

An aerial view of a city map with a green color scheme. The map shows a grid of streets and a river. Several people are walking on the map, scattered across the area. The text is overlaid on the map.

GLA Group Consultations

GLA Oversight Committee

LONDON ASSEMBLY

GLA Oversight Committee



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Contents

Contents	4
Foreword.....	6
Executive summary	7
Recommendations.....	9
Chapter one: Background.....	12
What is consultation?.....	12
When are public bodies required to consult?	12
What is recognised as good practice when consulting?.....	13
What are the benefits of consulting?	14
Development of a GLA Group-wide set of consultation principles	14
Existing GLA resources on consultation.....	14
Publicly available information about GLA Group individual bodies’ consultation processes ..	15
Development of a GLA Group-wide set of consultation principles	16
Ongoing monitoring is needed for any set of principles developed.....	17
What are the challenges to effective consultation?.....	18
Chapter two: Integrity	20
Timeliness	20
Organisational reputation.....	21
Avoiding biased wording	22
Chapter three: Accessibility and visibility.....	24
Visibility	24
Engaging with under-represented and hard-to-reach groups	25
Engaging with young people.....	27
Planning for accessibility considerations	27
Understanding the advantages and challenges of digital engagement.....	29
Using plain language in all consultation documents.....	30
Using different languages in consultations	30
Chapter four: Transparency and disclosure.....	32
Disclosing the responses received	33
Chapter five: Fair interpretation	34
Publishing the methodology used to analyse responses.....	34
Understanding who respondents are	35
Use of third-party organisations to support consultations	35
Consultations should not be treated as referendums	36

Chapter six: Publication.....	38
Timeliness of publication.....	38
What should be included in the publication document following a consultation?	39
Chapter seven: Conclusions.....	40
Organisations must be prepared to listen to consultation responses.....	40
Consultations should be evaluated for effectiveness.....	41
Appendix – Summary of what a GLA Group-wide Consultation Principles Statement should include	42
Committee Activity.....	44

Foreword



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

The GLA Oversight Committee has investigated best practice and delivery of consultations due to their vital importance as a democratic tool for Londoners to have their say and shape their city.

Hearing Londoner's voices throughout key decisions taken by The Mayor, Transport for London (TfL), The Metropolitan Police Service, The London Fire Brigade (LFB) and the Mayoral Development arms is pivotal to creating effective policy. This investigation sought to understand why consultation matters, what good practice in consultation looks like, and how effectively GLA Group bodies are carrying out consultations.

Our investigation heard extensive evidence from external experts in delivery that consultation truly matters. It matters because it improves project and policy outcomes by ensuring that they are informed by people's actual experiences, views and insights. It matters because giving people a voice on the issues that affect them helps to build trusting relationships, community cohesiveness and people's sense of belonging in their city.

The Committee also heard from representatives of the GLA, TfL, LFB, the Mayor's Office for Policing and Crime (MOPAC), and the Old Oak and Park Royal Development Corporation (OPDC). We were encouraged to hear from our guests a high level of commitment to consulting effectively and a solid understanding of why consultations matter. However, practices can be improved and consistency across the GLA Group is currently lacking.

We want to see consultations that are accessible to everyone, clear and transparent and to see evidence that consulting organisations are truly committed to listening to the nuanced and varied evidence they receive. This means consultations shouldn't be treated as oversimplified referendums.

This report calls for the GLA Group to develop a GLA Group-wide set of consultation principles. Londoners should know what they can expect from a GLA Group consultation and have a minimum standard against which they can hold GLA Group organisations to account. This report sets out recommendations on what these consultation principles should include, based on our research of good practice and the expert evidence we heard.

The Committee looks forward to seeing the GLA Group's consultation practices improve and to Londoners having clearer and better opportunities to have their say.

Executive summary

The GLA Oversight Committee held an investigation into what best practice in consultation is and how GLA Group bodies are carrying out consultations.

As part of the investigation, the Committee held two formal meetings in City Hall. The first meeting, held on 23 November 2023 with external experts, explored what consultation is, the benefits of consulting, what good practice looks like, and the challenges to effective consultation.

The second meeting, held on 14 December 2023, explored how GLA Group bodies carry out consultations and the processes they use.

The Consultation Institute's Consultation Charter sets out seven best practice principles for consultation: integrity, visibility, accessibility, transparency, disclosure, fair interpretation, and publication. These principles were used as a benchmarking tool for scrutinising the GLA Group's approach to consultations. This report is structured around these principles.

The Committee also scrutinised the GLA's internal guidance on consultations and the publicly available information about individual GLA Group organisation's consultation processes.

The Committee reached several key findings as part of our investigation, which are summarised below:

- Consulting on a project or policy is likely to result in better outcomes, as it means it is informed by richer evidence, insight and views of the people affected by the policy or project. Consulting also offers organisations an opportunity to build relationships with stakeholders and increase trust and engagement. Conversely, if an organisation doesn't consult on an issue it would have been expected to consult on, or doesn't consult properly or fairly, this carries a risk of eroding public trust; delivering poorly informed and ineffective work; and being challenged in the courts via judicial review.
- There is a wealth of useful external evidence about what good practice in consultation looks like, including from the Consultation Institute, the Cabinet Office, the Local Government Association (LGA), and the Gunning principles developed by the courts.
- The GLA has internal guidance available to staff about carrying out consultations. This is not publicly available. The majority of the GLA Group bodies have some publicly available information about their consultation processes. However, there is not a single GLA-wide consultation standard or set of principles that sets out to the public what they can expect from a GLA consultation. Most GLA Group bodies expressed interest in the development of a common set of a principles.
- The Committee heard that it is important that a set of consultation principles, if developed, is monitored and evaluated for how it is used and how effective it is.
- GLA Group representatives generally reported positive experiences to the Committee of holding consultations, as well as a strong understanding of the benefits of consulting.

However, this does not mean there is not room for improvement. The Committee also heard that there were some inconsistencies in consultation processes held by the GLA Group bodies.

- Cost and staff time can be major challenges to public bodies in carrying out effective consultations. However, the cost of consulting should be considered against the potential cost of making a poorer and less-informed decision or being judicially reviewed.
- The overall reputation of an organisation, and the trust that the public has in it generally, impacts the levels of trust in individual consultations. A strong track record of public engagement and having a strong public presence helps build trust and engagement for individual consultations.
- The Committee heard that it is essential that consultations demonstrate integrity. This means that organisations must consult at the right time, and be genuinely prepared to listen to and act on consultation responses.
- There can be barriers to people responding; and there need to be multiple avenues for consultees to respond. Digital skills and access can be a barrier for some people. A broad range of different tools is required to connect with as many local voices as possible, and voices from across all different communities. It is also essential for accessibility that consultation documents are written in clear and plain language.
- It is best practice to undertake a planning exercise before starting a consultation to identify whether any groups will be hard to reach or may have barriers to responding to the consultation and how these barriers can be mitigated. Planning should also consider how the consultation can be made visible to a wide range of groups.
- It is best practice for consultation reports to be published in a timely manner, and to be relevant and easily understandable. Consultation reports should cover what consultation responses were received, the methodology used for interpreting the responses, and what actions were taken based on the responses.

Recommendations

Recommendation 1

Training should be available to all GLA staff that includes guidance on why consulting matters, and the benefits of consulting.

Recommendation 2

The GLA should publish a clear, concise Group-wide Consultation Principles Statement. This should explain what the public can expect when it engages with a consultation, and why the GLA Group considers consultation to be an essential part of effective policy development, in order to establish and maintain public trust. This should be informed by the Gunning principles, the Consultation Institute's Consultation Charter and Government guidance on consultations. This statement should be formally adopted as a Mayoral Decision.

Recommendation 3

A GLA Group-wide Consultation Principles Statement should also apply to consultations held with staff.

Recommendation 4

The development of a GLA Group-wide set of consultation principles should be accompanied by a plan to evaluate their effectiveness, and how they are being used. This should include central monitoring and tracking of GLA Group consultations, to ensure that: they adhere to the required standards; and the principles can continue to evolve to reflect emerging best practice.

Recommendation 5

A GLA Group-wide Consultation Principles Statement should acknowledge that there is a cost to holding consultations. This should include a commitment to ensuring that spending on consultations is effective and efficient; and that due consideration has been given to whether a consultation is appropriate and likely to be beneficial.

Recommendation 6

A GLA Group-wide Consultation Principles Statement should recognise the importance of timeliness by consulting at an early stage of a decision-making process. GLA consultations need to be timely and transparent on what decisions have been made, and what can be influenced.

Recommendation 7

A GLA Group-wide Consultation Principles Statement should include recognition that public trust in the integrity of the GLA as a whole affects public trust in individual consultations.

Recommendation 8

The GLA should commit to using neutral and consistent wording in its consultations. Consultations should always include the option to disagree with proposals entirely.

