Transparency of the GLA Group and Family

February 2016



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The GLA Oversight Committee is responsible for a range of matters, including responding on the Assembly's behalf to formal staffing consultations from the GLA's Head of Paid Service, monitoring scrutiny expenditure and approving the expenditure over a certain level, approving rapporteurship proposals, overseeing the programming of the Assembly's business and recommending to the Mayor a budget proposal for the Assembly for the financial year and then allocating that budget. In addition, the GLA Oversight Committee now has responsibility for scrutinising any actions or decisions taken by the Mayor on matters relating to education. The Committee usually meets ten times a year.

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Rapporteur's foreword

Transparency means different things to different people. Some want to see contracts published, some would like to understand how decisions are made, and some take a particular interest in the expenses claimed by politicians and officials. For



those in power, transparency can feel like an irritation, an unwelcome complication or a distraction from the day job. What is clear is that people increasingly expect transparency from public bodies. These organisations – let us not forget – are funded by the public; it is only right that they are open to the public in how they operate.

The greater the resistance to publishing information, the more suspicious it looks – particularly where the private sector is involved. We've seen this on many occasions in recent years – at City Hall in relation to the Barclays cycle hire sponsorship deal, the Olympic Stadium agreement with West Ham United FC and the selection processes for the proposed Garden Bridge. And, whether or not those suspicions turn out to be true, the secrecy reinforces the perception that some businesses are getting a better deal from the public sector than they should, and that some officials would rather not let us know why they have made the choices they have made. Otherwise, what's there to hide?

The publication of commercial contracts is one issue I have examined in this investigation. Another is how easy it is to find information about decision making in the GLA Group and Family. In my opinion, which has developed over several years of grappling with this issue, in both executive and scrutiny roles, the way that major decisions are reached is often of greater interest than the bare facts — we would like to know what options were there, and how these were weighed up. This information, and a description of the process by which the decision was made, should be open to the public. If it is not, the perception quickly builds that decisions might be unsound, or have been taken behind closed doors for a reason that 'they' don't want us to know about. In contrast, where politicians and officials work in a transparent way, in the knowledge that their decisions are open to debate and challenge, this should help to ensure that their thinking is clear and their evidence base is sound. Transparency should help, rather than hinder, good decision making.

It's the job of the London Assembly to hold the Mayor to account. That is what over two million people voted us to do in 2012. Without transparency, we cannot do this properly, and this is why I investigated this issue in 2013 and am reporting on it again now. We have made progress in recent years. For example, in 2014, following years of pressure from the Assembly, a Freedom of Information request and a ruling from the Information Commissioner's office, the Mayor finally agreed to publish the advice he received from Transport for London when making his annual decision on fares. This was a pleasing outcome and sets a precedent for the next Mayor to follow. But this

was just one step forward. What will really make a difference is cultural change across the GLA Group and Family – the shift towards the presumption that information should be publically available. I think some early signs are there, but much more needs to be done to secure lasting change. To be generous, in a slightly backhanded way, Transport for London has become far more transparent, albeit from a low base. It has a way to go and I trust my successors will push for this.

On the other hand, it's obvious that many organisations find transparency a difficult concept. Some have operated hidden from view for many years and the thought of change makes them uncomfortable. The Metropolitan Police Service in this context has quite a closed culture, which, having been prised open a little in the first few years of the GLA, has in my experience grown following the demise of the Metropolitan Police Authority and its replacement by the Mayor's Office for Policing and Crime. It looks to me as if a cosy client relationship has developed between MOPAC and the MPS in which it is agreeable to both to not share too much with the world outside.

I need to emphasise that the quest for transparency is not a zealous mission to reveal everything, whatever the circumstances. There can be legitimate grounds for confidentiality. These may be genuine commercial reasons, or concern personal information, or raise issues of legal privilege, or indeed public safety. They may also concern facts which, if exposed during a decision-making phase, would weaken the hand of one party and damage or compromise good decision making. These are, however, special cases and should be both unusual and clearly signalled as exceptions, and open to challenge as necessary, but always internally challenged by the decision-making body. The sense that such grounds are lazily used to avoid scrutiny is, in my view, particularly damaging to public trust. Thus I see the position within the GLA Family of London & Partners, a body with a company structure but which is mostly publicly funded, is essentially publicly controlled, and exercises a number of public functions, as being untenable in this context. I would hope that a future Mayor would challenge this culture of secrecy, which the current Mayor has failed to do.

As stated some organisations still act as though transparency just doesn't apply to them. I recognise these resistances but I will continue to challenge them. I recommend we do so because, while transparency may not always be welcomed by organisations, those that resist it risk undermining the connection between themselves and the public. Their legitimacy is diminished. And the short-term advantages an organisation might enjoy from keeping a bad contract secret, or hiding a procurement process, other than in those very special circumstances when we all agree there may be exceptions, are outweighed by the long-term benefits of transparency. An organisation that embraces transparency, that respects the public's right to know, and accepts scrutiny and challenge as a way of improving, is much stronger than one that tries to hide away.

Transparency is easy to promise, but much harder to deliver. That is why we need strong leadership from above, as well as pressure from outside. The current Mayor has helped make the GLA Group more transparent than before, in most areas, and I

welcome that. Some organisations have started to nurture a culture of transparency and are making improvements by themselves. Some of this change has come as a result of pressure from Assembly Members, journalists, and a collection of bloggers and individuals who believe, as I do, that the benefits of transparency outweigh its costs.

This slow process of change needs to accelerate. This investigation has identified some areas of weakness – the Mayor's Office for Policing and Crime (MOPAC), inconsistency across the wider GLA family, Crossrail – and there are bound to be more. And the next few years will see more organisational change with the abolition of the London Fire and Emergency Planning Authority (LFEPA) and the creation of a structure to support Crossrail 2. Transparency needs to be considered as these structures are established, not as an afterthought.

John Biggs AM
Rapporteur for the GLA Oversight Committee

Executive summary

In June 2013, the GLA Oversight Committee published *Transparency of the GLA Group*, the results of an investigation carried out by John Biggs AM. The report concluded that, while the GLA Group had made some steps towards greater transparency in recent years, there was inconsistency between organisations in the Group, and several areas where improvements were needed. The initial response from the Mayor and the GLA Group was positive, and there were some indications that important changes were being made in response to the report.

We wanted to follow up the work from 2013, assess what progress has been made, and ensure that momentum is maintained on this important issue. We also wanted to see how far the principles of transparency extended outside the immediate GLA Group, among those other organisations the Mayor and GLA can exert significant influence over.

