



Independent Review of Ethnic Minority experiences at GLA

Summary Report

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.





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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.

This document represents a summarised version of the full report. Within this document you will find the key issues and high level recommendations that have been made to the GLA. For data backed evidence and insight into the staff experience, there is an associated comprehensive report.

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 the 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.



Key Issues

These are the highest priority issues for the GLA to address, as these will create the most potential for removing the structural barriers that prevent progression for Black, Asian and Minority Ethnic but particularly Black staff. We have expanded upon these in great detail in the full report where some issues have been split into two or more sections. Here we have summarised the most significant elements.

EDI Strategy

There does not appear to be a coherent or robust internal EDI Strategy, rather the organisation relies on a collection of loosely connected documents. This includes the Diversity & Inclusion Action Standard; pay gap action plans; and Dignity at Work policy. To ensure that EDI is seen as a strategic imperative, it will be important to formalise the EDI vision and initiatives into a comprehensive strategy with a robust action plan.

The EDI Strategy should encompass the EDI Vision and a statement, and set the tone for all EDI activities at the GLA. The GLA have set a goal of becoming an anti-racist organisation and the strategy and subsequent action plan will define how this is to be achieved. This will pave the way for implementing many of the recommendations and removing the structural barriers for Ethnic Minority colleagues. It will also help to remove inequity for all protected characteristics.

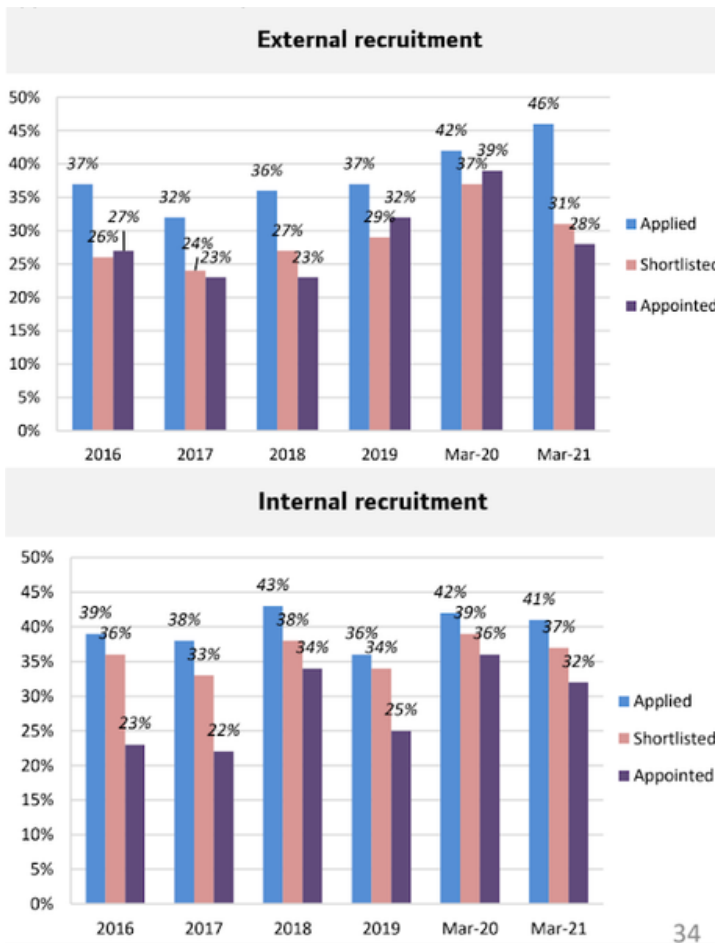
EDI Action Plans

In order to deliver the EDI Strategy action plan, it will be important that each directorate and unit has its own action plan. Some directorates and units have attempted to create their own action plans but without clear guidance or framework. As a consequence, these plans lack consistency and whilst some are more robust than others, none are complete. Using the strategy action plan as a framework, guidance should be provided so all directorates can create a specific action plan for their units.