Recommendation 9

The GLA Group should engage directly with disabled people's organisations to discuss consultation processes; best practice; and how to ensure that all accessible forms of consultation can be planned into consultations from the start.

Recommendation 10

GLA consultations must include essential pre-consultation planning to identify those that are impacted the most; and plan how to engage with them. Planning should also consider how to reach under-represented groups; what barriers there might be to some people responding; and how to mitigate these barriers. This needs to be an essential part of the wider cost/benefit analysis in reaching decisions about whether to consult.

Recommendation 11

A GLA Group-wide Consultation Principles Statement should include recognition of the need to accept responses via multiple channels, including non-digital channels.

Recommendation 12

A GLA Group-wide Consultation Principles Statement should include recognition of the need to use plain and simple language in all consultation documents.

Recommendation 13

GLA consultations should start from a position that everything is public. A GLA Group-wide Consultation Principles Statement should include a commitment to transparency. GLA consultations should only withhold information for commercial sensitivity reasons where this is absolutely necessary.

Recommendation 14

The GLA should publish the methodology it uses for analysing consultation responses. This needs to be established at the outset of a consultation.

Recommendation 15

The GLA should have a clear policy on the use of independent third parties to analyse responses.

Recommendation 16

All GLA consultation documentation should include a timetable for when a decision will be made, and a report published. This should include any intermediate steps to reaching a decision. All those who respond to a consultation should be informed of its outcome in a timely manner.

Recommendation 17

The GLA should commit to conducting an internal evaluation of each consultation it holds. This should be proportionate to the nature and size of the consultation itself; and should allow for ongoing learning and improvement of the consultation process.

Chapter one: Background

What is consultation?

The Committee's investigation was based on the Consultation Institute's definition of consultation:

*"Consultation is the dynamic process of dialogue between individuals or groups, based upon a genuine exchange of views, with the objective of influencing decisions, policies or programmes of action."*¹

When are public bodies required to consult?

There is no general duty for public bodies to consult on decisions. However, there is sometimes a statutory duty to consult on specific decisions, for example, on planning decisions.

There is also sometimes a common law duty on public bodies to carry out a consultation. This is known as the "doctrine of legitimate expectation".² The LGA's guidance on consultations states:

*"Essentially, where people have come to legitimately expect a process of consultation, for example, with local authority budget cuts or healthcare changes, there are grounds for a judicial review should a public consultation not take place."*³

Whilst statutory consultations are generally carried out in quite a specific and prescribed way, there is discretion for public bodies to decide how to carry out non-statutory consultations. However, the courts have said that all consultations must be conducted fairly. A set of principles known as the Gunning principles are used by the courts to determine if a consultation has been conducted fairly. These are set out below. The courts have said that the Gunning principles should be followed by public bodies when conducting all consultations, including consultations that the body is holding voluntarily.⁴ If a public body fails to consult fairly, it risks being subjected to a judicial review.

A judicial review occurs when an individual or group challenges a decision made by a public organisation by taking a case to the High Court and asking a judge to decide whether the decision made was lawful. Should the decision be found to have been made unlawfully, the courts can overturn the decision and direct the public authority to do something else. Judicial reviews are time-consuming and costly processes, particularly if a decision is overturned.⁵

Despite the risk of a challenge around how a consultation is delivered, it is important to acknowledge that a public body is under no obligation to act in accordance with responses. For example, if a public body carried out a consultation on whether a decision (for example to cut a

¹ Consultation Institute, [Consultation Charter](#), 2017

² LGA, [New Conversations 2.0 – LGA guide to engagement](#), February 2019

³ LGA, [New Conversations 2.0 – LGA guide to engagement](#), February 2019

⁴ Pinsent Masons, [Guide to public consultation in the UK](#), August 2023

⁵ Courts and Tribunals Judiciary, [Judicial Review](#), 2024

library service) should go ahead, and if it primarily received responses calling for the decision to not go ahead or to be done differently, the public body is not obligated to do this.⁶

What is recognised as good practice when consulting?

The Consultation Institute's Charter – seven best practice principles

The Consultation Institute is a leading not-for-profit best practice and membership body, promoting public sector and stakeholder consultation standards, as well as workplace training and thought leadership on consultations.

The Consultation Charter's best practice principles were used as a benchmarking tool for this investigation. The principles are integrity, visibility, accessibility, transparency, disclosure, fair interpretation, publication.⁷

Gunning principles

The Gunning principles were developed in a 1985 court case and are used by the courts to determine whether a consultation was conducted fairly. The principles are that:

- consultation must take place when the proposal is still at a formative stage
- sufficient reasons must be put forward for the proposal to allow for 'intelligent consideration' and response
- adequate time must be given for consideration and response
- the results of consultation must be conscientiously taken into account.⁸

Government consultation principles

The Government has also published a set of 11 consultation principles:⁹

- consultations should be clear and concise
- consultations should have a purpose
- consultations should be informative
- consultations are only part of a process of engagement
- consultations should last for a proportionate amount of time
- consultations should be targeted
- consultations should take account of the groups being consulted
- consultations should be agreed before publication
- consultations should facilitate scrutiny
- government responses to consultation should take place in a timely fashion
- consultation exercises should not be launched during local or national election periods.

⁶ LGA, [New Conversations 2.0 – LGA guide to engagement](#), February 2019

⁷ Consultation Institute, [Consultation Charter](#), 2017

⁸ LGA, [New Conversations 2.0 LGA Guide to Engagement The Gunning Principles](#), February 2019

⁹ Cabinet Office, [Consultation Principles: guidance](#), last updated 2018

What are the benefits of consulting?

The benefits of holding consultations were widely agreed by all guests at both Committee meetings.

“Just in terms of why we consult. I suppose, firstly to genuinely try to get better outcomes, secondly to try to know what we do not know, what the public is telling us rather than just what we were assuming about it, and then thirdly to try to build relationships with stakeholders and communities that we may not otherwise do.”¹⁰

Kenny Bowie, Director of Strategy and Metropolitan Police Oversight MOPAC

Alex Smith, Head of Campaigns Communications, London TravelWatch, stated: “You can get a lot of useful insight and information from people you otherwise might not have. Someone who lives in an area where it is happening might know more than what is on paper.”¹¹

Alex Smith also highlighted that consulting can offer the benefit of “getting buy-in when the people it is going to impact are involved”, adding: “Then it hopefully causes fewer issues, if there are any issues, later on.”¹²

A report by Trust for London on public participation in London linked the idea of public participation and a sense of belonging. It stated: “People are more likely to belong in a city they have helped shape and support.”¹³

Recommendation 1

Training should be available to all GLA staff that includes guidance on why consulting matters, and the benefits of consulting.

Development of a GLA Group-wide set of consultation principles

Existing GLA resources on consultation

The GLA does not have any publicly available information about GLA Group-wide consultation processes. The GLA also does not have a set of principles or Code of Practice relating to consultations specifically. However, it does have an internal resource available to staff about public engagement: the GLA Engagement Handbook. This resource sets out five values for effective engagement with the public:

¹⁰ GLA Oversight Committee, [Transcript of Agenda Item 8 – GLA Group Consultations](#), 14 December 2023, p2

¹¹ GLA Oversight Committee, [Transcript of Agenda Item 6 – GLA Group Consultations](#), 23 November 2023, p4

¹² GLA Oversight Committee, [Transcript of Agenda Item 6 – GLA Group Consultations](#), 23 November 2023, p4

¹³ Trust for London, [London Voices: the journey to full participation](#). December 2021

“Open, Honest and Trusting – We value open honest conversations, with transparency about opportunities and barriers. In turn we also trust partners to work with us through complexity.

“Inclusive and Diverse – We centre the importance of diverse voices and perspectives, and actively design processes that remove barriers to participation and focus on the needs of diverse groups.

“Collaborative – We recognise that challenges facing London are complex and seek to work in partnership wherever possible to achieve sustainable solutions.

“Respect & Power – We respect the contribution of all groups and perspectives and address inequalities in resource and power.

“Responsive – We are active in responding to the needs of communities, and always share the impact of engagement back with partners.”¹⁴

The Committee has considered this internal resource. Whilst we are encouraged to see that it has a strong focus on listening and engaging with communities, we would like to see it include: the types of scenarios in which consultation is likely to be helpful or important; and more specific content about how the GLA should carry out consultations, for example guidance around timeliness, promotion of consultations and interpretation of responses.

The GLA also has guidance available for staff, published on the intranet, about making consultations inclusive.¹⁵ This guidance is focused on making consultations accessible to disabled people, but some of the guidance in it will apply more widely. The Committee welcomes this guidance but would like to see it expanded and made more visible to staff.

