Listening to London best value review

Consulting London: a framework for the core GLA, LDA, LFEPA, MPA and TfL

1 Introduction and context

The GLA group provides governance and strategic direction, services and regulation for the capital. Collectively and individually we face the challenge of representing, consulting and engaging 7.5 million Londoners.

The Mayor's commitment must run through the GLA group's approach to consultation:

"I want to encourage the fullest participation and engagement by all London's communities in developing the policies and strategies we need to improve our city"

In practical terms, the GLA group consults and engages Londoners in order to ensure -

- high quality decision-making and leadership informed by the views of Londoners
- high quality, customer focused services
- strategies and policies which are responsive to the priorities and needs of Londoners and the capital's communities

The GLA Act 1999, best value and other legislation impose considerable statutory responsibilities on the core GLA and the functional bodies in relation to consultation. Meeting those obligations is a key priority. [A summary of statutory requirements across the GLA group is in preparation and will be attached as Appendix 1.]

The GLA group sees consultation and engagement as part of a continuum of related activities which include -

- communication, keeping Londoners informed and hearing their concerns
- raising awareness and building understanding of issues
- consultation on specific strategies, proposals or issues
- research to find out attitudes, preferences, needs and patterns of behaviour
- public engagement to ensure citizens have a say in their future, and to provide the means for ongoing dialogue with, and accountability to, Londoners
- stakeholder engagement as a process of dialogue with London's many communities and sectors, including equality target groups
- working in close contact and partnership with other organisations to deliver shared services and objectives for London
- local and community based consultation and engagement processes, for example police consultative groups at borough level

Our inclusive approach is focused on getting as representative a picture as possible, removing barriers to participation, ensuring that all voices are heard, and addressing particular needs of different communities.

Political leadership and electoral accountability are key to the way the GLA group operates. Consultation and engagement are no substitute for political decision-making. Neither should consultation be an excuse for inaction or for unjustified delay.

This framework focuses on consultation and public engagement, although the related areas of communication and research are also touched on. The framework sets out strategic objectives and principles for how we consult and engage Londoners. Its purpose is to enable a joined-up approach across the whole group where possible, recognising that there will be many occasions when individual bodies consult separately for their own specific purposes. We will take a developmental approach, starting with realistic and achievable aims in terms of coordination, and build on them over time.

This framework is a key outcome of a best value review of consultation and engagement across the GLA group in early 2002. It serves as a framework within which individual consultation strategies and programmes suited to the specific needs of the core GLA and each functional body will be constructed.

One of the key findings of the best value review is that we need better, not more consultation and engagement.

The purposes of this framework are to:

- set out shared principles and objectives
- map out how, when and why we consult and engage Londoners
- support action to coordinate and where appropriate share consultation and engagement activity
- plan improvements and agree ways to measure progress over time.

The rest of this paper addresses: issues of definition; objectives and principles; good practice guidance; co-ordination; taking a joint approach; evaluation and setting targets.

2 Definitions: what we mean by consultation and engagement

As the GLA group, we have many different audiences and target groups: citizens, customers, users, stakeholder organisations, individuals and communities. There are many modes of engagement: consultation, public involvement and participation, needs assessment, market research, re-connecting citizens with government, to name but a few. For public authorities, statutory requirements to consult, and legal definitions of consultation are also important (see Appendix 1). For practical purposes consultation is used in this paper as a generic term to encompass a wide spectrum of activities. The following working definitions have been adopted:

Consultation: providing effective ways for citizens, service users and stakeholders to understand and influence decisions and policies that affect them

Public engagement: an ongoing dialogue with the public, building shared knowledge of strategic London issues, and wider participation in shared solutions and decisions.

Londoners: people who live, work, study or run businesses in London, visitors to London, commuters into London, and organisations located here.

Stakeholders: organised and representative interest groups across all sectors of London's communities. These include business and academic institutions, the voluntary sector, London boroughs, and the wider community groups who function within an organised infrastructure.

Stakeholder engagement: processes to involve key London stakeholders in shaping policy and developing projects.