Having action plans will help each area of the business identify how it supports and advances the EDI Strategy. It will help employees identify appropriate EDI objectives that they can implement into their annual performance review and it will provide accountability for EDI initiatives for those in leadership roles.

Recruitment

There has always been a disparity between the Ethnic Minority representation of those applying for jobs, those shortlisted and those appointed, for both internal and external applicants. At each stage of the recruitment process, the percentage of Ethnic Minority applicants falls i.e. the diversity dilution rate increases. Whilst there has been some successful effort to reduce these falls, they still exist and will require further scrutiny over the recruitment process.



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We have identified potential barriers to recruitment within job descriptions and person specifications; the selection process; interview panel; and interview process. Each of these areas will require specific focus to ensure that all barriers are removed and the processes made inclusive.

Job ads should be reviewed to ensure job descriptions and person specifications are accurate and relevant – person specifications should only include essential criteria as desirable criteria serves to exclude people before they apply. The GLA should also consider including EDI responsibilities into the person specification. Job ads are also an opportunity to utilise positive action through phrases such as, “We particularly welcome applications from Ethnic Minority candidates.”

The selection process is another opportunity to utilise positive action, a minimum percentage of particular characteristics could be used to ensure representation at interview stage. Alternatively, where there is no representation, a guaranteed interview scheme could be provided for particular characteristics, similar to the Disability Confident scheme.

We have noted that it is not mandatory for interview panels to be diverse – it appears this has led to some hiring managers appointing all White panels. Diverse interview panels can suggest to diverse candidates that there is less likely to be bias in the recruitment process and can provide some confidence in seeing a more representative workforce. The GLA should make this the standard and require non-diverse panels to be explained. All hiring managers should be aware of the trained interview panellist pool.

It will also be important for panels to reflect on how they assess competency answers in interviews. Furthermore, they should focus on the behaviours and competencies relevant to the job rather than the events and experiences themselves. This will allow any diverse candidates better opportunities to showcase their potential. It will also be important to understand the personal qualities and experience ethnically diverse candidates may have developed through overcoming adversity in other areas.

Talent Management

Talent management has been identified as a key issue for all Ethnic Minority staff with Black staff feeling they experienced a disproportionately low level of support here. This is similarly backed up by the data with Black staff having a larger representation in lower grades and generally having the worst ethnic pay gaps. In one of the Black focus groups, the attendees 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.”

There also appears to be some large discrepancies between the skills and experience of Black staff and the application of the competency framework. This is particularly relevant when highly educated staff are told they were both too academic or not academic enough, or long serving staff members bluntly told they did not have enough experience. The competency framework is quite rigid and often over-relied on when it comes to assessing Ethnic Minority staff. When this is coupled with a lack of development support, it serves as a barrier for those staff.

Ethnic Minority staff, particularly Black staff, expressed frustration at their efforts to develop and progress being denied through lack of opportunity and not having their additional contributions and skills recognised. The frustration was increased when many recognised that they often saw White colleagues easily access the same opportunities, or receiving additional recognition simply for performing their role. This was summed up in one statement: **“I have definitely observed a lot of promoting their own people, White Managers will always mentor and encourage White juniors in the team.”**

A review of the existing talent management and development processes should look to embed EDI practices throughout and ensure that all managers are aware of their responsibility to develop all staff. This should be coupled with utilising targeted talent programmes such as the BAME Talent programme, with some additional focus for Ethnic Minority men.

EDI Learning

Some of the barriers that are present appear to be from a lack of understanding and awareness. It will be important to increase the learning opportunities to provide all staff with a better understanding of the GLA’s commitment to EDI, and particularly anti-racism. This should begin with requiring all staff to complete the “Let’s talk about Race” session and creating a second session for managers and allies to obtain a more in depth understanding.

There is also scope for learning on intersectionality and cultural awareness. Intersectionality will help staff understand the compounded complex barriers from having multiple minority characteristics, i.e. being Black and LGBTQ+, or Asian and disabled. Cultural awareness should seek to ensure everyone understands the complexities within Ethnic Minority groups and the often vastly different cultures that exist within single ethnic groups. This will help managers to develop better relationships with their diverse teams and will encourage the team members to share their specific culture(s).

