



# Independent Review of Ethnic Minority experiences at GLA

Understanding the structural barriers that prevent Black, Asian and Ethnic Minority and particularly Black staff from progression.

February 2022

# Executive Summary

The independent review into the structural barriers that prevent the progression of Black, Asian and Minority Ethnic but particularly Black staff, was tendered by the Greater London Authority (GLA) to identify and resolve issues within the organisation for all Ethnic Minority staff. Whilst the initial scope of the review requested that it be focused on the experiences of Black staff in achieving progression and the success of Black external applicants, it would have been wholly inappropriate to ignore the similar issues facing other Ethnic Minority groups.

Since the GLA's inception in 2000, the organisation has had problems with its Ethnic Minority representation and its ability to develop and progress staff from Ethnic Minority backgrounds. From 2016, under the new Mayor, Sadiq Khan, the GLA have utilised targeted interventions to improve representation and the experience of Ethnic Minorities. These efforts became more conscientious and targeted in 2018 and have led the organisation to requesting this independent review. We have noted that since 2018, the organisation has increased representation from 24% to 29% (31 March 2018 to 31 March 2021) and have set themselves a goal of 37.1% (the ethnic representation of London's economically active population) by 2025 as well as being an anti-racist organisation. This shows the commitment of the existing leadership within the GLA, to create a diverse and inclusive workplace.

Through our research we spoke to 51 members of staff as well as the Race Equity Action Group (REAG) at the GLA and the Mayor's Office, with more than half of them being from Ethnic Minority backgrounds – approximately 10% of the Ethnic Minority representation at the GLA. This allowed us great insight into the issues that Ethnic Minority, and particularly Black, staff and applicants face in the GLA. We learned that the perception of Black staff is that they are not valued for their efforts, reporting that they often experience credit for their work given to or taken by white colleagues, mostly men. A similar perception was raised by Asian staff that they have to do double the work for less recognition than their White colleagues.

This appears to be perpetuated in the recruitment process where Ethnic Minority candidates, both internal and external, experience their achievements, knowledge or skills minimised – often finding that the feedback they receive is in stark contrast to their actual abilities. We spoke to staff who have PhDs and Masters Degrees that were told they weren't educated enough or were too academic, we spoke to staff who have been requested to write blog pieces and other comms work told that their written English was too poor for a promotion. These and similar stories highlight a clear bias within the organisation that is limiting progression and recruitment of Ethnic Minorities.

We also conducted a data analysis, looking at the demographic data from 31 March 2021. From this data we were able to break down the ethnic representation in directorates, by grades and, by gender. This allowed us to fully understand where the lack of representation is prevalent and create targeted interventions. We noted that whilst White men are in the best overall position, Ethnic Minority men, particularly Black and Other, are most represented in lower grades with a significant concentration of Black men, 26%, in Grade 3 (all within Facilities Management).

There is a clear need to improve diverse representation at higher levels in the organisation – particularly between Grade 10 and 15. We note that some directorates have better overall representation of Ethnic Minorities but when breaking this down, we see disproportionate representation of particular ethnic backgrounds and often in lower grades. Other directorates have generally poorer representation although are more proportionally representative, i.e. they don't have a disproportionately high or low representation of one Ethnic Minority over another. This suggests that the GLA requires both general and targeted interventions to address the issues.

The recommendations that we have made as part of our review have been designed to be applied widely – they can be used to cover inequalities across multiple characteristics. Using these recommendations, The Equal Group will collaborate with REAG to develop a focused action plan and roadmap to create continuous improvement for Ethnic Minority representation.

Through our investigation, we have spoken to staff from various backgrounds and levels within the GLA, and we have heard both positive and negative experiences from their time at the GLA. However, one thing that we did take away from the conversations was the hope that this report and subsequent actions will bring about the meaningful and lasting change required. This hope would not exist without the positive efforts made prior to the independent review, and in our opinion reflects positively on the efforts of the current leadership and particularly the Workforce EDI team and Race Equity Action Group.





# Index

<b>2</b>	<b>EXECUTIVE SUMMARY</b>	23	Accountability
<b>5</b>	<b>INTRODUCTION</b>	24	Policy vs Process
<b>6</b>	<b>GLA EFFORTS AND PROGRESS</b>	25	Emotional Labour
		26	Structural Barriers
<b>8</b>	<b>STAFF EXPERIENCE AND SENTIMENT</b>	<b>28</b>	<b>RECOMMENDATIONS</b>
8	Recruitment	<b>48</b>	<b>APPENDICES</b>
10	Talent Management	48	Appendix A: Data
11	EDI Learning/Talent Programmes	61	Appendix B: Policies and Documents
12	Managers and Leadership		
<b>15</b>	<b>KEY ISSUES</b>		
15	EDI Strategy and Implementation		
15	EDI Action Plans		
16	Recruitment		
17	Advertising, job description and person specification		
18	Selection and Hiring Panels		
18	Interview and Offer		
19	Talent Management		
22	Positive Action		
23	EDI Learning		



# Introduction

The Greater London Authority (GLA) have commissioned The Equal Group (TEG) to conduct an independent review into current processes, policies and actions at the GLA, looking for any potential barriers to the recruitment and progression of Black, Asian and Minority Ethnic (BAME), but specifically Black, staff and applicants. This review connects internal measures with external measures such as the Mayor of London's social integration strategy, "All of Us" and the Mayor's Inclusion Strategy, "Inclusive London", which has a specific focus on tackling barriers and inequalities across London.

Throughout the report we have used the term "Ethnic Minority" when referring to the collective group of Black, Asian, Mixed and Other Ethnic groups but wherever possible we will talk about the specific groups. We take the approach of grouping demographic groups in order to maintain confidentiality and anonymity as much as possible whilst being able to understand the nuance of lived experience within different ethnic backgrounds and intersectional identities.

Many organisations have policies and processes in place – some historic, some implemented in good faith – that can create unforeseen barriers for particular groups. In the UK, Ethnic Minorities have often found themselves restricted by these intangible barriers that many employers and employees are unaware of – often dismissed with "that's the policy" or "that's the way we've always done it". As these policies, processes and even implied agreements are embedded into a culture it can be difficult to identify them, particularly when reviewed internally.

TEG have conducted a desk-based analysis of the current data from GLA, as well as key policies and processes related to recruitment and progression, and conducted multiple interviews and focus groups to attempt to understand the experiences and opinions of staff at the GLA. Through this we endeavoured to understand more about the disparate experiences within the GLA and the factors specifically restricting Black, Asian and Minority Ethnic, but particularly Black, staff and applicants from being recruited into the GLA and securing higher grade positions.

Whilst we have made reasonable attempts to build an accurate picture of the GLA as an employer, we have been limited by time and resources as well as executing our assessment remotely, given the prevalence of Covid-19 at the time of being commissioned to undertake this work. We acknowledge that these limitations might have had an impact on our ability to observe some issues in their proper context, however we do not believe that this has had a significant impact on any of our findings or recommendations.

We have focused on the staff experience and how we solve the issues present in the GLA. Our data and policy analysis has been included in the appendices of the report as evidence for the key issues and our recommendations. We have presented the key issues with recommendations that we've broken down into Objectives and Key Results. The intention is for these to be used in collaboration with the Race Equity Action Group to produce a SMART Action Plan and roadmap.

# GLA Efforts and Progress

The GLA has made great efforts in the past few years to become a more diverse and inclusive organisation. Looking at just the data, we can see a significant shift from 2018 onwards – this is likely in part due to the efforts made in the years since Sadiq Khan became Mayor in 2016 but has been continued and enhanced by the workforce and leadership since 2018. In this period, we can see that Ethnic Minority representation has continually increased, with only a small drop from 30% to 29% in 2020 – unfortunately the timescale and scope of this report has not allowed us to investigate this further but it is likely a result of the pandemic.

The majority of the current GLA leadership have a passion and drive to make the GLA a diverse and inclusive workplace, this has allowed many initiatives to be implemented. These initiatives include Our Time – a programme aimed at improving opportunities for women in the GLA. The GLA recognised that generally the pay gap is worse for Ethnic Minority women than White women and ensured that 50% of the positions in the Our Time programme were reserved for Ethnic Minority women. Other initiatives include the BAME Talent Programme and BAME Internship Programme where a focus was placed on providing development opportunities to Ethnic Minority staff and increasing employment opportunities within the GLA for young Ethnic Minority Londoners.

The GLA's Ethnic Minority staff make up 29% of the workforce (on 31 March 2021), compared to 2018 where it was 24% – some changes in representation, particularly reductions in relative rates of representation, occur when the organisation has grown in headcount but recruitment of Ethnic Minority staff has not grown proportionally. Under the current leadership, Ethnic Minority representation saw its highest mark at 30% on 31 March 2020. This has been the result of concentrated efforts to improve representation over a number of years.

We note that in the Workforce Reports, the organisation makes a commitment to being representative of London – targeting a 37.1% Ethnic Minority representation across the organisation. This is both ambitious and realistic – London's economically active population, i.e. those in or looking for work, have an Ethnic Minority representation of 37.1%. There has also been an acknowledgement following the BAME staff network requests to address racism and inequity, that the actual demographics of London show a 40.2% Ethnic Minority representation and the disparity is likely in part due to people outside the 16–64 age range as well as current societal issues that keep people with additional intersecting characteristics out of the workforce. Having awareness of intersectional issues across London should allow the GLA to target interventions in a more holistic manner, helping to address further inequalities for Ethnic Minority people who are also disabled, LGBTQ+ and other protected characteristics.

It should also be noted that this Independent Review was not a request from the Race Equity Network or REAG but as a result of senior leadership recognising there was a problem at the GLA. This recognition that the issue had to be addressed and would likely be difficult to effectively address through an internal review shows the commitment of the senior leadership team to make progress on the GLA's EDI journey.

Most of the work that has gone into this report would not have been possible without the previous efforts of the GLA. Whilst the GLA has a long way to go to regain the trust of many Ethnic Minority staff, the efforts made so far have provided some reassurance that the GLA have a genuine desire to deliver meaningful and impactful change for all minority groups. With the reassurance that the GLA intends for this report to provide the framework for the organisation to move forward, we feel many of the staff that we have spoken to felt confident speaking out with the hope that their openness and honesty would drive and inform the necessary changes.

Lastly, the GLA requests that this report and subsequent recommendations provide an action plan for addressing the issues we have identified, as well as any potential future concerns, showing a desire to address this issue both immediately and long term. Whilst this action plan will be owned by REAG and the Corporate Management Team (CMT), it will provide the opportunity for all staff to get involved in its delivery.

Through our investigation, we have spoken to staff from various backgrounds and levels within the GLA, and we have heard both positive and negative experiences from their time at the GLA. However, one thing that we did take away from the conversations was the hope that this report and subsequent actions will bring about the meaningful and lasting change required. This hope would not exist without the positive efforts made prior to the independent review, and in our opinion reflects positively on the efforts of the current leadership and particularly the Workforce EDI team and Race Equity Action Group.



# Staff Experience and Sentiment

This section will present the experiences and sentiments expressed by a wide and varied cross-section of staff at the GLA, as well as London more broadly. Participants in focus groups and one-to-one interviews with The Equal Group were given absolute freedom to express their views on their experience(s) in and of the GLA. We engaged with 51 GLA staff members from across the organisation including all members of the CMT and key personnel in the HR department as well as the Race Equity Action Group. From this broad group of staff, between 35 and 40 were from Ethnic Minority backgrounds, equating to just over 10% of Ethnic Minority staff at the GLA.

In the following sections we focus on themes that were regularly brought up in discussion across all focus groups and interviews. These themes will, in part, form the basis of the recommendations found later in this report.

## Recruitment

Among the focus groups conducted by The Equal Group, a common emerging theme noted several systemic barriers within the GLA's recruitment process that disproportionately disadvantage Ethnic Minority applicants, in particular, Black applicants. It is crucial to note that these feelings were not unique to any one group or person, and the sentiments expressed form the basis of a need to overhaul existing recruitment processes towards more equitable outcomes.

It was noted across several groups and demographics that the recruitment process for roles within the GLA is a lengthy and arduous undertaking for any potential applicant. This coupled with the assessment of rigorous technical and behavioural competencies, which are non-negotiablely tested at either application, interview or test stage – presents barriers that disproportionately affect Ethnic Minority staff, and in particular, Black staff. To paraphrase a number of staff who addressed the competency framework:

***"The competency framework and supporting statement make the recruitment process very difficult. The task of writing a 1500 word supporting statement to cover 8 required competencies when it's not clear if those competencies are entirely necessary. The process should focus on the technical requirements or identify 3 minimum requirements and encourage managers to recruit for potential."***

This sentiment gains yet more weight when considering the tendency for an application process like the GLA's to favour those of a particular educational and social background. Whilst Oxbridge, Redbrick and Russell group universities are becoming more diverse, this is only in the last few years and invariably have not significantly improved their Black representation.

The need to diversify the person specification for any open role has been noted as a priority by several Black staff members at the GLA, alongside an organisation-wide commitment to be more flexible in its application. Many Black staff members at the GLA noted that their contributions are seen as lesser than that of their White colleagues, beginning with the failure of managers to appropriately acknowledge when 'Black colleagues have done more outside the GLA [than their White counterparts]' and continuing to foster an environment where 'Black staff have the perception around them that they are not qualified.'



The personnel that manage the end-to-end process of recruitment (the hiring managers) were also believed to be non-diverse, unqualified to make recruiting decisions (in some cases), but overall, generally positioned to advantage White candidates through the application process to the detriment of Black and other Ethnic Minority candidates. The current recruitment guidance does not stipulate that recruitment and interview panels must be diverse, rather it is framed as an example of 'exemplary' recruitment conduct as and when it can be achieved. This is at odds with widespread sentiment amongst Black staff members at the GLA who remain surprised at the fact that it is not a requirement for interview panels to be diverse, including leaders at higher level grades, as well as long-standing staff members.

The importance of a diverse recruiting panel was emphasised by one staff member occupying a high-grade position:

***"All of it rests on the panel, the whole panel, fully participating and challenging the shortlisting panel. I'm challenging the hiring managers all the time, who is on the panel, where are you advertising, who have you chosen and who will challenge your decisions."***  
***- "Good recruitment practice should involve the whole panel fully participating and where possible, challenging hiring managers to understand who is on the panel and why."***

A diverse interview panel is critical in allowing Ethnic Minority applicants to see that the GLA has diverse staff members adopting decision-making roles, as well as offering Ethnic Minority applicants the 'opportunity to show how capable [we] are' to a much more varied and representative cross-section of people. Many EDI practitioners see that the impact of diverse interview panels rests on the elimination of shared biases, the ability for interviewers to gain a more well-rounded perspective of the candidate and the chance for applicants to gain a sense of what the organisation looks like. Internally, research has also shown that another benefit of diverse interviewing panels is that it provides development opportunities for existing staff members, who are able to undergo dedicated interview skills training and add this to their responsibilities and achievements within the workplace.

This comes under a general sentiment among Black staff members at the GLA, who have expressed that the progression of Black staff members has long been curtailed and deprioritised, and opportunities that allow for Black staff members to move upwards within the GLA are sidelined in favour of maintaining the status quo, where one 'boys' club' [gets] replaced by another 'boys club' and Black staff remain 'at the bottom of the hierarchy'. Whilst this was strongly referenced by Black staff, a similar sentiment was raised with other Ethnic Minority staff. This is especially relevant to the recruitment process, as the failure of the GLA to actively enforce diverse hiring panels as a necessity continues to disadvantage Ethnic Minority staff.

On the contrary, some Black staff members have noted that where an exemplary academic record and highly relevant past experience exists among Black candidates and colleagues, there is a view that these achievements are seen as superfluous at best, and inadequate at worst. This carves out a grey area for some Black colleagues, who believe their contributions are both underestimated and derided at the same time. A few colleagues including some long-standing colleagues at the GLA expressed:

***"We will never get promoted, no matter how qualified we are, you can look at senior levels and we're just not there. Even with the same or higher qualifications, we are at lower grades compared to White staff. They'd suddenly then say, we're too academic – even having years of experience isn't seen as a plus."***

This staff member's account points to the unwillingness to properly reward and progress Black candidates with appropriate levels of responsibility and remuneration, as supported by quantitative data showing that Black staff members seldom progress beyond the Grade 12 level. Instead, Black staff members have noted that there is a tendency to informally rely on and exploit the skills and expertise of its Black staff by ***'ask[ing Black staff members] to do things which are way above [their] roles without reward', and 'White men [getting] credit when the Black women did all the work'.***

# Talent Management

Several focus groups and interviews held by The Equal Group were started with the question, “what do you believe to be the biggest problem for Black and Ethnic Minority staff within the GLA?”. Of all responses given by participants and interviewees, progression was seen to be the biggest issue with a specific focus on the lack of robust talent management support in place to ensure that Black and Ethnic Minority staff members were being offered fair chances to advance within the GLA. This was seen to hold Black and Ethnic Minority staff back in their roles, as the requisite support, mentoring and encouragement from managers across all levels, departments and directorates was not perceived to be readily available for these groups.

The interviews and focus groups showed that this had been identified and rectified by individual managers seeking to provide more support than what they saw their contemporaries offering. However, the problem of a lack of widespread and aligned provision of both support and mentoring was also identified by these same managers – some staff alluded to the fact that the current mentoring scheme wasn’t easily accessed and not always inclusive for all Ethnic Minority staff. One staff member in leadership interviewed by The Equal Group stated:

***“If someone wants to speak with me informally, I say yes because of the journey I’ve been on and knowing I want to give back to others when I didn’t have the same support. I know line management can sometimes be a blocker so I want to provide as much support as I can. An organisation like the GLA needs to institute something like this.”***

A manager providing this support as a direct result of recognising the distinct lack of provision across the GLA demonstrates the need for a robust talent management policy that requires managers to be more proactive. Similarly, a staff member recognised that even structured attempts to support talent may negatively affect Black staff members the most, as indeed they find themselves at lower grade-level roles with fewer hopes and opportunities for progression:

***“I have heard from some people who had approached me in confidence that they didn’t feel like [Our Time] was a programme that had recognised long-term employees who had contributed significantly. They felt excluded by it.”***

This points to a limitation to existing talent management initiatives, while further strengthening the need for more managers to implement ‘informal’ means of mentoring and supporting staff members; managers should be engaging with staff regularly to understand what support they need to achieve their review goals. The lack of consistency across the GLA’s managerial personnel in providing this was highlighted by another leader:

***“People have said to me that no one has ever spent time with me on my career and [discussed] what my potential is. I’ve run an open-door policy where anyone in the team can get some time with me and talk to me privately. Over 3–4 years, I’ve had people come to me with negative and positive experiences. And sometimes I’ve had to call out managers for the things they’ve said and done – in some respects, this has worked.”***

The effectiveness of this kind of initiative has been useful in allowing those leaders who engage with their staff members to better understand the needs and goals of people in their teams. If this was to be rolled out more widely, the GLA would gain a far greater and more comprehensive understanding of the structural issues that have both historically and currently stifle Black and Ethnic Minority staff members’ progression opportunities. It should be noted that managers are expected to have career conversations with all members of their teams – the experiences of Ethnic Minority staff, suggests that some managers avoid having meaningful conversations with non-White staff.

The provision of tailored support for staff members who are seeking progression (both linearly and laterally) has been perceived to circumvent Black and Ethnic Minority staff members, who, in interviews and focus groups, noted that support and encouragement from their managers was non-existent in relation to the same offered to their White counterparts. One participant in a focus group for Ethnic Minority staff members observed that:

*"I have definitely observed a lot of promoting their own people, White Managers will always mentor and encourage White juniors in the team. It creates difficulties when there is a White Manager who is making your life difficult. The additional labour that is done by people of colour and women of colour, looking at people in the same job and the same grade, the amount of work piled onto her is noticeably different to the White man or White woman before them. You don't have anywhere to go for support but there is nobody around you telling you that it's unreasonable."*

This account combines a number of aspects already noted elsewhere in this section, demonstrating the interconnectedness of managers' affinity bias towards White colleagues, the overworking of non-White colleagues, and the lack of support available to share and address these experiences. Other staff noted that in some situations where they have achieved progression, their previous role hasn't been filled and they've been expected to perform both their new role and previous role.

The suggestion is that job roles and responsibilities become less clearly defined for Black and Ethnic Minority staff who are expected to undertake more than their job description covers, yet this is at the expense of a structured and tailored personal development plan so that their skills and contributions are noticed and lead to progression – even where progression is achieved by Ethnic Minority colleagues, they are experiencing vastly different expectations to White colleagues. To mitigate this, some interviewees and participants noted that a targeted initiative that functions as a **'pathway'** towards a senior role that reflects Black and Ethnic Minority staff members' ambition and skills should be implemented. This will involve and necessitate a transparent action plan which will outline what skills and requirements are needed at every stage of a role to progress, and will be implemented across the GLA to ensure that appointment decisions are not characterised by bias. This is to be viewed in conjunction with a wider offering of support by managers that will uncover and continuously monitor staff sentiment, particularly among Black and Ethnic Minority staff with regards to progression. These processes will be explored further in the recommendations section of this report.

## **EDI Learning/Talent Programmes**

The GLA has created several initiatives in recent years that promised to mentor, upskill and ultimately progress BAME (Black, Asian and Minority Ethnic) staff members. These programmes are developed and managed internally, and those that have been discussed within the interviews and focus groups that The Equal Group have conducted are the BAME Talent Programme and the Our Time programme.

The programmes have been met with some degree of positivity, with some staff members welcoming the targeted support of Ethnic Minority staff on the BAME Talent Programme, and of Ethnic Minority Women on the second cohort of the Our Time programme. This was, primarily, due to the outward commitment that the GLA appeared to be making to advance Ethnic Minority colleagues who, as data shows, tend to populate the lower grades of the organisation. Black colleagues are concentrated in Grades 4–9, although men are seen particularly concentrated in Grade 3, whilst Asian staff are concentrated in Grades 7–9. Where White staff see concentration in Grades 7–9, they have significant representation in Grades 10+.

The **'success stories'** of the BAME Talent Programme were expressed to The Equal Group by a contributor to its rollout, though it is worth noting that alongside these, the limitations of the programme were also raised and explained. The strongest aspects to the programme were seen to be the bespoke development and progression plans for participants, the one-to-one mentoring provision with a senior colleague and the ability to provide high-potential BAME staff with a **'safe space to have someone focus time on them'**. However, as mentioned, the limitations of this programme came by way of uncertainty around how scaleable it was, how much budget could be assigned to it and how, too much was trying to be achieved in a comparatively short space of time.

These apprehensions were echoed in the wider staff population, particularly amongst Black staff. They expressed that they were unsure of what came out of both this programme and the Our Time programme in terms of tangible career growth for their participating Black peers, with one staff member expressing that for the Our Time programme (dedicated to supporting women), only non-Black women were progressing. They went on to say that:

***'one [Black] member of staff after a year of that programme didn't meet the standard required. The performance review process is put in place so that you can say in 12 months whether this person is able to meet the standard or not.'***

That this staff member was still experiencing similar, negative feedback after the Our Time programme was expressed to be a worrying indictment of the both the managers who were delivering the programme and their own line manager, as it was thought that for a year-long programme there would be better support and acknowledgement of the experiences of Black, Asian and other Ethnic Minority women – leading to appropriately designed progression plans. The focus group for Black staff agreed the programmes aimed at progression and development need to be more aware of and considerate of the experiences of Ethnic Minority women. They also agreed that some White managers across the GLA need to be more stringently assessed on their managerial capabilities, contributing to the overall view that White managers who become arbiters of Black and ethnically diverse staff members' abilities ultimately leads to and perpetuates the lack of progression for these groups.