Our investigation has allowed us to conclude that the GLA and the functional bodies have all taken some steps to implement the recommendations of the 2013 report. While they have taken different approaches to embedding transparency in their organisations, they are presenting a broadly consistent message about the benefits of greater transparency, including improvements in efficiency, clearer decision making, and strengthened relationships with the public.

Transport for London (TfL) has made good progress in some areas. It publishes more contracts than it used to. And more information is being included in public Board and committee papers, rather than being buried in confidential papers. In October 2015 – while we were carrying out our investigation – TfL published its first transparency strategy. This includes several new commitments that we hope are swiftly implemented. However, progress has not been made by Crossrail – TfL's whollyowned subsidiary. We recommend TfL takes swift action to improve transparency in Crossrail, and also ensure that the concept of transparency is properly embedded in the new structures that will be needed to deliver Crossrail 2.

Other functional bodies have made less progress, and there are still major gaps and inconsistencies in the Group. We are particularly concerned at the lack of information published by the Mayor's Office for Policing and Crime (MOPAC). It is not compelled to publish information because it is not subject to the same regulations as others in the GLA Group. But we think that MOPAC should go further than publishing the bare minimum. We hope the next Mayor will push MOPAC to engage with the concept of transparency and open itself up to the public.

During our investigation, it became clear that improvements could be made to the way that Freedom of Information (FOI) Act requests are dealt with. While they are generally processed promptly in the GLA Group, the information disclosed is not easy

for others to find. It makes no sense to hide this information away. Searchable FOI logs would allow more people to access this information at minimal cost.

Moving on to the organisations that make up the wider GLA Family, we found a variety of attitudes towards transparency. Some operate on the basis that all of their decisions and information should be available to the public, while others operate a more closed approach. In part, this is a consequence of their different origins, governance arrangements and relationships with the Mayor and the GLA. Nevertheless, we believe that a more consistent approach to transparency would be beneficial. Any organisation that benefits primarily from taxpayers' funding should operate on the basis that it is accountable to the public for the decisions it takes. Proper transparency is an important part of that accountability. Clearer guidance from the Mayor about his expectations would help bring these organisations more into line with the corporate commitment to transparency.

The GLA Group continues to change and evolve, and it is important that the Mayor maintains and improves transparency as new organisations are created. The Old Oak and Park Royal Development Corporation (OPDC), established in April 2015, will have much in common with the London Legacy Development Corporation (LLDC). We urge the OPDC to learn from the findings of our investigation so it can avoid a situation like the controversy over the LLDC's Olympic Stadium contract. And the Government's announcement of its intention to abolish the London Fire and Emergency Planning Authority (LFEPA) will bring about more change to the GLA Group. It is essential that transparency is maintained, and not allowed to fall as happened when the Metropolitan Policy Authority was replaced by MOPAC in 2012.

1. Introduction

1.1 In June 2013, the GLA Oversight Committee published *Transparency of the GLA Group*, the results of an investigation carried out by John Biggs AM. It argued that

While transparency never built a house or ran a bus service, it is a foundation of proper accountability. It can help mitigate the risks of poor practice, poor value for money, reputational damage and even corruption. The public also has a fundamental right to know how public money is being used.¹

The report concluded that, while the GLA Group had made some steps towards greater transparency in recent years, there was inconsistency between organisations in the Group, and several areas where improvements were needed. It made a number of recommendations which sought to address specific weaknesses and encourage a wider cultural change in support of greater transparency across the GLA Group.

- 1.2 The initial response from the Mayor and the GLA Group was positive, and there were some indications that important changes were being made in response to the report. We wanted to follow up the work from 2013 and assess what progress has been made since then. We also wanted to see how far the principles of transparency extended outside the immediate GLA Group, among those organisations the Mayor and GLA can exert significant influence over. As we argued in 2013, greater transparency allows for better scrutiny, both by the Assembly, and by others. In turn, this should improve performance and reassure Londoners that these organisations are being run effectively.
- 1.3 In June 2015, John Biggs AM launched a second investigation into transparency, with three terms of reference. These were:
 - To assess the extent to which the *Transparency of the GLA Group (2013)* recommendations have been implemented.
 - To assess the extent to which the Mayor's transparency standards should apply to the wider GLA Family (including London & Partners, London TravelWatch, the London Pensions Fund Authority, the London Waste and Recycling Board, and the Museum of London).
 - To develop recommendations to improve transparency across the functional bodies and the wider GLA Family.
- 1.4 When establishing the scope of this investigation, it became clear that the Mayor and the GLA have close relationships with a number of organisations beyond the GLA Group, and exert varying amounts of control over them. We used the GLA's 2014-15 accounts to identify organisations who either receive over 50 per cent of their funding from the GLA, or have their Chair or Board Members appointed by the Mayor. This

provided us with a list of five additional organisations we have termed the wider GLA Family, outside the GLA Group.

This investigation examined the transparency of ten organisations

GLA Group GLA Family

Greater London Authority (GLA) London & Partners (L&P)
London Fire and Emergency Planning Authority London TravelWatch

(LFEPA) London Fire and Emergency Planning Authority London TravelWatch

London Pensions Fund Authority (LPFA)

Transport for London (TfL)

London Waste and Recycling Board (LWARB)

Mayor's Office for Policing and Crime (MOPAC) Museum of London

London Legacy Development Corporation (LLDC)

Note: Due to its limited time in operation, the recently-established Old Oak and Park Royal Development Corporation was not included in this investigation.

Our findings

- 1.5 Our investigation has allowed us to conclude that the GLA and the functional bodies have all taken steps to implement the recommendations of the 2013 report. While they all have taken different approaches to embedding transparency in their organisations, they are presenting a broadly consistent message about the benefits of greater transparency, including improvements in efficiency, clearer decision making, and strengthened relationships with the public. Key areas of progress across the GLA Group include implementing the requirements of the Local Government Transparency Code, and opening up decision making into the public domain through open meetings and the publication of papers. However, improvements are still needed regarding the publication of contractual information and Freedom of Information Act requests.
- 1.6 Turning to the wider GLA Family, we found a range of practices and attitudes towards transparency. Some of the organisations operate on the basis that all their activities are open to public scrutiny, and take a proactive approach to sharing information and decision making. Others prefer to carry out their functions from behind closed doors. A lack of guidance from the Mayor about his expectations for transparency has meant that some organisations are not in line with the corporate commitment to transparency. This means that not only are they less accountable to Londoners about the money they are spending and the decisions they are taking, but they are also missing out on the benefits that transparency can offer.
- 1.7 To address these issues, we have developed a set of recommendations which are designed to open up decision making across the GLA Group and the wider GLA Family, support the growing culture of openness, and offer advice to the next Mayor on how they can further support and drive transparency.