Managers and Leadership

The existing senior leadership within the GLA have taken responsibility for all EDI within the GLA. Whilst this has resulted in many good faith interventions with some success, it is clear that some of the barriers to progress exist in middle management. This tier of management is critical to affect cultural change so it will be important that all middle managers are involved in progressing the EDI initiatives. One senior leader highlighted:

“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”

Addressing this will require accountability towards the EDI initiatives to be built in at all levels with a particular focus on team leaders and line managers. The exact responsibilities of employees should be defined by their unit or directorate’s EDI action plan. More accountability will come from EDI being embedded in processes such as recruitment.

To assess employee performance against areas of accountability, the GLA should utilise 360 degree feedback seeking to understand if employees act inclusively and promote diversity, and where relevant, whether they have delivered on specific EDI goals.

Managers and team leaders will also have to hold their teams accountable to their own EDI objectives as well as the EDI Strategy. This may require them to work closely with HR (or any independent parties) to fully investigate any complaints of discrimination, harassment or victimisation. The GLA claims to have a zero tolerance approach when it comes to bullying of any kind. However, if employees are not held accountable when found to have bullied or discriminated against a colleague, client or member of the public, then the EDI Strategy will be undermined.

Policy vs Process

Through a review of particular policies appropriate to this investigation, we have concluded that generally, the policies are not the issue but rather its inconsistent application in regards to EDI. With the exception of the recruitment policy, many policies within the GLA lack robust processes to help guide employees through to implementation – where gaps exist in the process, the organisation’s prevailing culture will fill the gap.

This means that when the policy allows for management discretion, the manager will follow the work culture norm. This “norm” may not be in the best interests or in line with the desired culture of the GLA. Whilst the GLA is recultivating the desired anti-racist, diverse and inclusive culture it desires, it will be important to mitigate any potential effects of the existing culture.

We recommend creating clear and robust processes, particularly for policies that have the most potential to create disproportionate outcomes. Not every decision point in the process will be “yes/no” and therefore may require the manager and employee to agree on the appropriate decision. Where the employee does not agree with the manager on the decision, or does not agree with the set options, they should work with HR to identify the most appropriate route or alternative.

Some of the policies that we considered were 3 or more years old and had no evidence of a policy review. Policies should be reviewed every 1-2 years or whenever a change to the organisation or governing legislation is made. The last review date, next scheduled review date, last reviewer and policy owner should all be clearly displayed on the policy. This reassures employees that it is up-to-date.

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 do not understand an issue, we often go to a person with experience and ask them to explain it to us. This discovery is important to aid understanding. However, 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.

Accordingly, it will be necessary for the GLA to recognise the use of emotional labour when addressing the issues faced by minority and underrepresented groups. The volunteers who deliver the "Let's talk about Race" and every person who spoke to us through this review, have been asked to perform emotional labour and will need both support and recognition of their efforts.

This review may also give rise to colleagues from Ethnic Minority backgrounds or other underrepresented groups feeling the need to express and or relive their own experiences. They have likely utilised their own emotional labour to navigate through a system that hasn't been designed for them and continues to present a barrier to their progression. It will be important to respect this and provide opportunities for everyone to reflect on, and where appropriate, share their experiences, this will provide the GLA with further insight into the issues faced by underrepresented groups and shape initiatives to address them.

The GLA must also recognise the burden of this emotional labour which acts as a barrier to progression in that it is a burden that White colleagues do not have to bear on a day to day basis. When considering the impact of systemic racism within an organisation White colleagues will rarely, if ever, be sought out to share their experiences or insight, meaning they can concentrate on their 'day job'.

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 that exist that prevent Ethnic Minority colleagues from accessing development and progression opportunities, and/or systems, processes and procedures that deliver markedly different outcomes for Ethnic Minority individuals or groups. 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 these issues shows a willingness to address these barriers.