It is worth noting that sentiment among Black staff members around the advent of these programmes has not been wholly positive due to a tendency for ***'the GLA to operate....on a deficit model, mentoring, coaching, all this stuff'*** when it comes to directly supporting Black staff. It is crucial to view this sentiment alongside the GLA's inability to adequately identify or acknowledge the skills and experience of Black staff at application and interview stage. The GLA's talent programmes run the risk of becoming arenas within which qualified, able and exemplary Black staff members are being ***'infantalsised'*** and led to believe that their sole means of progression is through this route.

The outward image of the GLA's talent programmes was a point of contention for Black staff members in The Equal Group's interviews and focus groups. The BAME Talent Programme's rapid changeover of leadership was seen to obfuscate its results. This supports a wider accusation of there being underhanded practices, where it was said that ***'the GLA have a habit of passing things on, and you never really know why'***. This is especially detrimental when it comes to diversity and the fear many Black staff members have that diversity initiatives are poorly thought-through, lack longevity and result in a loss of faith in leaders who are seen to ***'throw some crumbs and [hope] it's going to distract [people].'***

## **Managers and Leadership**

Among conversations with all staff members within the GLA, managers and senior leadership teams were prominent talking points with regards to the recruitment and progression of Black and Ethnic Minority staff. The points raised motion towards the desire for greater connectedness, involvement and awareness from managerial staff when it comes to issues regarding diversity, and, more proactively, a need for managers to be more vocal and action recruitment and progression processes which work to eliminate disadvantages for Black and Ethnic Minority staff.

During the focus groups and interviews conducted, staff expressed varying levels of faith in senior management personnel, with some people identified as committed changemakers; though, often, these same people were further described as ***'lone wolves'*** – signifying a lack of alignment across leaders in all Directorates. Where perspectives on leadership appeared most bleak for staff, this was due to managers appearing to only ***'pay lip service'*** to diversity across the GLA, as the members of a focus group for Black staff expressed:

***"Managers pay too much lip service to diversity without much action and accountability. Black and BAME staff have to ask for more training but White staff don't need this training to advance a few grades. Lots of things are simple to implement but we spend too much time just talking about it."***

A second perception from the same group added:

***“There’s a lack of accountability among managers and no one is asked to step down if they don’t deliver on diversity and inclusion. That’s how managers fail on these issues. You will be responsible for a diversity action plan yet you create a culture where no Black people progress – it doesn’t make sense.”***

These sentiments go some way towards explaining the lack of progression Black staff face within the GLA. Managers are perceived to lack the desire to prioritise actionable, measurable and long-term strategic interventions, and, as a result, White staff are more likely to fare well against the existing culture, environment and processes at the GLA. This standpoint has been identified not only as unique to lower-grade staff members. Some leadership staff interviewed by The Equal Group expressed that the problem with managerial staff and leadership positions at the GLA is that there are **‘too many’**, and of these many posts, it is inevitable that some managers will be more advanced and committed to EDI than others. An example of this observed that there were instances in which managers were actively contributing to the difficulties faced by Black members of staff in achieving an internal progression appointment, staff members noted:

***“We want to understand what happens when Black and Ethnic Minority staff do go for higher grade positions, as skills and experience gained outside of the GLA are often minimised and dismissed. Ideally, the approach is to lean into the additional skills people have and see where they can add value. Instead, managers can pigeon-hole people and make them do their jobs in a narrow sense, missing the opportunity to understand and unlock employees’ potential.”***

This finds a noticeable continuity with the feeling expressed in focus groups for Black staff members. That is, managers are dismissive of the additional skills and experience Black and other ethnically diverse staff members have, resulting in a structural barrier to progression that suppresses the full potential of non-White staff members. On the contrary, when these skills are utilised, a Black staff member – who has remained in their grade-level for many years – expressed:

***“I took ownership of a project, then someone who was promoted because of its success attributed all of the credit to White staff.”***

This demonstrates an informal, unofficial reliance on the skills and contributions of Black staff members who, in turn, are not adequately rewarded with progression, opportunities for progression or credit for projects within the GLA they have designed and delivered. Where these achievements are accredited to White colleagues, it becomes clear that, structurally, managers are confident in erroneously attributing success to White colleagues, which subsequently, creates the conditions for comparatively steady progression for this group – all while non-White colleagues remain stuck in lower grades.

Managers were also seen to be visible in their favouritism towards White colleagues, accruing benefits such as progression opportunities, distribution of **‘better’** work and access to wider staff networks for these people. Notably, this was candidly detailed in the focus group for White colleagues at the GLA, where one contributor commented that:

***“Managers can have favourites, teams can be a bit cliquy and that can be a barrier for Black and Asian staff where the manager is White. For internal vacancies, there is a perception that the manager already knows who will get the role and for Black and Asian staff who are not favourites, it’s difficult to complain about. But I am close with a few Black and Asian staff members and whilst those very capable staff members don’t get progressed – White staff do.”***

This was echoed in contributions from the same group, connecting this practice to the failure of the GLA to; adequately progress Black and Ethnic Minority staff; to consistently have diverse interviewing panels; and to eliminate biases where talented Black and ethnically diverse colleagues were sidelined if they don’t **‘speak in the same jargon’** as their White counterparts.

These were seen as barriers to the recruitment and progression of Black and ethnically diverse applicants and staff members, with responsibility resting with managers who have the internal platform to promote diversity and inclusion, as well as actively challenge pre-existing processes and mindsets that halt its progress in the workplace.

The same White focus group also expressed a concern that there seemed to be a cultural divide between White managers and their Black team members. This was most prevalent when performing annual reviews or when the manager felt the need to challenge the team member. This in turn brought up the idea of “the model minority”, where Asian staff members were seen as more desirable and manageable than their Black colleagues. Through probing this issue, it seems that this could be explained by an inability to connect through the cultural divide – this could be resolved through cultural awareness training and celebration of different cultural backgrounds.

It will also be important that managers understand that they cannot approach all staff in the same way and may have to tailor their approach. In a country that has a clear issue with racism, it is safe to assume that most, if not all, ethnically diverse staff will have experienced racism at some point – some of those experiences will likely have occurred in workplaces and will have created a sense of distrust between them and any leadership. We have seen evidence of systemic racism in our healthcare, within our education, in the justice system and our government, the same institutions we expect to be doing more. Systemic, structural and institutional racism are part of the fabric in our society, we only have to look to two reports from Runnymede to find the evidence – [“Facts Don’t Lie”](#) and [“England Civil Society Submission to the United Nations Committee on the Elimination of Racial Discrimination”](#). This shows that it can embed itself into our lives and will only be eliminated through conscious and deliberate challenges to the system.

Where an organisation purports to be anti-racist or have strong EDI initiatives, seeing or experiencing racism in the workplace is even more egregious – this has left some Ethnic Minority staff feeling that EDI measures are insincere and tick box. Managers will have to understand these feelings, recognise the potential difference in experience and work with their team members to find the individual best practice for their development.



# Key Issues

We have listed out the key issues that the GLA currently have in relation to the experiences of Ethnic Minority staff, particularly when it comes to recruitment and progression. We have grouped the key issues into specific themes to allow us to focus on the areas where the issue is most prevalent. We have used these themes to form the framework for our recommendations. The recommendations will be in the form of Objectives and Key Results and will be the basis of the action plan – the action plan will be a collaboration between The Equal Group and the Greater London Authority, this should ensure that the actions are wholly deliverable by the GLA.

## EDI Strategy and Implementation

From our investigation there does not seem to be an internal, fully developed, robust Equality, Diversity and Inclusion Strategy – instead there is a collection of documents which make EDI appear ad-hoc and not a priority. These documents include the Diversity & Inclusion Action Standard, the pay gap action plans, the workforce reports and to some extent the Dignity at Work policy. EDI has to be seen as a strategic imperative attached to the organisation's mission and business strategy. Whilst this review was to focus on issues around race, we feel that no EDI issue can be dealt with in isolation. EDI has to be looked at holistically with a strategy that seeks to resolve issues for all protected characteristics.

We suggest that the GLA works to tie together all existing EDI initiatives, such as the pay gap reports (appendix B,2), D&I Action Standard, EDI work groups, etc under the same framework of a corporate level EDI Strategy. The strategy should provide a detailed analysis of the progress that has been made, the current status (in terms of data and staff feedback) and articulate an ambitious vision for where the GLA wants to be by the end of the particular control period (currently 2025). This should include existing and past efforts for diversity and inclusion, such as the BAME Talent Programme and Our Time, and explain how initiatives like these will be expanded and carried forward.

## EDI Action Plans

We understand that each directorate is supposed to have its own EDI Action Plan, however we only saw 3 in the course of our review, with a further 6 being specific to individual teams. The action plans we saw were inconsistent, suggesting that there is no guiding framework for them to work to, or any central scrutiny of these plans, with there being solely a requirement for them to provide their own action plan. This has provided at least 9 different approaches, and only 3 of them are vaguely similar – however, these 3 were by far the least appropriate or complete action plans.

There needs to be a corporate level action plan informed by the EDI Strategy. The EDI Strategy is a high level commitment to improving EDI within an organisation, it provides a vision of success and a high level understanding of how to achieve that vision.

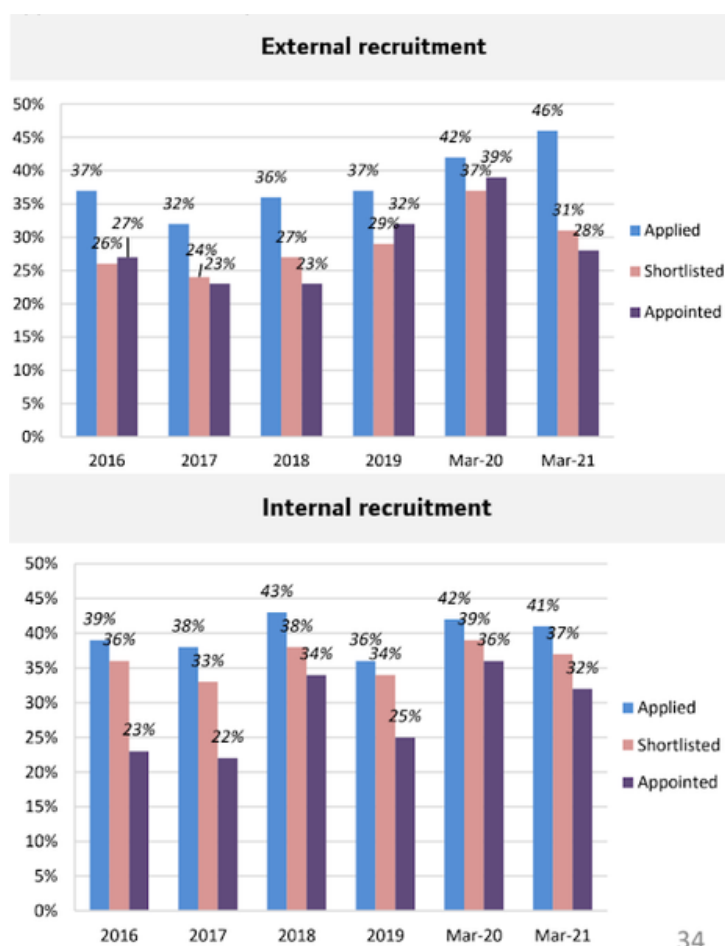
In order to deliver the strategy, an EDI Action Plan complete with SMART goals will need to be developed. Using the OKR framework in the strategy, we can break down the objectives into smaller tasks or SMART goals – each goal should be specific, detail what success looks like with a clear way to measure success, how it will be actioned, how it supports the delivery of the objective (relevant), who is accountable for the action and when it should be completed by (time).

This EDI Action Plan should then inform and provide the framework for all directorate level action plans which should subsequently inform the unit level action plan. When developing an action plan the teams should be encouraged to get feedback from the Workforce EDI team and sign off from the next senior person, i.e. the unit level should be signed off by the Executive Director, the directorate level by the Chief Officer and the GLA action plan by the Diversity and Inclusion Management Board as a collective.

## Recruitment

As part of the GLA's Workforce Report for the period 1 April 2020 to 31 March 2021, it is noted that:

*"The proportion of external BAME applicants has increased from 42% to 46%, shortlisted applicants decreased from 37% to 31%, and the number of external recruitment appointments from BAME groups decreased from 39% to 28%. The number of internal BAME applicants decreased to [from 42%] 41%; those shortlisted decreased [from 39%] to 37% and the number of internal BAME appointments was 32% [down from 36%]. (p.34)"*



This data necessitates an interrogation of each aspect of the recruitment and selection process as outlined in the document of the same name. Since shortlisted applicants from ethnically diverse backgrounds decreased in number following initial applications from an increased pool of BAME applicants, it is imperative that the content of the person specifications for each available role is investigated and, where possible, diverse shortlisting panels are enlisted to screen applications at the earliest stage. This is applicable to both external and internal candidates. You can see a full analysis of the recruitment policies and process in appendix B,4.



The data representing internal candidates requires a greater understanding of the internal conditions at the GLA for existing Ethnic Minority employees. This will span areas outside of recruitment and selection processes and procedures, as it is imperative to understand what provisions the GLA has in place to support the development and upskilling of Ethnic Minority employees. These provisions must serve to build confidence in Ethnic Minority staff as there is a perception that the system is set against them – this will limit the amount of Ethnic Minority staff applying but also their confidence and ability to showcase their skills and experience during the process. It will be important to ensure that steps are taken to eliminate or mitigate bias and discrimination in the workplace and especially within the recruitment process. These are instrumental contributing factors – or barriers – to internal progression and need to be investigated as rigorously as recruitment and selection procedures in place at the GLA.

## **Advertising, job description and person specification**

More broadly, attention needs to be given to the advertising of all open opportunities to ensure the number of Ethnic Minority applicants is maximised for each available role. Additionally, the continued monitoring of ethnicity data (where supplied) is critical to understanding at the particular recruitment stage(s) that seem to be a barrier for Black and ethnically diverse candidates. Since Ethnic Minority appointments for this period were 32% despite higher percentages of total applicants overall, it is also worth examining the process and content of interviews and final application stages to minimise the potential for bias.

Within the scope of the GLA's early recruitment activity, it is recommended for managers and Human Resources Business Partners (HRBP) to discuss any diversity criteria that will need to be prioritised to allow for a more balanced shortlist as the recruitment process moves forward. For the purposes of this review, the additional consideration here will see managers and HRBPs establishing the extent to which it is appropriate for people from underrepresented ethnic groups – particularly Black applicants – to be specifically encouraged or targeted to apply for any open role. This will be examined and implemented, as necessary, by considering the diversity of the existing team and any historic underrepresentation of Black and ethnically diverse candidates in the role in question.

Embedding this action from the outset of the application process will ensure that the consideration of diversity is at the forefront of all recruitment activity – specifically around roles where Black and ethnically diverse applicants are historically underrepresented. This is an action that can be applied to other protected characteristics (e.g. female/non-binary applicants, LGBTQI+ applicants and disabled applicants) and serves the purpose of ensuring a diverse applicant pool from the very start of the recruitment process which is less likely to dwindle as the process moves forward.

The messaging, language and tone conveyed within the GLA's job descriptions and person specifications is crucial as these documents will be read by potential applicants who will ascertain whether the job is the right fit for them, and whether they are a right fit for the role. For Black applicants, it is imperative that the GLA remove any trace of racial bias within their job descriptions and person specifications. On the contrary, the inclusion of specific elements within the job description and person specification could ensure ethnically diverse applicants are aware of the commitment the GLA has in diversifying its applicant pool.

These could include the GLA's commitment to EDI, stating that each employee will be responsible for achieving an EDI objective of their own and a positive action statement; "we particularly welcome applications from Black, Asian and Ethnic Minority candidates". How the GLA should work to achieve both the elimination of racial bias and an inclusive tone in its job descriptions and person specifications will be further explored in the recommendations section of this report.

The GLA has two primary ways of advertising for a role – internally and externally. Though most vacancies are advertised internally first, where there is a perceived internal skills deficit the vacancy in question will be advertised internally and externally at the same time. The places that a job vacancy is advertised in is crucial to supporting a diverse make-up of the overall applicant pool. It is prudent for the GLA to consider where open vacancies can be publicised with greater visibility and appeal to ethnically diverse applicants – and, in particular, to Black applicants.

## Selection and Hiring Panels

During the selection stage of the GLA's recruitment process, reference to a 'panel' is made. The details of the required make-up of the panel (function, background, grade, diversity) is not specified. Focus groups that The Equal Group have facilitated with HR personnel have expressed that though the GLA does not make diverse recruiting panels mandatory in their recruitment and selection process, the benefit of doing so is one of the ways in which bias can be minimised during the shortlisting and interview stages. It is therefore worth mandating diverse hiring panels as the standard for each vacancy.

The GLA requires that the shortlisting panel must consist of the hiring manager and at least one other person from the interview panel. There is no reference given as to the criteria that the additional colleague for the interviewing panel needs to fulfil, so consideration should be given as to whether this role should be filled by a non-White employee wherever possible (if the hiring manager also identifies as White). This will ensure that the GLA is aware of the need to present outwardly to applicants an indication of the kind of progress it is hoping to make, as well as ensuring that a different perspective is covered by the initial shortlisting panel. It is also important to note that whilst the hiring manager will have the final say, the candidate scores from the other panellists must be given equal consideration – where the hiring manager has chosen not to go with the highest scoring candidate, they will have to provide justification and seek approval from the HR Resourcing team before making an offer.

The GLA is aware of the opportunity the interview stage of the recruitment process presents to the candidate for ascertaining whether the hiring manager, department and wider organisation is aligned with their professional expectations and aspirations. It is here that Ethnic Minority applicants would benefit from a diverse interviewing panel as a means to see their peers represented in decision-making roles within the GLA. Visible representation of ethnically diverse interviewers indicates to Ethnic Minority applicants that their experience and background might be better understood; that implicit and explicit biases in the interview are more likely to be significantly reduced; and that the outcome of their interview will be decided by a diverse group.

## Interview and Offer

The interview firstly comprises competency-based questions, focusing on events and experiences in a candidate's past and giving them the opportunity to demonstrate how they behaved in these scenarios. It is important to focus on behaviours and competencies relevant to the job, rather than the events and experiences themselves. This is a crucial aspect to hiring for potential, and will allow Black and ethnically diverse candidates to demonstrate times where they have embodied certain professional and personal qualities that will be valuable to the open role.

It is important not to disregard situations that have a racialised aspect to them, as many Black and ethnically diverse candidates will have navigated and overcome adversity due to structural, institutional and social barriers that exist in this country. Instead, acknowledging the personal qualities demonstrated in these situations as showing potential – rather than as showing extensive experience – will ensure that the focus is on transferable skills that indicate growth and resilience. It is here that the need for a diverse interviewing panel is manifestly evident, as the ability to demarcate 'unteachable' personal skills and attributes from teachable technical knowledge is crucial.

The culmination point of all assessment activity throughout the GLA's recruitment and selection procedures is the interview outcome, where the successful applicant has best demonstrated their suitability for the role in question. The recruitment team then contacts the successful applicant, and the onboarding process is triggered. In terms of salary, the guidance states that the offer must be made at the first point of the salary band (Recruitment & Selection Guidance for Managers, 13.4).

This is a potential area for review for the GLA, as it may ensure that if a Black or ethnically diverse candidate is selected for the role, they will languish at the bottom of the salary band for the role they have successfully been awarded, only increasing their salary through time served. We understand that there is some management discretion to secure high quality candidates by offering them a higher position on the band. The implementation of this discretion should be reviewed to understand if it is being applied equitably or if it favours particular groups. It was unclear if this same discretion could be applied to awarding an employee with a larger salary increase than that given for time served.

This guidance could be amended to reflect a more flexible approach to remuneration such that previous experience and transferable skills are more heavily considered. In an interview with one of the GLA's senior staff, they highlighted the importance of getting to know each direct report and colleague's professional experience so that they could add value to the organisation in ways that extend beyond the remit of their role. This needs to be reflected in the remuneration policy; allowing for incoming Black and ethnically diverse candidates to demonstrate their vast experience and for the GLA to be encouraged to compensate these employees accordingly.

How the recruitment and selection processes currently in place at the GLA can be reviewed and redeveloped from end-to-end will be further explored in the recommendations section of this report.

## Talent Management

The GLA's approach to talent management has been identified as an issue by Black and Ethnic Minority staff. When contrasting these sentiments with the GLA's competency framework guidance (reviewed in Appendix B,4: Competency Framework), there are myriad discrepancies; demonstrating that the GLA may not be properly applying its own talent management standards to Black and Ethnic Minority employees' work and contributions.

We took an intersectional approach with this review and looked at the differences between men and women at the GLA to identify targeted interventions. When looking at the GLA, Black staff make up 3.5% of Grade 13+ and there is only one Black person above Grade 13, a Black man, suggesting a better outcome for Black men than Black women. However, when we look specifically at the pay gaps for Black men and Black women we see a different story – the pay gap for Black men to White men (the highest paid group on average) was 26.5% compared to 17.9% for Black women to White men.

A similar trend plays out across all Ethnic Minorities, with 'Other' Ethnic Groups having the worst result for men with a gap of 36%. In general women are in a worse position than men in the organisation, though this is primarily due to the success of White men. From our research, these gaps are due in part to a rigid and non-inclusive application of competency frameworks, poor engagement between managers and their staff (particularly between White Managers and Ethnic Minority staff) leading to ineffective development plans, and a culture that unconsciously favours White staff.

This gulf in the equitable outcomes from the GLA Competency Framework and the lived experience of Black and Ethnic Minority employees at the GLA points to a review of existing competency policies, and an organisation-wide application of fairer and more flexible policies. As is the case with the recruitment process, a less stringent reliance on behavioural competencies and (application of) technical skills and knowledge is needed in the competency framework, which covers performance management, development planning and support with career aspirations.

Though this may sound counterintuitive as the competency framework is designed to provide managers with the tools to clearly define and monitor key competencies in any role, an over-reliance on a rigid set of competencies puts employee progress at risk. This is due to the potential failure to recognise and reward additional skills and contributions that fall outside the traditional remit of any role. As focus groups and interviews with GLA staff across all directorates and levels have consistently shown, Black and Ethnic Minority colleagues have expressed dissatisfaction at their additional skills and experience being 'unofficially' utilised, yet not provided them with a good basis for progression or even development. As the competency framework 'outlines the behaviours that are essential to effective performance in our organisation', these inflexible lists of behaviours and technical skills will always form the basis of a case for any appointment – and indeed for advancing in the GLA – while ensuring that additional contributions and skills are not considered.

The competency framework is also applied to other areas of the recruitment process, including interviews. The framework stipulates that the candidate is asked questions specifically around competencies – both behavioural and technical – and is expected to defer to their previous experience to construct a strong answer. This, when taken with the recruitment guidance outlining that both a standard question bank and model answers constructed around the competencies can be used, could position candidates with non-traditional experience at a disadvantage. If we add to that the cultural competence within the GLA (the understanding of the experiences and impacts of different backgrounds) and non-diverse (or hiring manager dominated) interview panels, ethnically diverse candidates are more likely to not have their experiences (relevant or not) recognised or understood.

