

GREATER LONDON AUTHORITY

REQUEST FOR MAYORAL DECISION – MD3054

Title: Updating the Mayor's Equality, Diversity and Inclusion objectives

Executive summary:

Inclusive London, the Mayor's Equality, Diversity and Inclusion (EDI) Strategy, was published in 2018. It contains 39 equality objectives underpinned by evidence of unequal outcomes and barriers experienced by communities and demographic groups. These were published pursuant to the GLA's statutory duty set out in the Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017 ("the Regulations") to publish one or more objectives it thinks it should achieve to do any of the things mentioned in paragraphs (a) to (c) of section 149 (1) of the Equality Act 2010 ("the 2010 Act").

This decision approves a new cross-cutting set of strategic equality, diversity and inclusion objectives (which has been subject to consultation) for the GLA to replace the objectives set out in Inclusive London. This will be followed by a new strategic document incorporating these objectives, which is intended to be published in early January 2023.

Decision:

That the Mayor approves the content and publication of the updated set of equality, diversity and inclusion objectives set out in Appendix 1.

Mayor of London

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

The above request has my approval.

Signature:



Date:

21/11/22

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

Decision required – supporting report

1. Introduction and background

- 1.1. Inclusive London, the Mayor's Equality, Diversity and Inclusion (EDI) Strategy (MD2212), was published in 2018. It contains 39 equality objectives underpinned by evidence of unequal outcomes and barriers experienced by communities and demographic groups. These were published pursuant to the GLA's statutory duty set out in the Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017 ("the Regulations") to publish one or more objectives it thinks it should achieve to do any of the things mentioned in paragraphs (a) to (c) of section 149 (1) of the Equality Act 2010 ("the 2010 Act"). These are: *a public authority must, in the exercise of its functions, have due regard to the need to -*
 - (a) *eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;*
 - (b) *advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;*
 - (c) *foster good relations between persons who share a relevant protected characteristic and persons who do not share it.*
- 1.2. The Regulations require the GLA to review and publish its equality objectives. The objectives set out in Appendix 1 constitute an updated set of objectives that fulfil this requirement. They have been informed by a process of internal and external engagement that began in late 2021 and demonstrate how the GLA thinks it should achieve any of the things mentioned in paragraphs (a) to (c) of section 149 of the 2010 Act. The engagement that the GLA undertook is described in paragraphs 4.4 to 4.9.
- 1.3. Further work is required to incorporate these objectives into a strategic document, which is intended to be published in early 2023. This strategy will frame these objectives within a broader narrative around the changing nature of inequality in London, the work the Mayor is doing in partnership with others, and the policy changes required from national government to help make London a fairer, more inclusive city.
- 1.4. The Mayor authorised the publication of Inclusive London, under cover of MD2212 in 2018.

2. Objectives and expected outcomes

- 2.1. This decision is for the Mayor to approve the content of and publication of a new set of objectives he thinks he should achieve to do any of the things mentioned in paragraphs (a) to (c) of section 149 (1) of the 2010 Act.
- 2.2. Following the establishment of the London Recovery Programme, and reflecting the arrangements introduced in response to the COVID-19 pandemic, the GLA's work is now structured around specific 'missions' and 'foundations' for the purposes of budget setting and performance reporting. The implementation of these objectives will be aligned with this framework and reflected in the reporting dashboards that are compiled and published on a quarterly basis. Therefore, the objectives cover the following areas:
 - Affordable Housing and Physical Delivery
 - A Green New Deal for Londoners
 - High Streets for All

- A New Deal for Young People
- Helping Londoners into Good Work
- Digital Access for All
- Health
- EDI and Engaging Londoners.

- 2.3. Actions taken to deliver on the objectives will be reported through an annual equality report. Officers within the Communities and Social Policy unit ("CSP") would hold responsibility for the production of this report.