Whilst conducting our investigation we have concluded that many of the issues we have raised are a result of a long-standing culture which has persevered through multiple administrations and organisational changes. The GLA has existed since 2000 and in our research we have seen little evidence of addressing racial disparities within the organisation until 2016. The efforts begun in 2016 have been enhanced and started to deliver positive outcomes from 2018.

Whilst the data produced by the organisation has certainly highlighted a problem, the identification, definition and improvement of culture is a nuanced endeavour. Without the scrutiny present in the full report and interventions targeted at addressing the culture, even the best intentioned initiatives are likely to struggle to achieve significant change.

We note the GLA's public profile and position as a key part of London's infrastructure. The organisation has a vital role to play in serving a significantly diverse community, therefore there is a need to commit to leading from the front and demonstrating to partner organisations, many of whom will also be struggling to overcome structural barriers, how to resolve long standing issues with the representation and progression of Black, Asian and Ethnic Minority people.

The current leadership within the organisation have set an ambitious but necessary goal of becoming an anti-racist organisation. This will require a recognition of any and all potential barriers to racial and Ethnic Minority equity with particular scrutiny and careful cultivation of the desired culture. Following the recommendations found here



Recommendations

We have developed a number of recommendations that will support the delivery of the proposed solutions. These are a high level overview of the recommendations, a more in depth understanding can be found in the larger report - these will also be used to develop a detailed action plan in collaboration with REAG.

It should be noted that many of these recommendations do not specifically address the issues raised for Ethnic Minorities. We have chosen to leave the recommendations broad at this stage to allow the GLA to tailor their implementation for other underrepresented groups in the future. We will specifically focus on removing the barriers for Ethnic Minority staff through the action plan. The action plan will be developed as a collaboration between The Equal Group and the GLA's Race Equity Action Group.

Each section can be viewed as an individual theme to be addressed balanced against the capacity of the GLA to deliver the recommendations. 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. However, the "Fast Track Recommendations" are aimed at being delivered between the publication of the report and the end of the financial year and are all standalone.



Fast Track Recommendations

Objectives	Justification & Vision	Priority
Reaffirm the EDI Vision and Organisation Values	The EDI Vision and Organisational Values need to be fully developed and published prominently so that all staff are aware of the GLA's commitment. This is the first step to creating an effective EDI Strategy.	Immediate
Remind all staff about the use of anonymous applications and diverse interview panels	It appears that not all staff are aware of the use of anonymous CV sifting or the desired standard to have diverse interview panels. Staff should be aware of the need to have undergone Interview Panel training and the diversity of the staff who have done training.	Immediate
Lived Experience forum	We could not speak to all staff and of the staff we did speak to, we believe that we did not get a complete picture of their experience. The GLA should endeavour to provide a safe space for these issues to be raised so that the HR and EDI teams can understand the problem and ensure any issues raised cannot be repeated.	Immediate
Evaluate the role of EDI in each directorate	The GLA is a large and complex organisation, it will need more than two individuals to deliver EDI initiatives. It will not be fair to rely on the volunteering of individuals who are often unrecognised by their managers. Each directorate should have a defined EDI role with appropriate responsibilities.	Immediate
Set EDI Objectives	Not all staff currently have EDI objectives, this is an important part of ensuring that all staff understand EDI is everyone's responsibility. All staff should set themselves an EDI objective by the end of March 2022.	Immediate
Increase attendance for "Let's talk about Race"	The current attendance on "Let's talk about Race" is currently low. This is a mandatory session and therefore managers should be ensuring that they and their staff have attended. We recommend aiming for a 60% completion rate by the end of March 2022 and increasing efforts to achieve 100% in the new financial year.	Immediate