Publicly available information about GLA Group individual bodies’ consultation processes

Transport for London (TfL)

TfL has publicly available information on its consultation processes.¹⁶ This includes an explanation of the types of decisions it consults on; its consultation and decision-making processes; a link to TfL’s online consultation platform; a statement that all of TfL’s consultations are based on the Gunning principles; and an explanation of what consultation reports will include.

Old Oak and Park Royal Development Corporation (OPDC)

The OPDC has an Engagement Strategy, published in 2021 and updated in 2024.¹⁷ It also has a Statement of Community Involvement, which is regularly updated, providing guidance on how OPDC as local planning authority undertakes consultations and expects developers to consult local people on their planning applications, as well as a ‘frequently asked questions’ webpage, which includes some information about how it carries out consultations.¹⁸

¹⁴ GLA Intranet, GLA Engagement Handbook, February 2021

¹⁵ GLA Intranet, Making consultations inclusive

¹⁶ TfL, [Consulting with you – Transport for London \(tfl.gov.uk\)](https://www.tfl.gov.uk/consulting-with-you)

¹⁷ Old Oak and Park Royal Development Corporation. [Community Engagement Strategy](#), 2021

¹⁸ [OPDC FAQs](#)

London Fire Brigade (LFB)

LFB must follow the Department for Communities and Local Government's Procedural Guidance when consulting.¹⁹ The guide describes statutory consultations that fire safety enforcing authorities and building control bodies are obliged to carry out. As per the Government's Fire and Rescue National Framework for England, LFB is required to publish an Integrated Risk Management Plan in line with guidance from the National Fire Chiefs' Council. The National Framework provides that the draft Community Risk Management Plan (CRMP) must "reflect effective consultation throughout its development and at all review stages with the community, its workforce, and representative bodies and partners".²⁰

Mayor's Office for Policing and Crime (MOPAC)

It is not evident that MOPAC has any guiding principles or code of practice regarding its consultation processes that is publicly available. However, MOPAC does consult on its Police and Crime Plan. MOPAC hosted a consultation for its Police and Crime Plan for London 2022-2025 from 16 November 2021 until 21 January 2022.²¹ It does refer to the GLA Engagement Handbook.

London Legacy Development Corporation (LLDC)

The LLDC has a publicly available Code of Consultation, developed in 2013.²² The Mayor was asked at Mayor's Question Time in 2017 if he would review the consultation strategies employed by the LLDC. He responded that he was confident in its consultation practices.²³

Development of a GLA Group-wide set of consultation principles

The Committee asked the GLA Group body representatives at the 14 December 2023 meeting whether they would be interested in the idea of an agreed and published GLA-wide set of consultation standards.

On behalf of LFB, Susan Ellison-Bunce, Head of Strategy and Performance, responded: "*We would be very interested in working with GLA colleagues to develop a shared approach. That could be very interesting and could be very helpful.*"²⁴

Kenny Bowie, Director of Strategy and Metropolitan Police Service Oversight at MOPAC, agreed that "*the theory of it is very good*" and suggested that anything developed is "*anchored at that principle level rather than the detailed level [...] It would need that sort of flexibility*".²⁵

In agreement, Emma Williamson, Director of Planning, Old Oak and Park Royal Development Corporation, stated: "*It would be helpful. It is always good to collaborate.*"²⁶ Fraser MacDonald, Strategic Consultations Lead at TfL, advised that TfL "*do not use those particular guidance or*

¹⁹ Department for Communities and Local Government, [Building Regulations and Fire Safety Procedural Guidance](#), Fifth Edition, March 2015

²⁰ Home Office, [Fire and Rescue National Framework for England](#), May 2018, P14

²¹ MOPAC, [Police and Crime Plan for London 2022-2025 Consultation Summary](#), March 2022

²² LLDC, [Code of Consultation](#), May 2013

²³ , [Mayor's Question Time](#), 10 August 2017

²⁴ GLA Oversight Committee, [Transcript of Agenda Item 8 – GLA Group Consultations](#), 14 December 2023, p4

²⁵ GLA Oversight Committee, [Transcript of Agenda Item 8 – GLA Group Consultations](#), 14 December 2023, p4

²⁶ GLA Oversight Committee, [Transcript of Agenda 8 – GLA Group Consultations](#), 14 December 2023, p4

handbooks [existing internal GLA consultation resources], but we have ... been building our consultation approach and toolkit for the last 20-plus years.”²⁷

Recommendation 2

The GLA should publish a clear, concise Group-wide Consultation Principles Statement. This should explain what the public can expect when it engages with a consultation, and why the GLA Group considers consultation to be an essential part of effective policy development, in order to establish and maintain public trust. This should be informed by the Gunning principles, the Consultation Institute’s Consultation Charter and Government guidance on consultations. This statement should be formally adopted as a Mayoral Decision.

Internal GLA Consultations

In November 2022 the GLA moved staff from a monthly to a four-weekly payroll cycle. This was despite the internal consultation finding that *“some people are supportive of the changes we are introducing, but there are many who aren’t.”*²⁸ The number of people expressing views against this proposal far outweighed the number of people in favour of the proposal. This Committee did not consider that the consultation process was clear enough in its expression of whether there was real scope to change the course of action.

This Committee reiterated its concerns about the impact on staff and the disproportionate impact on lower-paid staff at the GLA Oversight Committee meeting on 1 November 2023. The Committee was greatly surprised and disappointed to learn that the GLA did not ask TfL whether it would be possible to move GLA staff to a monthly pay system. The GLA’s Chief Officer said: *“We never had any conversation with TfL about doing monthly payroll for us.”*²⁹ This should have been made clear in the internal consultation.

Recommendation 3

A GLA Group-wide Consultation Principles Statement should also apply to consultations held with staff.

Ongoing monitoring is needed for any set of principles developed

Mike Bartram, Fellow at the Consultation Institute, told the Committee of the importance of evaluating the effectiveness of any set of principles or consultation standard developed. He stated: *“There is no point having standards if you do not monitor effectiveness in delivering them because that just breeds cynicism.”*³⁰

²⁷ GLA Oversight Committee, [Transcript of Agenda Item 8 – GLA Group Consultations](#), 14 December 2023, p3

²⁸ GLA Intranet, Consultation on monthly payroll cycle

²⁹ , GLA Oversight Committee, [Transcript of Agenda Item 5 – HR and IT Shared Service Transfers – Panel 1](#), Wednesday 1 November 2023, p16

³⁰ GLA Oversight Committee, [Transcript of Agenda Item 6 – GLA Group Consultations](#), 23 November 2023, p13

Clare Delmar, Founder of Listen to Locals, added another argument to the need to monitor a set of consultation principles or standards, pointing out that best practice can change.

“Standards are very important and, if anything, people then have something to fall back on if they feel they have not been met. However, on the other hand standards are not set in stone and it is really important to recognise that. New evidence, new data, new best practice, new conditions, enter into what effectively forms a standard all the time.”³¹

**Clare Delmar, Founder
Listen to Locals**

Recommendation 4

The development of a GLA Group-wide set of consultation principles should be accompanied by a plan to evaluate their effectiveness, and how they are being used. This should include central monitoring and tracking of GLA Group consultations to ensure they adhere to the required standards, so that the principles can continue to evolve to reflect emerging best practice.

What are the challenges to effective consultation?

The Committee heard from guests at its 23 November 2023 meeting that the key challenges to public bodies holding effective consultations are cost and staff resource constraints.

Chris Harrison, Regional Project Director for the South, Project Centre, noted that consultations are often limited by cost and time constraints. He stated: *“Sometimes the look and feel of the consultation is not completely set because you have these limitations, and we have to work within the limitations.”³²*

The LGA’s consultation guidance also highlights the time that consultations take, advising:

“Before you run any consultation exercise, it’s important to make sure that it is a necessary activity. Consultations can be time-consuming for organisations to run, while asking residents for unnecessary information can be a waste of time and resources, as well as being annoying for the people asked to take part.”³³

Mike Bartram pointed out that there can be a cost to not consulting or not consulting well, stating: *“A large amount of money has been wasted on projects which have been judicially reviewed on the basis of their consultation and they have had to do them all again.”³⁴* He added: *“Consultation is good value for money for nothing else than getting it wrong is very bad value for money.”³⁵*

³¹ GLA Oversight Committee, [Transcript of Agenda Item 6 – GLA Group Consultations](#), 23 November 2023, p8

³² GLA Oversight Committee, [Transcript of Agenda Item 6 – GLA Group Consultations](#), 23 November 2023, p6

³³ LGA, [New Conversations 2.0 LGA Guide to Engagement](#), February 2017

³⁴ GLA Oversight Committee, [Transcript of Agenda Item 6 – GLA Group Consultations](#), 23 November 2023, p12

³⁵ GLA Oversight Committee, [Transcript of Agenda Item 6 – GLA Group Consultations](#), 23 November 2023, p13

The LGA similarly warns:

“With shrinking budgets, councils can’t afford the expense of getting the legal aspects of consultation and engagement wrong. Court cases are expensive, and the media firefighting and reputational damage that comes with a legal challenge bring their own costs.”³⁶

Recommendation 5

A GLA Group-wide Consultation Principles Statement should acknowledge that there is a cost to holding consultations. This should include a commitment to ensuring that spending on consultations is effective and efficient; and that due consideration has been given to whether a consultation is appropriate and likely to be beneficial.