The reliance on model answers to standard questions may be problematic and present far too much of a rigid and inflexible expectation of interviewees. This will disproportionately affect applicants from ethnically diverse backgrounds as it is likely that these standardised questions and model answers will be composed and signed-off by White decision-makers. This is not an easy issue to address and will require consistent monitoring and guidance to ensure an equitable application.

As this independent review has also found that the usage of diverse interviewing panels is not considered compulsory, the competency framework's failure to consider how to ensure parity for Black and Ethnic Minority staff at the GLA moving through the recruitment process points to an urgent need for reworking it in its current form. Aspects of the competency framework referring to recruitment can be reimagined to instead reflect a 'model framework' that emphasises potential, allowing different experiences and backgrounds to be assessed fairly using the same criteria.

The performance review aspect of the GLA's competency framework places the onus on staff members being able to 'clearly outline what is expected of us in terms of HOW we do our job'. It goes on to state that staff and managers are 'jointly responsible for gathering evidence of when the staff member has demonstrated these important behaviours in the workplace'. Though this is a fair undertaking on the side of both parties, the reality of the lived experience of Black and Ethnic Minority staff at the GLA paints a starkly contrasting picture.

Black colleagues have, in solo interviews and focus groups, expressed frustration at taking independent action with a view to advancing their position, yet being denied the opportunity to; go on secondment; have their additional contributions noticed and rewarded; and, despite asking managers, not receiving the necessary training to progress in their role. This renders the autonomous aspect of the performance framework as redundant for colleagues who have experienced these setbacks at work.

The root cause of these negative experiences must firstly be identified and addressed outside of the competency framework, before any such framework can be applied in good faith. Alternatively, the competency framework should be reviewed and reimagined to place far more responsibility on how managers should be aiding the learning and development of their staff.

The competency framework outlines the GLA's key competencies which encompass: 'Working with others', 'Leadership', 'Delivering results' and 'Organisational context' – elaborating on each of these by classifying what makes for 'effective' and 'ineffective' performance.

Among the areas outlining 'ineffective' indicators of performance, the phrasing of statements such as 'interacts inappropriately with others' and 'is unhelpful or unprofessional when interacting with stakeholders' and 'gives up too easily when initial plans are met with resistance' serves to disproportionately affect Black and Ethnic Minority colleagues due to their lived experience of a mischaracterisation of their intentions, communication and effort.

Both in interviews and focus groups conducted by The Equal Group, as well as in staff surveys, Black and Ethnic Minority staff have recounted harrowing instances of verbal abuse at the GLA where they have been labelled '*scary when I have not done anything to provoke it*', '*[an] aggressive Black woman*', and been told that they will not pass their probation period due to their '*communication skills being off*' – the first two being clear racism and the last being a key example of microaggressions.

In contrast to the inflexibility elsewhere in the competency framework, the vagueness around what it means to communicate 'awkwardly or inappropriately' or 'unprofessionally' with colleagues and stakeholders within the GLA gives managers and decision-makers the power to become unchallenged arbiters of what constitutes an effective indicator of behavioural competence. This emboldens those that have used racialised stereotypes to characterise Black and Ethnic Minority staff members' behaviours incorrectly and detrimentally, and points to an urgent need to review this section of the competency framework.

As part of the talent management policy within the GLA, it is essential that there is a process in place that allows for open communication between hiring managers and staff members seeking progression opportunities. In the focus groups and interviews conducted by The Equal Group, Black and Ethnic Minority staff members were falling victim to the same recurring cycle – that is, they would apply for a more senior position, receive no prior support or encouragement for doing so, and, at the culmination of the (unsuccessful) process, be provided with unsatisfactory or inadequate feedback on their performance. One staff member recounted:

***"I haven't progressed even through restructures, and I'm in the same job I was in several years ago. I applied for a new role, didn't get it and I was disappointed that no manager encouraged me to apply or said they'd be happy to consider my application."***

Upon an unsuccessful application to an internal role, another staff member recalls:

***"I was part of a team that set up a project. I didn't even get shortlisted for the project leader role which opened soon after. And when I got feedback – it was apparently because I'd been in the GLA for too long."***

These sentiments illuminate the failure of managers to properly encourage Black and Ethnic Minority talent within their teams, coupled with vague feedback that does not provide any developmental tools or direction following an unsuccessful interview process. This points to the urgent need for any talent management initiatives to focus on providing full, end-to-end support to Black and Ethnic Minority staff members across the entire process of applying, interviewing, and seeking post-application feedback for a more senior role. The competency framework outlines in detail the collaboration between manager and staff member in constructing a clear career development plan. However, the lived experience of Black and Ethnic Minority staff paints a starkly different picture; that is, one where they feel they have been abandoned by managers and decision-makers in the process of seeking a step forward in their careers.

Overall, the approach to talent management within the GLA needs to be reviewed and redeveloped as per the recommendations in this report. Many aspects of what should be applied through the competency framework manifest far differently in practice and reality than in reference to what is written in the framework policy itself. As it stands, Black and Ethnic Minority staff are being held back by the GLA's competency framework, rather than being given the opportunity to flourish because of it. A robust but flexible and culturally aware competency framework provides the recruitment and progression policies with a solid foundation by which to fairly assess candidates at application stage, appreciate additional contributions made by Black and Ethnic Minority staff to the GLA, and offer progression opportunities and useful feedback to staff members in these groups wishing to advance their careers at the organisation.

When speaking to staff about the current training and development programmes, there were mixed feelings about how successful the BAME Talent Programme and other similar programmes had been. Whilst all spoke positively about the programme in general, few had a good understanding of if it had yielded any positive results for Ethnic Minority staff. There seemed to be consensus that the programmes should continue, we suggest that success stories are better communicated.

## Positive Action

There is a lack of understanding around positive action within the GLA, a common false assumption we encountered through our focus groups and interviews is that a minority group can be favoured over a majority group in any circumstances. This is likely due to an oversimplification of how it can be applied, and an assumption that there is no difference between positive action and positive discrimination. In fact the line between positive action and positive discrimination (which is illegal) is very clear although can be incredibly thin.

For example, positive discrimination would be to award a member of a minority group a position based purely on their characteristics and with no consideration of the skills or experience. Positive action is an effort to remove or mitigate structural barriers for an underrepresented minority group (UMG) – this only affects the final recruitment decision in favour of the UMG candidate when they score evenly with the other top scoring candidates against all criteria. When selecting a UMG candidate over other candidates, the candidate must score equal or higher than the other candidates in the interview process and there is a lack of representation for that particular candidate's background within the area of the business they have applied for.

Other examples of positive action include:

- Placing job adverts to target particular groups, to increase the number of applicants from that group – such as using BAME Recruiters to target Ethnic Minority candidates or advertising in predominantly Black or Asian communities.
- Including statements in job adverts to encourage applications from under-represented groups, such as 'we welcome Ethnic Minority applicants'.
- Offering training or internships to help certain groups get opportunities or progress at work – such as the BAME talent programme.
- Offering shadowing or mentoring to groups with particular needs to improve their opportunities for progression.
- Hosting an open day specifically for under-represented groups to encourage them to get into a particular field.

It should be noted that the GLA already implements various positive action initiatives, including those listed above. Unfortunately, not all staff are clear on what is and isn't allowed and what efforts the GLA already take that fall under positive action.

Positive Action is a key aspect of the Equality Act 2010 and can be found in [Part 11, Chapter 2, sections 158 and 159](#). It is there to allow employers to take reasonable steps to remove or minimise potential barriers that disadvantage those of minority groups. It should also be noted that the GLA as a public organisation is bound by the Public Sector Equality Duty (PSED). Positive action is a tool that employers who are bound by PSED to help them achieve this aim. The requirements under PSED are:

1. Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
2. Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
3. Foster good relations between persons who share a relevant protected characteristic and persons who do not share it

The GLA have a legitimate aim to become more diverse and inclusive, and are bound by the PSED. We can also look at reports by [McKinsey](#) that suggest more ethnically diverse companies outperform their competitors with a profitability margin up to 36% higher – we can assume this is due to increased productivity and innovation, which for the GLA should result in a more cost effective and better service provision for London. These provide the legal and business case for improving ethnic diversity and therefore utilising positive action as a means to increase Ethnic Minority representation.

## EDI Learning

Through talking to staff at various levels within the GLA, there is a strong belief that everyone, particularly those with management duties, need to have more comprehensive EDI training. A common view expressed was that White managers were blockers to Black and Ethnic Minority progression – whilst some believed this was due to an inability to engage with ethnically diverse staff, others were more pointed about calling out what they saw as “clear bias”.

It is clear that there is a cultural divide between White colleagues and their Ethnic Minority colleagues, some of the Black and Asian staff that we spoke to raised the issue that White managers in particular do not respect or understand their lived experience. A similar divide on culture exists between Black and Asian staff – whilst they all experience racism and disadvantage in the system, they are not aware of the nuance between their experience. This points to a need for the GLA to have a wider socio-cultural awareness into not only the cultural and ethnic background and experiences of their employees but of the culturally and ethnically diverse London population. This awareness will help colleagues better empathise with each other, leading to more productive collaboration and stronger feelings of inclusion, and also a better understanding of the needs of Londoners.

When discussing the current EDI learning opportunities, such as “Let’s talk about Race”, most staff were happy that it was now in place – there were some reservations around how successful it was even with it being mandatory. Additionally, staff were concerned with how long it took to develop – a concern we shared considering the request was made in July 2020.

Having looked at the “Let’s talk about Race” training, it is a good baseline to ensure all staff have a basic understanding, we would suggest that this is a “beginners” session, with more in depth training for managers and allies being made available. We also noted that trainers delivering the session were volunteers, taking time out of their regular duties – many of which feel they haven’t received recognition from their own managers. This will have to be closely monitored as many delivering the sessions are from Ethnic Minority backgrounds and are being asked to take on more emotional labour without additional recognition, compensation or support. It may be necessary to adjust role responsibilities whilst the sessions are still to be delivered to the majority of the organisation.

## Accountability

Everyone is responsible for EDI, that means that everyone has to challenge actions, initiatives or behaviours that undermine or go against the organisation’s EDI Vision and Strategy. Everyone should have an EDI objective informed by their unit or directorate EDI action plan – they may be responsible for delivering an action on the plan or it could just show how they’ll support a particular action. Of the staff that we spoke to, they were either not aware of EDI objectives and that they should have one, or they were actively involved in EDI – this suggests that team leaders and managers are not ensuring these objectives are set, and are not being held accountable to them being met.

The higher up the grade/management structure, the more the EDI objectives have to take into account the EDI performance of those below them, i.e. an Executive Director is only successful if the Assistant Directors and Heads of units are delivering successfully, the ADs and Heads are only successful when all their teams are delivering successfully.

The accountability starts at the top and filters down to the bottom but those at the bottom should be able to hold those above them to account on their EDI actions. As such, it must be built into the review process, everyone should be asked how they have delivered on EDI and on their action from the previous 12 months. This should inform whether or not staff can receive raises or bonus payments – recognition payments should be awarded for those who have delivered above and beyond their peers.

During the review, staff should have recourse to explain why they didn't meet an action - there could be very good reasons, i.e. downsizing, small team, genuinely no diverse applicants, training/event was cancelled, etc - this explanation must be scrutinised and assessed for merit. Where a staff member repeatedly fails to meet EDI actions or expectations, the GLA should be prepared to take this down a disciplinary route.

To allow for full accountability, annual reviews should utilise 360 degree feedback. This is the process of getting feedback on an employee's performance from everyone they work directly with and could include their manager, team members, peers and clients.

The Dignity at Work policy (analysis in appendix B,3) states that the GLA takes a zero tolerance approach to bullying, victimisation and harassment. This must be proven through proper investigation of any complaint - staff may come through various channels, if the issue involves bullying, victimisation or harassment, HR should commit to investigating it with support from the Workforce EDI team (they should be kept informed of any cases involving discrimination). If the investigation finds that the complaint is true, then the responsible person should be taken through the appropriate disciplinary process and if necessary, retrained in EDI for their level. If the complaint comes through the resolution process, the staff member should be informed about how seriously the GLA takes these issues and with their permission, would like to investigate it fully - if they say no, you should allow them to follow the resolution process with an investigation as a potential alternative if the process breaks down.

## **Policy vs Process**

Having reviewed a number of policies that we felt could have a significant impact on the experiences of Ethnic Minority staff, we have come to the conclusion that the policies themselves aren't the issue but instead, most likely how policy is applied differently across the GLA - this is in part from our discussion with staff and our policy review which is in Appendix B. With the exception of the recruitment process, we saw only loose guidance on how to enact policy with little to no process for managers to follow. This leaves managers to interpret the policy based on their interpretation of the organisation's overarching mission. If we consider how people act on their unconscious bias, this could have a disproportionately negative impact on Ethnic Minority or other historically underrepresented groups.

Certain policies and processes have the ability to create disproportionate outcomes across the organisation, these include recruitment, talent management and disciplinary to name a few. HR should define all areas where this has potential to happen and implement a system to monitor all usage of the policy, including any informal processes each year. They should look for disproportionate use or outcomes for protected characteristics and identify whether the policy is being used appropriately or not. This falls under the zero tolerance approach outlined in the Dignity at Work Policy as it would be considered discrimination.

We would also recommend that a policy review process is implemented to ensure that policies are regularly reviewed to ensure they are in line with the company mission and strategy. We recommend that this process is undertaken every 12-24 months or whenever there is a significant change to the business, an initiative is implemented that has a significant impact on the outcomes of the policy or there is legislative change. The owner of the policy, who last reviewed the policy, the last policy review date and next scheduled review date should be included in a table placed in the footer - this allows stakeholders to know the policies are up-to-date and who to ask if they have any challenges or queries.



# Emotional Labour

Emotional labour within the context of EDI is defined as the additional effort members of a minority and/or historically disadvantaged group make to explain their lived experience to members of the majority group. When we don't understand an issue, we often go to a person with experience and ask them to explain it to us, when that results in asking a Black or Asian person to explain their experience of racism, that is asking them to relive that experience which will likely be a source of trauma for a person or even group.

Every person who engaged with us on this independent review was asked to take on emotional labour, whether that be reliving their own experiences or engaging with other colleagues with similar experiences. Whilst the white staff we engaged with will likely not have undertaken as much emotional labour as their Ethnic Minority colleagues, they will have taken on some - especially if they consider how these issues impact their friends and colleagues. We cannot get away from using emotional labour to deliver the EDI initiatives that we as a society and the GLA need, we need to understand the lived experience in order to address it. It can also seem disingenuous when a White person is delivering training on race to Ethnic Minority staff - initiatives like "Let's talk about Race" require Ethnic Minority facilitators. However, we have to be mindful of how we expect people to engage and how we acknowledge their labour.

Where colleagues are having to take on emotional labour to engage with EDI initiatives or help an independent review, it will be important to ensure that they have the support they need - before, during and after. This support could be a dedicated helpline for race related issues, a decompression hour after delivering "Let's talk about Race" or engaging in an interview to discuss lived experience, it could also be in recognising emotional labour through the recognition policy.

We spoke to around 60 staff through interviews and focus groups, this included a group of around 10 white colleagues in a focus group, and key personnel (i.e. CMT, HR) who were also White. This leaves around 35-40 Ethnic Minority colleagues or just over 10% of Ethnic Minority staff. These colleagues were asked to help us understand their experience of work at the GLA and what they believe needs to be done in order to make the GLA a diverse and inclusive workplace. This required all of them to engage in emotional labour, reliving problematic experiences, listening to colleagues communicating all too familiar stories. Whilst we have provided the staff who engaged with us a list of support resources and advised them to decompress after the conversations, they may still require additional support.

The GLA must also be aware of the remaining 90% of Ethnic Minority staff who have their own stories that they may wish to tell. It will be important that the GLA develops a process that will allow any person from a minority background but particularly Ethnic Minority backgrounds, to communicate their experiences. The GLA should take this as an opportunity to understand the lived experience of their employees so that the workforce can be provided with better support to foster inclusion and belonging. Some issues that are raised may point to a need to make policy changes or issue guidance to ensure that all staff experience an equitable process.

This may require a dedicated email inbox or online form to allow people to book time with the Workforce EDI team or trained HR rep. The key issues of the event should be recorded but unless requested otherwise, all conversations should be anonymous - this should be about ensuring it can't happen again first, historic accountability in this area will be difficult and may undermine efforts to hold people accountable for the present or slow down EDI progress.

# Structural Barriers

This independent review was to investigate the structural barriers that prevent Black, Asian and Ethnic Minority, and particularly Black, staff from progression. The acknowledgement that this review was necessary on behalf of the management was likely due to a suspicion that the organisation, like many in the UK, has an issue with systemic racism, i.e. structural barriers exist that prevent Ethnic Minority colleagues from accessing development and progression opportunities. The GLA is not alone in facing this issue but the fact that it has been willing to allow an independent organisation to investigate and expose the issue shows the willingness of the leadership to remove those barriers.

Throughout this review, we have observed issues related to a long-standing culture which, despite the various changes of structure and administration over the last 21 years, hasn't changed much where race relations and the impact of equality, diversity and inclusion are concerned. This is not to say that there is any deliberate malice or intentionally detrimental outcomes being pursued, but rather, many of the people working at the GLA, are passive participants in a long-standing system that produces different outcomes for staff based on their ethnicities, leading to Ethnic Minority staff being left behind their White counterparts. Where structures, policies and processes are in place, these have not always been scrutinised in view of their inclusiveness and in the absence of any formal mandates, the position of defaulting to 'cultural norms' (whether that be through following examples set by previous leaders or through assumed ways of working) leads to routinely disproportionately negative outcomes for Ethnic Minority staff.

The effects of this are shown by a general lack of representation across the organisation but particularly at higher grades – it is our assertion that this would not be so without structural barriers being present. Additionally, we heard multiple stories where Ethnic Minority staff were given unsupported reasons for unsuccessful job applications, not being allowed to access development opportunities or being expected to do more additional work than White counterparts for less or no recognition. Staff also relayed experiences of calling out racism and seeing no consequences for the racism but have experienced some measure of victimisation – some of these stories highlight an HR department either unable or not motivated to change or even address issues of the status quo.

These experiences at best reflect unconscious bias within the organisation, particularly in management positions, but at worst active racism – we do not make this point lightly and are not accusing anyone, we make this point to highlight the potential these issues have had to create a hostile and non-inclusive environment for many Ethnic Minority colleagues.

Systemic racism within an organisation is often defined as racism that exists within the culture and/or structure of the organisation. It is rarely easy to identify just by looking at policies and processes as to write these with any racist intent would be a clear violation of multiple laws including the Equality Act 2010. More often we see that the structure within the system has gaps, these gaps are necessary to allow for management discretion or flexibility in the application of policies – many of these gaps are necessary to allow a smooth functioning operation. Where the system has gaps in its structure, the culture necessarily fills in these gaps, creating unwritten, often unspoken, rules about how to apply discretion or policy flexibility.

Culture is often a very difficult thing to describe within an organisational context, it is the intangible product best described as "how things are done around here". This can make it very difficult to acknowledge or identify without proper scrutiny, making it even more difficult to change without a clear plan of action, vision and consistent approach.

The GLA has been in place since 2000, with many staff staying at the organisation through multiple administrations and through multiple structural changes and initiatives where the leadership have attempted to address core issues. In our review, we have been made aware of some initiatives since 2016, by the current mayor to address issues of inequality but not the existing culture and since 2018 there have been some positive action initiatives (BAME Talent Programme, 50% of Our Time reserved for Ethnic Minorities) that long term could help to address the cultural issues and the first initiative to address the culture directly was the "Let's talk about Race" sessions. We have not reviewed any initiatives pre-2016 as these would have been out of scope.

As the culture has not been actively addressed in two decades, much of the culture that was embedded at the foundation of the organisation will likely still remain in place today. Most staff will likely be passive practitioners of the culture, unaware of the detrimental effects it has on Ethnic Minority staff and unaware of even how the culture was born – some may be active participants in the culture although will likely not know or remember how it was born.

It's also important to recognise that culture is as much a product of society, and often more so, as it is about the organisation. Where the organisation has not fully considered how a culture develops, the staff will develop the culture based on their own societal experience and expectations. As representation of Ethnic Minorities has been historically low across the organisation, and particularly low in management and senior leadership, this has meant a culture based on a likely homogenous experience of White staff. Without conscious challenges to the culture, it has been allowed to perpetuate itself.

The GLA have set a necessary and ambitious goal of becoming an Anti-Racist Organisation, this will not be achievable without the recognition of the existing and historic culture that has perpetuated decades of overt and subconscious racism. Whilst the issue of systemic racism will not get any direct recommendations, we have identified throughout our recommendations where we believe this issue can be addressed. We feel that it is important with this issue to not point fingers or make accusations within the report and instead everyone in the organisation must make this the point where they commit to creating a culture that is inline with the vision and mission of the organisation and the subsequent EDI Strategy.

The key recommendations we have identified to begin to make positive changes to the culture are those of accountability and EDI learning. Whilst the strategy will provide the foundation and framework for taking the organisation forward in its EDI journey, these are the areas where people can start to understand how to make the change and see how the change will be measured.



# Recommendations



We have developed a number of recommendations that should help to achieve the proposed solutions. We have used the framework of Objectives and Key Results (OKRs), this has allowed us to provide a very high level set of recommendations here which will be further used to build a detailed action plan.

Objectives and Key Results allow us to set big goals, we then define those goals by the key results - what does success look like - then within each of these objectives or key results we develop tasks. The tasks can be simple or complex but we find it best to use SMART goals when developing the tasks.

The recommendations that are found here are not currently specific - this is due to The Equal Groups intersectional approach and looking at the organisation holistically. It appears to us that many of the issues that we have identified are not exclusive to Ethnic Minority staff but do disproportionately affect Ethnic Minority staff. With this in mind we thought it best to provide recommendations that had the potential to be more all encompassing and then narrow in on the specific area - in this case, race - through the action plan. The action plan that we develop will then provide a framework that the Workforce EDI team can utilise to address similar issues for other characteristics going forward.

We have used the themes set out in the "Key Issues" section to group our recommendations together. Using these themes, the GLA can focus on a single set of recommendations at a time. The prioritisation within these themes details when we believe each recommendation should be started and delivered by from the starting point of that section. Not all recommendations that are immediate have to be delivered within the same 3 month window. We have also created a list of priority recommendations that are deliverable asap - these will show the GLA commitment to the report recommendations and hopefully make it easier to deliver some of the recommendations going forward.

We are aware of some constraints of the GLA in being able to deliver on some of the more immediate recommendations quickly - remember that they are the first task in the set and the counter begins when the GLA comes to that set. This may mean that some of the themes cannot be addressed in full until the next financial year, leaving a significant time period in which the GLA could lose the engagement of stakeholders. In order to provide continuous progress and maintain engagement, we have identified a number of recommendations that can be done between now and the end of the financial year that will prepare the GLA to deliver the other recommendations.

These "Fast track Recommendations" are all immediate, i.e. should be started by the end of March 2022. Whilst they are associated with particular themes, they can be considered in relative isolation.