Adopting a broad general definition of consultation and related activities does not avoid the need for clarity in relation to planning specific activities. There are many dimensions to consider:

Why do we consult?

- Service improvement future planning building consensus
- Understanding behaviour attitudes needs views
- Statutory requirements

What are we doing?

- Information consultation deciding together delegation of decision-making
- Communication research offering opportunities for involvement

Who do we consult and how?

- Groups/stakeholders prescribed by statute wider public or selected groups
- Customers (including involuntary ones) users citizens voters taxpayers
- Public at large informed public/individuals experts
- Individuals communities (of place, of interest) stakeholder organisations
- Directly affected groups/individuals indirectly affected ones citizen interests
- Large/representative numbers targeted groups self-selected groups
- Quantitative qualitative deliberative methods

3 Strategic objectives

There are several shared objectives across the GLA group, all aimed at giving Londoners a voice in decisions and policies that affect them, and in the future of their capital

Objective 1:

Consultation and engagement which support:

- high quality decision-making informed by Londoners views
- high quality, customer focused services
- strategies and policies which are responsive to the priorities and needs of Londoners and the capital's communities

Objective 2:

Collaborate across the GLA group to:

- bring existing information together
- fill gaps in our understanding and information
- build up a comprehensive picture of Londoners' views, preferences and needs over time
- deliver joint projects and programmes which enhance stakeholders' opportunity to participate in the running of the city

Objective 3:

Best use of consultation outcomes and other sources of public feedback such as complaints and correspondence, to inform decision-making

- support a 'culture of consultation' where decision-makers are sensitive to public views and feedback from all sources
- regular reports on consultation and resulting change or action

Objective 4:

Ensure good practice in consultation and engagement through -

- innovation, learning from elsewhere and keeping abreast of changes in technology and other fields which extend channels for consultation
- using consultation methods which are representative and which target traditionally excluded groups where appropriate
- over time, testing our practice through survey questions and targets to gauge perceptions of the GLA as listening and responsive
- using a range of evaluation techniques

Objective 5:

Support and promote stakeholder engagement and partnership activities with London's sectors and especially with those communities whose voices have traditionally not been heard

4 Principles

The following principles will underpin consultation and engagement:

Consultation

1. Meeting statutory obligations including the need for sufficient information and sufficient time for those consulted to be able to respond meaningfully

- 2. Consulting with a clear purpose and advance planning
- 3. Treating those consulted with respect
- 4. Efforts and resources spent on consultation should be proportionate to the impact of decisions and the importance of the issue
- 5. Understanding what we know already before doing more, and only consulting when directions or decisions can be informed, confirmed or reviewed
- 6. Where appropriate, using a range of methods and ways of reaching people
- 7. Using opinion polling to seek Londoners' views on key issues
- 8. Actively seeking out the views of traditionally excluded groups and of those that respond less readily to consultation
- 9. Providing feedback on consultation outcomes to participants and the public as appropriate
- 10. Linking consultation results to decision-making
- 11. Communicating in clear and accessible ways in relation to documents, information and public meetings
- 12. Promoting transparency and openness
- 13. Learning from best practice and innovation

Public engagement

Many of the same principles as for consultation apply, but also -

- 1. Clarity about not just the purpose but also the parameters and expectations of the dialogue taking place
- 2. Using all available means including media and events to promote interest in and knowledge of London governance, strategies and policies that are important to London
- 3. Using a range of channels to reach different audiences

Stakeholder engagement

Again, many of the same principles as above apply, in addition to -

- 1. Establishing accessible and inclusive engagement processes, which are 'fit for purpose'
- 2. Ensure, where possible, that stakeholder networks, alliances and organisations are fully representative of the stakeholder community they are representing
- 3. In recognition of London's diverse and complex community, ensure equal access and representation for all stakeholder communities
- Ensure outcomes of engagement activities are fed into policy development and implementation activities, which link into the GLA group's strategies and services.
- 5. Manage expectations and avoid initiatives outside policy and strategy frameworks
- 6. Work within an equalities focussed, human-rights based framework of engagement.