³⁶ LGA, [New Conversations 2.0 LGA Guide to Engagement](#), February 2017, p34

Chapter two: Integrity

The Consultation Institute's Consultation Charter sets out integrity as its first best practice principle, and states:

"The process must have an honest intention. The Consultor must be willing to listen to the views advanced by consultees and be prepared to be influenced when making subsequent decisions. If the decisions subject to consultation have already been taken, it is a waste of consultee's time and a fraud upon all participants to undertake a purposeless exercise and breaches the principle of Consultation Integrity."³⁷

Key findings

- **Integrity is something that organisations build up over time and throughout different consultations.**
- **The overall reputation of an organisation, and the trust that the public has in it generally, impacts the levels of trust in individual consultations.**
- **A strong track record of public engagement and having a strong public presence helps build trust and engagement for individual consultations.**

Timeliness

All guests at the Committee's 23 November meeting raised the importance of timeliness as part of integrity and there was agreement that a consultation must occur at an early stage of a piece of work. Alex Smith said: *"Are you doing it at a point where it can make a difference? Are people's contributions going to have an impact where appropriate?"³⁸*

"All too many consultations happen too late when really all you just want to do is check that you have it right and then tell everyone that you have after you have ignored their responses. Therefore, it is important to consult at the right time. You can consult too early as well, when you are not clear enough what you are proposing and therefore people do not know what they are reacting to. The timing is really important."³⁹

**Mike Bartram, Fellow
Consultation Institute**

Fraser MacDonald stated this was also important to TfL: *"We want to make sure that we are consulting at a point before any decisions have been made."⁴⁰*

³⁷ Consultation Institute, [Consultation Charter](#), 2017

³⁸ GLA Oversight Committee, [Transcript of Agenda Item 6 – GLA Group Consultations](#), 23 November 2023, p2

³⁹ GLA Oversight Committee, [Transcript of Agenda Item 6 – GLA Group Consultations](#), 23 November 2023, p2

⁴⁰ GLA Oversight Committee, [Transcript of Agenda Item 8 – GLA Group Consultations](#), 14 December 2023, p2

Roz Henville, Director of Communications, Engagement and Strategy, OPDC, provided an example of undertaking community engagement in advance of beginning the OPDC's Supplementary Planning Document consultation. She explained how this was beneficial as it *"hopefully enabled us to build a bit more trust with the community as well because they could see ... we are really invested [...] we really want to listen, and this was before we had even started the formal consultation."*⁴¹

Recommendation 6

A GLA Group-wide Consultation Principles Statement should recognise the importance of timeliness by consulting at an early stage of a decision-making process. GLA consultations need to be timely and transparent on what decisions have been made and what can be influenced.

Organisational reputation

Stephanie Bortoli, Head of Communications and Engagement, Project Centre, highlighted that the overall reputation of an organisation impacts the level of trust that the public has in its individual consultations, stating: *"It is really hard to separate integrity on a consultation with the authority delivering that consultation."*⁴²

It was also argued that a strong track record of public engagement can increase trust in organisations.

*"Having this continued presence, always being in the room, always being in the community, showing before you break ground or start building or change your health service that you are listening and you are there makes a big difference."*⁴³

Clare Delmar, Founder

Listen to Locals

Recommendation 7

A GLA Group-wide Consultation Principles Statement should include recognition that public trust in the integrity of the GLA as a whole affects public trust in individual consultations.

⁴¹ GLA Oversight Committee, [Transcript of Agenda Item 8 – GLA Group Consultations](#), 14 December 2023, p19

⁴² GLA Oversight Committee, [Transcript of Agenda Item 6 – GLA Group Consultations](#), 23 November 2023, p15

⁴³ GLA Oversight Committee, [Transcript of Agenda Item 6 – GLA Group Consultations](#), 23 November 2023, p15

Avoiding biased wording

The Committee heard that consultation questions should not be asked in a way that could influence respondents towards answering a particular way. This was highlighted by Clare Delmar at the Committee's 23 November 2023 meeting who said: *"It is also how the questions are asked [...] not leading or directing people towards a sort of prejudged outcome."*⁴⁴

Case Study – TfL Consultation on ULEZ

The Ultra Low Emission Zone (ULEZ) is a scheme that charges drivers of older, more polluting vehicles to enter certain areas of London. The ULEZ zone was expanded on 29 August 2023 to cover all of Greater London. People who wish to drive in London must ensure that their vehicle is compliant with the ULEZ standards or pay a daily £12.50 charge.

The ULEZ scheme is administered by TfL. TfL held a consultation on the expansion of the ULEZ from 20 May 2022 to 29 July 2022.⁴⁵

The email address that TfL usually uses for consultations is haveyoursay@tfl.gov.uk. The email address used for the ULEZ consultation was cleanairyourview@tfl.gov.uk.

At the Committee's 14 December 2023 meeting, Committee members questioned TfL's representatives about the use of the 'clean air' email address. Fraser MacDonald explained: *"We created the mailbox for ULEZ in the sense that we knew there was going to be a high volume of responses, so we wanted to have that information kept into one distinct area."*⁴⁶

Christina Calderato, Director of Transport Strategy and Planning, TfL, added: *"The consultation was broader than just the London-wide ULEZ [...] It was not just a ULEZ consultation to be fair."*⁴⁷

The exploration of the ULEZ consultation formed only a small part of the Committee's investigation into consultations and the use of the 'clean air' email address was not definitively seen as being biased or created with the intention of influencing responses. However, the Committee recognised that the email framing was open to being questioned. This risks eroding trust in the consultation, TfL and the wider GLA Group.

Case Study – LFB's 2021 consultation on its Community Risk Management Plan

LFB hosted a consultation for its CRMP 2023: Your London Fire Brigade in 2022.

LFB published a report summarising the CRMP consultation in September 2022, which stated that officers undertook to learn lessons from the CRMP consultation in 2021. The report included concerns raised by some consultation respondents in 2021 about potentially biased wording and said:

⁴⁴ GLA Oversight Committee, [Transcript of Agenda Item 6 – GLA Group Consultations](#), 23 November 2023, p16

⁴⁵ TfL ULEZ consultation [Proposals to help improve air quality](#)

⁴⁶ GLA Oversight Committee, [Transcript of Agenda Item 8 – GLA Group Consultations](#), 14 December 2023, p35

⁴⁷ GLA Oversight Committee, [Transcript of Agenda Item 8 – GLA Group Consultations](#), 14 December 2023, p35

“Some respondents to the previous consultation had challenged the questions that were used. Some people felt them to be expressed in ‘management speak’ and others felt that the questions were ‘leading’ and bound to be supported.”⁴⁸

The Committee is encouraged by LFB’s recognition of this issue and the fact that their report reflected on it and considered lessons learned.

Recommendation 8

The GLA should commit to using neutral and consistent wording in its consultations. Consultations should always include the option to disagree with proposals entirely.

⁴⁸ LFB, [Community Risk Management Plan 2023 Your London Fire Brigade](#), September 2022, p5

Chapter three: Accessibility and visibility

The Consultation Institute's Consultation Charter includes accessibility and visibility in its best practice principles, and states:

Visibility: *"All those who have a justifiable right to participate in a consultation should be made reasonably aware of the exercise. For Closed Consultations (where the audience only consists of fully identified stakeholders), this will be less demanding than for Open Consultations. Visibility is also important for decision-makers who should have full awareness of any consultation exercise, which is relevant to decisions they are about to take."*⁴⁹

Accessibility: *"Consultees must be able to have reasonable access to the exercise. This means that the methods chosen must be appropriate for the intended audience and that effective means are used to cater for the special needs of 'seldom heard' groups and others with special requirements. New technology and social media offers an ever-wider choice of consultation mechanism, but consultors must always ensure that the 'Digital Divide' does not disenfranchise citizens or stakeholders."*⁵⁰

Key findings

- **A broad range of different tools is required to connect with as many local voices and differing voices from across all different communities.**
- **There are barriers to people responding, and these barriers will be different for different people. Digital skills or access to digital equipment can be a barrier.**
- **It is vital that there are multiple ways in which people can respond to consultations.**
- **Understanding the consultation documents can also be a barrier. It's vital that documents are presented clearly and in simple language, with alternative formats available.**
- **It is best practice for organisations to carefully plan how they can mitigate accessibility barriers and make their consultation as visible and accessible as possible.**

Visibility

Alex Smith stressed the importance of using communications to increase visibility to the Committee, stating: *"There is no point having a consultation if no one knows it is happening and they cannot respond."*⁵¹

Mike Bartram told the Committee about the value of in-person engagement and street exhibitions as a way of increasing visibility and accessibility.

