



**Emma Best AM**  
**Chair of the GLA Oversight Committee**

Sadiq Khan  
Mayor of London  
(Sent by email)

CC:

Debbie Weekes-Bernard, Deputy Mayor, Communities and Social Justice  
Mary Harpley, Chief Officer, Greater London Authority (GLA)

30 January 2024

Dear Mr Mayor,

**Re: GLA Equality, Diversity and Inclusion Strategy**

I am writing to you in my position as Chair of the London Assembly GLA Oversight Committee regarding the Committee's investigation into the 2018-22 GLA's Equality, Diversity and Inclusion Strategy ("the EDI Strategy"). This follows a meeting held by the Committee on 24 May 2023, which was attended by the following guests:

- Debbie Weekes-Bernard, Deputy Mayor for Communities and Social Justice
- Jazz Bhogal, Assistant Director, Health, Children and Young Londoners, GLA
- Rupinder Parhar, Head of Equalities, GLA
- Kenny Bowie, Director of Strategy and Metropolitan Police Service (MPS) Oversight, Mayor's Office for Policing and Crime (MOPAC)
- Spencer Sutcliff, Assistant Commissioner, Fire Stations and Central Operations, LFB
- Mark Evers, Chief Customer Officer, TfL

The EDI Strategy Annual Report is one of the most important tools that you, as the Mayor, have at your disposal to demonstrate how the GLA Group is working together to improve the lives of

Londoners. As you state in your foreword to the strategy, Londoners ‘recognise that our diversity is not just an added extra, but one of our most valuable assets’.<sup>1</sup>

There is a clear consensus that London needs to be more equitable and that the pandemic has highlighted growing issues that threaten the future success of the city. This organisation, with its diverse elected representatives, is well placed to make a meaningful change in this vibrant and diverse city. However, this Committee is concerned that the absence of a performance framework means there is a lack of evidence that real progress has been made during the period covered by this strategy. The Committee accepts that a lot of hard work has been put in by the GLA and functional bodies but a lack of performance metrics means it is unclear the extent to which this has been effective.

The Committee’s investigation sought to understand the GLA Group’s progress in delivering the EDI Strategy’s objectives and their impact on Londoners. On behalf of the Committee, please may I thank your representatives for attending and giving evidence on 24 May, in particular Jazz Bhogal and Rupinder Parhar for attending at short notice. However, the Committee remains concerned about the difficulty which it faced in securing updates on this strategy and GLA guests to attend our meeting to discuss such an important cross cutting topic. It is hoped this does not continue in future investigations on the new strategy.

### **2018 EDI Strategy**

Firstly, the Committee recognises the challenges posed by the COVID-19 pandemic, and the need to divert GLA resources away from previously agreed workstreams to new initiatives. This inevitably caused disruption and impacted the relevance and delivery of the original EDI objectives. The Committee notes the work that has taken place to develop a suite of new objectives, which are fewer in number and more focused on the challenges facing a post-pandemic London.<sup>2</sup>

Nevertheless, the Committee believes the evidence provided in your Equality Report 2020-22 and at recent Committee meetings suggests the GLA has not maximised the opportunities provided by the current EDI Strategy. The Committee has set out its specific concerns below:

### **The 2018-22 EDI Strategy lacks an adequate performance framework to measure the impact of objectives in a clear and consistent way.**

Your Equality Report 2020-22 lists actions that relate to the strategy’s objectives but there is either limited or no assessment of the impact of the actions. For example, in outlining the delivery of objective 34 (to ensure London’s diverse populations no longer experience stigma associated with mental ill-health), the Annual Report refers to the award of circa £250,000 in grants to 38 community projects to support Londoners’ mental health and wellbeing.<sup>3</sup> However, there is no reference to the impact of this funding, such as a change in perception or confidence among the groups involved in the projects (nor is there any indication of any intention to track or measure such impacts). There is also no link to the associated projects mentioned in the Annual Report, which could provide more information or evidence for the statements made.