2. Progress since 2013

Key issues

The 2013 report contained eight recommendations for the functional bodies and the Mayor, and there is evidence that the functional bodies have taken steps to implement them. TfL, for example, now publishes more contracts than it used to. And more information is being included in public Board and committee papers, rather than being buried in confidential papers. However, some of the functional bodies have made less progress, and there are still major gaps and inconsistencies in the Group: MOPAC stands out as a poor performer in this regard. It is not compelled to publish information because it is not subject to the same regulations as others in the GLA Group. We argue that MOPAC should go beyond the bare minimum in deciding what to publish, and engage with the concept of transparency as an essential foundation of accountability.

- 2.1 This chapter considers how the GLA Group and the Mayor have implemented the recommendations in the 2013 report, which fell into three main categories:
 - Publishing contracts.
 - · Opening up decision making.
 - Working with the Assembly.

Publishing contracts

2.2 The Assembly has often been frustrated in its efforts to secure access to important contracts signed by various parts of the GLA Group. This places a limit on the Assembly's ability to scrutinise these deals, some of which run into the hundreds of millions of pounds. The functional bodies – particularly TfL – often cited commercial confidentiality as the reason why contracts could not be published, but the 2013 report found that this was happening too often. It concluded that

There should be a presumption that all GLA Group contracts should be published unless there are pressing reasons not to – and this should only happen exceptionally.

It is disappointing to note that, two years on, relatively little progress has been made on contract publication. Improvements have been made – notably by TfL – but we have not seen a wholesale shift across the GLA Group towards the presumption that all contracts should be routinely published.

TfL is publishing more of its commercial contracts

In 2010, TfL signed a contract with Barclays to sponsor its cycle hire scheme. TfL repeatedly refused to publish that contract, stating it "would adversely affect TfL's bargaining power when negotiating other sponsorship opportunities." When it finally agreed to publish the contract in full, it showed that TfL had signed a five-year deal with Barclays, giving the bank exclusive naming rights for a £25 million contribution to the scheme's costs. The secrecy over the contract had attracted negative press coverage and inhibited the Assembly's ability to scrutinise the deal.

In February 2015, the Mayor announced that Santander would replace Barclays as sponsor, with a contract valued at more than £40 million over 7 years.³ TfL published the contract in full on its website.⁴ TfL's ability to secure a valuable commercial deal was seemingly not hampered by the publication of the previous contract or the transparency clauses in the new contract, as had previously been argued by TfL.

- 2.3 TfL publishes more contracts than before, but it can be extremely difficult to find them. According to TfL, it now publishes all contracts above the relevant EU procurement thresholds, plus any lower value contracts that are mentioned in a TfL press release. Crucially, TfL now publishes these contracts complete with financial information, where before this was commonly redacted. The next step is for TfL to make these contracts easier to find. At the moment, a selection of commercial and sponsorship agreements are available in the "Transparency" section of the TfL website. 6 Users have to navigate to a separate contract finder website to track others down. And the TfL website has a further page with links to contracts published as a result of Freedom of Information Act requests. 8 A list of older contracts is also provided, and these are available in full on request, but they are not immediately available online. Finally, the contract with Santander for the cycle hire sponsorship is only available on a completely separate part of the website which makes it extremely hard to locate. 10 So, while we applaud TfL for taking steps to make more of its contracts available, we suggest it makes them easier to find.
- 2.4 Despite being a wholly-owned subsidiary of TfL, Crossrail publishes far less information than its parent organisation. While the Crossrail website does include lists of contracts worth more than £5,000¹¹, it does not publish any of these contracts in full.¹² It also does not publish papers from its Board meetings, which are held in private. In its submission to our investigation, TfL told us that "All our policies and initiatives designed to ensure transparency apply across the TfL Group, to all subsidiary companies." This is clearly not happening with regard to Crossrail and it may well be an issue elsewhere in TfL. We raised the lack of transparency regarding Crossrail in 2013, but TfL has so far failed to address it.¹⁴ TfL needs to look again at how these policies and initiatives are being implemented across the whole organisation. And when TfL sets up the organisational structures needed to deliver Crossrail 2, it must ensure that they are transparent and open to public scrutiny.

- 2.5 The core GLA and the other functional bodies currently publish lists of contracts, but none of them publishes their contracts in full. While this is in line with the Government's 2015 Local Government Transparency Code, it does not meet the recommendations we made in 2013. In our first report, we asked the functional bodies to publish all new contracts and to make them easily accessible through searchable webpages. Neither of these recommendations has been implemented, despite all the positive words from the functional bodies about the benefits of transparency.
- 2.6 The LLDC is still refusing to publish the contract with West Ham United Football Club to lease the Olympic Stadium. ¹⁶ The Assembly has repeatedly called for the LLDC to publish this in full; there remain concerns over whether the deal represents a good deal for taxpayers, but it is currently impossible to make a judgment about it. The agreement has been requested under the FOI Act, and the Information Commissioner has rejected the LLDC's arguments to keep the agreement secret. The LLDC is currently appealing this decision, incurring yet more expense to keep information out of the public eye. The London Assembly's Budget and Performance Committee has recently recommended that LLDC should publish the contract in full should its latest appeal fail. ¹⁷
- 2.7 MOPAC appears to be heading in a more transparent direction. The Assembly's Budget and Performance recently recommended MOPAC should publish large outsourcing contracts proactively, as well as publishing regular financial and performance data on outsourced services. In response, MOPAC said the Met has amended its tender documentation to ensure all new contracts can be published. It added that "greater transparency of performance and financial data will be embraced in 2016." 18

Recommendation 1

The next Mayor should ensure that all organisations in the GLA Group start to publish all their contracts in full, and set up search facilities on their websites to make them easy to find.

Recommendation 2

Transport for London must ensure that it provides a consistent level of transparency across all parts of its organisation. In particular, it should start publishing the contracts and Board and committee papers of Crossrail, and make a commitment that Crossrail 2 will be transparent and open to scrutiny.