⁴⁹ Consultation Institute, [Consultation Charter](#), 2017

⁵⁰ Consultation Institute, [Consultation Charter](#), 2017

⁵¹ GLA Oversight Committee, [Transcript of Agenda Item 6 – GLA Group Consultations](#), 23 November 2023, p20

“I have seen on many consultations I have run where, despite all the publicity we have given to an exhibition on the street, I would say about two-thirds of the people who came into the exhibition vehicles are, ‘What is this about then?’ They have no idea, never heard of the project, no idea about any publicity, but it was prominent so they stumbled upon it.”⁵²

**Mike Bartram, Fellow
Consultation Institute**

Fraser MacDonald described some of the methods that TfL uses to increase visibility of consultations: *“We use the local press, we use stakeholder groups, we use events at local community centres, we will do flyering on the streets.”⁵³* He also mentioned social media: *“We have tried to broaden our approach with that, and we can even do things like geofenced messages to people on their mobile devices when they come into an area. Superloop was a great example of that.”⁵⁴*

Fraser MacDonald also explained that letter dropping is a method sometimes used by TfL, stating: *“The cost of letter dropping to the whole of London is going to be prohibitive, but actually on a local level with the agencies that we use for that, it can be particularly effective.”⁵⁵*

Engaging with under-represented and hard-to-reach groups

The Committee looked at the importance of and approaches to achieving a wide range of responses from all areas in the community.

“Often what we find in local communities is one voice is the loudest and we do live in a democracy, and we have people at the extremes often who are the loudest. However, we need to find a way to involve everyone”⁵⁶

**Clare Delmar, Founder
Listen to Locals**

The GLA’s internal Guide to Engagement includes ‘inclusive and diverse’ as a core value and states: *“We centre the importance of diverse voices and perspectives, and actively design processes that remove barriers to participation and focus on the needs of diverse groups.”⁵⁷*

At the 14 December 2023 Committee meeting, guests provided examples of methods used by their organisations to promote accessibility of their consultations. Fraser MacDonald shared how TfL tries to work with existing community groups and leaders to broaden their engagement across communities.

⁵² GLA Oversight Committee, [Transcript of Agenda Item 6 – GLA Group Consultations](#), 23 November 2023, p19

⁵³ GLA Oversight Committee, [Transcript of Agenda Item 8 – GLA Group Consultations](#), 14 December 2023, p16

⁵⁴ GLA Oversight Committee, [Transcript of Agenda Item 8 – GLA Group Consultations](#), 14 December 2023, p16

⁵⁵ GLA Oversight Committee, [Transcript of Agenda Item 8 – GLA Group Consultations](#), 14 December 2023, p16

⁵⁶ GLA Oversight Committee, [Transcript of Agenda Item 6 – GLA Group Consultations](#), 23 November 2023, p7

⁵⁷ GLA intranet, GLA Engagement Handbook, February 2021

“We try to look for community leaders, community voices, and representatives in an area who can connect us better with the communities that are around them and give us inroads into, usually meetings, venues and events that have already been set up by those groups.”⁵⁸

**Fraser MacDonald, Strategic Consultations Lead
TfL**

A similar approach was described by Donna Peters, Head of Community Engagement at LFB, regarding LFB’s consultation on its CRMP. She said:

“We attended everything from the country park-style events to events that were, for example, being run by deaf and disabled communities and, yes, we did largescale events and also more grass root events.”⁵⁹

Natasha Plummer, Head of Community Engagement, MOPAC, also shared examples of approaches taken by MOPAC to make the Police and Crime Plan consultation visible and accessible. These included social media advertising, online events, and working with stakeholder groups. She said: *“We worked also with LGBTQ+ organisations; we had sessions that were around Black, Asian and minority ethnic communities, migrant people and people who came from refugee backgrounds.”⁶⁰*

The Committee also heard that engaging with people who do not hold a particularly strong supporting or opposing view can be a challenge. However, if this group’s views are not included in consultation responses, it can skew responses towards more extreme ends of opposing or supporting a decision. Mike Bartram warned, *“The people who are much more motivated to respond would be the people who are critical.”⁶¹*

“For example, when we were engaging with the Muslim community, we used their local news networks and we were having our Assistant Commissioners being interviewed and having conversations, which generated a lot of interest. We discovered that a lot of communities suddenly found out that we were interested in listening to our communities and hearing from them, from our underserved and seldom-heard communities.”⁶²

**Donna Peters, Head of Community Engagement
LFB**

⁵⁸ GLA Oversight Committee, [Transcript – GLA Group Consultations](#), 14 December 2023, p15

⁵⁹ GLA Oversight Committee, [Transcript – GLA Group Consultations](#), 14 December 2023, pp 22-23

⁶⁰ GLA Oversight Committee, [Transcript – GLA Group Consultations](#), 14 December 2023, p20

⁶¹ GLA Oversight Committee, [Transcript of Agenda Item 6 – GLA Group Consultations](#), 23 November 2023, p9

⁶² GLA Oversight Committee, [Transcript of Agenda Item 8 – GLA Group Consultations](#), 14 December 2023, p22

Engaging with young people

Clare Delmar urged the Committee to also consider how to consult with young people, and stressed the importance of doing so.⁶³ She advised: *“Schools are a tremendous resource for consultation.”*⁶⁴

In the Committee’s second meeting, Fraser MacDonald, advised that TfL’s consultation on ULEZ *“had a very good representation of views from older Londoners”*, but that younger Londoners were under-represented. He acknowledged that TfL *has “more lessons to learn[....] about how to engage with younger Londoners.”*⁶⁵

Natasha Plummer shared that MOPAC’s social media advertising of the Police and Crime Plan Consultation had *“worked particularly well for younger Londoners”*.⁶⁶

Planning for accessibility considerations

The Committee heard from guests about the importance of undergoing planning processes before starting consultations, to understand what might be needed to reach a wide audience and how accessibility barriers can be mitigated. Chris Harrison explained that the Project Centre’s approach is to *“spend that time at the very beginning just understanding who the audience is and how we get to that audience”*.⁶⁷

The Committee heard that addressing accessibility considerations is a process that can be driven by the engagement that sits alongside a consultation.

⁶³ GLA Oversight Committee, [Transcript of Agenda Item 6 – GLA Group Consultations](#), 23 November 2023, p26

⁶⁴ GLA Oversight Committee, [Transcript of Agenda Item 6 – GLA Group Consultations](#), 23 November 2023, p26

⁶⁵ GLA Oversight Committee, [Transcript of Agenda Item 8 – GLA Group Consultations](#), 14 December 2023, p10

⁶⁶ GLA Oversight Committee, [Transcript of Agenda Item 8 – GLA Group Consultations](#), 14 December 2023, p20

⁶⁷ GLA Oversight Committee, [Transcript of Agenda Item 6 – GLA Group Consultations](#), 23 November 2023, p21

“One of the things we spent a lot of time doing before, during, and following consultation, was we did a lot of engagement with stakeholder groups and particularly with disability stakeholder groups. I spent quite a lot of time going to different roundtables and groups and having those conversations with people who were telling you, ‘This is why it is very difficult for me. This is why that mitigation, which you think you have built in, does not go far enough for me.’ It is quite difficult to listen to, but it is really important to go and listen to. You get that richness of information, which we might not have got without that lived experience of people in those pockets. That engagement was really important to us in shaping the final proposals, which were recommended. There was an entirely new disability benefits grace period, which was built in. Things like we built in wheelchair accessibility for vehicles, but understanding how much some of the other vehicle adaptations cost and that you do not get that until you are talking to people about the cost of swivel seats or hoists, all that kind of thing. That is exactly as you say, that local context and the personal circumstances, which mean that people are on a microlevel affected quite differently by proposals. It is important that we get that out of engagement and consultation. It is not just consultation; it is the engagement that sits alongside it.”

**Christina Calderato, Director of Transport Strategy and Planning
TfL**

Recommendation 9

The GLA Group should engage directly with disabled people’s organisations to discuss consultation processes; best practice; and how to ensure that all accessible forms of consultation can be planned into consultations from the start.

