	Deliver open and inclusive communications.
	External objectives
Objective 1	Increase our understanding of our local communities.
Objective 2	Champion and celebrate the rich diversity of our area.

⁷⁴ The LLDC People strategy is not published online. A copy was provided to the Assembly's Research Unit.

⁷⁵ OPDC, Equality, Inclusion and Diversity Strategy and Action Plan 2022-2027, 2022, p3

⁷⁶ OPDC, Equality, Inclusion and Diversity Strategy and Action Plan 2022-2027, 2022

Objective 3	Ensure diverse representation in our projects and panels,
Objective 4	Plan for a welcoming, accessible and inclusive place.

OPDC highlighted the below key activities and data to the Assembly's Research Unit:

- 43 per cent of new OPDC staff in 2022-23 were from an ethnic minority background
- The diversity of OPDC's Planning Committee has increased. 40 per cent of members are female and 40 per cent are from an ethnic minority background
- OPDC has supported 180 residents into work in the OPDC area. Of these, more than 60 per cent are from an ethnic minority background.⁷⁷

Publication of equality information

As set out in section 1.2 the OPDC is not required to publish equality objectives or equality information as per the specific duties set out in the Equality Act.

OPDC publishes an annual report setting out the progress it is making against its EDI Strategy and Action Plan. Its first and most recent annual report is for 2022-2023.

OPDC <u>publishes</u> its ethnicity and disability pay gap data, alongside its gender pay gap data.

OPDC has published an equality, diversity and inclusion statements for its Supplementary Planning Documents.⁷⁸

4 London Assembly scrutiny

4.1 GLA Oversight Committee

The GLA Oversight Committee takes the lead role in scrutinising the GLA Group's adherence to its equality obligations. However, all Committees scrutinise how the GLA and its functional bodies are adhering to their equality obligations, and the equality impacts of decisions and policies, as part of their general scrutiny processes. Committee's may also undertake additional scrutiny of issues that are particularly related to equality as they arise.

As set out in section 2.3, the GLA produces a workforce report every six months which includes information about the diversity of the GLA's workforce and the GLA's EDI initiatives. This is presented to the Assembly's GLA Oversight Committee every six months for scrutiny.

In 2023-24, the GLA Oversight Committee held an investigation into the GLA's EDI Strategy 2018-2022. It held a meeting in May 2023 with Dr Debbie Weekes-Bernard, Deputy Mayor for Communities and Social Justice and officers from the GLA, LFB, MOPAC, MPS and TfL.⁷⁹

⁷⁷ OPDC, <u>Equality</u>, <u>Diversity and Inclusion Annual Report 2022-23</u>, p5

⁷⁸ OPDC, Public Realm and Green Infrastructure Supplementary Planning Document, 13 June 2024; Industrial Supplementary Planning Document, 23 November 2033

⁷⁹ London Assembly GLA Oversight Committee, Meeting Transcript, 24 May 2023

Following this meeting, in January 2024, the Committee <u>wrote to the Mayor</u> with recommendations on the GLA's EDI Strategy. The letter set out a number of recommendations, including:

- Recommendation 1: The new EDI Strategy must have a comprehensive performance framework with clear measures and targets on which the Committee and Londoners can hold the GLA Group to account. Measuring and reporting performance must be integral to the implementation of the new EDI Strategy. The new arrangements must address the reporting inconsistencies in the previous strategy. The Committee hopes the development of the refreshed London Datastore will meet these objectives.
- Recommendation 2: The new EDI Strategy must have a clear delivery plan with accompanying governance arrangements to ensure there is genuine collaboration across the GLA Group with ownership and accountability for the delivery of objectives. This should include named officers at an appropriately senior level who are required to engage in the implementation of the new strategy on a regular basis.
- Recommendation 3: The Mayor should consider allocating additional resources to the GLA's Equality team to support the delivery of recommendations 1 and 2. Notwithstanding the gaps in the team over the last few years, which will have impacted on capacity, if the Mayor is realistic about delivering the objectives of the new EDI Strategy, he should consider the overall resourcing requirements for the team tasked with overseeing this work.⁸⁰

4.2 Other committees

A number of other Assembly committees can scrutinise the GLA Group's fulfilment of statutory obligations in this area, include through themed investigations that consider issues related to equality and diversity in London. In particular, Assembly committees scrutinise the Mayor's draft statutory strategies, which the Assembly, as a whole, can reject by a two-thirds majority vote.⁸¹