Opening up decision making

2.8 Transparency in the public sector is not just about publishing decisions and contracts: the processes and the thinking behind those decisions should also be made clear. How did MOPAC and the Metropolitan Police Service decide which police stations to close down? Why did the Mayor agree to provide £30 million of funding for the Garden Bridge? How does the GLA allocate its housing budget? It is inevitable (and healthy) that people will disagree about decisions as important as these. But if the information behind those decisions is not provided promptly – or at all – real accountability is lost. And, as we noted in 2013,

a truly strong Mayor is one who is relaxed about openness, because he or she is fundamentally confident of the decisions made, and open to learning how to be better still.¹⁹

- 2.9 We have found that improvements have been made since 2013, when we identified issues with an overreliance on confidential (Part 2) papers and redactions, private meetings, and corporate governance. LFEPA, TfL and the LLDC are subject to Access to Information rules, and publish agenda papers and minutes from their boards and committees. We are now coming across fewer examples of information being needlessly hidden in confidential papers, but there are still instances where Part 2 papers are being used for example, a recent TfL Board Paper about the purchase of 200 New Routemaster buses. ²¹
- 2.10 One concern in particular is how little information MOPAC publishes about its decision making. Because MOPAC is not subject to the same Access to Information rules, it does not have to publish as much information as the other functional bodies. MOPAC must comply with the Police Reform and Social Responsibility Act 2011 and the Elected Local Policing Bodies (Specified Information) Order (2011). It publishes meeting notes to comply with these regulations, but they contain so little information they are virtually useless. The notes of the regular meetings between the Mayor and the Commissioner are a good example:

Mayor Met Commissioner Bilateral 7 December 2015 $^{\rm 22}$

RECORD OF MEETING

- 1. OPERATIONAL UPDATE
- 1.1 The Commissioner updated the Mayor on operational matters.
- 2. PERFORMANCE UPDATE
- 2.1 The Commissioner updated the Mayor on Police performance in London.
- 3. POLICE FUNDING
- 3.1 There was a discussion around police funding following the Comprehensive Spending Review.

- 2.11 MOPAC needs to publish more information about its decision making. It is still a relatively young organisation, and has not developed the culture and practices of the other functional bodies in publishing decision-making information. Because it is not subject to the same Access to Information rules as the other functional bodies, it is under no legal obligation to publish more. And we recognise the challenges of balancing greater openness with operational sensitivities. But the lack of progress since 2013 suggests that MOPAC does not recognise the importance of transparency regarding its decision making, and the Mayor has been unable or unwilling to exert any influence over it.
- 2.12 In some respects, MOPAC is making more of its information available to the public. In 2014, it launched a new online tool to help Londoners monitor crime locally, with the aim of making it easier for Londoners to see what is happening with crime in their area and how well their local police are performing.²³ This followed the Mayor's 2013 pledge for "even greater transparency" over crime data.²⁴ MOPAC should extend this commitment to improve transparency over its decision making.

Recommendation 3

The next Deputy Mayor for Police and Crime should review the decision-making information MOPAC publishes and propose improvements to the Committee by 1 August 2016.

Working with the Assembly

- 2.13 The Assembly's ability to hold the Mayor and the GLA Group to account on behalf of Londoners depends on having the right information available, but this has not always been the case. The 2013 investigation found that Assembly Members and committees often failed to receive adequate or timely responses to queries, and set out two recommendations for the Mayor to address this problem: recommendation six asked the Mayor to issue guidance for people working for the GLA Group clarifying that it is their duty to assist the Assembly in its role; and recommendation seven requested that the Mayor establish standards for responses to Assembly Committees and individual Members. In 2013, the Mayor rejected these recommendations on the basis that he was "not sure that formal guidance or additions to appointment letters would necessarily help in this regard as the solution does not lie in bureaucratic initiatives but in cultural change." His position remains the same in 2015. It is therefore unsurprising that little improvement has been made. Assembly Members from all parties continue to express frustration at the problems they encounter trying to carry out the work they have been elected to do.
- 2.14 As in 2013, MOPAC stands out as the worst performer in this regard. Then, we found that Assembly Members were experiencing significant delays in receiving responses to correspondence and varying treatment of Members and Members' staff enquiries.

We recommended that MOPAC should set up a single email address specifically for Members and their staff for the purpose of managing their correspondence. This has now been done, but Members still report problems with the timeliness and quality of information they receive from MOPAC. It seems that MOPAC needs to take another look at the processes in place to provide timely responses to Members.

- 2.15 We have also identified a particular issue with responses to Mayoral questions regarding policing and crime being provided in private correspondence to individual Assembly Members. This means that the information does not become part of the public record, and is therefore much harder for other people to track down. Members can be placed in a difficult position where information has been provided in confidence, but they feel it would be in the public interest to publish. It would make sense for all responses to be published so these situations can be avoided.
- 2.16 As in 2013, we disagree with the Mayor's view that central guidelines would not help. We believe that the Mayor needs to remind the functional bodies particularly MOPAC of the importance of providing information on a timely basis to Assembly Members. One way of doing this without creating extra red tape would be to refresh the GLA Corporate Governance Framework document which sets out statutory and non-statutory powers and duties for the Mayor, the London Assembly, the chief officers of the GLA and the functional bodies. We understand that this document is currently being refreshed and a draft will be considered by the incoming Mayor later in the year. Improving this document to include provisions for openness and transparency would help support effective governance across the GLA Group. It would also ensure that all individuals were aware of their respective responsibilities when it comes to facilitating transparent decision making and effective scrutiny.

Recommendation 4

The GLA Corporate Governance Framework should be updated to include requirements that:

- Relevant papers should be provided at least 5 working days before committee meetings.
- Information requests from committees and Assembly Members should be fulfilled within 20 working days.
- Answers to Mayoral Questions should always be made public, not sent to Assembly Members confidentially.

3. Transparency in the wider GLA Family

Key issues

Organisations in the wider GLA Family display varying attitudes toward transparency, and a range of practices. Some operate on the basis that all of their decisions and information should be available to the public, while others operate a more closed approach. While we note that all the organisations in the GLA Group and wider GLA Family have different functions, commercial partnerships, and funding arrangements, we believe that a more consistent approach to transparency would be beneficial. Any organisation that benefits primarily from taxpayers' funding should operate on the basis that it is accountable to the public for the decisions it takes. Proper transparency is an important part of that accountability.

3.1 There is a marked difference in the practices of some of the organisations in the wider GLA Family, with some operating on a fairly open and transparent basis, and others preferring to operate from behind closed doors. In part, this is because these organisations all have different remits, structures and relationships with the Mayor and the GLA.

