

City Hall Greens

Caroline Russell AM
City Hall
Kamal Chunchie Way
LONDON E16 1ZE

Rory McKenna
The Greater London Authority's Monitoring Officer
City Hall
Kamal Chunchie Way
LONDON E16 1ZE

16 August 2023

Dear Rory,

Formal complaint about Mayor of London and Deputy Mayors

I am writing to request that you investigate the conduct of the Mayor of London, Sadiq Khan, and Deputy Mayors Rajesh Agrawal and Justine Simons OBE, with regard to their relationship with United Airlines.

Background

In May 2022 the Mayor and a GLA delegation of two Deputy Mayors and eight officials flew to the United States for a four-day visit to New York, San Francisco and Los Angeles to promote tourism between the US and London. In a response to a Freedom of Information request on 9 June 2022, the GLA Information Governance Officer stated:

*"United Airlines supported the visit through a package of flights where only taxes and fees were payable. Costs for all flights were therefore £254.76 per person. The agreement with United Airlines was for business class flights from London to New York, New York to San Francisco and Los Angeles to London, and economy class flights from San Francisco to Los Angeles."*¹

The Mayor's press release for the visit included the following note to editors:

*"United Airlines is proud to be flying the Mayor of London Sadiq Khan and his team on their trade mission to the United States. United Airlines is set to operate 22 flights per day from London Heathrow to the United States for Summer 2022."*²

The Mayor's personal (@SadiqKhan) and official (@MayorofLondon) Twitter accounts also posted a photo with United Airlines staff advertising '22 in 2022'.³

¹ GLA, Freedom of Information response, [FOI – USA Trip \[Jun 2022\]](#), June 2022

² GLA, Press Releases, [Sadiq heads to America to bang the drum for London](#), 8 May 2022

³ Twitter, [@MayorofLondon status](#), May 2022; Twitter, [@SadiqKhan status](#), May 2022

Ahead of an investigation into GLA International and Domestic trips in June 2023, GLA staff informed the Oversight Committee that a 'partnership agreement' had been reached with United Airlines. In the Committee meeting on 6 June 2023 the Mayor's Chief of Staff, David Bellamy, denied this was a sponsorship deal and committed to publishing the partnership agreement, though to date it has not been published.

Failure to declare gifts from United Airlines

Paragraph 17 of the Code of Conduct states:

"The procedures under which registration and declaration of interests, gifts and hospitality are to be made are attached at Appendix 5."

Appendix 5, paragraph 1.5-6 of the Code states:

"All Members are required to continue to declare the receipt of any gifts and hospitality in accordance with the Authority's existing procedures and guidance, by registering gifts and hospitality received on the Authority's on-line database."

The GLA Gifts and Hospitality Policy and Procedure states under paragraph 2.2 that gifts include:

"the opportunity to acquire any goods or services at terms not available to the general public, including additional services, privileges and other advantages related to your position at the GLA (benefits and favours)."

Paragraph 2.4 of the policy further states:

"Where travel or accommodation associated with attendance at an international function, event, conference or similar is made on GLA business or as a GLA representative and paid for by a third-party, a gifts and hospitality declaration should be made." ⁴

The opportunity to acquire flights where only taxes and fees are payable is not one that is available to the general public. This may therefore represent a gift from United Airlines to each of the beneficiaries in their capacity as a GLA representative.

No declaration has been made in the Gifts and Hospitality registers of the Mayor⁵, Deputy Mayor Rajesh Agrawal⁶ or Deputy Mayor Justine Simons OBE⁷. I believe this may represent a breach of Appendix 5, paragraph 1.5-6 of the Code of Conduct.

⁴ GLA, [Gifts and Hospitality Policy and Procedure](#), July 2022

⁵ GLA, [Sadiq Khan – gifts and hospitality](#)

⁶ GLA, [Rajesh Agrawal – gifts and hospitality](#)

⁷ GLA, [Justine Simons, OBE – gifts and hospitality](#)

Openness in public office

The Mayor is bound by the principles of public life included in the Code of Conduct under paragraph 1(4), including openness:

“Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.”

While external funding for Mayoral visits may be to the financial benefit of the GLA, full transparency about those arrangements is essential to avoid the perception of bias.

The failure to publish the partnership agreement reached with United Airlines prevents scrutiny of the Mayor’s relationship with that company. The apparent reciprocity of that agreement – whereby a GLA press release and a post from the Mayor’s official Twitter account expressly promoted the company and its commercial offer – only underlines that there is a clear public interest in this instance in transparency, not restriction. Therefore, I believe the ongoing failure to publish the partnership agreement may constitute a breach of the Code of Conduct by the Mayor.

Integrity in public office

The Mayor is also bound by the principle of integrity, included in the Code of Conduct under paragraph 1(4):

“Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their official duties.”

The apparent reciprocity of the agreement reached with United Airlines brings into question the integrity of the Mayor, and the decision to use official GLA channels to promote this particular company and its commercial offer.

Without access to the partnership agreement itself, it is impossible to have clarity at this stage as to whether any specific obligation to United Airlines did exist. However, the evidence presented here is I believe sufficient to warrant further investigation from you, including by requesting sight of the partnership agreement from the Mayor and seeking clarification about the nature of the relationship.

It should go without saying that if any business is able to provide the Mayor and his team with in-kind benefits, and as a result secure favourable promotion of their commercial business offer through official GLA channels, then the integrity of the Mayor and his office may be at significant risk.

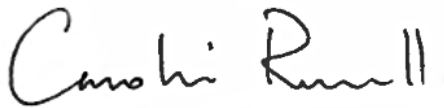
Request for action

I request that you:

- Confirm whether the failure to declare the gift from United Airlines constitutes a breach of the GLA Gifts and Hospitality Policy and Procedure by the Mayor and Deputy Mayors Rajesh Agrawal and Justine Simons OBE.
- Request that the Mayor, Deputy Mayors and all beneficiaries of the gift from United Airlines make a retrospective entry to their Gifts and Hospitality register.
- Confirm whether the failure to declare the gift from United Airlines constitutes a breach of the Code of Conduct, specifically Appendix 5, paragraph 1.5-6.
- Confirm whether the failure to publish the partnership with United Airlines constitutes a breach of the Code of Conduct, specifically a lack of openness under paragraph 1(4).
- Request that the Mayor publish the partnership agreement reached with United Airlines, so the arrangement can be properly scrutinised.
- Confirm whether the apparent reciprocity of the agreement with United Airlines constitutes a breach of the Code of Conduct, specifically a lack of integrity under paragraph 1(4).

Thank you in advance for your consideration of this matter.

Yours sincerely,

A handwritten signature in black ink, reading "Caroline Russell". The signature is written in a cursive, flowing style.

Caroline Russell
Green Party Member of the London Assembly