## Fast Track Recommendations

Objectives	Justification & Vision	Priority
Reaffirm the EDI Vision and Organisation Values	<p>This is the first step to providing an equal, diverse and inclusive organisation. The GLA already have a vision of being an anti-racist organisation, we would take this and expand on it to being an organisation where people of all backgrounds and characteristics are welcome and has no place for bigotry.</p> <p>An integral part of delivering on EDI is having relevant and meaningful values. We understand that the GLA has been working on new values, fully developing the values and ensuring that EDI is integral to the values will help to cement the EDI vision.</p>	Immediate
Remind all staff about the use of anonymous application sifting and diverse interview panels	<p>From our review, it seems that many staff are unaware of these initiatives or do not believe they see them appropriately applied in their area. These are two important initiatives to increase equality of opportunity and fairer outcomes. It will be important to ensure all staff are aware of these initiatives and know when and how they should be applied. Both initiatives are explored in Appendix B under Recruitment.</p> <p>It will be important to ensure that the policy and process around anonymous applications is easily accessible to all staff. The more staff who are aware of and understand the policy as well as how it fits with the GLA mission and vision, the more likely it will be that it is applied appropriately and consistently. We would recommend ensuring that the policy and process reflect the available resources and are updated to reflect any changes - there is a recommendation in the Recruitment section of recommendations.</p>	Immediate
Lived Experience forum	<p>Due to the logistics of running focus groups and interviews as part of the review, we had only a limited number of spaces.</p>	Immediate

	<p>We reserved space for Ethnic Minority staff and a representative group (10%) were able to participate. This leaves 90% of Ethnic Minority staff who may feel more comfortable or a stronger desire to have their experience heard.</p> <p>Whilst it can be a difficult process to relive experiences of racism, as for many this will have embedded itself as personal and even racial trauma, it can also be a cathartic experience.</p> <p>The GLA should take this as an opportunity to understand the potential mistakes that have been made in the past and put measures in place to limit the chances of it happening again. This will require a forum of some kind to allow staff to share their experience.</p>	
<p>Evaluate the role of EDI in each directorate</p>	<p>Currently, there are two workforce positions with EDI in their job title, these are both in the Workforce EDI Team within the HR Workforce Development team. They are also the only staff that we are aware of that have EDI responsibilities written into their job description. The GLA is a large and complex organisation and EDI cannot be delivered by two people - as such the GLA has a number of volunteers in directorates who have taken on additional EDI responsibilities within their directorate or unit.</p> <p>We recommend that each directorate evaluate the role of EDI and define the requirements of the position. This would then form part or all of a job description. We accept that, initially, the directorate EDI role may not constitute a full time role whilst the GLA builds the EDI Strategy and action plans</p>	<p>Immediate</p>
<p>Set EDI Objectives</p>	<p>We understand that the GLA had set a requirement that all staff should have an EDI objective, when we asked staff about their EDI objective, very few were aware of the requirement, even fewer had one. This suggests that the importance of EDI is not being effectively relayed through managers.</p>	<p>Immediate</p>

	<p>We recommend that all staff begin to set EDI objectives and that all managers are reminded that they are responsible for their team's EDI objectives as well as their own. We expect the initial EDI objectives to be small and not very impactful – a few people may be ambitious but it will be important to ensure they are being realistic. Once the EDI strategy and Action Plans have been developed, we expect it will be easier for individual objectives to be set.</p>	
<p>Increase attendance for “Let’s talk about Race”</p>	<p>We understand that it is mandatory that all staff attend the “Let’s talk about Race” sessions but that it currently has quite a low completion rate of around 20%. This will need to be addressed. Aiming for 100% completion by March would be unrealistic, however we recommend setting an ambitious target of 60% based on current capacity.</p> <p>Managers will need to be reminded that it is mandatory that they and their team attend this session. It should be communicated that this is the first step on the road to a more diverse and inclusive organisation for all. White colleagues should be reminded that whilst the conversation may initially be uncomfortable, the sessions are not about assigning blame or pointing fingers but about creating an open and honest environment where all staff can communicate effectively with each other.</p> <p>Managers will also need to be aware that if they have a staff member who has volunteered to run these sessions, then they must be afforded the time to run them as needed without any repercussions. If managers are making it difficult for their team to attend and/or run these events, then the manager is sending the message that they do not value this training or respect the EDI goals of the GLA.</p>	<p>Immediate</p>

## Long Term Recommendations

Objectives	Justification & Vision	Priority
<b>EDI Strategy</b>		
Define an EDI Statement	<p>We understand that the GLA has the Diversity and Inclusion Action Standard (Appendix B, Dignity at Work), this provides a combined strategy and a set of actions and behaviours. Unfortunately, we believe that instead of providing a clear understanding of EDI, it serves to limit the scope or EDI and makes engagement difficult. At The Equal Group, we understand having multiple documents to cover different levels of a policy or initiative can seem confusing and off putting but with the EDI Strategy and vision it is important to be clear about your mission – this will require you to start with the foundations, define the big picture and narrow down into the strategy and action plan, these different stages can then be condensed into one comprehensive document.</p>	Within 6 months
Review the EDI requirements in the statement and assign an EDI budget	<p>We understand that a new budget has currently been assigned to EDI at the GLA, although we have not seen the agreed budget or the decision making process in assigning this budget. This is not to say that it won't be appropriate or relevant.</p> <p>The Workforce EDI budget in each organisation will be different depending on the size and complexity of the organisation as well as the size of the Workforce EDI team. The GLA EDI budget may be appropriate for the current initiatives and the existing team but this may have to be reviewed once the statement has been confirmed and the GLA understands it's future commitment.</p>	Within 6 months
Develop an EDI Strategy	<p>The EDI Strategy is the governing document for all EDI initiatives, how the organisation plans to improve EDI and what is expected of staff. The strategy helps to set and maintain a course for EDI, and as a living document is adaptable to change.</p>	6-12 months



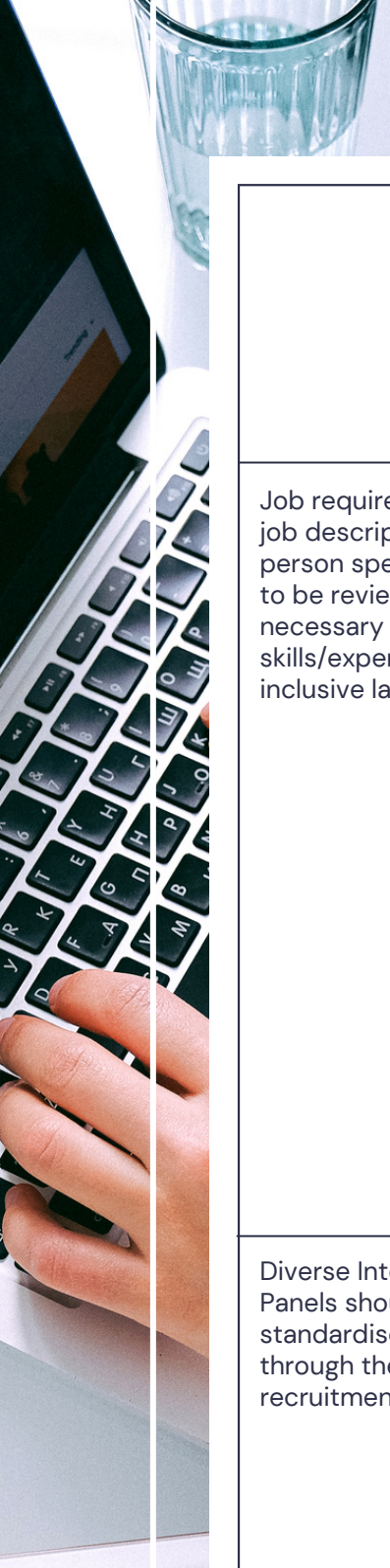
	<p>The current Diversity &amp; Inclusion Action standard is a useful tool to measure progress but does little to challenge people or teams, or hold them accountable for not achieving the standard.</p> <p>The strategy should be developed by EDI experts within the organisations with buy-in, support and sponsorship from the CMT, DIMB and Staff Networks. The strategy should be an in depth breakdown of the EDI Statement, reaffirming the vision and definition of EDI at the GLA. It should include a corporate level set of objectives for the organisation to hit with specific deadlines and accountable teams/people assigned.</p>	
<p>Build an EDI Action Plan</p>	<p>Once the EDI Strategy is in place, we recommend using the objectives to build an action plan. The Action plan takes the objectives and breaks them down into specific tasks or actions - these can take the form of SMART goals. In this you can see the framework of Objectives and Key Results (OKRs), where the objectives and results are defined in the strategy and then the objectives are broken down into smaller goals.</p> <p>The smaller goals can then be targeted at specific interventions and used to collectively achieve the larger objective. Each objective can have as many or as few associated actions as necessary, these actions could also be objectives that have their own collection of actions associated - it can be broken down as far as it needs to be to make it achievable.</p>	<p>6-12 months</p>
<p><b>EDI Action Plans</b></p>		
<p>Create guidance on developing action plans</p>	<p>The existing EDI Action Plans that cover directorates and units don't have consistency and none of them are complete action plans. Providing guidance should help to create consistency and ensure all teams are pulling in the same direction for EDI.</p>	<p>Within 6 months</p>

	<p>The guidance should cover what is expected within each plan and how they should align with the next level Action Plan – i.e. unit plan aligned to the directorate and directorate plan aligned to the EDI Strategy Action plan. The guidance should utilise the same framework as the EDI Strategy Action Plan to ensure consistency.</p>	
<p>All Directorates to have EDI Action Plan</p>	<p>Once the EDI Strategy Action Plan has been fully developed with sign off from the Chief Officer, DIMB and CMT, each directorate should develop their own action plan that aligns to the strategy action plan. They should use the newly developed guidance and framework to ensure that they all meet the same standard.</p> <p>During this process, the responsible team should seek guidance from the EDI team and input from the DMT. Once they believe that it is ready, it should be signed off by the Executive Director, the EDI team, the DIMB and Chief Officer.</p>	<p>6-12 months</p>
<p>All Units to have EDI Action Plan</p>	<p>Similar to the directorate level plans, once a directorate level plan is approved unit level plans should be produced. These should still meet the approval of the Assistant Director or Head of unit, and the EDI team. They should also follow the same guidance and align themselves with the directorate level plan.</p> <p>The plans may become smaller and more specific as they move down the levels, as long as they detail how the team is going to deliver EDI in their area. Using this framework, staff should be able to easily identify EDI objectives within the plans that they can help achieve, which will help them with their EDI Objective in their performance review.</p>	<p>12-18 months</p>
<p><b>Accountability</b></p>		
<p>Make EDI Objectives part of annual reviews</p>	<p>If EDI is to be a strategic imperative to the organisation, it must be held in the same regard as operations. GLA staff get an annual review where they are assessed against their job role and individual objectives.</p>	<p>Within 6 months</p>

	<p>By building EDI objectives into this process, everyone should be held accountable to their own EDI objectives and to their teams EDI development.</p> <p>People or teams mentioned within their Unit/Directorate EDI Action Plan can use this as an EDI Objective. If the action isn't due by the annual review meeting, then the team or person would have to show their progress.</p> <p>A manager's EDI portion of their review would require them to show not only their own EDI Objective success or progression but also that of their team.</p>	
<p>All complaints of discrimination should be investigated and resolved</p>	<p>Within some of the staff sentiment was a feeling that not all complaints of discrimination are taken seriously, some staff even felt that they had been dismissed by HR. In order to gain trust in staff, a clear policy and process for investigating any incident where a staff member alleges that they have been discriminated against should be produced. This should extend across all areas, HR should also be looking for potential discrimination issues when looking at policy usage tracking.</p> <p>Where the investigation finds that discrimination has occurred, the perpetrator must be taken through the disciplinary process with a sanction appropriate to the seriousness of the situation. Where employees are not dismissed for gross misconduct (the only course for overt and deliberate discrimination, harrasment or victimisation), they should be expected to retake all EDI training courses.</p> <p>Discrimination has to be met with a zero tolerance approach - ignorance cannot be a defence where training and education are made available.</p>	<p>Within 6 months</p>
<p>Review manager roles and responsibilities to ensure EDI is built in</p>	<p>Managers are responsible for the productivity and wellbeing of their team. This is a delicate balance as it could be easy to focus on productivity to the detriment of wellbeing, or get so wrapped up in wellbeing initiatives you don't see when they are detrimental.</p>	<p>6-12 months</p>

	<p>For most employees, they want to be productive and good at their jobs, ensuring they can be productive and get development without persistent stress or worry is key.</p> <p>To do this effectively, managers have to understand the role that EDI plays, particularly in building, developing and managing a diverse team. This should then be built into their job description and their annual review should reflect how well their team feel they perform on EDI - how included does everyone feel, does the manager seem comfortable with various diverse characteristics, etc.</p>	
<p><b>Policy vs Process</b></p>		
<p>Ensure consistency of approach to policy through clear processes and guidance</p>	<p>The policies we read were consistent with similar policies we've seen elsewhere, there aren't any issues within the policies that create inequality. This points us in the direction of the policy implementation and how each person interprets and applies the policy.</p> <p>To overcome this and ensure that policy is applied consistently and fairly, processes should be developed. Processes define how the policy should be applied in particular situations, removing as much opportunity for different interpretations as possible.</p> <p>Where the policy process options don't match with the situation, the staff member should work with HR to form an appropriate alternative in line with the policy and organisation values.</p>	<p>Within 6 months</p>
<p>Provide guidance on how to manage policy issues</p>	<p>Policies and processes can be expertly written, with every conceivable issue accounted for and there may still be regular disputes with the policy and/or process. Guidance for how managers and HR handle policy disputes or issues arising during a process will ensure that staff are heard - they may have misunderstood part of the process or not been fully aware of the issue, they could also have identified a potential flaw in the policy.</p>	<p>6-12 months</p>

	<p>This will help to build trust between staff, managers and HR, improving employee relations and helping to make the organisation feel and actually be more inclusive.</p>	
<p>Policy reviews</p>	<p>We understand that all policies will have existing review processes. However, it appears that policies are not reviewed regularly, with some documents dating back to 2017. We recommend that policies are reviewed every 12-24 months with a mechanism to trigger a review when appropriate.</p> <p>The review process should also be clear to the staff, i.e. visible on the intranet. Additionally, the policy owner, most recent reviewer, last review date and next due review date should be displayed on the policy to assure staff that it is up-to-date. We also recommend that the GLA review all existing policies over a 12 month period to ensure they are designed inclusively.</p>	<p>12-18 months</p>
<p><b>Recruitment</b></p>		
<p>All Hiring Managers to be given "Inclusive Recruitment" training</p>	<p>We have reviewed the Recruitment policies in Appendix B under Recruitment, and we have heard from staff that not all recruitment processes are equal.</p> <p>Hiring managers must understand their responsibility for EDI within the recruitment process. To ensure that all managers are given the appropriate understanding it will be necessary for them to attend not only "Inclusive Management" training but "Inclusive Recruitment". This training will include learning on developing inclusive job descriptions and person specifications, how to reach a wider candidate pool, removing bias from shortlisting processes, the use of anonymous CVs, and conducting inclusive interviews.</p>	<p>Immediate start</p> <p>Continuous progress</p>
<p>Review Recruitment policy to embed EDI throughout</p>	<p>The current recruitment policy and process is incredibly robust, leaving little room for EDI throughout. EDI considerations are not made mandatory where they are embedded and not given full consideration until the end of the policy.</p>	<p>Within 6 months</p>



	<p>For the GLA to ensure that the recruitment process drives forward the EDI ambitions of the organisation, EDI will need to be embedded throughout the policy and where possible, made mandatory. It is likely that where EDI is not embedded and not mandatory, it will not be considered.</p>	
<p>Job requirements in job descriptions and person specifications to be reviewed for necessary skills/experience and inclusive language</p>	<p>Whilst we are not aware of any racial bias in job postings, the messaging, language and tone conveyed within the GLA's job descriptions and person specifications is crucial as these will be read by potential applicants who will ascertain whether the job is the right fit for them, and whether they are a right fit for the role. For Black applicants, it is imperative that the GLA remove any trace of potential racial bias within their job descriptions and person specifications.</p> <p>Where time and resource permits, it is useful for multiple reviews of job descriptions and person specifications to be carried out by a diverse cross-section of HR personnel to ensure the elimination of bias across both documents before they become publicly available. Additionally, the specialist recruitment services that the GLA already work with will likely be able to help in ensuring any potential bias is removed and limit the future potential for bias - this applies to all characteristics.</p>	<p>Within 6 months</p>
<p>Diverse Interview Panels should be standardised through the recruitment policy</p>	<p>Whilst diverse interview panels are recommended through the recruitment policy, they are not standard. It will be necessary to ensure that all hiring managers make appropriate efforts to guarantee a diverse panel. The GLA have a programme to ensure that all interview panellists have appropriate training and understanding of their responsibility - this pool already has significant diversity but will require efforts to ensure it is maintained.</p> <p>It is also crucial that diverse interview panellists are not expected to field the diversity questions. This is the responsibility of the hiring manager to ensure EDI questions are asked as part of the interview, expecting a colleague from an underrepresented group to ask the EDI questions is avoiding responsibility and expecting emotional labour.</p>	<p>Within 6 months</p>

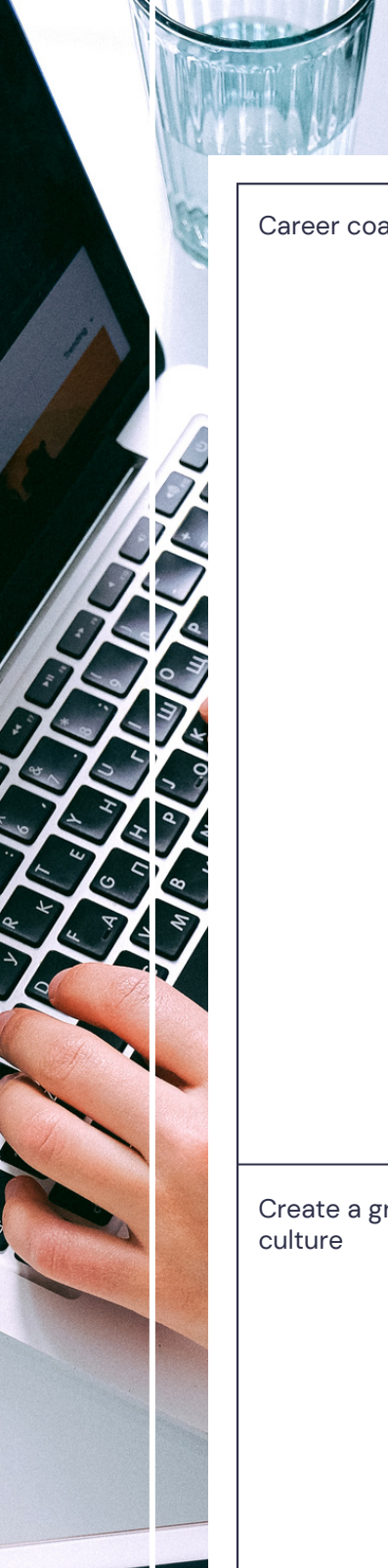
<p>Utilise positive action to increase representation in interview pools</p>	<p>Managers and HRBPs should establish the extent to which it is appropriate for people from underrepresented ethnic groups – particularly Black heritage applicants – to be specifically encouraged or targeted to apply for any open role. This is achieved internally through internal staff networks and managers specifically mentoring and encouraging interested Black and Ethnic Minority team members to apply to open roles; and externally using advertisers, recruitment agencies and media outlets whose audiences are specifically targeted towards ethnically diverse groups.</p> <p>The GLA has instituted a Guaranteed Interview Scheme (GIS) for candidates who declare a disability on their application form, making them eligible for the GIS ‘if they demonstrate ‘acceptable performance’ against the requirements outlined in the person specification’ (9.1). – i.e. they meet the minimum requirements of the role requirements. The GLA should consider applying this GIS framework to ethnicity, where Black and other ethnically diverse applicants can choose to ‘opt-in’ on the GIS section of the application form.</p>	<p>6-12 months</p>
<p>Ensure that Anonymous Applications are standard through the recruitment policy</p>	<p>We understand that the GLA currently has a process for ensuring the anonymity of candidates when making interview shortlists and that this should be applied across the GLA. Through our interviews, we do not believe it is common knowledge that this should be standard and is likely not consistently applied.</p> <p>The hiring manager needs to understand the skills and experience that the applicant has and for some roles, what qualifications they have. In all situations, they do not need to know their name, age, gender, ethnicity, disability, sexuality, etc. This could be taken further with school or university names redacted as well as previous employer names redacted – HR will require this information for background checks but the hiring manager does not.</p> <p>We recommend that the GLA works to ensure that in all situations where there is no need for positive action to be taken (i.e. representation is fair), an anonymous application process is utilised. To ensure that anonymous application processes are effective, it will be necessary to review the existing process and consider whether new recruitment software would be appropriate.</p>	<p>12-18 months</p>

## Talent Management

<p>Review Competency Framework</p>	<p>We recommend a review of the rigidity of the existing Competency Framework – both application of technical skills and the behavioural competencies – that the GLA stipulates are essential to perform any role. Whilst we don't believe it to be intentional, the rigidity of the framework and limited scope to consider additional skills or achievements will have likely hindered those from underrepresented and diverse cultural backgrounds.</p> <p>The framework's key competencies should also be amended so that managers are not able to attribute characteristics freely and unfairly to staff members, which, in the case of this independent review, prop up racialised stereotypes. The vagueness of these statements needs to be addressed and reviewed by a diverse cross-section of the organisation so that the risk of this section of the Competency Framework in disproportionately discriminating against Black and Ethnic Minority staff is eliminated.</p>	<p>Within 6 months</p>
<p>Build Talent Development Programme</p>	<p>Building new talent programmes must address the issues that staff members at the GLA believed to hinder the success of the BAME Talent Programme and Our Time, namely; the tendency for these programmes to sideline colleagues who have been at the GLA for longer periods of time; the lack of consistency in leadership, budget and delivery of these programmes and; the perception that Black women still fare the least well on GLA talent programmes.</p> <p>New talent programmes must increase their scope in terms of intake (particularly for Ethnic Minority men), and have a committed roadmap and vision with a dedicated leader/team who is able to manage its end-to-end delivery. The programmes should, ideally, be developed by diverse teams to eliminate the risk of any one demographic being at a disadvantage, and the GLA must ring fence a dedicated budget to these programmes to ensure their regular delivery.</p>	<p>6- 12 months</p>
<p>Make it standard practice to provide additional training after unsuccessful interviews</p>	<p>Currently, many Black and Ethnic Minority staff members who have applied for an internal position at a higher grade have been let down by the lack of support available to them before, during and after the application and interview process.</p>	<p>6-12 months</p>