5 Good practice guidance

Many good practice guides on consultation and much practical experience of what works exist. The challenge is in implementing good practice consistently. The GLA group is committed to ensuring high professional standards in carrying out and

commissioning consultation, and to establishing mechanisms to promote and monitor good practice.

The good practice guidelines proposed are most directly applicable to a distinct consultation exercise or process, but most of the principles and steps also apply to ongoing public and stakeholder engagement processes.

Key standards we are adopting include -

Planning: the checklist below makes for effective consultation and engagement in the GLA group context.

- Identify issue, question to be answered, decisions, purpose etc
- Find out what is already known, what has been done
- Decide audiences (including groups required to be consulted by statute)
- Decide appropriate methods (see above) with particular attention to traditionally excluded groups
- Plan budgets and time scales
- Manage expectation: make parameters of consultation (what is being asked, what will happen to results) clear to everyone consulted
- Carry out consultation allowing time for responses
- Collate, analyse and summarise results
- Consider and take account of the results in decision-making
- Feed-back to public/participants in appropriate ways, depending on nature of consultation, number of responses etc
- Communicate decision and reasons more widely where appropriate
- Evaluate process, outcomes and value for money
- Share results with other interested parties
- Log major consultation processes and results on database, to inform future developments and avoid duplication

Time scales: there are statutory requirements for consultation periods in relation to some formal consultation processes. In other cases, time allowed for responses will always need to reflect the audience and particular circumstances. Three months for consultation on written documents such as draft strategies, where organisations have to consult their members, is a generally accepted standard which we will adopt. For simpler forms of consultation such as questionnaires, response deadlines can be shorter.

Accessible documents: documents for consultation will be in plain English. Any unavoidable technical terms and concepts will be clearly explained. Long documents will be summarised. (A core GLA policy on accessible communications is being developed which will also cover issues such as translations and different formats.)

Confidentiality and data protection: we will be conscious of the need to protect confidentiality and anonymity where relevant, while exploring ways to share information and to provide feedback.

Implementing good practice: the GLA group will develop a common core set of good practice guidance, available in several formats and covering different needs, from general awareness to in-depth knowledge of particular techniques. The guidance will be based on the assumptions that a wide range of staff will carry out consultation, not just specialists. Guidance will:

- communicate basic principles clearly and simply, and signpost sources of more detailed information/help
- use different 'live 'forms of spreading good practice, using intranet, presentations, telephone advice, networks
- use different formats for guidance: eg short 'key facts' card, longer printed version, on intranet etc

7 Promoting equality in consultation and engagement

Consultation and engagement need to happen within a strong equalities framework. London is one of the most diverse cities in the world – being in touch with Londoners must mean reaching all cultural and ethnic communities, and other communities of place and of interest. Strategies and policies often need to address the particular needs of specific communities and groups. Influence on decisions, and participation in democratic processes is one of the arenas from which many groups have traditionally been excluded or alienated.

The GLA group will ensure all consultation is as representative and inclusive as possible, and will target specific groups who are excluded or who tend to participate less. We will -

- identify specific guidelines, examples, and sources of information to support an imaginative and flexible approach to consultation
- carefully consider the nature, interests and needs of the audience or target group, and where, when and how best to reach them
- use existing forums or appropriate external organisations to help us to reach some groups and communities
- implement an accessible communications policy (in development core GLA)

A key component of stakeholder activity is to prioritise our engagement with communities traditionally isolated or excluded from participation in democratic processes. By focussing on the GLA key equality target groups, we can ensure that their voices are heard and that their views are taken on board through our policy development and implementation processes such as the Partnership Register, the Capital Woman conference, and the establishment of the African-Caribbean Business network.

The GLA group has carried out a best value review entitled 'Equalities for All' which sets overall objectives in support of leading the equalities agenda in London. In addition, the core GLA has recently adopted an equalities strategy and framework to guide and coordinate its promotion of equalities. This consultation framework is in line with wider equalities policies.