The GLA’s London Datastore, which hosts performance information for the EDI Strategy, has not

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<sup>1</sup> [The Mayor’s equality, diversity and inclusion strategy, May 2018](#)

<sup>2</sup> [The Mayor’s Equality, Diversity, and Inclusion Strategy Objectives \(2022\) | London City Hall, November 2022](#)

<sup>3</sup> [Mayor’s Equality Report 2020/22 | London City Hall](#)

been updated since 2020.<sup>4</sup> During the Committee's 24 May meeting, GLA guests stated that a decision was made, post-pandemic, to create a new dataset that focused on the impact of COVID-19 on inequalities.<sup>5</sup> GLA guests also stated that the GLA was rebuilding the London Datastore platform ready to support the new EDI Strategy.<sup>6</sup>

Whilst the Committee understands the reasons for this decision, it is disappointing that it has made it more challenging to monitor the impact of the EDI Strategy. Creating a new COVID-19 dataset should not have meant abandoning the existing dataset. Overall, the Committee is concerned about the impact on the existing EDI Strategy, which has lacked a comprehensive dataset for half of its lifetime.

There are several inconsistencies with the way performance is measured in the 2020-22 Annual Report:<sup>7</sup>

- The different measures cover different time periods, which makes it difficult to compare overall performance across the indicators. For example, some measures compare performance in 2014-5 and 2018-19, and some measures compare performance before and after COVID-19.
- Some measures only cover partial periods of the EDI Strategy. For example, Accessible Housing performance only covers 2018-19.
- Some measures cover periods of time completely outside the scope of the 2018 EDI Strategy and with no point of comparison to illustrate change over time. For example, Air Quality performance refers to 'a one-off piece of research' from 2013 with 'no update since then'.<sup>8</sup>
- The narrative accompanying each performance measure does not always fully capture the change in trend between points of time comparison. For example, the Annual Report states that the proportion of accessible new build homes rose from 66 per cent in 2017-18 to 74 per cent in 2018-19.<sup>9</sup> However, the EDI measures from London Datastore show that the figure was 76 per cent in 2016-17 and 86 per cent in 2015-16. Therefore, although the figure is now higher than when compared with 2017-18, it has fallen from a high point of 86 per cent.<sup>10</sup>

At the Committee's 24 May meeting, GLA guests suggested the differences in reporting arrangements, including pauses in reporting, had arisen because of the pandemic.<sup>11</sup> Whilst the Committee accepts the pandemic may have had a temporary impact these issues arose partly due to the GLA's decision making when establishing its performance framework to oversee the implementation of the EDI Strategy. As the Committee pointed out during the meeting, reporting each measure on the same time basis, such as monthly, quarterly or annually, would provide the

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<sup>4</sup> [Equalities, Diversity and Inclusion Measures - London Datastore](#)

<sup>5</sup> [Agenda for GLA Oversight Committee on Wednesday 24 May 2023, 2.00 pm | London City Hall](#)

<sup>6</sup> [Agenda for GLA Oversight Committee on Wednesday 24 May 2023, 2.00 pm | London City Hall](#)

<sup>7</sup> [Mayor's Equality Report 2020/22 | London City Hall](#)

<sup>8</sup> Annual Report – air quality measure Appendix 1 [Mayor's Equality Report 2020/22 | London City Hall](#)

<sup>9</sup> Appendix 1 [Mayor's Equality Report 2020/22 | London City Hall](#)

<sup>10</sup> [Equalities, Diversity and Inclusion Measures - London Datastore](#)

<sup>11</sup> [Agenda for GLA Oversight Committee on Wednesday 24 May 2023, 2.00 pm | London City Hall](#)

basic consistency required to compare performance across the EDI Strategy's objectives.<sup>12</sup>

**There is a lack of evidence that shows the GLA Group is strategically coordinating its work to improve equality outcomes for Londoners.**

When the Assembly contacted the Deputy Mayor for Communities and Social Justice's office to explain the purpose of the investigation and request suggested named individuals from each GLA Group organisation, we were sent names of officers who are generic points of contact for each organisation, such as the Head of Private Office. The Deputy Mayor's office had the opportunity to share the names of officers who work with them to implement and monitor the EDI Strategy but this did not happen.

Furthermore, GLA Group representatives who gave evidence at the Committee's 24 May meeting gave varying views about how the GLA's EDI Strategy had influenced their work in practice, and the representatives referred frequently to their own organisations' EDI strategies.

Both issues left the Committee with an impression that there has been a lack of engagement from the GLA with the rest of the Group to implement and monitor the EDI Strategy.

Your Equality Report 2020-22 lists actions taken and measured by GLA Group organisations but it appears partially complete, with data relating to years outside the strategy's timeframe. For example, the report includes a reference to air quality measurements from 2013 with no subsequent data presented. The Committee is aware that the GLA and TfL have commissioned several more recent research projects.<sup>13</sup>

The Committee has not seen enough evidence to suggest that there are robust governance arrangements in place to enable all GLA Group organisations to work together regularly to implement and monitor the delivery of the EDI Strategy.