Some guests highlighted the importance of completing Equality Impact Assessments (EIAs) as part of the planning process. Fraser MacDonald and Donna Peters explained that EIAs were a key part of the process for TfL and LFB. LFB shared how it incorporates planning into its pre-consultation work. Donna Peters said:

“Frontloading our consultation with a lot of pre-consultation engagement. That really has to start with the EIA, recognising who are the greatest impacted by the consultation that we are going to be running and then frontloading the consultation with a lot of engagement around how we should approach it, designing the consultation, and thinking about how we actually reach into those communities that would be most greatly impacted.”⁶⁸

⁶⁸ GLA Oversight Committee, [Transcript of Agenda Item 8 – GLA Group Consultations](#), 14 December 2023, p14

In the Transport Committee's response to the TfL 2022 Central London Bus Review, recommendation 2 was that TfL must ensure all relevant information is available from the date a consultation launches. In this case the consultation launched on 1 June 2022, but the TfL website front page only included details of the consultation from 14 June. The British Sign Language (BSL) video did not become available until 21 June, 20 days after the launch of the consultation.⁶⁹

Recommendation 10

GLA consultations must include essential pre-consultation planning to identify those that are impacted the most; and plan how to engage with them. Planning should also consider how to reach under-represented groups; what barriers there might be to some people responding; and how to mitigate these barriers. This needs to be an essential part of the wider cost/benefit analysis in reaching decisions about whether to consult.

Understanding the advantages and challenges of digital engagement

Several guests at the Committee's 23 November 2023 meeting raised the need to recognise that not everyone has access to digital equipment or the skills to respond to consultations digitally, and argued that organisations must allow responses via a range of channels.

"Often, the easiest way to respond to a consultation for some is just filling in an online form or sending an email, but not everyone has access to that. Is there a phone option? Is there an in-person option? Also, if you do have these options, particularly post and phone, is it free?"⁷⁰

**Alex Smith, Head of Campaigns Communications
London TravelWatch**

The benefits of online engagement were also discussed by some guests. At the Committee's second meeting, Natasha Plummer said: *"It was an interesting learning point, particularly around disabled people, for example, that in some respects the online event worked even better ... just because you have a lot of accessibility tools that you can use in the online environment [...] and you are not putting the burden on people to travel places."⁷¹*

⁶⁹ <https://www.london.gov.uk/press-releases/assembly/central-london-bus-review-consultation>

⁷⁰ GLA Oversight Committee, [Transcript of Agenda Item 6 – GLA Group Consultations](#), 23 November 2023, p25

⁷¹ GLA Oversight Committee, [Transcript of Agenda Item 8 – GLA Group Consultations](#), 14 December 2023, p20

Recommendation 11

A GLA Group-wide statement on consultation principles should include recognition of the need to accept responses via multiple channels, including non-digital channels.

Using plain language in all consultation documents

Guests at the first meeting also stressed the importance of using clear and plain language and explaining concepts simply. Stephanie Bortoli told the Committee: *“You should not need to be a subject expert to respond to a consultation. Do not presuppose knowledge.”*⁷²

Recommendation 12

A GLA Group-wide Consultation Principles Statement should include recognition of the need to use plain and simple language in all consultation documents.

Using different languages in consultations

The Committee also heard the importance of accommodating responses in different formats including BSL.

Sometimes people want to be able to communicate back in the language that is preferred by them, for example British Sign Language (BSL). Somebody might want to provide a consultation result in that particular way, and we need to be open to that. That was one of the interesting things that, as ULEZ was happening, the [British Sign Language] Act [2022] recognising BSL as part of the British language was coming into force. Therefore, we had to think about the ways that we could service that community in the future and moving forward to make sure that their voices were heard. '

Fraser McDonald

TfL

This extends to different languages, and the way different languages are accommodated.

⁷² GLA Oversight Committee, [Transcript of Agenda Item 6 – GLA Group Consultations](#), 23 November 2023, p25

“I was running that consultation and we managed to get a student placement from a young Sikh lad, who was from Southall and his parents still lived in Southall. He arranged for translations of posters to go up and he took them round to local shops and got them to put these posters in Punjabi in the shop windows and he was talking to everyone, just walking around the area. It was a massive effort and we had four interpreters there when we ran the exhibition, again on the street, and we engaged with over 900 people in one day, which was far and away the largest number of people we have engaged anywhere. When you think of leafy Ealing and the more sort of middle-class parts of the route of the West London Tram, it was quite an achievement to reach that number of people. We had all the questionnaires translated into those languages so we could hand them out to people in that language. We were ready with people to understand the answers that came in in those languages, which was a considerable step forward compared to the way in which it is often done, which is to scribble a few sentences at the end of a long document in English and hope people magically manage to find them and do something with them.”

**Mike Bartram, Fellow
Consultation Institute**

Chapter four: Transparency and disclosure

The Consultation Institute's Consultation Charter includes transparency and disclosure in its best practice principles, and states:

Transparency: *"Many consultations are highly public, and rightly so. Indeed the principle of Transparency and the Freedom of Information Act 2000 requires that stakeholder invitation lists, consultee responses and consultation results be published. But this should only occur with the express or implied consent of participants. Consultors who intend to publish details of respondents and their responses have a duty to ensure that this is understood by all participants. Consultation submissions will be published unless specific exemptions apply. Freedom of Information requests can be used to seek access to data previously kept hidden. Consultees rightly expect full transparency of the governance arrangements applicable to a consultation and the decision-making process which will follow. They will also expect explanations for decisions taken following a consultation."*

Disclosure: *"For consultation to succeed, and to encourage a measure of trust between the parties, it is important to provide for reasonable disclosure of relevant information. Consultors are under a duty to disclose information which could materially influence the nature and extent of consultee's responses. In particular, areas where decisions have effectively been taken already, and where consultee views cannot influence the situation, should be disclosed. Consultees are also under a duty to disclose certain information. If a representative body expresses a view on behalf of its members, it should inform the consultor of the presence of any significant minority opinion within its membership, and be prepared to estimate the extent to which it is held."⁷³*

Key findings

- **Transparency considerations set out what needs to be disclosed to the public. The presumption should be that everything is public.**
- **It is critical to be honest with the public about what can be changed through a consultation.**

The Committee heard from guests about the importance of transparency.

Transparency [...] so that people can understand the process, what is happening, why decisions have been made, and that is important just to make sure that there is trust in the process and that people can fully understand and in future will hopefully continue to engage."⁷⁴

**Alex Smith, Head of Campaigns Communications
London TravelWatch**

⁷³ Consultation Institute, [Consultation Charter](#), 2017, p4

⁷⁴ GLA Oversight Committee, [Transcript of Agenda Item 6 – GLA Group Consultations](#), 23 November 2023, p2

Fraser MacDonald stated that TfL starts “from the point that we should be transparent with everything that we have; that things are there to be disclosed unless there is a legitimate reason, either commercial or data-protection related”.⁷⁵

Lisa Fairmaner, Head of London Plan and Growth Strategy, GLA, advised that the GLA provides a public online engagement portal for its Planning for London consultation programme. She added: “There are no materials that would be given to somebody at an event that are not downloadable publicly.”⁷⁶

Similarly, Emma Williamson advised, in relation to planning: “We basically publish all of the supporting material which we have drawn upon [...]. The only time we would not publish some of that, we would redact something if it was commercially sensitive, but that is unusual.”⁷⁷

Recommendation 13

GLA Consultations should start from a position that everything is public. A GLA Group-wide Consultation Principles Statement. GLA consultations should only withhold information for commercial sensitivity reasons where this is absolutely necessary.

Disclosing the responses received

In the first Committee meeting, Mike Bartram argued that stakeholder responses to consultations should be published, and a “high bar” set for requests for responses to be kept confidential.⁷⁸ He said: “If you are trying to influence a decision, you should be prepared for the way in which you are trying to influence to be visible to everyone.”⁷⁹

⁷⁵ GLA Oversight Committee, [Transcript of Agenda Item 8 – GLA Group Consultations](#), 14 December 2023, p28

⁷⁶ GLA Oversight Committee, [Transcript of Agenda Item 8 – GLA Group Consultations](#), 14 December 2023, p29

⁷⁷ GLA Oversight Committee, [Transcript of Agenda Item 8 – GLA Group Consultations](#), 14 December 2023, p30

⁷⁸ GLA Oversight Committee, [Transcript of Agenda Item 6 – GLA Group Consultations](#), 23 November 2023, p26

⁷⁹ GLA Oversight Committee, [Transcript of Agenda Item 6 – GLA Group Consultations](#), 23 November 2023, p26

Chapter five: Fair interpretation

The Consultation Institute's Consultation Charter includes fair interpretation as a best practice principle and states:

*"Information and viewpoints gathered through Consultation exercises have to be collated and assessed, and this task must be undertaken promptly and objectively. In general, decision-makers should not normally be personally involved with primary analysis and interpretation of consultation data, and the use of external data analysts has many advantages. Where consultors use weighting methods to assist in the assessment process, this must be disclosed to participants and to decision-makers relying on the consultation output."*⁸⁰

Key findings

- **The methodology used to analyse consultation responses should be made publicly available.**
- **If the same staff that are delivering a piece of work are also leading its consultation, there can be a risk that they are less open to hearing criticism or new ideas. This can risk consultation responses being interpreted fairly.**
- **There are benefits to commissioning the analysis of responses to an independent third party.**
- **Another element to fair interpretation is understanding who respondents are.**

Publishing the methodology used to analyse responses

It was argued by some guests at the first meeting that the methodology used to analyse responses should be made publicly available. Mike Bartram advised: *"All good reports will publish the code frame and explain the way in which they have approached the analysis."*⁸¹

Kenny Bowie acknowledged that MOPAC does not currently publish its consultation interpretation methodology, stating: *"It is something for us to think about, that we do build that in at the outset."*⁸²

Recommendation 14

The GLA should publish the methodology it uses for analysing responses. This needs to be established at the outset of a consultation.