	<p>This is harmful to their prospects of progression and has demoralised these colleagues enough that, in the focus groups and interviews conducted by The Equal Group, some staff members said that they do not intend to try to progress in the GLA anymore.</p> <p>Managers should seek to provide well-rounded, comprehensive feedback to any members of their team that have sought a progression opportunity and be committed to designing tailored career progression plans with them to identify and work on any development points. This should be instituted as standard and will ensure that Black and Ethnic Minority talent are not either discouraged from seeking progression or are being actively held back by the lack of help from the leaders around them.</p>	
<p>Develop process for staff to challenge interview feedback</p>	<p>The lack of comprehensive feedback delivered to candidates is a concern. Through the focus groups and interviews delivered by The Equal Group, ethnically diverse candidates were advised that they did not meet the criteria for a position due to vague and arbitrary reasons such as 'being in the GLA for too long' and for 'not being strategic enough'. These examples of feedback are demoralising and lazy, failing to provide any valuable insights into performance and development points for a staff member seeking progression.</p> <p>The GLA should design and implement a process for any staff member to be able to consult the hiring manager formally and directly if they feel their feedback was inadequate. A feedback process should be developed and instituted, comprising comprehensive verbal feedback in person, and written feedback if requested by the candidate. If neither of these provide satisfactory responses for the internal candidate, the GLA should develop a process by which candidates are able to speak with a senior member of the HR and recruitment team, who can independently collect feedback from all members of the recruitment panel and ascertain whether the initial feedback offered to the candidate was fair. Where the review finds in favour of the candidate, then appropriate action should be taken.</p>	<p>6-12 months</p>



<p>Career coaches</p>	<p>Everyone below grade 15 should be assigned a job coach - everyone above grade 8 should have the opportunity to be a career coach. This can be done in tandem with a mentorship programme.</p> <p>There is a key difference between mentoring and coaching - mentoring is directive (i.e. telling or instructing) whilst coaching is non-directive (i.e. raising awareness, reflecting, etc). This means that the coach doesn't have to be from the same area of work as the staff member they are coaching and can come from any part of the business. The coach is to provide guidance to their colleagues and advocate for them to help improve their development opportunities.</p> <p>The skills required to coach someone also make up part of what is required to be a manager or leader. By taking up coaching opportunities, people can improve their skills and experience, making them better candidates for higher grade jobs. Coaches will need training to make them effective, but providing robust guidance could get most started. There are also qualifications available for coaching, if people want to improve their coaching ability - this would improve the outcome of the coaching programmes.</p>	<p>12-18 months</p>
<p>Create a growth culture</p>	<p>Not all talent management is about getting people to the next level. Sometimes talent management is about helping staff do their job better, adapt to new technology or processes and providing them with a stronger sense of job satisfaction.</p> <p>Through a growth culture, everyone in the organisation should seek to constantly improve themselves. This could be in their job performance, gaining new knowledge, expanding their skillset outside of their usual tasks or even in their EDI objectives.</p> <p>It'll be important to ensure all staff are encouraged, not forced, to seek out ways to improve themselves - even outside of work improvements can create a positive change in staff performance.</p>	<p>12-18 months</p>

## Grade 10+ Intervention

<p>All grade 8+ jobs should utilise positive action</p>	<p>We have spoken about the need to utilise positive action in our "Recruitment" recommendations. We want to emphasise the impact positive action could have on representation at higher grades.</p> <p>The GLA have asked for specifically Grade 10+ interventions, we believe that the intervention of positive action will need to start earlier to increase Black representation specifically.</p> <p>Positive action in these grades will take a number of forms:</p> <ol style="list-style-type: none"> <li>1.Ensuring inclusive job advertisements and including the phrase, "we particularly welcome applications from Black, Asian and other Minority Ethnic people."</li> <li>2.Providing a guaranteed interview for Ethnic Minority applicants - this follows the same legal position as the Guaranteed Interview Scheme for Disabled People.</li> <li>3.Tracking demographics through the hiring process and actively challenging significant reduction in diverse candidates.</li> <li>4.Ensuring a diverse interview panel.</li> <li>5.Requesting that 30-50% of interview candidates are from Ethnic Minority backgrounds.</li> </ol> <p>The Equal Group can provide guidance on implementing any or all of these.</p>	<p>Within 6 months</p>
<p>Talent pipeline for Ethnic Minority staff</p>	<p>It's really important to have a clear talent process that will help any staff member understand how they can progress from one position or grade to another. This will benefit everyone but is the first step in ensuring Ethnic Minority staff have access to proper support and guidance.</p> <p>Talent development programmes should be available for all staff with additional programmes, or a specific amount of training spaces reserved for Ethnic Minority colleagues. Managers should be encouraging all staff to seek these development opportunities and providing time to attend any training.</p> <p>The GLA will need to utilise the other tools we have recommended in the Recruitment and Talent sections to ensure that they are improving representation at all grades.</p>	<p>6-12 months</p>

	<p>Seeking Black candidates for Grade 10+ when there is a lack of representation in Grades 8 and 9 will leave the organisation relying on external candidates only - whilst external candidates bring in different experiences, they lack the knowledge of the inner workings of the GLA.</p>	
<p>Diversity in Succession Planning</p>	<p>Succession planning is often used to ensure that important responsibilities are not left unfulfilled whilst the position is vacant or post holder is absent. This usually involves identifying deputies or potential successors in the event of absence or vacancy.</p> <p>This can create a unique opportunity to ensure diverse talent has an opportunity to step up and/or progress. We recommend identifying 3 personnel for any position of leadership or required position where possible. These 3 positions should meet the following criteria:</p> <ol style="list-style-type: none"> <li>1. The first person should be the most appropriate person, i.e. most experienced, meets minimum criteria.</li> <li>2. If the first person is a White man, the second person should be a woman or from an Ethnic Minority.</li> <li>3. If the first and second person is a man, then the third person should be a woman. If they are white, then the 3rd person should be from an Ethnic Minority.</li> </ol> <p>The personnel identified should be the most appropriate people, i.e. have the most experience or meet more of the required skills. Where the personnel do not meet the minimum requirements, the GLA should ensure that they are developed appropriately.</p> <p>This is a limited option for improving diversity as it cannot become too specific, i.e. there is limited ability to specify particular ethnic groups unless similar roles/grade levels have disproportionately low representation. However, the GLA could identify other characteristics and more personnel for these positions, thereby increasing the opportunity for more diversity.</p>	<p>6-12 months</p>



<p>Job placement programme</p>	<p>Through our conversations with staff at the GLA, there are a number of Ethnic Minority staff who are highly skilled and educated, who have been in the same position for a long time. These staff members reported feeling that they were stuck, couldn't develop and couldn't showcase other skills.</p> <p>One way to help these staff develop and showcase skills may be to get them an opportunity outside of their team or unit. These secondment opportunities could be within other areas of the GLA or in partner organisations.</p> <p>For all placements, the staff member should maintain a learning journey - i.e. capturing relevant experience against particular skills or actions. Internal positions will already have an idea of the skills and experience required and can help the staff member develop a learning plan before starting. For external placements, where possible the GLA should work with the associate organisation to help the staff member develop their learning plan.</p>	<p>12-18 months</p>
<p>Working with local organisations and government departments to share GLA's anti-racist and inclusive culture through encouraging Grade 12+ staff to take opportunities outside of the GLA</p>	<p>Having talent programmes, job placements and even positive action efforts for Ethnic Minority staff won't be enough to improve their representation at higher grades. In order to improve representation, there has to be vacancies - this requires the GLA to increase the number of higher grade positions or for existing staff to leave.</p> <p>Whilst we understand that not all staff will want to leave, particularly if they aren't seeking further progression and are happy with their employment at the GLA, there will likely be some staff who are seeking development or new opportunities the GLA cannot offer. It'll be important that this is not treated or seen as forcing people out, these opportunities should be open to everyone and no-one should be pressured to apply.</p> <p>As the GLA becomes an anti-racist organisation, this provides an opportunity to share the new culture with other public service organisations or local partners.</p>	<p>12-18 months</p>

## EDI Learning & Talent Programme

<p>Expand "Let's Talk About Race"</p>	<p>The current "Let's talk about Race" sessions are a useful introduction to the subject – however, we believe they only provide a basic understanding of the issues faced by many Ethnic Minority staff and Londoners. We believe the sessions could be enhanced to provide a more comprehensive understanding as well as create tangible outcomes.</p> <p>A 2nd session should be developed as a mandatory session for managers and as an optional for allies – this should provide a more in depth analysis of lived experiences and what they can do to help improve the situation. This 2nd session should also encourage the attendees to make an EDI objective around race, i.e. a manager may set themselves a target of 100% completion for team on "Let's talk about Race" or an ally could set themselves a target of reading a novel by an ethnically diverse author on lived experience.</p>	<p>6-12 months</p>
<p>Develop Management and Allies training</p>	<p>Further to the expanded "Let's talk about Race" sessions, we believe a dedicated course for managers, allies and sponsors would help to create more inclusion and belonging between White staff and their Ethnic Minority colleagues.</p> <p>This should be a series of courses or training videos designed to help managers and allies understand lived experience of all diverse characteristics with a particular focus on race initially.</p>	<p>6-12 months</p>
<p>Develop "Unconscious Bias" training into "Conscious Inclusion" training</p>	<p>Unconscious Bias has been a buzzing topic for a long time with many EDI organisations pushing it and even more articles written about the efficacy of it. We believe that understanding unconscious bias is a necessity for everyone in our society but that this is just the beginning of that journey.</p> <p>We think that organisations need to continue the journey by developing a "Conscious Inclusion" course which would explore unconscious bias but help develop staff and teams into being consciously inclusive – i.e. "how could this exclude people and how do we change that?" or "is this activity appropriate for everyone?"</p>	<p>6-12 months</p>

<p>Use staff networks to raise awareness and use momentum to develop content for other EDI areas</p>	<p>Staff networks are an important resource for any organisation to help guide EDI in the organisation. They have unique access across the organisation in which they can spread awareness and create momentum. Typically, the people who lead the networks have lived experience of the issues the members face or have developed their own knowledge. This can be used to develop content for other EDI learnings and improve intersectional content.</p> <p>By having the networks work together to improve each other's content, the EDI learning and raise awareness in their members who can encourage their peers to attend networks or take learning, the GLA can harness the power of staff engagement.</p>	<p>6-12 months</p>
<p>Provide education on intersectional identities</p>	<p>During the course of our review, there appears to be little consideration of intersectional identities, with a small concession for the focus on Ethnic Minority women in the Our Time programme. Intersectional theory tells us that the more diverse a person is in their particular characteristics, the harder they have to fight for the same opportunities.</p> <p>We recommend that the staff networks and the Workforce EDI team develop training on intersectional identities, looking at the issues faced by each minority group and how those issues are compounded when someone fits 2 or more characteristics.</p>	<p>12-18 months</p>
<p>Create Cultural Awareness content</p>	<p>One of the big issues we encountered when talking to staff at the GLA was the feeling that there may be a cultural disconnect, particularly between White managers and their Ethnic Minority staff. There can often be a significant divide between 2 cultures, which can make it difficult for staff to effectively collaborate and understand each other.</p> <p>This can be addressed by having cultural awareness sessions - whilst it will be useful to develop content for these sessions, they may not always have to be structured and could be run by individual teams - if a member of the team wishes to share their culture, the manager should set aside time one week for everyone to engage. Cultural celebrations such as Diwali, Christmas, Eid, etc can all be great opportunities to explore different cultures.</p>	<p>12-18 months</p>

# Appendices

## Appendix A: Data

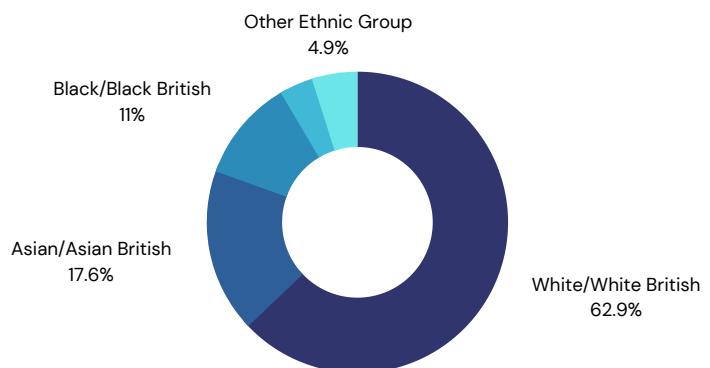
To get the best understanding of the issues within any organisation it is necessary to understand the hard data – specifically the demographics. In this section we review the demographic data for both London and the GLA to get a better understanding of the issues at hand. We have shown the London demographics both by economically active and working age before detailing key data from the GLA. This should help provide a frame of reference and comparison between the organisation and the people it serves. The GLA have set a goal of representing London’s economically active population with a further stretch goal of being representative of London’s working age population.

### 1. London Demographics

London is the largest city in the UK and as such it has an incredibly diverse population, particularly when looking at race and ethnicity. We are specifically looking at working age (16–64) populations, it is however important to understand the expected change in the workforce. 67.2% of Londoners were aged between 16–64 in 2020, representing 6 million people, of this group 79.5% (5 million people) are in the workforce in 2021.

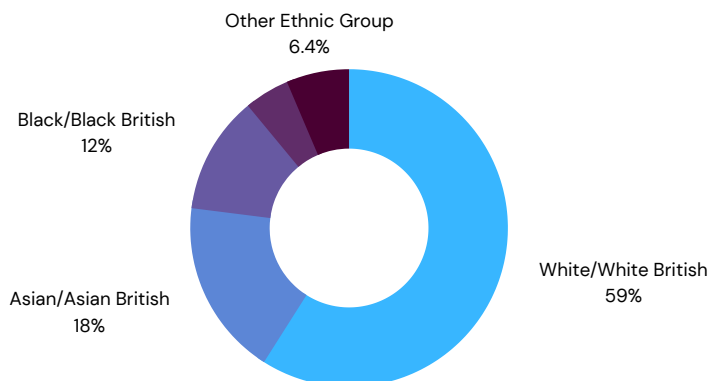
#### London's Economically Active Population

- White/White British – 62.9%
- Ethnic Minority – 37.1%
  - Asian/Asian British – 17.6%
  - Black/Black British – 11%
  - Other Ethnic Group 4.9%
  - Mixed – 3.6%



#### London's Whole Population

- White/White British – 59%
- Ethnic Minority – 41%
  - Asian/Asian British – 18%
  - Black/Black British – 12%
  - Other Ethnic Group – 6.4%
  - Mixed – 4.6%



Unfortunately the data set used to understand the wider London Demographics grouped Mixed Race and Other together, in order to compare demographic profiles, we have assumed that these would maintain the same ratio as London’s working age demographics.

Whilst we cannot provide accurate statistics on the working age breakdown of ethnicity to gender without taking all data back to 2011, gender breakdown is often between 49% and 51% women in the wider population, which remains true across ethnicities.



## 2. Greater London Authority

Here we have presented as in depth an analysis of the GLA as we can, addressing the GLA as a whole before analysing the individual directorates. We have also taken care to consider representation across grades both across the GLA and at directorate level. It is important that we also consider intersectionality and how this can influence the experience of each person, as such we have broken down ethnicities by other categories where we can still maintain anonymity.

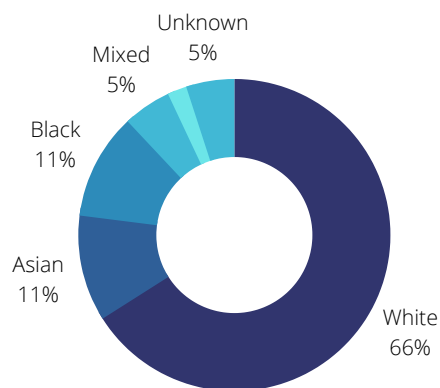
It's important to note that this data is a snapshot of the GLA profile from 31 March 2021 – some of this data has likely changed due to recruitment, staff turnover and even internal moves. The GLA takes this snapshot of the data at the same time every year to inform the workforce report and both the Gender Pay Gap and Ethnicity Pay Gap reports.

### a. Total Workforce Demographics

We have attempted to provide a more intersectional breakdown of the GLA as a whole – whilst this will be more difficult when analysing individual directorates, where we see significant differences we will identify it in the report.

#### Ethnicity

- White/White British – 66%
- Ethnic Minority – 29%
  - Asian/Asian British – 11%
  - Black/Black British – 11%
  - Mixed – 5%
  - Other Ethnic Group – 2%
- Unknown/Prefer not to say – 5%



#### Ethnicity broken down by Gender:

##### Gender

- Men – 39%
- Women – 61%



##### White/White British

- Men – 42%
- Women – 58%



##### Ethnic Minority

- Men – 33%
- Women – 67%



##### Black/Black British

- Men – 31%
- Women – 69%



##### Asian/Asian British

- Men – 39%
- Women – 61%



##### Mixed

- Men – 30%
- Women – 70%



##### Other Ethnic Group

- Men – 18%
- Women – 82%



As we can see, men are underrepresented in the GLA when compared to London's general population, although this appears to be thematic across similar organisations (council services, city authorities, etc) – the more concerning difference is the disproportionate rates across ethnicities. The scope of this report doesn't allow an in depth analysis into why the GLA has less representation in Ethnic Minority men, particularly Black, Mixed and Other – this should be a concern and will be addressed within our recommendations.

There is a significant difference between White colleagues and Ethnic Minority colleagues when looking at Religion. The largest religious group amongst all colleagues is "none" (45.8%), followed by Christian (27.9%), Not specific (6.6%) and Muslim (5.3%). There is a significant shift when looking at Ethnic Minorities with Christian being the largest group (34.4%) followed by None (25.4%) and Muslim (17.2%) – all other religions also increase. This appears to be similar to current ONS data from across the country.

LGBT sexual identities make up around 8% of the GLA but drop to 3.6% across BAME colleagues. This could be partly due to cultural differences, although could be an indicator that LGBT Ethnic Minority people feel less welcome in the GLA. This will be an area that the GLA should monitor once more accurate data on sexual and gender identity is available through the ONS. Current data for the country (from 2019) suggests 2.7% of the population identify as LGB with an anticipated further 1% having a trans identity – this is based on small data pools and it is assumed that London’s LGBTQ+ population is proportionately larger than the rest of the country.

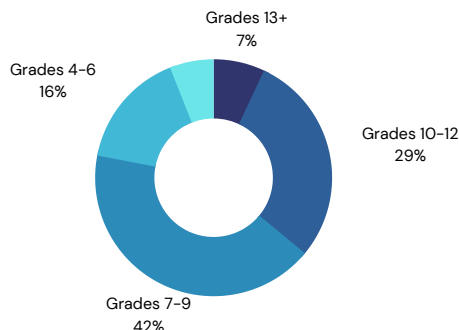
Recent studies suggest that around 1 in 5 (19%) UK working adults are disabled under the definition in the Equality Act whilst only 5.9% of GLA staff identify as having a disability. This slightly increases to 6.6% in Ethnic Minority Staff with Black staff being the most likely amongst minority groups to acknowledge a disability. Similarly, this may be a cultural issue, but an understanding of the social model of disability which includes mental health and neurodiversity may change these figures and allow a better understanding of staff.

**b. Ethnicity representation across grades**

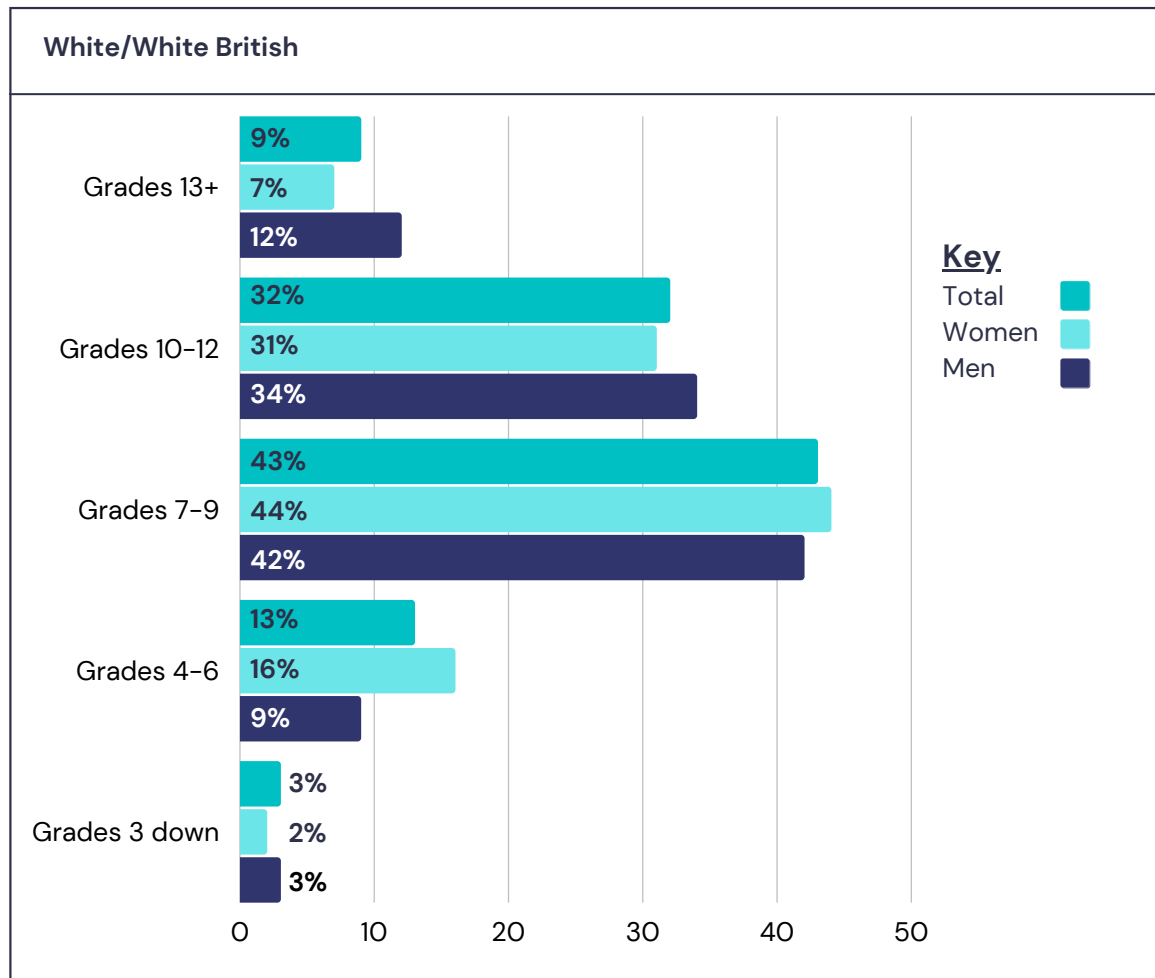
Where we can, we have broken these down into more specific Ethnic groupings. First you will see how each ethnic group breaks down across grades before the grades are broken down by ethnicity.