Organisations in the GLA family have different relationships with the Mayor and the GLA				
Name	Funding from GLA (2015-16)	Comments		
London & Partners	£12 million	Mayor appoints Chair and one non-executive director		
Museum of London	£9 million	GLA is co-sponsor of the Museum and appoints half of its Board		
London TravelWatch	£1 million	London Assembly funds LTW and appoints its Chair and Board		
London Pensions Fund Authority	-	Mayor appoints Chair and Board		
London Waste and Recycling Board	-	Mayor appoints Chair and one Board member		
Source: Relevant websites and GLA Statement of Accounts 2014-15, pages 119-12				

3.2 Our investigation set out to examine the extent to which the Mayor's transparency standards should apply to the wider GLA Family. The following sections outline how transparent each organisation currently is, before we set out our recommendations for future improvements.

London & Partners

- 3.3 The Assembly has encountered problems with the transparency of London & Partners (L&P) on several occasions in recent years. In 2014, L&P refused to provide remuneration details of its senior staff to the GLA Oversight Committee. It was also unwilling to allow the Budget and Performance Committee sight of its draft business plan during its scrutiny of the Mayor's draft budget.
- 3.4 In January 2015, the Mayor agreed to implement the Budget and Performance Committee's recommendation that the grant agreement between the GLA and L&P should include transparency requirements. We are therefore pleased to note that L&P has provided the Assembly with its draft business plan much earlier in this year's budget-setting cycle. L&P has also shown a more positive attitude in coming before the Assembly and its committees to be scrutinised.
- 3.5 L&P, however, shows no signs of opening up its decision-making processes, and is sticking to its line that, as a private sector company, it would not be appropriate to publish more information. Its Board meetings are not open to the public, and L&P does not publish any papers. Its website does not provide any information about its grant agreement with the GLA, its annual budget, its accounts or the remuneration of its senior staff. And L&P does not publish a list of its contracts, let alone the contracts themselves. We therefore cannot agree with the conclusion of the L&P Chief Executive Officer, Gordon Innes, that L&P is "committed to being transparent in relation to how taxpayers' money is spent". The GLA provided L&P with over 60 per cent of its income in 2015-16, and the L&P Chairman is a Mayoral appointment.²⁷ It is therefore disappointing that L&P has not made more progress in these areas in recent years, and that the Mayor has not done more to encourage it to do so.

Museum of London

3.6 The Museum of London takes a reactive, rather than a proactive, approach to transparency. It does not publish details of any of its contracts, or any of its Board papers or decisions. It is willing to make papers available if requested, but there is no way of knowing what is being discussed, or when meetings have been held, in order to make such a request. As it told us,

Given the amount of information we hold versus the level of resources we have and the varying ages of our major information handling systems we a take a strategic approach to information release and publication.²⁸

3.7 The Museum of London does, however, show a willingness to become more transparent, and would consider any guidance it received from the Mayor. It is reassessing its approach to information sharing and reviewing its restrictive marking system to publish information more quickly. A good first step would be for the Museum of London to publish its Board papers.

London Pensions Fund Authority

- 3.8 Bearing in mind the commercially sensitive nature of its activities, the London Pensions Fund Authority (LPFA) is a reasonably transparent organisation. It holds its Board meetings in public and publishes Board papers and minutes. It publishes committee agendas, but committee meetings are held in private. Summary minutes of each meeting, however, are published in the Board papers and some committee papers are available by contacting the LPFA's Freedom of Information officer. It is regularly scrutinised by the GLA Oversight Committee.
- 3.9 The LPFA does not publish its contracts. Instead it publishes high level information regarding the payment of invoices over £500, including the supplier name, a brief description of the service, and the amount paid. In its response to our questionnaire, the LPFA stated that it was updating its contract register which would be published before the end of August 2015. As of February 2016 this had not happened.

London Waste and Recycling Board

3.10 The London Waste and Recycling Board (LWARB) has told us it operates on the assumption that all of its activities are open to public scrutiny, and that transparency has always been part of its culture. Its Board and committee meetings are open to the public (for non-confidential items) and it publishes the minutes and a variety of papers, including its business plan, on its website. It does not publish information which it deems 'sensitive', for example infrastructure investments, or any requests under the Environmental Information Regulations. It also does not publish any details about its contracts.

London TravelWatch

3.11 London TravelWatch (LTW) takes a positive approach to transparency on the whole, although there is some room for improvement. For example, although it told us that it publishes details of contracts over £5,000, we could not find that information on its website; it merely publishes expenditure logs that list payments over £500. More encouragingly, LTW has a simple transparency policy, and told us it works on the basis that all information should be made public. In this spirit, it pays regard to the Local Government Transparency Code 2015 even although it is not required to do so by statute. It holds Board and Policy Committee meetings in public, and publishes its papers online. It supports this with live tweeting of its meetings – an innovative

approach that others could try out. In its submission to our investigation, LTW also noted the Memorandum of Understanding it holds with the GLA and affirmed its commitment to assisting the Transport Committee and the wider Assembly.

3.12 LTW does exclude the public for private discussions at its Board and Policy Committee, and does not publish certain papers. Chief Executive Janet Cooke told us that

We often hold confidential discussions either before or after our public Board and Policy committee meetings. These discussions may be supported by confidential reports for members... On balance, we accept that these discussions must be held in confidence in order for us to gain the most valuable insights into matters affecting the industry and solutions for transport users in London. Without these confidential discussions we would not be as effective in our work on behalf of transport users.²⁹

Information from these private sessions is sometimes released at a later date, but LTW has no formal system for doing so. LTW must limit those private discussions to a minimum, and we suggest it sets up a process for releasing confidential papers after an appropriate period.

Conclusion

3.13 Transparency varies widely between different organisations in the GLA Family. In view of the different functions, histories and structures of the organisations, this is not surprising. And without intervention from the Mayor, this situation is unlikely to change. We believe that there should be more consistency between the organisations of the GLA Family to bring them more into line with local government good practice. We therefore call on the Mayor to extend the same principles of transparency to the GLA Family that we recommended in 2013 should apply to the GLA Group.

Recommendation 5

The next Mayor should introduce a more consistent approach to transparency across the GLA Family, bringing it in line with that of the GLA Group. Each organisation should publish a transparency policy that reflects the objectives of the Local Government Transparency Code. In particular, these organisations should publish Board and committee papers, and details of contracts over £5,000 (and full contracts on request). These requirements will remain subject to commercial sensitivity tests, but the presumption should be to publish.