⁸⁰ Consultation Institute, [Consultation Charter](#), 2017, p5

⁸¹ GLA Oversight Committee, [Transcript of Agenda Item 6 – GLA Group Consultations](#), 23 November 2023, p34

⁸² GLA Oversight Committee, [Transcript of Agenda Item 8 – GLA Group Consultations](#), 14 December 2023, p33

Understanding who respondents are

Mike Bartram advised that it is important to understand whether responses are from individuals or from organisations when interpreting consultation responses.

“There is no sum or weighting you can come up with that gives you the right answer, but you need to know if a point of view is being expressed by somebody who had been elected by 30,000 people or an organisation that has 100,000 members.”⁸³

**Mike Bartram, Fellow
Consultation Institute**

Use of third-party organisations to support consultations

At the 23 November 2023 Committee meeting, guests discussed the risk of having the same people who are running a project also leading on the consultation for it. Guests mentioned the risk that this can make them less open to engaging with criticism of the project or new ideas. Stephanie Bortoli advised that this usually occurs due to a lack of staff resources: *“In many cases, they are doing the whole process so there is not necessarily, because of resource constraints, a complete separation in those two functions of a project.”⁸⁴*

As well as offering independence, a second benefit of using a third-party organisation is additional resources.

“Enormous numbers of responses can suck up an enormous amount of resources as well, which can get a bit out of control. You want somebody who has done it before and can pull in extra resources if you get a larger response or a lengthier set of responses than you were expecting.”⁸⁵

**Mike Bartram, Fellow
Consultation Institute**

Lisa Fairmaner explained that the GLA has *“used opinion research companies to create separation between ourselves and the people that we are speaking to”*, and added: *“We cannot help ourselves. We have buy-in. We know what we already think.”⁸⁶*

Fraser MacDonald explained that TfL has an in-house team which can and does analyse consultation responses, but *“for those larger consultations, ULEZ would be a great example of that, we would use one of our providers”*.⁸⁷

⁸³ GLA Oversight Committee, [Transcript of Agenda Item 6 – GLA Group Consultations](#), 23 November 2023, p31

⁸⁴ GLA Oversight Committee, [Transcript of Agenda Item 6 – GLA Group Consultations](#), 23 November 2023, p17

⁸⁵ GLA Oversight Committee, [Transcript of Agenda Item 6 – GLA Group Consultations](#), 23 November 2023, p33

⁸⁶ GLA Oversight Committee, [Transcript of Agenda Item 8 – GLA Group Consultations](#), 14 December 2023, p13

⁸⁷ GLA Oversight Committee, [Transcript of Agenda Item 8 – GLA Group Consultations](#), 14 December 2023, p34

The use of third parties by LFB appeared to be discretionary, with Donna Peters advising:

“If there were any issues around trust or if we felt that the outcome was going to be contentious, we would use a third party to do the analysis, pull it into themes and then we would do the same.”⁸⁸

Emma Williamson noted, for OPDC:

“Our SCI [Statement of Community Involvement] says that we summarise issues, but we do not do that. We do go list out point by point what people have raised and then how we are responding to that. We are going to change the SCI to reflect the practice that we currently have.”⁸⁹

The Committee acknowledges that use of a third-party organisation to support consultations may not be appropriate in all situations as there may be some smaller consultations where it may not be the best use of public money to spend on outside consultants.

Recommendation 15

The GLA should have a clear policy on the use of independent third parties to analyse responses.

Consultations should not be treated as referendums

Some of the guests at the 23 November 2023 meeting argued that organisations should not treat consultations as referendums on particular issues, as this can oversimplify the various and nuanced viewpoints that respondents may have.

Chris Harrison argued that a consultation should be focused on *“what can be influenced and what can be changed and understanding that and that is not a ‘Yes’ or ‘No’ question usually.”⁹⁰* Stephanie Bortoli added: *“If we are treating things like referendums for a really small part of the community who might be participating in that process [...] then we are in real danger of delivering the wrong things.”⁹¹*

Case study – TfL’s interpretation and reporting of responses on the ULEZ consultation

TfL consulted on the proposed expansion of the ULEZ scheme between May and July 2022. The consultation report included that when asked whether the ULEZ scheme should be expanded, 59 per cent of respondents said that the expansion should not be implemented.⁹²

⁸⁸ GLA Oversight Committee, [Transcript of Agenda Item 8 – GLA Group Consultations](#), 14 December 2023, p32

⁸⁹ GLA Oversight Committee, [Transcript of Agenda Item 8 – GLA Group Consultations](#), 14 December 2023, p33

⁹⁰ GLA Oversight Committee, [Transcript of Agenda Item 6 – GLA Group Consultations](#), 23 November 2023, p9

⁹¹ GLA Oversight Committee, [Transcript of Agenda Item 6 – GLA Group Consultations](#), 23 November 2023, pp9-10

⁹² TfL, [Report to the Mayor: Our proposals to help improve air quality, tackle the climate emergency, and reduce congestion by expanding the ULEZ London-wide and other measures \(scheme consultation\)](#), November 2022

Alongside TfL's consultation, the GLA commissioned YouGov to do a survey on the proposals. The survey was carried out in July and received 1,245 responses, which were weighted to be representative of all London adults. 51 per cent of those surveyed supported the ULEZ expansion and 27 per cent thought it should not be enacted at all.⁹³

The Mayor publicised the findings of this survey by issuing a press release on 10 October 2022, titled "Nearly twice as many Londoners support expansion of ULEZ".⁹⁴

A written response, on 12 December 2023, to a Mayor's Question Time question on the ULEZ consultation stated: "*The consultation was not a referendum on ULEZ expansion and those who responded were not asked to cast a vote.*"⁹⁵

The Committee's view is that the reporting of the survey's findings in this way overshadowed and oversimplified the findings of TfL's consultation on the expansion of the ULEZ scheme.

⁹³ Mayor of London, [Nearly twice as many Londoners support expansion of ULEZ \(press release\)](#), 10 October 2022

⁹⁴ Mayor of London, [Nearly twice as many Londoners support expansion of ULEZ \(press release\)](#), 10 October 2022

⁹⁵ London Assembly, [MQT ULEZ Consultation](#), 12 December 2023

Chapter six: Publication

The Consultation Institute's Consultation Charter includes publication as a best practice principle, and states:

*"Participants in a consultation exercise have a proper expectation that they will see both the output and the outcome of the process. Except in certain Closed or Internal consultations, the assumption should be that publication in a form accessible to the consultee would follow within a reasonable time after the conclusion of the exercise. It is the responsibility of a consultor to publish an adequate feedback document, consisting of consultation output, preferably in advance of decisions being taken. Where no publication is intended, it is the duty of the consultor to disclose this when initially inviting stakeholders or the public to participate."*⁹⁶

Key findings

- **It is best practice for all consultations to have a consultation report published which includes a summary of the responses received and explanation of the actions the organisation is taking based on these responses.**
- **Consultation reports must be published in a timely manner, be relevant and be understandable.**
- **All consultation respondents should be notified when the consultation report is published.**

Timeliness of publication

The Committee asked the guests at its second meeting about their approach to publishing consultation findings and reports in a timely way. The responses provided did not give definitive timeframes.

Kenny Bowie advised that MOPAC works to publish a 'consultation summary' document *"as quickly as is reasonable"*⁹⁷ following consultation.

A similar response was provided by Susan Ellison-Bunce for LFB: *"We will do that as quickly as we can."*⁹⁸

Lisa Fairmaner responded on behalf of the GLA: *"It depends. It is how long it takes to write up."*⁹⁹

Roz Henville, advised that for the OPDC in terms of publishing reports, *"it is usually when the draft document is published."*¹⁰⁰

⁹⁶ Consultation Institute, [Consultation Charter](#), 2017, p5

⁹⁷ GLA Oversight Committee, [Transcript of Agenda Item 8 – GLA Group Consultations](#), 14 December 2023, p41

⁹⁸ GLA Oversight Committee, [Transcript of Agenda Item 8 – GLA Group Consultations](#), 14 December 2023, p40

⁹⁹ GLA Oversight Committee, [Transcript of Agenda Item 8 – GLA Group Consultations](#), 14 December 2023, p39

¹⁰⁰ GLA Oversight Committee, [Transcript of Agenda Item 8 – GLA Group Consultations](#), 14 December 2023, p41

Fraser MacDonald referred to the Government's best practice guidance which advises that a consultation report should be published by twelve weeks following consultation¹⁰¹ and said: *"The industry as a whole is probably erring towards 115 to 120 days at the moment [...]. We land somewhere in between the two of those."*¹⁰²

What should be included in the publication document following a consultation?