3. Equality comments

- 3.1. Under section 149 (1) of the 2010 Act, as a public authority, the GLA must have due regard to the need to eliminate unlawful discrimination, harassment and victimisation, and any conduct that is prohibited by or under this Act; to advance equality of opportunity; and foster good relations, between people who share a protected characteristic and those who do not. Protected characteristics under the 2010 Act are: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation, and marriage or civil partnership status (the duty in respect of this last characteristic is to eliminate unlawful discrimination only).
- 3.2. Pursuant to the Regulations, the GLA is required to prepare and publish one or more specific and measurable objectives it thinks it should achieve to do any of the things mentioned in paragraphs (a) to (c) of section 149(1) of the 2010 Act.
- 3.3. Under section 33 of the Greater London Authority Act 1999 ("GLA Act"), the GLA is required to have in place arrangements to ensure that due regard has been had to equality of opportunity for all people in the exercise of the Mayor's general powers, as well as in the formulation and/or implementation of the statutory strategies he must publish under section 41 of the GLA Act.
- 3.4. These objectives, and the process through which they will be implemented set out the GLA's commitment to meeting its statutory obligations. The processes of external and internal engagement that informed the objective-setting has also enabled evidence from, and the views of organisations representing, Londoners sharing protected characteristics to be fed through to GLA teams and mission leads.
- 3.5. The ongoing implementation of these objectives will continue to be supported by a programme of stakeholder engagement with equalities groups. This is based around the regular meeting of the Mayor's EDI advisory group, which will be supplemented by engagement with specific sectors, including: race equality organisations, Deaf and disabled people's organisations, older Londoners' groups, LGBTQ+ organisations, and others.

4. Other considerations

Key risks and issues

Risk	Mitigation
Delivery of the objectives is not owned by teams across the GLA	Implementation of the objectives will be aligned with the GLA's corporate performance management arrangements, with mission and foundation leads providing updates on actions taken against objectives and dashboards reflecting relevant actions and performance indicators.
The objectives are not communicated as part of a strategic approach to addressing structural inequality	A full EDI strategy will be published in early 2023, framing these objectives in a broader narrative around the changing nature of inequality in London.

Links to Mayoral strategies and priorities

- 4.1. Given that other functional bodies in the GLA Group have their own documents setting out their equality objectives, the objectives set out in Appendix 1 are primarily concerned with the actions that will be taken by the GLA. They seek to focus on those areas where the GLA has a specific function or responsibility that can be exercised to help achieve the overarching vision.
- 4.2. In particular, the updated set of objectives do not include specific objectives relating to transport and keeping Londoners safe. For these areas, the Mayor's statutory obligations are considered to be fulfilled by other documents:
 - for transport, the relevant document is Transport for London's equality objectives, published in November 2021
 - for keeping Londoners safe, the relevant documents are the Mayor's Policing and Crime Plan; and the Violence Against Women and Girls Strategy, both published in 2022.
- 4.3. Often the role of the Mayor and the GLA in addressing inequalities is to act as a 'convenor' of a wider range of partners towards a common goal. Therefore these objectives should be considered alongside the following:
 - Building a Fairer City, the London Recovery Board's action plan for addressing the inequalities that drove the disproportionate impact of the pandemic, or were created by it
 - the Economic Recovery Framework and its implementation plan, which sets out how the GLA and London's boroughs will help London's economy to grow back stronger, greener and fairer
 - the Anchor Institutions Charter, through which some of London's most powerful organisations have agreed to work collaboratively and leverage their status to support the capital's recovery
 - the Responsible Procurement Policy and Implementation Plan.

Consultation and impact assessment

- 4.4. The EDI objectives were arrived at after a programme of engagement with key external stakeholders and stakeholders internal to the GLA and the GLA Group. The former was based around meetings of the Mayor's EDI Advisory Group and a range of other forums for engaging with organisations representing groups sharing protected characteristics.
- 4.5. Early drafts of the objectives and an overview of the main policies and programmes for delivering them were shared with the Mayor's Deaf and Disabled People's Organisation (DDPO) forum, the London Age-Friendly Forum, roundtable discussions with race equality organisations, and LGBTQ+

stakeholders, as well as the EDI advisory group. In addition, dedicated submissions were received and considered by organisations including Age UK London, the Greater London Forum for Older People – and its Black, Asian and Minority Ethnic sub-committee – Inclusion London, and the Human Rights and Equalities Network.