4. Freedom of Information requests

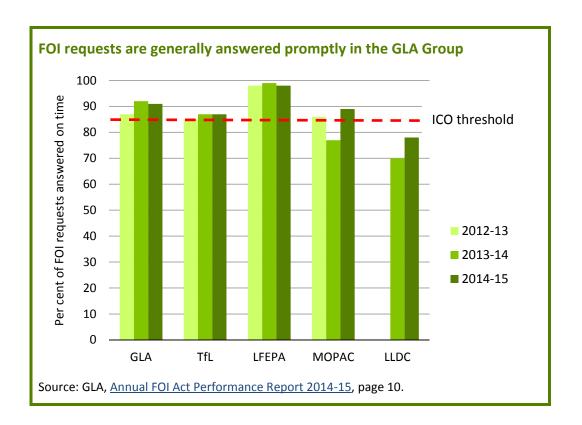
Key issues

Being able to request information under the Freedom of Information (FOI) Act has forced organisations to become more transparent. We found that, while FOI requests are generally dealt with promptly in the GLA Group, the information disclosed is not easy for others to find. There are benefits in introducing searchable FOI logs for the public (who can search the log to access information) and for organisations (who should have fewer duplicate requests for information).

- 4.1 During the course of our investigation, it became clear that improvements could be made in the way FOI requests were being handled. The FOI Act was passed by Parliament in 2000 to force public sector bodies to become more transparent. It obliges public authorities to publish specific information about their activities, including a 'publication scheme' that sets out what information they will publish, how often and in what format. More significantly, it gives members of the public the right to request information from public authorities. The Act applies to all parts of the GLA Group, plus the Museum of London, the LPFA and London TravelWatch from the GLA Family.
- 4.2 We were interested in two elements of FOI in the GLA Group and Family: the speed of responses, and how easy it is to find information disclosed as a result of FOI requests. Organisations in the GLA Group and Family covered by the Act must comply with the statutory 20 working day limit. And, once information is provided, we think it should be made available online for others to see. This not only improves transparency, it potentially reduces the administrative burden of dealing with duplicate FOI requests.

Speed of response

4.3 Organisations in the GLA Group generally respond promptly to FOI requests. In 2014-15, over 3,200 FOI requests were made to the GLA Group. Of these, 66 per cent went to TfL, 18 per cent to the GLA, 11 per cent to LFEPA and 2 per cent to MOPAC. As the chart below shows, these four organisations meet the minimum threshold of the Information Commissioner's Office (ICO) that 85 per cent of FOI requests should be answered within 20 working days. The LLDC does not currently meet this requirement, and we urge it to improve its processes to ensure this is done as soon as possible. It receives relatively few FOI requests each year (95 in 2014-15, making up just 3 per cent of the GLA Group's requests) so it should be able to improve its performance relatively quickly. Data for the Met (as opposed to MOPAC) is not published, but it must fall below the 85 per cent threshold because the Met is now being monitored by the ICO for its poor performance.



4.4 FOI data is less easy to find for organisations in the wider GLA Family. The LPFA is the only organisation to publish this information. According to its latest accounts, the LPFA received 19 FOI requests in 2014-15, all of which were dealt within 20 days. Neither LTW nor the Museum of London publish how many requests they receive each year. We suggest they start publishing this data – and what percentage of requests are dealt with within 20 days – in their annual reports.

Publishing responses

- 4.5 We found a variety of approaches to how FOI responses are published within the GLA Group:
 - The GLA and MOPAC share a disclosure log on the new GLA website. In theory
 this should allow users to filter FOIs by topic, but the user interface currently
 makes searching very difficult.³¹
 - The LLDC website includes a simple disclosure log organised on a monthly basis, with short descriptive titles to help users identify relevant information.³²
 - LFEPA publishes a "selection" of FOI requests which it feels are in the "wider public interest". 33 These can be found on a disclosure log organised by category of information (for example corporate governance, emergency planning, finance and spending) and identified with a short title.

• TfL does not currently publish FOI responses. Since TfL receives by far the most FOI requests in the GLA Group, this is disappointing. TfL has told us, however, that it is in the process of buying new software that will allow it to do so.

We suggest that these websites are improved to allow users to search FOI requests, rather than forcing them to trawl through the disclosure logs. In addition, some of the responses have vague titles – for example "housing", "internal review" and "expenditure". As a result, identifying particular FOI requests and the associated responses can be an almost impossible task.

4.6 None of the organisations subject to the FOI Act in the wider GLA Family publishes responses to requests as a matter of course. These organisations (LTW, the Museum of London and the LPFA) receive fewer FOI requests than organisations in the GLA Group, and appear to lack the processes needed to routinely publish them. In view of the small number of FOI requests they receive each year, we suggest they publish them through a disclosure log with descriptive links to the documents. They may also wish to examine whether a shared service arrangement could help them deal with FOI requests more efficiently.

Recommendation 6

Organisations in the GLA Group should publish all responses to FOI requests as a matter of course. They should set up online FOI search facilities to help users track down information more quickly.

Those organisations in the GLA family that are subject to the FOI Act should set up disclosure logs on their websites, and keep them up to date. These should contain clearly titled links to relevant documents.

Recommendation 7

The Metropolitan Police Service should meet the performance threshold set by the Information Commissioner's Office for responding to FOI requests without delay. To allow the Assembly to monitor progress, the Met's FOI performance should be included in the GLA's Annual FOI Act Performance Report.

5. Conclusions and next steps

- 5.1 As our investigation has shown, organisations in the GLA Group have taken some steps to implement the recommendations from our 2013 report. All of them are broadly aware of the minimum standards which are expected, and they generally have processes in place to ensure they meet these obligations. In addition, organisations in the Group have told us about work underway, or being considered, that would make them more transparent, including:
 - The Mayor is intending to review and refresh the 2009 GLA Group Corporate Governance Framework.
 - TfL is in the process of acquiring new software which will allow it to publish FOI responses, and it is also improving its contracts finder.
 - The LLDC is considering introducing end dates for its confidential papers, and is planning to introduce a transparency policy.
 - LFEPA is currently considering what further non-mandatory information it could publish.
 - MOPAC has plans to make it easier for users to find information online.

We welcome these developments, and we invite these organisations to update us on progress when they respond to our report.

- 5.2 Another area of progress to highlight is TfL's publication of its transparency strategy in October 2015.³⁴ The strategy includes several new commitments to enhance transparency, including the publication of FOI responses in 2016, the development of a publication schedule setting out when it will publish regular information, as well as improvements to its website. We ask that TfL considers the findings in this report as it works to deliver these improvements, and applies a consistent approach to improve the transparency of subsidiaries such as Crossrail.
- 5.3 Organisations in the wider GLA Family have different attitudes towards transparency. In part, this is a consequence of their different origins, governance arrangements and relationships with the Mayor and the GLA. We do think, however, there is an opportunity for the Mayor to use his influence to improve the levels of transparency at these organisations. We have recommended these organisations draw up transparency policies, and publish key documents such as Board papers and contract lists.
- 5.4 The GLA Group continues to change and evolve, and it is important that the Mayor maintains and improves transparency as new organisations like Crossrail 2, for example are created. A new functional body, the Old Oak and Park Royal Development Corporation (OPDC), was established in April 2015 to oversee the regeneration of 650 hectares of north-west London. As a Mayoral Development

Corporation, the OPDC will have much in common with the LLDC. We urge the OPDC to learn from the findings of our investigation: it must have policies and systems in place to avoid a situation like the controversy over the LLDC's Olympic Stadium contract.