Long Term Recommendations

Objectives	Justification & Vision	Priority
EDI Strategy		
Define an EDI Statement	From the EDI vision, the GLA should develop a statement that provides a high level understanding of the GLA's current position and how they will deliver on EDI.	Within 6 months
Review the EDI requirements in the statement and assign an EDI budget	An appropriate budget is imperative to ensuring that EDI initiatives can be delivered. Using the EDI Statement, the GLA should review the value of their investment in EDI and allocate an appropriate budget.	Within 6 months
Develop an EDI Strategy	The strategy takes a 1-2 page statement and builds a more in depth approach complete with Objectives and Key Results. This will be the governing document for all EDI and combine all existing EDI documents.	6-12 months
Build an EDI Action Plan	The EDI Action plan will be a specific set of actions developed from the Objectives set out in the strategy. This will also provide the framework for all EDI Action Plans.	6-12 months
EDI Action Plans		
Create guidance on developing action plans	Using the Strategy EDI Action Plan as a framework, guidance should be developed to ensure all EDI Action Plans are robust and take a consistent approach.	Within 6 months
All Directorates to have EDI Action Plan	To ensure the delivery of the EDI Strategy, each directorate should have an action plan that helps achieve the corporate plan. The leadership in each directorate would be responsible for these plans.	6-12 months
All Units to have EDI Action Plan	A more targeted unit level plan should also be developed to show how each unit will help achieve the directorate plan. This should show contributions from all teams within the unit.	12-18 months

Accountability		
Make EDI Objectives part of annual reviews	EDI must be an integral part of annual reviews to ensure that all staff are aware of their responsibility to the strategy. Making it part of reviews creates accountability not only for the individual but their managers.	Within 6 months
All complaints of discrimination should be investigated and resolved	It is imperative that all complaints of discrimination are taken seriously and investigate fully. Appropriate sanctions should be implemented where necessary, with all discrimination being met with zero tolerance.	Within 6 months
Review manager roles and responsibilities to ensure EDI is built in	EDI responsibilities should be embedded directly into the roles and responsibilities of all managers and team leaders. This will ensure EDI is a consistent consideration when they are undertaking their duties.	6-12 months
Policy vs Process		
Ensure consistency of approach to policy through clear processes and guidance	Policies need robust processes and guidance to ensure consistency of application. There will be a need to provide HR support when the process cannot be easily applied. EDI should be a key consideration within all processes.	Within 6 months
Provide guidance on how to manage policy issues	Where the policy cannot account for individual needs, a process will need to be developed for employees to work with HR to reach an appropriate solution.	6-12 months
Policy reviews	Policies must be reviewed regularly, we recommend at least every 12 months or when there is a significant change to the organisation or legislation. Review dates and policy owners should also be displayed on the policy.	12-18 months

Recruitment		
All Hiring Managers to be given "Inclusive Recruitment" training	Based on the available data and staff experience, it appears that not all recruitment processes are equally applied. It will be necessary to provide all hiring managers with appropriate training to ensure a consistent and EDI conscious approach.	Immediate start Continuous progress
Review Recruitment policy to embed EDI throughout	The existing recruitment policy has strict processes, however EDI is not embedded throughout and is relegated to a single end section. It will be necessary to ensure EDI is embedded throughout the policy and processes, making it a key consideration at all stages and not an afterthought.	Within 6 months
Job requirements in job descriptions and person specifications to be reviewed	The messaging, language and tone conveyed within the GLA's job descriptions and person specifications is crucial for attracting diverse talent. It will be necessary to ensure that the language is inclusive and that only essential requirements are included.	Within 6 months
Diverse Interview Panels should be standard	Diverse interview panels are not currently required, only recommended. The GLA should endeavour to make these standard and have hiring managers provide a reasonable explanation for not having a diverse panel.	Within 6 months
Utilise positive action to increase representation in interview pools	It is possible for the GLA to require a minimum representation within the pool of interview candidates, this will improve chances of diverse hires. Hiring managers should also understand the nature of positive action and how it can legally be applied.	6-12 months
Ensure that Anonymous applications are standard	It is not common knowledge that an anonymous application process is the preferred standard for shortlisting. HR's resourcing team should ensure that all CV's are anonymised in hiring processes.	12-18 months