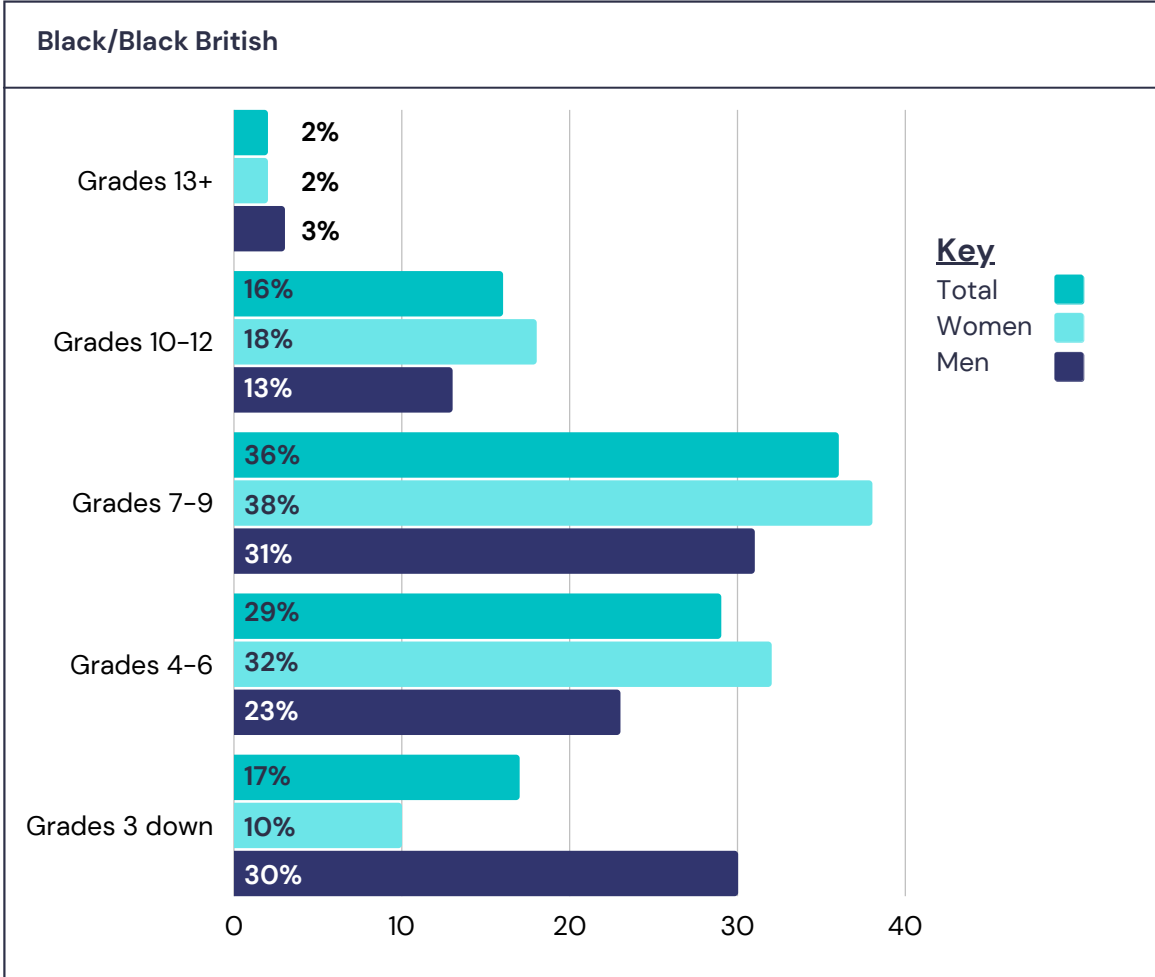
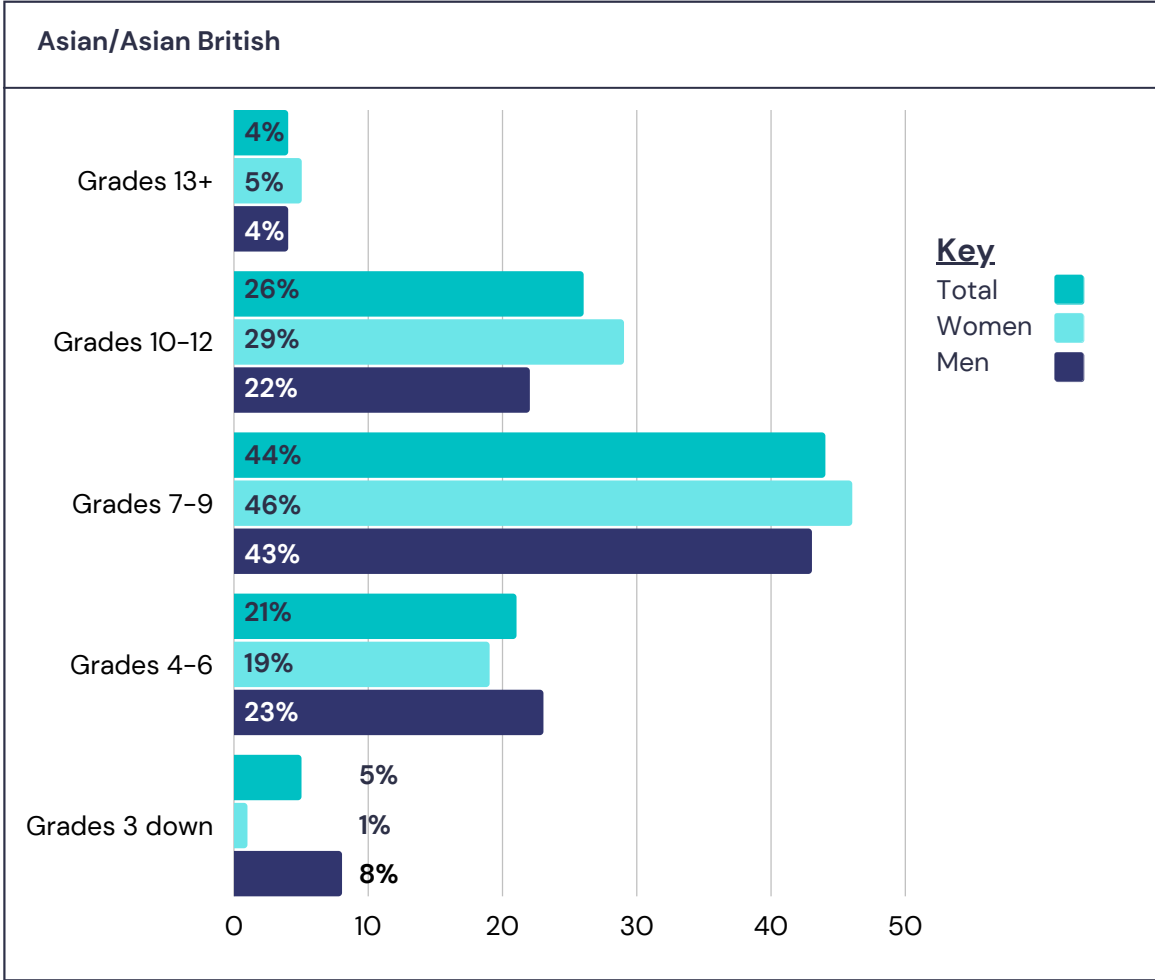
**Grade Distribution**

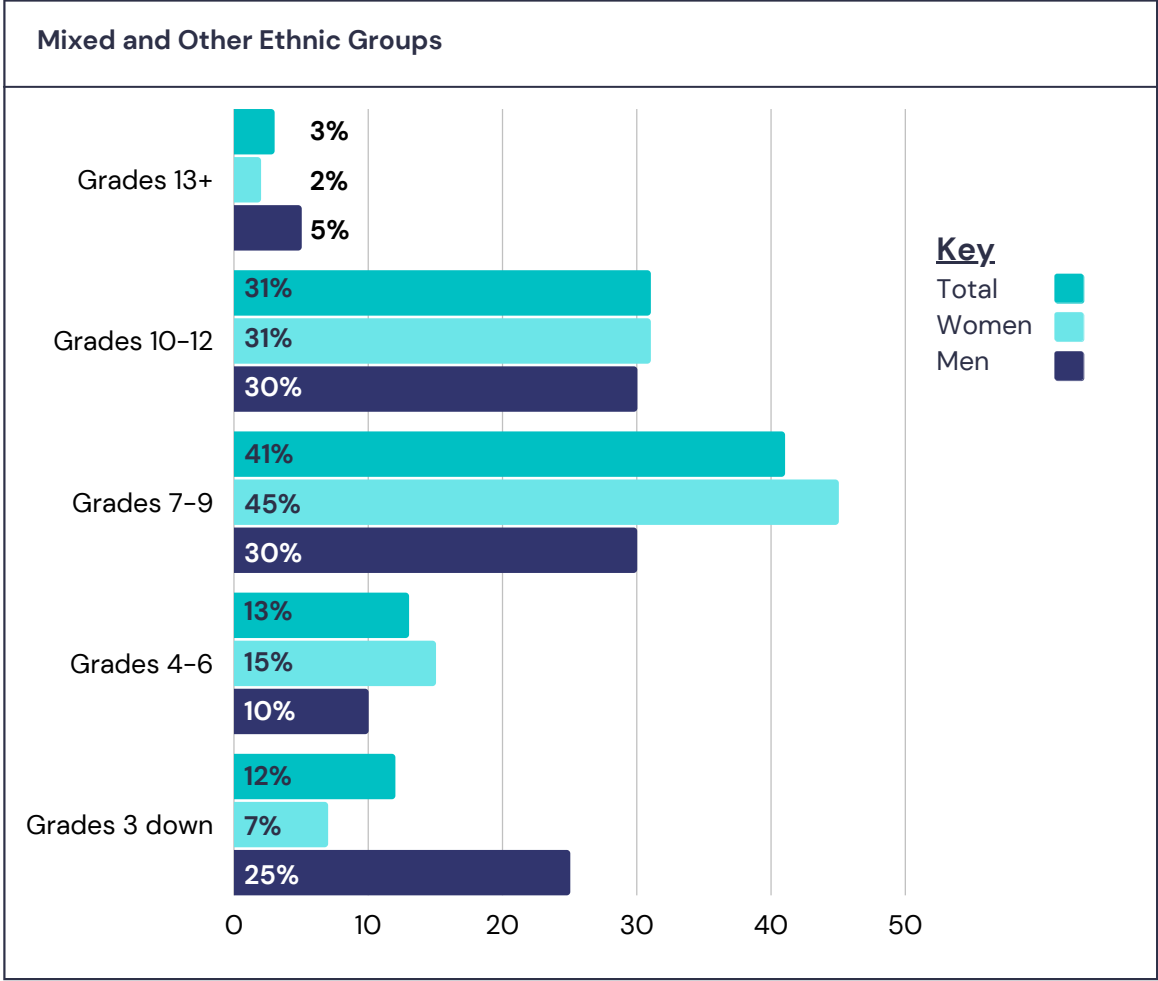
- Grades 13+ – 7%
- Grades 10 to 12 – 29%
- Grades 7 to 9 – 42%
- Grades 4 to 6 – 16%
- Grade 3 and under – 6%



**Ethnic representation across Grades:**





















Whilst it is difficult to maintain parity with these numbers across demographics, within a truly equitable system, these figures would be much closer aligned. It is also important to note that the Mixed/Other group has been combined due to low numbers which could make it easy to identify people - in general those of Mixed Ethnic backgrounds are in higher middle grades, whilst those of Other Ethnic backgrounds (typically Arab/Middle Eastern) are generally in lower middle grades.

Below we have broken down the Ethnic representation in each grade. Looking at how Ethnicities are spread across grades and comparing against the concentration within grades can help to identify where specific action could be taken. Spot Salary includes all spot salaries but we have looked at the Mayor's office specifically as it makes up 11 spot salary positions.

## Ethnic representation within Grades:

Grade	Distribution
<b>Spot Salary (19 Positions)</b> <ul style="list-style-type: none"> <li>White/White British - 53%</li> <li>Ethnic Minority - 21%</li> <li>Not Known - 26%</li> </ul> 	<b>Mayor's Office Spot Salary (11 Positions)</b> <ul style="list-style-type: none"> <li>White/White British - 46%</li> <li>Ethnic Minority - 18%</li> <li>Not Known - 36%</li> </ul> 
<b>Grade 15 (18 positions)</b> <ul style="list-style-type: none"> <li>White/White British - 78%</li> <li>Ethnic Minority/Not Known - 22%</li> </ul> 	<b>Grade 14 (15 Positions)</b> <ul style="list-style-type: none"> <li>White/White British - 100%</li> </ul> 
<b>Grade 13 (33 Positions)</b> <ul style="list-style-type: none"> <li>White/White British - 82%</li> <li>Ethnic Minority/Not known - 18%</li> </ul> 	<b>Grade 12 (78 Positions)</b> <ul style="list-style-type: none"> <li>White/White British - 80%</li> <li>Ethnic Minority/Not known - 20%</li> </ul> 
<b>Grade 11 (84 positions)</b> <ul style="list-style-type: none"> <li>White/White British - 81%</li> <li>Ethnic Minority/Not known - 19%</li> </ul> 	<b>Grade 10 (166 positions)</b> <ul style="list-style-type: none"> <li>White/White British - 66%</li> <li>Ethnic Minority - 29% <ul style="list-style-type: none"> <li>Asian/Asian British - 14%</li> <li>Black/Black British - 7%</li> <li>Mixed/Other - 8%</li> </ul> </li> <li>Not Known - 5%</li> </ul> 
<b>Grade 9 (206 positions)</b> <ul style="list-style-type: none"> <li>White/White British - 72%</li> <li>Ethnic Minority - 23% <ul style="list-style-type: none"> <li>Asian/Asian British - 10%</li> <li>Black/Black British - 10%</li> <li>Mixed/Other - 3%</li> </ul> </li> <li>Not Known - 5%</li> </ul> 	<b>Grade 8 (200 positions)</b> <ul style="list-style-type: none"> <li>White/White British - 60%</li> <li>Ethnic Minority - 33% <ul style="list-style-type: none"> <li>Asian/Asian British - 14%</li> <li>Black/Black British - 9%</li> <li>Mixed/Other - 10%</li> </ul> </li> <li>Not Known - 7%</li> </ul> 
<b>Grade 7 (79 positions)</b> <ul style="list-style-type: none"> <li>White/White British - 72%</li> <li>Ethnic Minority - 28% <ul style="list-style-type: none"> <li>Asian/Asian British - 11%</li> <li>Black/Black British - 9%</li> <li>Mixed/Other - 8%</li> </ul> </li> </ul> 	<b>Grade 6 (125 positions)</b> <ul style="list-style-type: none"> <li>White/White British - 57%</li> <li>Ethnic Minority - 37% <ul style="list-style-type: none"> <li>Asian/Asian British - 15%</li> <li>Black/Black British - 17%</li> <li>Mixed/Other - 5%</li> </ul> </li> <li>Not Known - 6%</li> </ul> 
<b>Grade 5 (46 positions)</b> <ul style="list-style-type: none"> <li>White/White British - 48%</li> <li>Ethnic Minority - 52% <ul style="list-style-type: none"> <li>Asian/Asian British - 15%</li> <li>Black/Black British - 30%</li> <li>Mixed - 7%</li> </ul> </li> </ul> 	<b>Grade 4 (11 positions)</b> <ul style="list-style-type: none"> <li>White/White British - 55%</li> <li>Ethnic Minority/Not Known - 45%</li> </ul> 

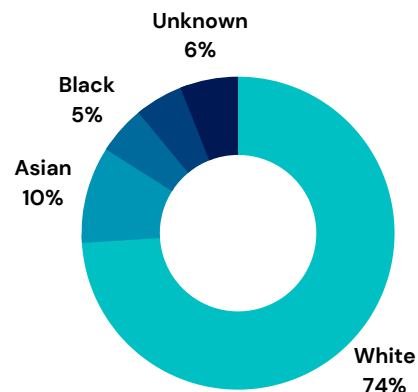
Grade	Distribution
<b>Grade 3 (35 positions)</b> <ul style="list-style-type: none"> <li>White/White British - 29%</li> <li>Ethnic Minority - 57% <ul style="list-style-type: none"> <li>Asian/Asian British - 8.5%</li> <li>Black/Black British - 40%</li> <li>Mixed/Other - 8.5%</li> </ul> </li> <li>Not Known - 14%</li> </ul>	<b>Grade 2 (8 positions)</b> <ul style="list-style-type: none"> <li>White/White British - 63%</li> <li>Ethnic Minority/Not Known - 37%</li> </ul>
<b>Grade 1 (4 positions)</b> <ul style="list-style-type: none"> <li>Ethnic Minority - 100%</li> </ul>	<b>London Living Wage (16 positions)</b> <ul style="list-style-type: none"> <li>White/White British - 31%</li> <li>Ethnic Minority - 69% <ul style="list-style-type: none"> <li>Black/Black British - 38%</li> <li>Asian/Mixed/Other/Not Known - 31%</li> </ul> </li> </ul>

We can see how White representation is concentrated in higher grades, particularly 11-14, whilst Ethnic Minorities start to be overrepresented at lower grades with Black colleagues being disproportionately in the bottom 4 grades. The GLA has an Ethnic Minority Representation of 29% - ideally, representation across Grades would be similar, although it can be more difficult with lower numbers as a single person leaving/joining can have a huge impact on the balance.

### c. Ethnic Representation within Management roles

Of the GLA's 1143 staff (based on workforce data 31st march 2021), 35% are line managers - this means that on average there is 1 manager to every 2 non-managerial staff. When breaking down management positions by demographics, 20% are Ethnic Minority staff - 9 percentage points below the GLA ethnicity representation - and only 5% are Black - 6 percentage points below the GLA representation, making up the biggest drop. Here is the current ethnic breakdown of line managers:

- White/White British - 74%
- Ethnic Minority - 20%
  - Asian/Asian British - 10%
  - Black/Black British - 5%
  - Mixed/Other - 5%
- Unknown/Prefer not to say - 6%



When looking at the individual directorates, those with higher representation of Ethnic Minorities generally have a higher representation of Ethnic Minority staff within management positions. Unfortunately every directorate has lower Ethnic Minority representation within management, although some are worse hit than others. Below we have explored the representation within directorates, where we see disproportionate representation between staff members and management positions, we have highlighted this.

It's also important to note that 7% of those with line manager duties have chosen not to declare their ethnicity compared to just 1% for gender. Across the GLA, 5% of staff chose not to declare their ethnicity, whilst it isn't a large gap it is something worth monitoring. In order to deliver equality, diversity and inclusion (EDI) across the organisation, manager's should role model EDI positive behaviours, this includes declaring their protected characteristics.

The GLA should explore the lack of willingness to disclose Ethnicity data and should specifically seek to understand whether there is a perception that Ethnicity data is not 'safe' to disclose. Non-disclosure of Ethnicity data gets worse when looking specifically at those earning over £100,000, jumping to 19% whilst Ethnic Minority representation is just 17%.

#### d. Ethnicity within Directorates

Each directorate has had general Ethnic representation broken down with a further analysis of how each group is represented across grades. We have removed those on Spot Salaries (Executive Directors) as they can often skew the results for their directorates. The number associated with the directorate is the total headcount minus spot salaries.

Where the numbers within the directorate and the representation across ethnicities allow, we have looked at the individual Ethnic Minorities – where we have grouped them into “Ethnic Minority” this is to protect anonymity. Where we believed it was necessary, we may have focused on one Ethnic Minority group if there is significant disproportionate representation.

#### Chief Officer

##### Ethnic Representation

- White/White British – 44%
- Ethnic Minority – 49%
  - Asian/Asian British – 7%
  - Black/Black British – 40%
  - Mixed – 2%
- Unknown/Prefer not to say – 7%

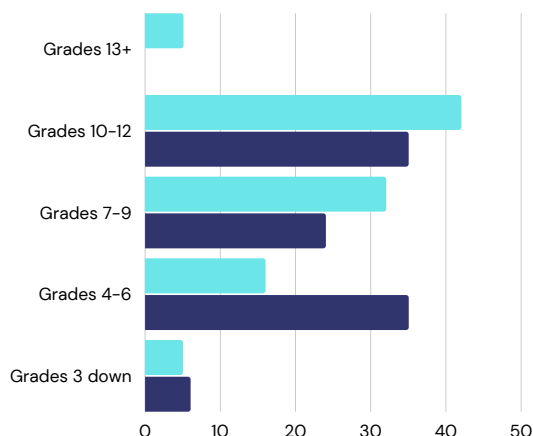


##### White/White British

- Grades 13 to 15 – 5%
- Grades 10 to 12 – 42%
- Grades 7 to 9 – 32%
- Grades 4 to 6 – 16%
- Grades 1 to 3 and LLW – 5%

##### Black British

- Grades 13 to 15 – 0%
- Grades 10 to 12 – 35%
- Grades 7 to 9 – 24%
- Grades 4 to 6 – 35%
- Grades 1 to 3 and LLW – 6%

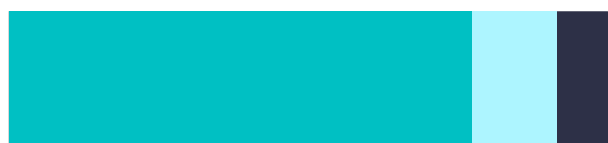


Due to low numbers of Asian, Mixed and Other Ethnic backgrounds, these can not be displayed via a grade breakdown. Ethnic Minority staff are actually disproportionately overrepresented within this directorate, yet are still more likely to be represented at lower grades than their White colleagues. Additionally, there is significantly reduced representation amongst Asian, Mixed and Other Ethnic backgrounds. We must also remember to consider the size of the directorate, with only 43 staff, one staff member leaving and a colleague of a different ethnicity joining could have a noticeable effect on the data.

#### Assembly Secretariat

##### Ethnic Representation

- White/White British – 76%
- Ethnic Minority – 14%
- Unknown/Prefer not to say – 10%

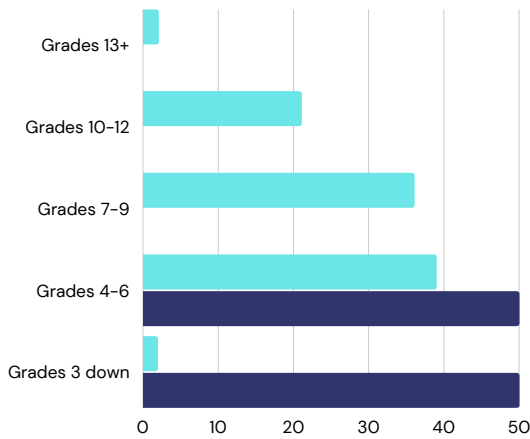


##### White/White British

- Grades 13 to 15 – 2%
- Grades 10 to 12 – 21%
- Grades 7 to 9 – 36%
- Grades 4 to 6 – 39%
- Grades 1 to 3 and LLW – 2%

##### Ethnic Minority

- Grades 13 to 15 – 0%
- Grades 10 to 12 – 0%
- Grades 7 to 9 – 50%
- Grades 4 to 6 – 50%



Ethnic Representation is too low to divide it into more specific groups, but as can be seen in the data they are underrepresented in the directorate and concentrated in grades 4-9 – the highest concentration is in grades 6 and 8. It should also be noted that when looking at gender, Ethnic Minority representation in the Secretariat is 80% women and 20% men, compared to 65% women and 35% men for White representation, much closer to the GLA wide man/woman ratio.

There is also a disparity between Ethnic Minority men and women – overall men represent 35% of the directorate but drop to 20% for Ethnic Minorities. This could be symptomatic of the general underrepresentation of Ethnic Minorities in the directorate.