- 5.5 The Government's announcement of its intention to abolish LFEPA will bring about more change to the GLA Group. This responsibilities will be brought within existing Greater London Authority structures, and a new role of deputy mayor for fire will be established. The London Assembly will provide scrutiny and oversight through a new statutory Fire and Emergency Planning Committee. It is essential that these changes do not diminish the current level of transparency around London's fire and rescue service. LFEPA's status as a local authority means it is subject to Access to Information rules it therefore has to publish agendas, papers and minutes. As we noted in our 2013 report, transparency fell when the Metropolitan Policy Authority was replaced by MOPAC in 2012. The same should not be allowed to happen when LFEPA is replaced.
- 5.6 We have seen progress in the GLA Group since our 2013 report, and we reiterate our support for those changes. Our investigation has shown, however, that the GLA Group should take further action to become more transparent and accountable. We have also identified ways to improve the transparency of organisations in the wider GLA Family. We therefore urge the Mayor and organisations in the GLA Group and Family to recognise the benefits that transparency brings, both to their organisations and to the public. We look forward to their responses and hearing about their plans to become more transparent over the years to come.

Appendix 1 – Recommendations

Recommendation 1

The next Mayor should ensure that all organisations in the GLA Group start to publish all their contracts in full, and set up search facilities on their websites to make them easy to find.

Recommendation 2

Transport for London must ensure that it provides a consistent level of transparency across all parts of its organisation. In particular, it should start publishing the contracts and Board and committee papers of Crossrail, and make a commitment that Crossrail 2 will be transparent and open to scrutiny.

Recommendation 3

The next Deputy Mayor for Police and Crime should review the decision-making information MOPAC publishes and propose improvements to the Committee by 1 August 2016.

Recommendation 4

The GLA Corporate Governance Framework should be updated to include requirements that:

- Relevant papers should be provided at least 5 working days before committee meetings.
- Information requests from committees and Assembly Members should be fulfilled within 20 working days.
- Answers to Mayoral Questions should always be made public, not sent to Assembly Members confidentially.

Recommendation 5

The next Mayor should introduce a more consistent approach to transparency across the GLA Family, bringing it in line with that of the GLA Group. Each organisation should publish a transparency policy that reflects the objectives of the Local Government Transparency Code. In particular, these organisations should publish Board and committee papers, and details of contracts over £5,000 (and full contracts on request). These requirements will remain subject to commercial sensitivity tests, but the presumption should be to publish.

Recommendation 6

Organisations in the GLA Group should publish all responses to FOI requests as a matter of course. They should set up online FOI search facilities to help users track down information more quickly.

Those organisations in the GLA family that are subject to the FOI Act should set up disclosure logs on their websites, and keep them up to date. These should contain clearly titled links to relevant documents.

Recommendation 7

The Metropolitan Police Service should meet the performance threshold set by the Information Commissioner's Office for responding to FOI requests without delay. To allow the Assembly to monitor progress, the Met's FOI performance should be included in the GLA's Annual FOI Act Performance Report.

Appendix 2 – Transparency of the GLA Group (2013) recommendations

- The GLA Group should implement the Government's transparency code of recommended practice. In particular, it should assert the principle that all contracts should be published unless there are pressing and genuine reasons not to.
- 2) All GLA Group organisations should have a searchable webpage (akin to Crossrail's) with an up-to-date register of their active contracts including brief descriptions, contract values (as opposed to using value bands), the names of suppliers, contract end dates and hyperlinks to published contracts (including those released under FOI). If an organisation has a very large number of active contracts perhaps over 500 it could have a minimum price threshold for inclusion in the register as TfL does. However, in an age where this information is held electronically the administrative burden is much less than it would have been.
- 3) It would be in the public interest for all GLA Group contracts to be publishable. As such, transparency clauses should be included routinely in all new contracts to allow them to be published in full, including financial information. Where a functional body believes a transparency clause could prejudice its commercial interest, and that this would outweigh the inherent public interest in openness and transparency, it should note the reason in its contracts register.
- 4) GLA Group bodies should each adopt an open policy on the value of contracts that will be published. TfL has committed to publishing contracts worth over £10 million, which will result in 20-25 contracts a year being released. We believe this threshold is too high and that TfL should reassess it in order to publish more contracts. We do accept that volume may be a barrier so each body should determine a suitable value threshold, ensuring as many contracts as possible are published, and provide it to the Committee with reasons for the value chosen.
 - These recommendations should be seen as a minimum in advance of potential new government regulations which could force public bodies to publish all contracts in full.
- 5) The Mayor should review practice around the GLA Group informed by the responses provided to this investigation to identify how more information around decisions can go into the public domain. His response should:
 - a) indicate how he will implement the hierarchy of confidentiality mechanisms, avoiding reserved and delayed papers in favour of Part 2s and redactions. We want there to be a Group-wide commitment to including an open Part 1 for

- every agenda paper and decision form to avoid papers that are reserved in their entirety or have their publication delayed.
- b) include a clear test for use across the GLA Group to determine whether information should be withheld from publication and/or considered in private, including criteria for when information is commercially sensitive, and when and how any such information could subsequently be released. This is particularly important for information that is not covered by Access to Information rules where the bases for deciding what information will and will not be published can be less clear.
- c) indicate who within each GLA Group organisation is responsible for determining whether the test above has been met and ensuring that the best confidentiality mechanism is being used.
- d) make proposals as to how progress in publishing more decision making information could be monitored over the coming months.
- e) comment on the changes to the structure under TfL's Board which mean detailed conversations are continuing to happen in private despite the intention of the Localism Act to bring more of them into the public domain.
- 6) The Mayor should prepare guidance for people working for the GLA Group clarifying that it is their duty to assist the Assembly in its role. This should also be made clear in documentation when new appointments are made.
- 7) In addition to addressing the specific concerns above, the Mayor should establish standards for responses to Assembly committees and individual Members. He may wish to use the following parameters, some of which are already established, as a starting point:
 - a) Full responses to correspondence will be received within 20 working days. Functional bodies will not need to be chased.
 - b) Responses to reports will be received within a maximum of three months.
 - c) Quality: responses should address each recommendation in turn (even if it is to say why it has not been accepted) and engage with a committee's concerns and the conclusions it has drawn.