**New EDI Strategy**

The development of the new EDI Strategy provides an important opportunity for the GLA to learn lessons from the last four years. In the context of the issues identified in the investigation, the Committee makes four recommendations:

**Recommendation 1**

**The new EDI Strategy must have a comprehensive performance framework with clear measures and targets on which the Committee and Londoners can hold the GLA Group to account.** Measuring and reporting performance must be integral to the implementation of the new EDI Strategy. The new arrangements must address the reporting inconsistencies in the previous strategy. The Committee hopes the development of the refreshed London Datastore will meet these objectives.

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<sup>12</sup> [Agenda for GLA Oversight Committee on Wednesday 24 May 2023, 2.00 pm | London City Hall](#)

<sup>13</sup> [Mayor's Equality Report 2020/22 | London City Hall](#)

## Recommendation 2

**The new EDI Strategy must have a clear delivery plan with accompanying governance arrangements to ensure there is genuine collaboration across the GLA Group with ownership and accountability for the delivery of objectives.** This should include named officers at an appropriately senior level who are required to engage in the implementation of the new strategy on a regular basis.

## Recommendation 3

**The Mayor should consider allocating additional resources to the GLA's Equality team to support the delivery of recommendations 1 and 2.** Notwithstanding the gaps in the team over the last few years, which will have impacted on capacity, if the Mayor is realistic about delivering the objectives of the new EDI Strategy, he should consider the overall resourcing requirements for the team tasked with overseeing this work.

## Recommendation 4

**The Mayor should respond to the specific concerns of the Committee included in Appendix A.** The Committee has a series of specific concerns from a detailed review of your EDI Strategy 2020-22 Annual Report which are included in Appendix A.

The Committee would welcome a response to this letter by 23 February 2024. Please your response by email to the Committee's Clerk, Nikoleta Kemp ([nikoleta.kemp@london.gov.uk](mailto:nikoleta.kemp@london.gov.uk)).

Yours sincerely,



Emma Best AM

**Chair of the GLA Oversight Committee**

## Appendix A

The Committee has some further reflections and questions about the EDI Strategy's existing performance reporting arrangements, which are summarised below.

- The report highlights that a large amount of activity has taken place to deliver the objectives, which is welcome. However, it is not clear whether some actions are considered more important than others as the report does not describe the relative role each action has played in delivering the objectives.
- Since the publication of the previous Annual Report, performance has improved in reducing employment gaps, reducing school exclusions and increasing the proportion of older Londoners accessing the internet. What learning is the GLA Group taking from these areas of progress and applying to other inequalities?
- The action which explains how the GLA Group is delivering objective 18 (to increase the number and diversity of people gaining the skills they need) is welcome, however it would benefit from additional information, such as the time period in which the learners progressed into employment and apprenticeships. This information should be included in any future performance reporting arrangements.
- Regarding the delivery of the GLA's Warmer Homes programme, there is no assessment of performance in the Annual Report. This information should be included in any future performance reporting arrangements.
- Since the publication of the previous Annual Report, it has emerged that child and older person poverty rates have risen. What assessment has the Mayor made of the impact of his policies on poverty rates in London?
- Since the publication of the previous Annual Report, it has emerged that the ethnicity and disability pay gaps remain high at 28 per cent and 17 per cent respectively. The ethnicity pay gap is broadly level with 2014 but is higher than the 6 per cent in the rest of England and Wales. The disability pay gap is up from 14 per cent in 2014 and is higher than the 15 per cent pay gap for the UK as a whole.<sup>14</sup> What action are you taking to address these issues?
- Since the publication of the previous Annual Report, trust in the MPS has fallen from 79 per cent to 66 per cent. To what extent are the objectives in the EDI Strategy linked to levels of trust in the MPS?
- Since the publication of the previous Annual Report, adult obesity rates have risen. Which teams across the GLA Group are responsible for influencing this indicator?
- Since the publication of the previous Annual Report, sexual offence levels have risen, as well as levels of all types of hate crime, including race, Islamophobic, antisemitic, transgender and sexual hate crime. Why does this trend exist and what are you doing to reverse it?

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<sup>14</sup> [Economic Fairness – Disability Pay Gap – London Datastore](#)