Talent Management		
Review Competency Framework	The current competency framework is very rigid and potentially exclusionary in how it is applied. We recommend reviewing the framework to ensure that it is inclusive of all characteristics and experience, and puts an emphasis on potential.	Within 6 months
Build Talent Development Programme	It will be important to ensure that there is adequate support and guidance for all staff but particularly Ethnic Minority staff in their professional development. Initiatives like the BAME Talent Programme should be utilised to improve opportunities and may require specific targeting for all Ethnic Minority men.	6-12 months
Make it standard practice to provide additional training after unsuccessful interviews	Repeated unsuccessful internal applications point at a lack of development progress for individuals. Staff should be provided with additional support to ensure they obtain the development they require, providing them with a better chance of success in the future.	6-12 months
Develop process for staff to challenge interview feedback	Feedback after interviews and applications is not consistent with many Ethnic Minority staff reporting that they do not feel the feedback is appropriate or helpful. They must be given an opportunity to challenge this; appropriate and useful feedback is key to an effective development plan.	6-12 months
Career Coaches	Career coaches are an alternative to mentoring, it removes the need for the individuals to be in similar workstreams. This provides senior staff with the opportunity to develop their coaching skills whilst providing junior staff with an advocate.	12-18 months
Create a growth culture	A growth culture is about ensuring that everyone has the opportunity, support and encouragement to continually improve. Improvement can come in many forms as even external improvement can positively impact work performance.	12-18 months

Grade 10+ Intervention		
All grade 8+ jobs should utilise positive action	In order to ensure a talent pipeline of Ethnic Minority, but particularly Black, staff into Grade 10+ jobs, the GLA will need to ensure proper representation is achieved and maintained in Grade 8+. Carefully managed positive action should increase representation in these grades by improving representation in applications and challenging significant falls in representation.	Within 6 months
Talent pipeline for Ethnic Minority staff	Talent pipelines are an important factor in any organisation ensuring that they have the talent in house to step up when necessary. It will be important to ensure that the talent pipeline is representative of Ethnic Minorities.	6-12 months
Diversity in Succession Planning	Having diverse succession plans encourages managers to ensure the development of underrepresented groups in their teams. This will ensure that Ethnic Minority colleagues are being given opportunities to step up and access opportunities.	6-12 months
Job placement programme	Opportunities for development may not always present themselves in an employee's workstream. It may be important to identify secondments in other units, directorates or even other public services.	12-18 months
Export GLA's anti-racist and inclusive culture	To create space in Grade 10+ for better representation, it may be necessary to increase positions or encourage staff to leave who do not actively support an anti-racist and inclusive culture. Working with partner organisations, the GLA could find new opportunities for senior staff to share the GLA culture in other public sector organisations.	12-18 months
EDI Learning		
Expand "Let's Talk About Race"	A further session for people managers and allies would help to refine understanding and allow them to dig deeper. This session would discuss intersectionality and have the attendees set individual anti-racist EDI objectives.	6-12 months

Develop Management and Allies training	The GLA would benefit from tailored training sessions designed to help managers and allies work with underrepresented and minority groups. These sessions could be expanded to include other characteristics.	6-12 months
Develop "Unconscious Bias" training into "Conscious Inclusion" training	Whilst "Unconscious Bias" training is the first step in addressing an issue, it is important to evolve this into "Conscious Inclusion" training. This will provide staff with the tools and understanding they need to address theirs and their colleague's biases in the workplace.	6-12 months
Use staff networks to raise awareness and use momentum to develop content for other EDI areas.	Staff networks are an important resource in delivering EDI initiatives as they will be able to spread information about new training and understand from their members what training is wanted. A collaboration here could see participation rates for all increase as members encourage teams to join discussions and access training.	6-12 months
Provide education on intersectional identities	There appears to be limited consideration or awareness of intersectional identities. It is important that all employees understand the nature of intersectionality.	12-18 months
Create Cultural Awareness content	Cultural awareness will help all employees collaborate well with colleagues from different backgrounds. This should also help managers accommodate cultural or religious requirements and find solutions to potential communication barriers.	12-18 months



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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.