In future, the Assembly secretariat will systematically monitor responses to committee information requests and reports. It will report to the GLA Oversight Committee instances where responses take longer than 20 working days or three months respectively. It will also report responses when committee chairs consider them to be poor quality. The GLA Oversight Committee may also choose to refer these cases to the Mayor.

8) To reduce delays in its responses to correspondence, we consider that MOPAC should, as a matter of urgency, set up a single email address specifically for enquiries from Members and Members' staff. Additionally, the distinction that MOPAC previously tried to draw between enquiries from Members and their staff was inappropriate and MOPAC should confirm that this is no longer its approach.

Appendix 3 – How we carried out the review

In order to assess transparency across the GLA Group and wider GLA Family, we sent questionnaires to the Mayor and each organisation to gather information about their practices and processes. Organisations had one month to reply and we had a 100 per cent response rate. We reviewed various corporate documents, including the Mayor's Openness and Transparency Statement and the GLA Corporate Governance Framework Agreement. We also wrote to Assembly Members to ask for their views on the transparency of the GLA Group and wider GLA Family, and asked for suggestions of what the organisations, and the Mayor, could do better. Finally, we wrote to some external stakeholders to seek their opinions about how the organisations are performing.

To assess how transparent the organisations are in practice, we searched their websites for a variety of information including details of meetings, decisions, and contractual agreements. For those organisations covered by the Freedom of Information Act 2000, we reviewed whether their requests and responses were published on their websites. We compared and contrasted the practices of the GLA and the functional bodies, as well as those organisations that form part of the wider GLA Family. Although we recognise that there an element of subjectivity in such an exercise, a key pillar of transparency is accessibility to information, and by crosschecking the responses on the organisations' websites we could make an assessment of what information is readily available to the public.

Appendix 4 – Endnotes

¹ GLA Oversight Committee, <u>Transparency of the GLA Group</u>, June 2013, page 7.

² MayorWatch. Exclusive: TfL reveals how much Barclays has paid for Cycle Hire scheme. 12 December 2012.

³ Transport for London. <u>Mayor announces Santander as new Cycle Hire sponsor</u>. 27 February 2015.

⁴ http://content.tfl.gov.uk/cycle-hire-sponsorship-contract.pdf

⁵ EU procurement thresholds are available at http://www.ojeu.eu/thresholds.aspx

⁶ https://tfl.gov.uk/corporate/transparency/

⁷ https://www.contractsfinder.service.gov.uk/Search

⁸ https://tfl.gov.uk/corporate/publications-and-reports/contracts-released-under-foi

⁹ https://tfl.gov.uk/corporate/publications-and-reports/contracts-greater-than-5000

¹⁰ https://tfl.gov.uk/corporate/publications-and-reports/cycle-hire-contracts

¹¹ http://www.crossrail.co.uk/about-us/freedom-information/transparency

¹² A redacted version of the operating contract with MTR is available on the main TfL website at https://tfl.gov.uk/corporate/publications-and-reports/contracts-crossrail

¹³ Letter from Howard Carter, TfL General Counsel, to John Biggs AM, 31 July 2015.

¹⁴ GLA Oversight Committee, <u>Transparency of the GLA Group</u>, June 2013, page 17.

¹⁵ Available at http://content.tfl.gov.uk/gla-contract.pdf,
www.londoncontractsregister.co.uk, http://content.tfl.gov.uk/gla-contract.pdf,
www.londoncontractsregister.co.uk, http://content.tfl.gov.uk/gla-contract.pdf,
www.londoncontractsregister.co.uk, http://content.tfl.gov.uk/gla-contract.pdf,
www.met.police.uk/foi/c lists and registers.htm

 $^{^{16}}$ The contract is between E20 LLP, a joint venture of the LLDC and Newham Investments, and West Ham United Football Club.

¹⁷ Budget and Performance Committee, <u>Response to the Mayor's Budget Consultation</u> <u>Document 2016-17</u>, January 2016, page 22.

¹⁸ <u>Letter from Deputy Mayor for Policing and Crime</u> to Chair of the Budget and Performance Committee, in response to the Committee's report *To Protect and Save*, 19 January 2016.

¹⁹ GLA Oversight Committee, <u>Transparency of the GLA Group</u>, June 2013, page 5.

²⁰ Set out in the <u>Local Government (Access to Information) Act 1985</u>.

- ²⁵ Letter from the Mayor to John Biggs AM, <u>GLA Group Transparency</u>, 24 September 2013.
- ²⁶ Letter from the Mayor to John Biggs AM, <u>Pre-Budget Report 2014</u>, 12 January 2015.
- ²⁷ L&P's budget for 2015-16 was £18.5 million, of which £11.4 million was provided by the GLA. See http://cdn.londonandpartners.com/l-and-p/assets/abouts-us/landp-businessplan-2015-16.pdf, page 16.
- ²⁸ Submission from Museum of London, 31 July 2015.
- ²⁹ Letter from Janet Cooke, Chief Executive of London TravelWatch, to John Biggs AM, 31 July 2015.
- ³⁰ LPFA Annual Report 2014-15, page 72.
- 31 https://www.london.gov.uk/foi-disclosure-log
- ³² http://queenelizabetholympicpark.co.uk/our-story/the-legacy-corporation/good-governance/publication-scheme/disclosure-log
- 33 http://www.london-fire.gov.uk/DisclosureLog.asp

²¹ http://content.tfl.gov.uk/board-160203-item12-p1-new-routemasters.pdf

https://www.london.gov.uk/what-we-do/mayors-office-policing-and-crime-mopac/governance-and-decision-making/mayor-commissioner

https://www.london.gov.uk/what-we-do/mayors-office-policing-and-crime-mopac/data-and-research/crime

²⁴ https://www.london.gov.uk/press-releases-6348

³⁴ TfL, <u>Transparency Strategy</u>, October 2015.

³⁵ https://www.gov.uk/government/consultations/enabling-closer-working-between-the-emergency-services

³⁶ GLA Oversight Committee, <u>Transparency of the GLA Group</u>, June 2013, page 15.

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Greek

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Punjabi

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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 لم خص ل ذا ال مستند بدا غتك، فسرجاء ال التصال بسرق مال التف أو ال التحصال على ال عنوان البسري دي العادي أو عنوان البسري د ال الكتروني أعلاه.

Gujarati

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

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