### Communities and Skills

#### Ethnic Representation

- White/White British – 66%
- Ethnic Minority – 31%
  - Asian/Asian British – 12%
  - Black/Black British – 11%
  - Mixed/Other – 8%
- Unknown/Prefer not to say – 3%



#### White/White British

- Grades 13 to 15 – 4%
- Grades 10 to 12 – 36%
- Grades 7 to 9 – 48%
- Grades 4 to 6 – 11%
- Grades 1 to 3 and LLW – 2%

#### Black British

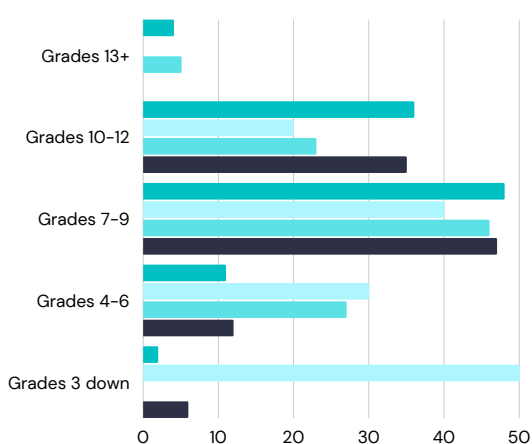
- Grades 13 to 15 – 0%
- Grades 10 to 12 – 20%
- Grades 7 to 9 – 40%
- Grades 4 to 6 – 30%
- Grades 1 to 3 and LLW – 10%

#### Asian/Asian British

- Grades 13 to 15 – 5%
- Grades 10 to 12 – 23%
- Grades 7 to 9 – 46%
- Grades 4 to 6 – 27%
- Grades 1 to 3 and LLW – 0%

#### Mixed/Other

- Grades 13 to 15 – 0%
- Grades 10 to 12 – 35%
- Grades 7 to 9 – 47%
- Grades 4 to 6 – 12%
- Grades 1 to 3 and LLW – 6%



Communities and Skills has the most proportionate representation of the GLA's wider demographic profile, although there are still noticeable issues with how representation is distributed across grades. Whilst grades 7-9 are relatively proportionate across different ethnic backgrounds, the primary issue seems to be that Black and Asian staff are underrepresented in Grades 10+ and overrepresented in Grades 6 and below – it's also important to note that there is no Black, Mixed or Other Ethnic representation in Grades 13 up. Currently this group is made up of 8 people, 2 of which are the Executive Directors, it could be difficult to maintain representation in this grouping although it will be a necessary consideration if the team grows or someone leaves.

There is only a slight change in representation when looking at representation in management roles – Ethnic Minority representation drops from 31 to 25%, Black representation drops from 11% to 6% whilst White representation rises from 66% to 71%. Communities and Skills should also be aware of their gender representation. In general, the representation of men is 29%, this drops to just 18% in Ethnic Minorities and 10% for Black staff.



## Good Growth

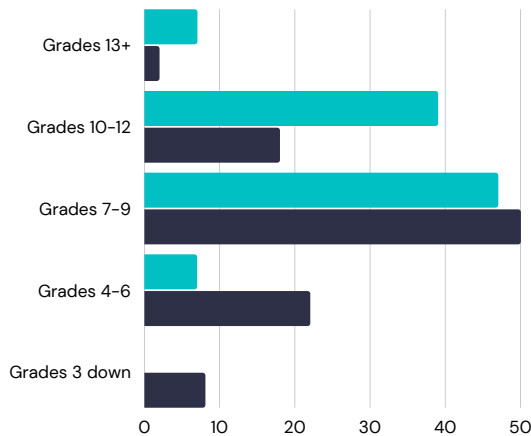
### Ethnic Representation

- White/White British – 73%
- Ethnic Minority – 23%
  - Asian/Asian British – 10%
  - Black/Black British – 5%
  - Mixed/Other – 8%
- Unknown/Prefer not to say – 4%



### White/White British

- Grades 13 to 15 – 7%
- Grades 10 to 12 – 39%
- Grades 7 to 9 – 47%
- Grades 4 to 6 – 7%
- Grades 1 to 3 and LLW – 0%



### Ethnic Minority

- Grades 13 to 15 – 2%
- Grades 10 to 12 – 18%
- Grades 7 to 9 – 50%
- Grades 4 to 6 – 22%
- Grades 1 to 3 and LLW – 8%

The data shows that Good Growth has an underrepresentation of Ethnic Minorities, particularly with Black staff in comparison to GLA wide representation – we would also note that both Asian and Black are underrepresented when compared with London’s working age population. Similar to other directorates, Good Growth has a concentration of Ethnic Minority staff in lower grades and are 1 of 3 directorates, alongside x and x with no representation at Senior Management level.

When looking at representation in management positions, Good Growth’s Ethnic Minority representation drops from 23% to 14%. This is a significant drop given that management positions in Good Growth make up 37% of the directorate.

Good Growth demonstrates a significantly better gender representation than the rest of the GLA (with 41% men) but should be aware that this drops to 33% amongst Ethnic Minorities. This drop is most prevalent with Asian staff, dropping to 26% and Other Ethnic Minorities having no men. Conversely, Black men actually represent 57% of Black staff – whilst this may look better, it’s important to note the lower representation of Black staff within the directorate – it is likely that the presence or absence of a single person could shift that balance significantly.

## Housing and Land

### Ethnic Representation

- White/White British – 70%
- Ethnic Minority – 27%
  - Asian/Asian British – 12%
  - Black/Black British – 9%
  - Mixed/Other – 6%
- Unknown/Prefer not to say – 3%



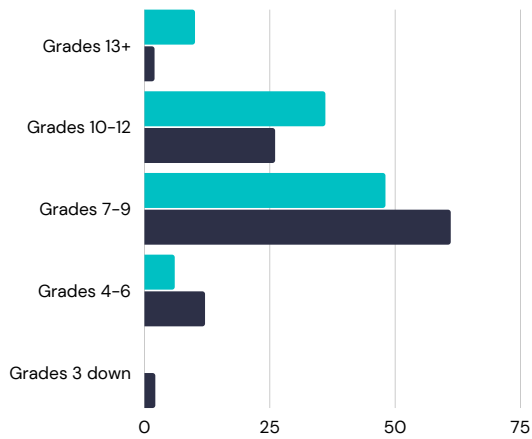
### White/White British

- Grades 13 to 15 – 10%
- Grades 10 to 12 – 36%
- Grades 7 to 9 – 48%
- Grades 4 to 6 – 6%
- Grades 1 to 3 and LLW – 0%

### Ethnic Minority

- Grades 13 to 15 – 2%
- Grades 10 to 12 – 26%
- Grades 7 to 9 – 61%
- Grades 4 to 6 – 12%
- Grades 1 to 3 and LLW – 2%

Housing and Land have been steadily increasing their Ethnic Minority representation alongside the GLA but still have some ways to go to reach the GLA target of 37%. With the exception of the Executive Director (not included in above statistics), there is no Ethnic Minority representation above grade 13, although this is a small group of 7 total positions in grades 14 and 15. Housing and Land shows a similar narrative of Ethnic Minority staff being more concentrated below Grade 10 than their white colleagues with much higher concentration in lower grades.



Housing and Land have a similar gender balance (36% men) to the GLA wide profile (39% men) which doesn't change much when looking at Ethnic Minorities – the only change worthy of note is that gender representation in Asian colleagues is 50/50 men and women.

## Resources

### Ethnic Representation

- White/White British – 45%
- Ethnic Minority – 45%
  - Asian/Asian British – 18%
  - Black/Black British – 23%
  - Mixed/Other – 4%
- Unknown/Prefer not to say – 10%



### White/White British

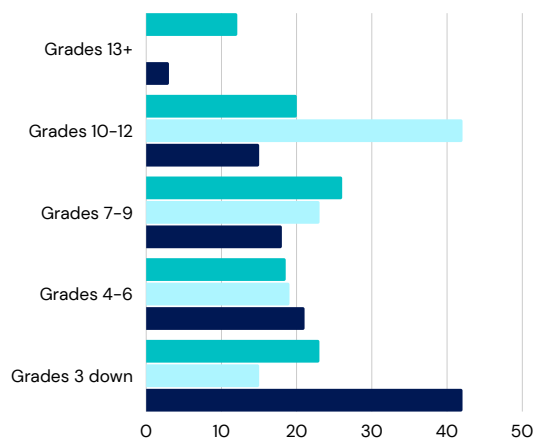
- Grades 13 to 15 – 12%
- Grades 10 to 12 – 20%
- Grades 7 to 9 – 26%
- Grades 4 to 6 – 18.5%
- Grades 1 to 3 – 23%

### Asian/Asian British

- Grades 10 to 12 – 42%
- Grades 7 to 9 – 23%
- Grades 4 to 6 – 19%
- Grades 1 to 3 – 15%

### Black/Black British

- Grades 13 to 15 – 3%
- Grades 10 to 12 – 15%
- Grades 7 to 9 – 18%
- Grades 4 to 6 – 21%
- Grade 3 – 42%



Ethnic Minority staff have a 45% representation within Resources, on par with White Colleagues – this is both disproportionately high for the GLA and for London, with Black staff being disproportionately overrepresented and Mixed/Other underrepresented – Asian representation is only slightly higher than London's representation but significantly higher than across the GLA. Asian staff however are well represented across the directorate, with the largest group being within Grades 10-12. This is not true of Black staff, whilst they are overrepresented in the directorate, they have poor representation at higher grades with 42% of all Black staff in the directorate being grade 3.

Digging deeper, Ethnic Minority staff represent 57% of Grade 3 staff – Black staff make up the largest group at 40% compared to 29% White and 9% Asian. All grade 3 positions across the GLA fall under Facilities Management where Black staff make up 29% of all Facilities Management staff – this is still overrepresented, however significantly less than the 40% concentration in Grade 3. If we remove Grade 3 from the Facilities Management statistics, Black representation drops to 12.5% whilst White representation jumps from 39% to 54%, this is much closer to actual representation in London. Additionally, you can see by the bracketed numbers that the distribution of Ethnic groups across grades improves when we remove Facilities Management from the data.

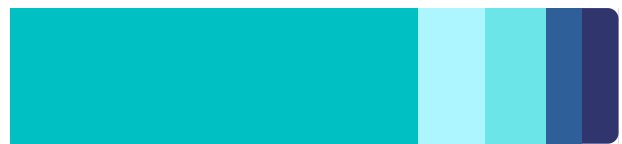
When looking at the representation across management roles we see a significant change in Asian and Black representation – Asian staff are overrepresented in management, increasing from 18% to 26%, whilst Black staff decrease from 23% to just 10%. This further highlights the disproportionate representation of Black staff within the directorate – whilst they are overrepresented in Resources, they are underrepresented in management roles and higher grades.

Resources is the only directorate that has a higher representation of men than women, with women making up 36% of the directorate compared to 61% across the GLA. Representation of women drops when looking at White colleagues and increases to 56% when looking at all Ethnic Minorities and 52% for Black colleagues but stays broadly similar for Asian colleagues.

## Strategy and Communications

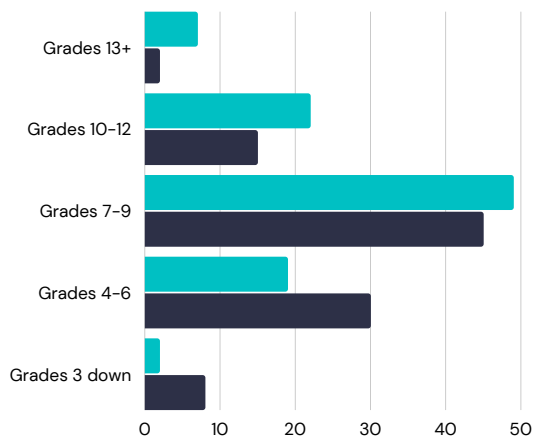
### Ethnic Representation

- White/White British – 67%
- Ethnic Minority – 27%
  - Asian/Asian British – 11%
  - Black/Black British – 10%
  - Mixed/Other – 6%
- Unknown/Prefer not to say – 6%



### White/White British

- Grades 13 to 15 – 7%
- Grades 10 to 12 – 22%
- Grades 7 to 9 – 49%
- Grade 4 to 6 – 19%
- Grades 1 to 3 and LLW – 2%



### Ethnic Minority

- Grades 13 to 15 – 2%
- Grades 10 to 13 – 15%
- Grades 7 to 9 – 45%
- Grades 4 to 6 – 30%
- Grades 1 to 3 and LLW – 8%

Strategy and Communications is a relatively new directorate with a representation not too far removed from the GLA wide representation – there is still work to be done to make the directorate representative of London. We also have to consider the concentration of Ethnic Minority staff – from the London Living Wage (LLW) to Grade 6, White representation is 22%, this jumps to 38% for Ethnic Minorities.

Ethnic Minority representation drops when assessing management roles – though almost exclusively within Black representation which drops from 10% to 5%. Asian representation remains the same at 11% whilst White representation increases to 75%.

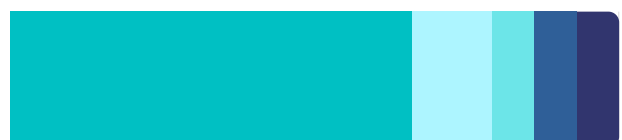
Gender representation in Strategy and Communications is 36% men, rising to 39% for White staff but dropping to 18% for Black staff and 0% across Mixed and Other Ethnic Groups.

## Mayor's Office

It is important that the Mayor's Office be included within this analysis but should be noted that staff on Spot Salaries have been included here. This is from the same snapshot of 31 March 2021, we are aware of a restructuring of the Mayor's Office but it would be unfair to present data from a different period for one area of the GLA.

### Ethnic Representation

- White/White British – 66%
- Ethnic Minority – 27%
  - Asian/Asian British – 13%
  - Black/Black British – 7%
  - Mixed/Other – 7%
- Unknown/Prefer not to say – 7%

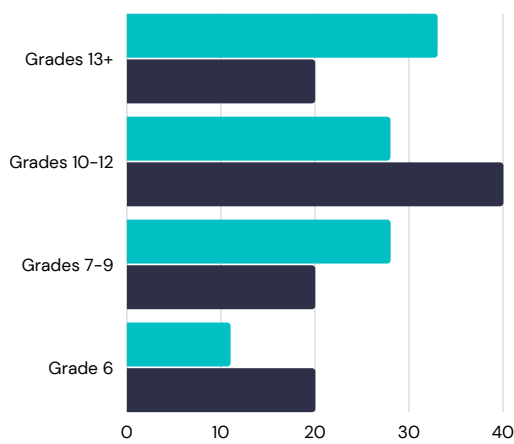


### ■ White/White British

- Grade 13+ – 33%
- Grades 10 to 12 – 28%
- Grades 7 to 9 – 28%
- Grade 6 – 11%

### ■ Ethnic Minority

- Grade 13+ – 20%
- Grades 10 to 12 – 40%
- Grades 7 to 9 – 20%
- Grade 6 – 20%



As can be seen from the data, the Mayor's Office is not immune to the issues present across the GLA with a higher representation of White staff at senior levels – however, Ethnic Minorities are more concentrated in Grades 10 to 12 here where they are often at lower grades in the other directorates.

Similarly, the Mayor's Office and Mayoral Appointees have a decrease in representation in management roles, from 27% to just 8%.

The Mayor's Office also maintains the gender ratio at 60/40 women to men – however, this changes when looking at different Ethnicities. The ratio is 50/50 for White staff but drops to 20% men in Ethnic Minority groups. With a group as small as this, even a single person can have a large impact on the Ethnic Minority gender ratio, it will be important to understand why fewer men from Ethnic Minority backgrounds are working in the Mayor's office.

## Summary

On the surface, the GLA looks like it has been improving its Ethnic Minority representation over the last few years, however when we break down this data as above, we start to see key issues. Currently there is still an underrepresentation of Ethnic Minorities across the GLA, with this being most prevalent amongst Asian demographics. All Ethnic Minorities are underrepresented in Grade 10+, which is true everywhere except the Mayor's Office where 10-12 is the highest grouping of Ethnic Minority staff – they are still underrepresented above grade 12. The disproportionate representation of Ethnic Minorities at lower grades is most prevalent when looking at Black staff with the worst example of this being in the Resources directorate.

There is also evidence to suggest that Ethnic Minority men, primarily those of Black or Other Ethnic backgrounds are more underrepresented within the GLA than women from the same ethnic group. Additionally, whilst White men are similarly underrepresented within the GLA to other ethnic groups, they are at disproportionately higher levels and are proportionately better represented than White women at higher grades. Conversely, when looking at all Ethnic Minorities, the men are more likely to be in lower grades.

# Appendix B: Policies and Documents

To get a better understanding of the culture, practices and demographics of the Greater London Authority, we have explored the policies and guidance documents associated with Equality, Diversity and Inclusion (EDI), as well as recruitment, progression, grievance and discipline. We have also analysed the 3 most recent workforce reports from 2019–2021 as well as 54 other individual documents. This documentation includes:

- Workforce data reports from 2018–21
- Staff surveys and survey documentation
- Ethnicity Pay Gaps
- Dignity at Work Policy and Guidance
- Disciplinary Procedure
- Resolution Policy and Guidance
- Recruitment documents and data
- Secondment documents and data
- Talent and Development documents and data
- Diversity and Inclusion Action Standard
- Code of Conduct of the Greater London Authority
- Code of Ethics and Standards for Staff
- Competency Framework
- The GLA Staff Charter
- Let's talk about race training
- Dignity and Inclusion training
- Resolution training
- 9 EDI Action plans (3 Directorate level)

## 1. Workforce Reports

These provide a snapshot of the organisation on a specific date (typically 31st March each year for the 3 we reviewed). They are publicly available, meaning that anyone can read them – unfortunately they are not prominently displayed nor advertised, our admittedly small sample size of London residents were broadly unaware of the GLA and entirely unaware of the workforce reports.

The workforce reports provide a straightforward understanding of the position of the organisation across a broad range of issues and allows staff to compare against previous years. Due to the amount of information contained, much of the nuance in particular areas has been removed or minimised to allow an easier understanding – this can obscure some issues or make it difficult to understand it within the context of the GLA as a whole or even within individual directorates. One area where this stood out was the choice to remove White colleagues from the Ethnicity demographics section – we can understand why this may have been a logical choice (makes it easier to see the actual size of smaller groups) but in practice, it makes it difficult to compare Ethnic Minority groups to the White majority. Additionally, there isn't much of an intersectional understanding, i.e. the difference between Black men and women or Black women to White women. An additional analysis on key protected characteristics (ethnicity, gender, disability) that takes an intersectional approach and disaggregates BAME (Black, Asian and Minority Ethnic) as much as possible, could help provide a clearer understanding of the EDI issues – this may require individual reports for ethnicity and gender with a collective report for other characteristics due to low reported numbers.

That being said, there is still a lot of very useful information with the report that any staff member or member of the public could reference as evidence for issues with ethnic representation. The report shows Ethnic Minority representation from 2008 to 2021, showing a steady improvement from 2018 – there was a small drop in 2021 that could be attributed to EDI progress being hindered by Covid-19. There is also a comparison between directorates with reference points to the GLA average and the London working age population and breakdowns of Ethnic Minority groups by salary and grade.

Within the 2021 report, the GLA has set itself a target for 2025 of having 37.1% Ethnic Minority representation – whilst this is an ambitious target considering the current level, based on external trends and presumed growth of Ethnic Minority groups (which is predicted to be shown in the yet to be released 2021 census data), achieving this goal could still leave the organisation with Ethnic Minorities being underrepresented when compared to regional demographic data.

## 2. Ethnicity Pay Gap reports and policies

The pay gap reports that we reviewed are for 31st March 2019 and 2020, the 2021 report was not published before our review process. There is no legal requirement to publish an Ethnicity Pay Gap report, although the practice is in line with regulations on Gender Pay Gap reporting and puts the GLA ahead of most organisations. We opted not to review the Gender Pay Gap reports and associated documents as it fell outside of the scope of this review – however the Ethnicity Pay Gap report does provide an intersectional breakdown in tables 27 through 30.

The 2020 report shows that the ethnicity pay gap has decreased in the year 2019–20 from the previous year with the mean (or average) pay gap dropping from 18.4% to 14.49% – the median has increased slightly from 11.06% to 11.3%, this will likely be a result of more Ethnic Minority staff coming in at lower grades than higher grades when compared to White staff. The report also details for the individual ethnic groups showing a huge disparity across the groups with the lowest pay gap for any Ethnic Minority group being 7.32% for Mixed staff vs the highest at 20.62% for Black staff. The Mixed Ethnicity group actually shows the biggest drop from the previous year (15.01% to 7.32%) whilst Black staff show the smallest drop (21.26% to 20.62%).

These figures actually get worse when we look at intersectionality, Ethnic Minority men are paid disproportionately less when compared to Ethnic minority women – the pay gap between White men and Ethnic Minority men is 21.81% compared to just 8.76% when comparing White women to Ethnic Minority women. We also see that the pay gap for Mixed Ethnicity men is still 15.76% compared to just 1.29% for women, whereas for Black staff it's 26.5% for men compared to 15.9% for women.

The report doesn't provide a pay gap of Black women to White men, typically the furthest apart in terms of equality, so we have done the maths and found a pay gap of 17.89%, slightly better than it was for Black men, but still higher than it was when Black women were compared to White women. The largest gap exists within the smallest ethnic group, Other Ethnic Group with a pay gap of 7.59% for women and 36.27% for men – whilst this could be significantly altered with 1 person from the Other Ethnic Groups joining or leaving the GLA, it'll be important to ensure that the gaps between men and women in Ethnic Minorities also closes alongside the general Ethnic Pay Gap.

## Bonus Payment

There is a very concerning issue around bonus payments in the 2020 report: whilst Ethnic Minority staff were overrepresented in receiving bonus payments, the payments were disproportionately lower. The mean pay for Ethnic Minority staff was less than half of that for White staff whilst the median pay was 40% less. Whilst we did not have access to the monetary awards for 2020–21, we can see that the amount of Ethnic Minority staff receiving additional payments (bonus payments) was just 23%, down from 30% in the 2020 report, whilst White staff receiving bonus payments went from 66% to 70%. Bonus payments should come under either honorarium payments (which should be in relation to the associated duties that a person is performing above their job role) and recognition payments. The recognition payments are set at 4 levels with defined amounts for each level. Which level of payment is paid out depends on a few criteria, the first of which is the type and level of work carried out. This means that those in lower grades (where Ethnic Minorities are disproportionately represented) will likely receive lower recognition payments due to their limited access to higher levels of work.

## Summary

Generally speaking, the GLA is closing the ethnicity pay gap, almost all Ethnic Minority pay gaps were decreased from the 2019 report to the 2020 report (with the exception of the bonus payments) – it's important to note that the Gender Pay gap slightly increased in the same period and Ethnic Minority representation dropped slightly in 2020–21. It'll be important for the GLA to ensure that they continuously progress towards closing these gaps. The Action Plans associated with the pay gaps show a commitment to closing the pay gap and reducing all further inequalities, with key actions to increase representation and provide means to measure progress.

The action plans alone cannot help deliver the goals, they must be supported completely by the actions of the organisation, with a solid understanding of EDI as a foundation for progress. Additionally, the action plans need to have accountability as well as ownership – this is the person who takes responsibility if the action isn't delivered, explains why and what efforts are being made to achieve the action.

We believe that the work already put into the Ethnicity Pay Gap reporting and action planning has made some headway into making the GLA a more equitable workplace for Ethnic Minorities. A more robust EDI foundation, comprehensive EDI Strategy and Action Plan framework should help to push these efforts forward.