- 4.6. The drafting of the objectives was also directly informed by vision statements that were co-created with equity-led groups to inform the London Recovery Board's Building a Fairer City action plan. These statements set out key inequalities experienced by different groups of Londoners that drove the disproportionate impact of the Covid-19 pandemic, and what successfully addressing them would look like.
- 4.7. Officers from the GLA's CSP worked with colleagues in the governance team, leads from each of the missions and foundations, and all the relevant policy teams to review current, proposed and potential EDI actions and performance indicators for the GLA's corporate quarterly review dashboards. The outcomes from these meetings informed the updated objectives.
- 4.8. The engagement helped confirm that the objectives were a broadly sound description of how the needs of different groups of Londoners could be met through the GLA's new performance and budgeting framework.
- 4.9. Much of the feedback received from external stakeholders flagged issues of cross-cutting concern (for example, the need to retain an intersectional focus so that the combined barriers and discrimination faced by, say, Black disabled Londoners was considered). Elsewhere, the feedback related to the delivery of specific policies or programmes rather than the wording of objectives.
- 4.10. As well as the wording of objectives being developed in partnership with internal teams and mission/foundation leads at the GLA, the following points raised by stakeholders were also incorporated in the objectives:
 - The need for the potential differential impact of measures aimed at improving air quality in London on older and low-income Londoners to be acknowledged. This point has been included in Objective 4.
 - The importance of regeneration in London being responsive to the needs of groups that make use of public spaces and have specific access needs, particularly older Londoners, being considered. The wording of Objective 5 specifically reflects this point.
 - The need for initiatives aimed at reducing financial hardship to be able to incorporate the needs of specific groups disproportionately likely to be affected by the cost-of-living crisis. This approach is – and will continue to be – adopted in programmes that deliver against Objective 6.
 - The importance of considering the needs of those groups (such as older Londoners) experiencing specific barriers in returning to the labour market following the pandemic. Programmes such as the 'No Wrong Doors' programme referred to under Objective 8 speak to this.
 - The importance of approaches to addressing digital exclusion being informed by the needs of specific groups. This is reflected in the wording of Objective 11.
- 4.11. The wording of the objectives themselves set out in Appendix 1 indicates the policies and programmes that will contribute to the delivery of the objectives, and where these respond to the needs of groups sharing protected characteristics. All policies and programmes referenced have been or will be subject to the standard requirements to consider their equalities impact. An account of how the impact of key policies and programmes will be tracked on an ongoing basis is also set out.

Conflicts of interest

- 4.12. There are no conflicts of interest arising from this decision.

5. Financial comments

- 5.1 There are no immediate financial implications associated with constructing a new set of EDI objectives. However, the application of these new objectives may lead to changes in profile and magnitude of spend. These implications will be considered as future changes to policy or delivery are progressed.

6. Legal comments

- 6.1 Section 149 of the Equality Act 2010 provides that the Mayor must have due regard to the need to eliminate unlawful discrimination, harassment and victimisation, and any conduct that is prohibited by or under this Act; and to advance equality of opportunity and foster good relations between people who share a protected characteristic and those who do not. The duty is set out in full in paragraph 3.1.
- 6.2 Regulation 5 (1) of the Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017 requires the GLA to prepare and publish one or more objectives it thinks it should achieve to do any of the things mentioned in paragraphs (a) to (c) of section 149(1) of the Equality Act 2010. Regulation 5 (2) of the 2017 Regulations provides that the objectives must be published at intervals of not greater than four years beginning with the date of last publication. Regulation 5 (3) provides that an objective published by a public authority in compliance with paragraph (1) must be specific and measurable. The proposed objectives are set out in Appendix 1.
- 6.3 Section 33 of the GLA Act provides that the GLA is required to have in place arrangements to ensure that due regard has been had to equality of opportunity for all people in the exercise of the Mayor's general powers, as well as in the formulation and/or implementation of the statutory strategies he must publish under section 41 of the GLA Act.

7 Planned delivery approach and next steps

Activity	Timeline
Publication on London.gov.uk of updated EDI objectives	November 2022
Mayor's Annual Equality Report 2022-23 published	Summer 2023

Appendices and supporting papers:

Appendix 1 – Text of new set of EDI objectives

Public access to information

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

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

Part 1 – Deferral

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

If YES, for what reason: To allow time for the objectives to be published on London.gov.uk and any related promotional activity

Until what date (a date is required if deferring): 31 December 2022

Part 2 – Sensitive information

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

Is there a part 2 form – YES

ORIGINATING OFFICER DECLARATION:

Drafting officer to
confirm the
following (✓)

Drafting officer:

Dan Drillsma-Milgrom has drafted this report in accordance with GLA procedures and confirms the following:

✓

Sponsoring Director:

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

✓

Mayoral Adviser:

Debbie Weekes-Bernard has been consulted about the proposal and agrees the recommendations.

✓

Advice:

The Finance and Legal teams have commented on this proposal.

✓

Corporate Investment Board

This decision was agreed by the Corporate Investment Board on 14 November 2022

✓

EXECUTIVE DIRECTOR, RESOURCES:

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

Signature

Date

D. Gane

16/11/22

CHIEF OF STAFF:

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

Signature

Date

D. Bellamy

14/11/22