Examples of specific work in this area include:

- The Police and Crime Committee used committee meetings throughout 2023-24 to examine the findings of the Casey Review, as discussed above. For example, in March 2024, the Committee met with the Independent Office for Police Conduct, National Black Police Association, the Deputy Mayor for Policing and Crime MPC and MOPAC to examine the progress made by the MPS in the year since the report's publication. The Committee also used its Question and Answer meetings with the Met and MOPAC to explore recruitment and retention in the Met, including the diversity of its workforce.
- The Fire, Resilience and Emergency Planning Committee (reconstituted as the <u>Fire Committee</u> in May 2024) also used meetings during 2023-24 to consider the findings on the Independent Culture Review, as discussed above, and the role of women in LFB. In January 2024, the Fire Committee <u>wrote</u> to the National Fire Chiefs Council on the progress made by LFB following the Independent Culture Review.

⁸⁰ London Assembly, Letter from Emma Best AM, Chair of GLA Oversight Committee, to Sadiq Khan, Mayor of London, 30 January 2024

⁸¹ GLA Act 1999, <u>section 42B</u>

Other formats and languages

If you, or someone you know needs this report in large print or braille, or a copy of the summary and main findings in another language, then please call us on: 020 7983 4100 or email assembly.translations@london.gov.uk

Chinese

如您需要这份文件的简介的翻译本, 请电话联系我们或按上面所提供的邮寄地址或 Email 与我们联系。

Vietnamese

Nếu ông (bà) muốn nội dung văn bản này được dịch sang tiếng Việt, xin vui lòng liên hệ với chúng tôi bằng điện thoại, thư hoặc thư điện tử theo địa chỉ ở trên.

Greek

Εάν επιθυμείτε περίληψη αυτού του κειμένου στην γλώσσα σας, παρακαλώ καλέστε τον αριθμό ή επικοινωνήστε μαζί μας στην ανωτέρω ταχυδρομική ή την ηλεκτρονική διεύθυνση.

Turkish

Bu belgenin kendi dilinize çevrilmiş bir özetini okumak isterseniz, lütfen yukarıdaki telefon numarasını arayın, veya posta ya da e-posta adresi aracılığıyla bizimle temasa geçin.

Punjabi

ਜੇ ਤੁਸੀਂ ਇਸ ਦਸਤਾਵੇਜ਼ ਦਾ ਸੰਖੇਪ ਆਪਣੀ ਭਾਸ਼ਾ ਵਿਚ ਲੈਣਾ ਚਾਹੋ, ਤਾਂ ਕਿਰਪਾ ਕਰਕੇ ਇਸ ਨੰਬਰ 'ਤੇ ਫ਼ੋਨ ਕਰੋ ਜਾਂ ਉਪਰ ਦਿੱਤੇ ਡਾਕ ਜਾਂ ਈਮੇਲ ਪਤੇ 'ਤੇ ਸਾਨੂੰ ਸੰਪਰਕ ਕਰੋ।

Hindi

यदि आपको इस दस्तावेज का सारांश अपनी भाषा में चाहिए तो उपर दिये हुए नंबर पर फोन करें या उपर दिये गये डाक पते या ई मेल पते पर हम से संपर्क करें।

Bengali

আপনি যদি এই দলিলের একটা সারাংশ নিজের ভাষায় পেতে চান, তাহলে দয়া করে ফো করবেন অথবা উল্লেখিত ডাক ঠিকানায় বা ই-মেইল ঠিকানায় আমাদের সাথে যোগাযোগ করবেন।

Urdu

اگر آپ کو اس دستاویز کا خلاصہ اپنی زبان میں درکار ہو تو، براہ کرم نمبر پر فون کریں یا مذکورہ بالا ڈاک کے پتے یا ای میل پتے پر ہم سے رابطہ کریں۔

Arabic

ال حصول على ملخص لهذا المستند بلغتك، فرجاء الانتصال برقم الهاتف أو الانتصال على العنوان البريدي العادي أو عنوان البريد الإلكتروني أعلاه.

Gujarati

જો તમારે આ દસ્તાવેજનો સાર તમારી ભાષામાં જોઈતો હોય તો ઉપર આપેલ નંબર પર ફોન કરો અથવા ઉપર આપેલ ૮પાલ અથવા ઈ-મેઈલ સરનામા પર અમારો સંપર્ક કરો.