## 3. Dignity at Work

The Dignity at Work policy provides a clear position from the GLA on issues around bullying, harassment and victimisation – the policy states that this should have zero tolerance.

The policy is fairly comprehensive in its definitions of bullying, harassment and victimisation, how to recognise them and the effects of these issues on the victim. There is a potential issue within section 3: "Perception of bullying, harassment and victimisation", where it allows a lot of discretion to decide whether a "reasonable person would view the behaviour as offensive" – what is or isn't offensive to a person is often different to the next person; this is compounded when the 2 people have different lived experiences, i.e. a White man vs a Black woman.

In the situation where a Black person accuses a White colleague of offensive behaviour, a White manager may not understand the exact issue and feel that the action would not be offensive to them, therefore dismissing the claim. If this happens regularly, employees may stop coming forward with issues and allow potentially toxic cultures to thrive. Employees may need additional support outside of their team/unit hierarchy to arrive at a just or equitable outcome – additionally, managers should have robust EDI training that includes cultural sensitivity, understanding of the impact of racism, the effects of misogyny on women and the workplace, and how intersectionality can compound it. This is not an exhaustive list as managers should have a good working knowledge of EDI with support provided by EDI experts either within their directorate or at an HR level.

The Dignity and Inclusion training is a good introduction to EDI within the GLA although it doesn't scale with seniority to reflect the power dynamic and feels like some slides are outdated – particularly the definitions of positive action and positive discrimination, the descriptions are quite similar with the example under positive action being a small scale positive action. The training also isn't very well connected to the Dignity at Work policy which we understand to be a key reason for the training. We would recommend that this training is further reviewed to ensure that it provides clear and accurate information with a closer link to the Dignity at Work policy.

The Dignity at Work policy also directly informs and is informed by the Disciplinary and Resolution policies. These policies and how they are implemented can have a significant effect on a colleague's opportunity for development and progression within an organisation

## **Disciplinary Policy**

The Disciplinary policy and guidance is very straightforward with clear examples of when employees may be guilty of misconduct. The document provides good guidance for dealing with misconduct and an understanding of potential sanctions. It would be good to remind managers to consider an employee's conduct within the context of the team, environment or personal situation – there may be an external reason for the employee's behaviour or actions. In a situation where an employee's wellbeing is at risk, the manager should take responsibility for taking steps towards safeguarding within the workplace. Additionally, it would be good to remind managers of the scope for reasonable adjustments when following the disciplinary process – good practice is not to ask why a staff member needs a reasonable adjustment but just to consider if the adjustment is reasonable and achievable.

The Disciplinary Policy and associated guidance is fairly standard with only limited areas of uniqueness for the GLA. The actual policy and guidance isn't an area where we feel there needs to be change. We did ask to look into disciplinary outcomes but the limited use of sanctions through this policy meant that we couldn't reasonably use the data to make a well reasoned and informed judgement – there doesn't appear to be any disproportionate use even within the small numbers. Unfortunately, this may not reflect all uses of the policy as we could not access policy tracking information – it should be standard to get feedback from staff even if they go down the informal route, this helps to improve the policy and using staff IDs the organisation can understand if there's a discrepancy in usage and experience between demographics.

Tracking policies allows HR to understand if policies are being used appropriately, where HR sees a procedure like the disciplinary procedure being implemented excessively in one area of the organisation, by a particular manager or against a person, this should be investigated to understand the reason. It may be that there is a poor understanding of how to apply the policy or what other procedures may be more beneficial – it is also important to understand that the reason may be much worse and you could find employees victimised through misuse of a policy.

## **Resolution Policy**

The Resolution Policy was designed to replace the Grievance Policy and put an emphasis on resolving issues between staff members with a mutually acceptable outcome. This comprehensive policy allows staff to access support through resolution champions, provides a confidential process that is separate from their team/unit hierarchy and can help build better working relationships between colleagues or between staff and management.

This policy could help to create an open, honest and bias free workplace if utilised effectively. It is our understanding that the policy is still relatively new and unfortunately, many staff are unaware of its existence – with a poor opinion of the previous grievance process for taking too long and not delivering outcomes that are mutually acceptable, from our interviews and focus groups, many staff members seemed to actively avoid raising grievances and subsequently resolutions. Reminding staff of the process and using champions to advocate for the process should help more staff engage with it, as needed.

As long as all parties engage in the process in good faith then we believe the outcomes should be a net positive. Champions and mediators may need to have specialised training when the resolution case deals with a protected characteristic and some form of bullying or harassment.



## Zero Tolerance

The Dignity at Work policy stresses a zero tolerance approach to issues regarding bullying, harassment and victimisation – there is a strong implication that this is in particular reference to any form of bigotry. The option for informal disciplinary action or pushing staff towards a resolution process when the issue at hand deals with an incident or accusation of racism may undermine minority groups faith in these processes.

Where an employee wishes to raise an issue regarding racism, sexism, homophobia etc, they should be informed of all potential avenues including the Resolution policy – all options should be given equal explanation. HR or the line manager will still have to investigate and decide on the appropriate course of action whilst considering the impact of any action on the victim. Where a person comes through multiple processes for the same or a similar issue, whether that be a mix of policies or just one, this should be tracked and investigated to understand why with the option to escalate the case when appropriate.

## 4. Recruitment and Progression

### Recruitment

The Recruitment Guidance documents supplied to The Equal Group by the GLA function as the primary resource for Recruiting Managers to defer to for the following: the preparation of job descriptions and person specifications for open opportunities; the advertising and publication of open opportunities; the selection and interviewing of shortlisted candidates; and the outcome and feedback for successful and unsuccessful candidates.

These documents are comprehensive and process-driven, leaving less room for diversity and inclusion to be embedded in the recruitment process from its inception. In fact, “Equal opportunities and diversity” is the second last section in the recruitment policy, before “complaints”. Until this point, there is little reference other than diverse applicant pools and diverse interview panels about how Equality, Diversity and Inclusion should or could be applied throughout the process. This sends the message that it is an afterthought and not a necessary consideration of recruitment.

There is little reference to implementing best recruitment practice which would alleviate the possibility of a less-diverse applicant and candidate pool; where it is referenced, it is not stated to be compulsory. This encompasses the use of diverse recruiters, diverse interview panels and the requirement for open roles to have diverse shortlists – all of these aspects are positioned as ‘exemplary’ rather than necessary, and absolves the need for hiring managers to provide robust justifications of each if/when they are not achieved.

The rigidity with which the GLA outlines person specifications for open roles is a potential means by which Black and other ethnically diverse candidates (as well as candidates from other underrepresented backgrounds) may be discouraged from applying. The inflexibility this presents may influence the panel to disregard applicants from unconventional professional backgrounds, thereby narrowing the pool of diverse candidates as the process moves forward. The risk of this has not been identified and monitored within the recruitment guidance, and currently, the Guaranteed Interview Scheme (GIS), reserved for disabilities, is the only measure in place that allows for a less stringent reliance on the points in the person specification.

Though the scoring criteria scale is succinct and easy to apply (1–5), reviewing and reimagining what the GLA means by ‘requirements’ is key to ensuring that Black and other ethnically diverse applicants are being considered fairly, and that their experience and background is being viewed through a flexible lens. The person specification could benefit from further categorisation into ‘essential’ and ‘desirable’ skills. This affords applicants the opportunity to be progressed based on potential rather than experience and ensures that historic reliance on a set of criteria that has typically tended to advance White applicants over and above their Black and ethnically diverse counterparts can be less heavily deferred to.

For the GLA's recruitment and selection guidance, the shortlisting guidance is the first section where ethnicity is explicitly referenced as a factor to monitor. The guidance states that:

*Before completing the shortlist, those shortlisting should consider whether the panel has fully considered the issues of ethnicity and gender and whether the shortlist would benefit from a more diverse group of candidates. (8.3)*

This outcome can be mitigated by the earlier consideration of aspirational targets around shortlisting BAME applicants – in particular, Black applicants – which can be achieved through; establishing a non-negotiable need for a diverse shortlist; more inclusive job adverts; partnering with diverse recruiters; and nurturing and encouraging Black and other ethnically diverse internal staff.

### **Interview Panel**

For the interview stage, the GLA states in its guidance that the interviewing panel can be greater in number than the shortlisting panel, though for fixed-term opportunities two people can suffice. This can be limiting, especially as the guidance does not stipulate that the interviewing panel must mandatorily consist of diverse people representing different experiences and backgrounds. Instead, an option is given to managers who 'may wish to consider' approaching relevant personnel from other service areas or directorates, though not on the basis of diversifying interviewing panels by ethnicity. The guidance states that the panel should be 'representative', though no further elaboration is offered. This phrasing appears insufficient and inscrutable, leaving managers with no clear or robust guidance as to what is meant by 'representative'.

The GLA is aware of the opportunity the interview presents to the candidate for ascertaining whether the manager, department and wider organisation is aligned with their professional expectations and aspirations (Recruitment and Selection Guidance for Managers, 10.4). It is here that BAME applicants – and, in particular, Black applicants – would benefit from a diverse interviewing panel as a means to see their peers represented in decision-making roles within the GLA. The guidance should be extended to include this as an assessment criterion for the candidate. Visible representation of Black and ethnically diverse interviewers indicates to BAME applicants – in particular, Black applicants – that their experience and background will be properly understood; that implicit and explicit biases in the interview are more likely to be eradicated; and that the outcome of their interview will be decided by a diverse group.

GLA's feedback process for unsuccessful candidates entails an initial email advising them of the unsuccessful outcome, followed by a telephone call – if requested by the candidate – to take place shortly after. For internal candidates, face-to-face feedback replaces a telephone call. All candidates can request their feedback to be sent to them in writing.

A crucial aspect to feedback which is amiss from the guidance is what to do in the event of a candidate wishing to dispute feedback and escalate to a third party. This provision is useful for supporting Black and ethnically diverse candidates, as it aims to offer a means by which they can defer to an objective party if they feel they have been discriminated against on the grounds of ethnicity. Though instances of this kind can be reputationally damaging for any organisation, it is imperative that hiring managers are aware of a process which exists to escalate, discuss and resolve complaints that any applicants have about the recruitment process. This needs to exist and be implemented in a standardised way across the GLA.

It is also vital to include a segment within the feedback call or meeting where the candidate is offered the opportunity to provide feedback on the entire recruitment process with the GLA. This will allow the GLA to note any trends that are specifically evident and recurring among Black and ethnically diverse candidates, and allow the opportunity to review aspects of the recruitment and selection procedures in line with this.

Overall, the quality of recruitment guidance supplied to hiring personnel within the GLA is essential to securing a higher number of Black and ethnically diverse candidates that can then move forwards and progress within the GLA. The limitations to the recruitment guidance will be examined further in our recommendations, supported by the feedback from interviews and focus groups held with staff members at the GLA.

# Talent Development

All employees should be afforded the opportunity for appropriate learning and development without any discrimination. They should also be encouraged to discuss their career prospects and training needs with their manager. The Learning and Organisational Development framework puts equal responsibility on the staff member and their manager for ensuring that they have a development plan. Managers should have formal performance reviews with their employees every 12 months, this meeting should be used to assess performance and identify areas for development or opportunity – managers should also engage with their staff informally to ensure progress is steady in the intervening 12 months and that they have the support they need.

The informal process is encouraged by the Performance Management Guidelines. These guidelines provide a comprehensive breakdown of what should happen between the employee and manager. The performance review process requests that all staff use SMART goals to help them achieve their development plans and asks them to consider what competencies they are performing well and where they need to develop more.

The policies and guidelines around talent development are comprehensive, detailing exactly what an employee and a manager should be doing to help all employees develop. This is not only about career development but also about ensuring that all staff are maintaining high standards in their work by ensuring they continue to develop their skills and knowledge. The documents are necessarily dry as they have to contain detailed information with little room for differing interpretations – this can make access difficult if employees feel they are under pressure. Separating the policies out into manager and employee documents may make them easier to understand but also ensuring that employees have a full understanding by providing training during onboarding/probation and elearning for existing employees.

Managers should also be expected to rely heavily on EDI training when working with staff of differing characteristics to produce development plans. Different lived experience can produce very different expectations and interpretations of various requirements – an employee may feel they have achieved a particular competence as they have interpreted the competency requirements differently from the manager, it would not be fair to assert that the managers interpretation is correct and would require them both to explain and agree to a common understanding. Additionally, an employee may have experienced prejudice from previous managers or have a negative perception of authority due to their lived experience (or even inherited trauma), this may require the manager to be particularly empathetic and exercise patience to allow this employee to open up about their specific development needs.

## Competency Framework

The Competency Framework is designed to provide staff and managers with a clear understanding of what the expected skills and behaviours are for specific competencies at particular levels. The competencies are split into 4 categories; working with others, leadership, delivering results and organisational context. Job roles should identify key competencies required and have 5–6 for non-managerial roles and 7–8 for managers – they do not specify that roles should also specify a competency level.

The competency framework also calls for 360-degree feedback, learning profiles and development plans based on competencies. Utilising these tools, the GLA should be able to help any staff member progress steadily. There seems to be little guidance for how to put these areas into practice.

We did not see any guidance on how to handle “ineffective performance” and we noticed that many of the “ineffective performance” indicators were also indicators of neurodivergence or trauma. Trauma can be a result of prolonged abuse either in childhood or within relationships, it could be the result of experiencing abuse from many different people based on a characteristic (racist slurs, sexist comments, physical altercations) or it could be inherited trauma, as we mentioned above – adults who experienced issues due to a particular characteristic may instruct their child or children close to them on how to protect themselves, this can implant previous generations trauma into the next generation, an issue we see with many Ethnic Minority groups and with women.

We would also recommend a redesign of the competency framework to ensure it is accessible to all staff and is robust in how it is applied – including how people can access developmental assistance based on their required competencies. The content of the competency framework is good, however the document itself is inaccessible – the formatting of it makes it difficult to read and will be off putting to many staff members, risking many staff to be unaware of exactly how the competency framework is supposed to work and be applied.

Competencies are also skills that can be developed with proper training and support from coaches/mentors. Making these an essential part of a job role could lock potentially great candidates out of progression routes particularly when assessing a person's competence is a very subjective act within an interview. We would not reduce the amount of competencies, only ensure that a minimum amount is specified with the expectation that the other competencies be developed within a probation period – this will likely not be enough time to fully develop but the staff member should be able to show progress.

## **Secondment**

This section deals with Acting Up, this area should allow an employee to develop and demonstrate their skills and competence within the role. The process for identifying whether an acting up position is appropriate is fair, transparent and straightforward – if the team can divide duties or a colleague in the team has the competencies to step up, then there is no need to advertise widely.

However, if the duties of the post are similar to other jobs across the organisation, then the opportunity should be advertised. However, the process and the statement on acting up are not linked together – it also isn't clear whether the document covering acting up, honoraria and recognition is policy, statement or guidance, therefore it could be construed as non-binding.

A clear policy on secondments with a separate policy for honoraria and recognition payments should be produced in order to provide clarity on all issues. This will help staff to understand their rights and obligations under the policies and where they can seek recourse if they feel the procedure has been followed unfairly. It should also be clear how those on secondment will be paid (salary of the role they are seconded to, their substantive post salary or an agreed rate). Where employees are "acting up" they should be paid the salary of the role they are stepping up to cover. Employees who are on secondment to a different team or directorate should be considered for honorarium/recognition payment if they are not paid at a higher rate – reasons for them not receiving an additional payment should be provided and weighed against their performance in the role.

We also want to acknowledge the name given to the action of covering a senior role or taking on additional responsibilities – "acting up" whilst to most seems like an innocuous phrase, it has some historical and cultural connotations that make it a potentially non-inclusive phrase. We recommend using alternate phrasing such as "Step Up", "Higher Grade Duties", etc for when someone is either deputised or performing a senior duty within their team – where someone is brought in from elsewhere in the organisation, secondment is generally the clearer and preferred term.

## 5. Diversity and Inclusion Action Standard

The action standard provides clear definitions of EDI and a clear standard within EDI for teams and people to work towards. The foundations set out the expectations for each level that the team should be meeting, although we have only seen an achievement record with no explanation of how these were achieved per directorate. The grading criteria set out by Equality Works (EW) sets a very basic standard for EDI. Additionally the EW and ENI assessments are for the whole organisation without a breakdown for individual directorates, this allows individual directorates and units to get by on the actions of others. Whilst we support the initiative to use these standards initially, we don't believe that they help move EDI forward and instead allow organisations to relax whilst doing the bare minimum.

The action standard is a framework that should allow colleagues to rate theirs or their team's efforts towards Equality, Diversity and Inclusion. It should be used to help directorates, units and teams develop their action plans, giving them a way to measure each action and show how they are achieving the organisation's goals.

It would be good practice to blend the chapters into the appropriate policies that they impact, i.e. Chapter 3 on Recruitment should be referenced within the recruitment policy and copied into an appendix, Chapter 5 on Inclusive Culture should be referenced within management responsibilities and within management level performance reviews. This would ensure that staff are aware of the standards and where they apply and allow an easier comparison between desired and actual implementation of policy/process.

The action standard on its own will not deliver the standards within it. In order to support the action standard and drive the EDI work within the GLA forward, it should be supported by an EDI statement explaining the importance to the GLA, where the GLA currently is and the vision the organisation has. Then to ensure that this is delivered a corporate level EDI Strategy and Action Plan, owned by the Chief Officer, that can be used to inform all subsequent EDI Action Plans should be produced. The action plan here should provide the template that allows all subsequent action plans to ensure they are comprehensive and robust.

## 6. EDI Action Plans

In the course of our review, we saw 9 EDI Action Plans (only 3 appeared to be at directorate level), of these 9 only 2 were at a standard where they would be effective - 2 more were almost to the same standard but needed a little more work. The 5 that were not of an appropriate standard were lacking any clear methodology, vision or accountability, they appeared to have been hastily put together to tick a box rather than to achieve any meaningful change. This also suggests that whilst a colleague may take ownership of EDI, it is not a core part of their responsibilities and instead is a side of the desk add-on that they volunteer for - if this is an accurate assessment, then EDI is necessarily the 1st thing to get dropped when that colleague is too busy, on leave or sick.

Even between the 2 that we believed were of a good standard, there wasn't much consistency in their structure/methodology. This suggests that each directorate, unit or team is expected to develop an action plan without any clear guidance or solid framework to work within.

We would typically expect to see a corporate level internal EDI Action Plan that has been produced by the Workforce EDI team to help deliver the internal EDI Strategy, this should provide the framework for all supporting EDI Action Plans. The directorate level EDI Action Plans should be informed by and support the corporate level, the unit level should be informed by and support the directorate level, etc.

Each Action Plan should be signed off by the next level up, i.e. the directorate level would be approved by the Chief Officer, the unit level approved by the Executive Director, etc. Anyone writing an EDI Action Plan should have access to best practice and support from the Workforce EDI team or EDI responsible person within the directorate.

Action plans should cover a particular period, this is usually defined by the organisation's mission – we already know that the GLA have set targets for 2025, so all current action plans should cover between now and 2025. This doesn't mean that they can't be adjusted, the action plan should be a living document that you consistently refer to and update accordingly to monitor progress or address unforeseen issues. The current selection of action plans do not have set periods and most of them have no measurements or time bound tasks.

## **7. Code of Ethics**

The Code of Ethics details the expected behaviour and standards for all GLA employees. The Code of Ethics in particular sets a high standard, expecting staff to have respectful, open, honest and dignified working relationships. Within this the relationship between staff and their manager is defined; staff are expected to carry out any reasonable and lawful request whilst being fair and courteous with the manager – manager's are expected to provide their staff with the necessary support they need to perform their duties and help to resolve disputes between staff.

Section 3 of the Code of Ethics sets out the Equal Opportunities Standard. Here we are provided an understanding of the GLA's commitment to equality, with a clear but concise definition of discrimination, a short but detailed Equality at work policy statement, a recruitment and selection statement and more. Much of this would make a good foundation to build an EDI Strategy from, combined with the other documents and policies that discuss EDI, this would create a strong strategy.

We also note that within the Equal Opportunities Standard is the requirement for EDI to be monitored, this duty falls under the Executive Director of Resources. It is not clear how monitoring is to be carried out or what monitoring has been done since publication in November 2019. We would expect to see a transparent monitoring process with regular updates and an integration of this work with the Workforce EDI team.

## **8. Let's Talk about Race**

The Let's talk about Race sessions were requested by the Race Equity Action Group in July 2020 – unfortunately it wasn't until May that the sessions began. We have noted that considerable time and effort has been put into the sessions and there has been a generally positive response from Ethnic Minority staff. Although all staff are mandated to take the training, there has been a slow uptake – based on our investigation, we expect this is due to a lack of EDI accountability, many staff that we spoke to do not have an EDI objective and there seems to be a common issue of managers not promoting EDI within teams.

The session itself is a very good introduction to race issues, setting up a baseline understanding for all staff. However, we don't believe it goes deep enough for manager and allies – managers need to have a great understanding of the potential barriers that society and cultural expectations in organisations can put on those from different ethnic backgrounds, allies will want to gain a better understanding.

We would recommend that a 2nd session is implemented that allows attendees to dig deeper into the issues, exploring the nuances between West and East African as well as between African and Caribbean or the differences between India and Pakistan as well as South Asian and Southeast Asia. The current session does little to discuss intersectionality, whilst this should be added retroactively to the current session, it should be expanded on greatly in the 2nd session. Attendees of both sessions should be expected to think of a race related EDI objective; for the first session it could be to read a book by an Ethnic Minority author or learn more about an upcoming cultural event – the second session, we would expect bigger, more impactful objectives such as improving representation in the team or having all team members complete the EDI training on race, allies could sign up to help deliver sessions or challenge poor EDI practice in their team/directorate.

Similar to the Action Standard, we recommend having 3 levels; the first creating a baseline understanding, the second should dig deeper into the issues and explore empathy, and the third should be focused on solutions. Having developed a good understanding of the issues around race and ethnicity, employees in position to change things and allies should be looking for how they can improve things. This can dig deeper into positive action and how to implement it across various initiatives and policies; it could be about ensuring the GLA acknowledges, and where appropriate, celebrates all cultural events, providing an opportunity for staff to get involved and embrace each other's cultures.

We also recommend that this not be the only EDI training that discusses race - it will be important to ensure that EDI training in general is expanded with sessions that focus on particular protected characteristics but there should also be intersectional approaches and generic EDI that include race as a key issue. Additionally, eLearning or suggested resources on the various cultures that the GLA represents could help managers understand their staff a little better before asking them to undertake more emotional labour to educate them.



The Equal Group  
1 Victoria Square  
Birmingham  
B1 1BD

(+44) 0121 616 0155  
[contact@theequalgroup.com](mailto:contact@theequalgroup.com)

Contact Us:

Mac Alonge  
CEO

(+44) 07452 822 126  
[mac@theequalgroup.com](mailto:mac@theequalgroup.com)

The Equal Group is a data-driven, equality, diversity and inclusion tech company, focused on providing forward thinking organisations with the tools and support that they need to optimise their equality, diversity and inclusion efforts.

The Equal Group implement a range of tech based products and strategic services to enable organisations to initiate a clear, concise and consistent approach to equality, diversity and inclusion – resulting in significant improvements in employee retention, candidate attraction and general workplace culture.