*"It is always good practice to say in consultation materials, 'This is what you can expect to happen after the consultation has closed,' and very often that will include a timetable for when a decision will be made. However, there will be multiple decisions and different stages of the project and so next steps is also a matter of explaining to people what other things are going to happen."*¹⁰³

**Mike Bartram, Fellow
Consultation Institute**

The Committee heard that there are two key elements to what should be published in a consultation report. The first is what the consultation responses were and how they were interpreted. The second is an explanation of what actions were taken and changes made to the project being considered in accordance with the consultation responses.

Mike Bartram linked to this to the fourth Gunning principle of 'conscientious consideration' and said: *"You need to be really clear that you have considered all of the suggestions that have been made and all of the key arguments that have been made."*¹⁰⁴

The Committee also heard from guests about the importance of notifying consultation respondents once a consultation report has been completed. All of the GLA Group bodies present at the Committee's second meeting shared that they do this.

Recommendation 16

All GLA consultation documentation should include a timetable for when a decision will be made, and a report published. This should include any intermediate steps to reaching a decision. All those who respond to a consultation should be informed of its outcome in a timely manner.

The London Assembly passed a motion in September 2022 calling on the Mayor to provide a forward plan of decisions to aid transparency. In this motion the point was made that a good forward plan has both upcoming consultations and decisions.¹⁰⁵

¹⁰¹ Cabinet Office, [Consultation Principles](#), 2018

¹⁰² GLA Oversight Committee, [Transcript of Agenda Item 8 – GLA Group Consultations](#), 14 December 2023, p41

¹⁰³ GLA Oversight Committee, [Transcript of Agenda Item 6 – GLA Group Consultations](#), 23 November, p37

¹⁰⁴ GLA Oversight Committee, [Transcript of Agenda Item 6 – GLA Group Consultations](#), 23 November, p35

¹⁰⁵ London Assembly, [Mayor should publish forward plan for transparency](#), 8 September 2022

Chapter seven: Conclusions

Key findings

- **Consulting offers organisations many benefits, including enabling better outcomes, gaining richer evidence and insights, and building relationships and trust.**
- **It is essential that when organisations consult on an issue, they are prepared to listen to the responses they receive and, where possible, make changes to their plans.**
- **It is best practice to evaluate how effective individual consultations were, to understand what worked and what did not and to learn lessons for future consultations.**
- **There are several elements to delivering an effective consultation and guidance and training on how to do so should be easily accessible to staff.**
- **GLA representatives generally reported positive experiences of holding consultations as well as a strong understanding of the benefits of consulting. However, this does not mean there is not room for improvement and better consistency.**

Organisations must be prepared to listen to consultation responses

The Committee heard that a key part of integrity is organisations being committed to listening to the consultation responses received and making changes based on them. Stephanie Bortoli told the Committee that consulting organisations must be “*really clear and transparent about what is not able to be influenced*”.¹⁰⁷

*“We had one proposal that was to move a second fire engine from one fire station to another where we felt it might be of more benefit to the London-wide community and, in fact, there were a significant number of respondents that said that they did not support that proposal. Therefore, we did not do that. We agreed to come back and review the impact of not doing it within a year and to make a final decision. When we reviewed it, we agreed that we would keep the second fire engine where it was. Sometimes we have made quite significant changes as a result of consultation.”*¹⁰⁶

**Susan Ellison-Bunce, Head of Strategy and Performance
LFB**

Chris Harrison commented that a project changing due to consultation responses received was positive:

¹⁰⁶ GLA Oversight Committee, [Transcript of Agenda Item 8 – GLA Group Consultations](#), 14 December 2023, p40

¹⁰⁷ GLA Oversight Committee, [Transcript of Agenda Item 6 – GLA Group Consultations](#), 23 November 2023, p1

“That usually means that we have got the consultation and engagement right[...] we came up with what we thought was technical and then we have come out with something which is completely different to that but fits the local context to it and fits their answer.”¹⁰⁸

Chris Harrison, Regional Director for the South Project Centre

Consultations should be evaluated for effectiveness

The Committee heard from guests about the importance of evaluating individual consultations to understand how effective they were and what lessons can be learned for future consultations.

“We cannot just sit on our laurels after such a huge exercise like ULEZ. We need to use the periods in between to look for the opportunities, try to innovate, learn from others in the industry as well.”¹⁰⁹

Fraser MacDonald, Strategic Consultations Lead TfL

The LGA includes the need for evaluation in its consultation guidance, stating:

“Evaluate your consultation: Consider if your consultation has achieved its objectives. How have consultees’ views affected the council’s decision? What has changed as a result of the consultation? What lessons that can be learned?”¹¹⁰

Recommendation 17

The GLA should commit to conducting an internal evaluation of each consultation it holds. This should be proportionate to the nature and size of the consultation itself; and should allow for ongoing learning and improvement of the consultation process.

¹⁰⁸ London Assembly GLA Oversight Committee, [Transcript of Agenda Item 6 – GLA Group Consultations](#), 23 November 2023, p14

¹⁰⁹ London Assembly GLA Oversight Committee, [Transcript of Agenda Item 8 – GLA Group Consultations](#), 14 December 2023, p10

¹¹⁰ LGA, [Understanding the views of residents: An introduction to surveys and consultation](#), August 2017, p20

Appendix – Summary of what a GLA Group-wide Consultation Principles Statement should include

The primary recommendation made in this report is that the GLA should publish a clear and concise Group-wide Consultation Principles Statement (the statement) on what the public can expect when it engages with a consultation; and why the GLA Group considers consultation to be an essential part of effective policy development in order to establish and maintain public trust. This statement should be formally adopted as a Mayoral Decision (see Recommendation 2).

In summary, the statement should apply to external and internal consultations held by GLA Group organisations and should include:

Recognition that public trust in the organisation affects trust in individual consultations (see Recommendation 7).

Commitment to the following principles:

- consider how to **promote participation and mitigate accessibility barriers** (see Recommendation 9)
- consult in a **timely way** and at an early stage of the decision-making process (see Recommendation 6)
- use **neutral, non-biased language** in all consultation documents (see Recommendation 8)
- use **plain language** in all consultation documents (see Recommendation 12)
- **accept consultation responses via multiple channels**, including non-digital channels (see Recommendation 11)
- **transparency** and only withholding documents due to commercial sensitivity when absolutely necessary (see Recommendation 13)
- **publish the methodology** used for analysing consultation responses (see Recommendation 14)
- **publish easily understandable and timely consultation reports** that set out what consultation responses were received and the actions taken in response to them (see Recommendation 16)
- **inform all consultation respondents** of the publication of the consultation report (see Recommendation 16)
- **evaluate individual consultations** to understand what worked well and what could be improved on for future consultations (see Recommendation 17)

-
- **regularly evaluate the Consultation Principles Statement itself** and how effectively it is being used (see Recommendation 4)
 - **efficient spending** on consultations (see Recommendation 5).

Committee Activity

The Committee's first meeting was held on 23 November 2023 and explored good practice in consultations and public engagement. The meeting was attended by the following guests:

- **Chris Harrison**, Regional Director for the South, Project Centre
- **Stephanie Bortoli**, Head of Communications and Engagement, Project Centre
- **Alex Smith**, Head of Campaigns Communications, London TravelWatch
- **Mike Bartram**, Fellow, the Consultation Institute
- **Clare Delmar**, Founder, Listen to Locals

The Committee's second meeting was held on 14 December 2023 and explored how GLA Group bodies view and carry out consultations. The meeting was attended by the following guests:

- **Christina Calderato**, Director of Transport Strategy and Planning, TfL
- **Fraser MacDonald**, Strategic Consultations Lead, TfL
- **Kenny Bowie**, Director of Strategy and Metropolitan Police Service Oversight, MOPAC
- **Natasha Plummer**, Head of Community Engagement, MOPAC
- **Roz Henville**, Director of Communications, Engagement and Strategy, OPDC
- **Emma Williamson**, Director of Planning, OPDC
- **Donna Peters**, Head of Community Engagement, LFB
- **Susan Ellison-Bunce**, Head of Strategy and Performance, LFB
- **Lisa Fairmaner**, Head of London Plan and Growth Strategy, GLA

Other formats and languages

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

Chinese

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Vietnamese

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Greek

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

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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

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Urdu

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Arabic

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فراجع الاتصال برقم الهاتف أو الاتصال على
العنوان البريدي العادي أو عنوان البريدي
الإلكتروني أعلاه.

Gujarati

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