8 Joined up consultation

The best value review of consultation has established the case for a joined up approach:

- the public and stakeholders expect that the GLA as a group is coordinated
- value for money can be achieved by sharing effort, expertise and outcomes
- consultation fatigue can be avoided, particularly among the 'usual' stakeholder organisations. For instance, London boroughs are key stakeholders that all the GLA group members regularly engage with, in formal consultation, through partnership working, through shared information and in other less formal ways.

We will use several mechanisms and tools to achieve better coordination. Informal contacts, ways of working and networks are as important as more formal ones and will need to be nurtured. Joined up working does not mean carrying out all or even most consultation jointly – it means sharing information and planning to cooperate where it makes sense.

Mechanisms for managing and coordinating consultation

- strengthened consultation network or board of GLA group staff involved in public and stakeholder consultation
- explicit expectation placed on those involved in consultation to share information across the GLA group where relevant
- clear protocols on joint working
- shared annual consultation and public engagement programme to enable opportunities for collaboration to be identified
- newsletter and electronic information sharing
- database of consultation exercises, outcomes, contacts and future plans
- exploration of a wider London network over time

Joint infrastructure

- shared surveys
- shared lists of suppliers and approaches to commissioning
- common forms for certain survey questions
- shared demographics for surveys

A set of protocols to enshrine common approaches will be developed and agreed.

9 Annual timetable for consultation

Sharing information on planned consultation activities for the year ahead across the GLA group is necessary to deliver a joined up and coordinated approach. It will also help to give notice to stakeholders and others of what consultation and public engagement activities are coming up.

An overview timetable of major activities across the whole GLA group for 2002/03 has been compiled as part of this review but a more detailed forward programme is needed and will be developed as part of the action plan.

10 Evaluation and targets

Several strategic objectives across the GLA group have been set. We will need to find ways to assess whether we are achieving these objectives. At the same time we should evaluate and learn from individual consultation and engagement exercises as we move forward.

Effectiveness of consultation

We need to demonstrate that -

- consultation makes a difference to the quality of decision-making, of services and of future planning, through a clear link between consultation and decisionmaking processes
- we follow good practice and agreed principles in carrying out consultation
- we apply proportionality and achieve value for money in the extent to which we consult on different issues

These objectives are not always easy to measure. We will keep the best ways of assessing and measuring how well we consult under review. We will:

- 1. establish good audit trails of all stages of consultation
- 2. evaluate all major consultation processes at the end against criteria such as feedback from participants and impact on decision-making
- 3. carry out a systematic study of a sample of consultation and engagement activities from across the group once a year
- 4. use forms of peer review and external advice
- 5. include in the GLA annual report the outcomes of key consultations undertaken by the GLA group, and secure a year on year increase in the policy changes arising from consultation

Effectiveness of wider public engagement

Many public organisations use surveys as a means to assess satisfaction with services and with activities such as communication, providing information, being easy to reach, listening, responsiveness, customer care etc. The best value regime has introduced performance indicators by which some of this activity can be measured consistently. London boroughs have long used surveys which measure perception of councils as 'listening' and 'good at keeping people informed'.

The GLA group should use survey data of this kind to measure communication related to consultation and public engagement. However, the core GLA, and the configuration of the GLA group (if not all the individual members) are still very new, and general awareness is low. This makes it difficult to use survey questions on listening or responsiveness as valid measures at present.

Targets for this area of awareness, information and responsiveness are:

1. a positive trend year on year in awareness of Mayor, Assembly and individual FBs and their roles and responsibilities, measured by annual surveys

- 2. positive trend year on year, measured by annual surveys, on how effective the GLA group is in providing information on its responsibilities and achievements
- 3. introduce survey questions on listening and responsiveness in 2004 or 2005 and achieve a positive trend over time thereafter
- 4. find comparable information from other (new) regional governments if these are available

Implementing such survey-based measures will be an area for careful planning and coordination, to make sure that survey questions offer the most comparable results across the GLA group, and with other organisations in London and elsewhere.

Effectiveness of stakeholder engagement

Stakeholder engagement is also difficult to measure, but there are a number of dimensions we can monitor and assess:

- 1. the level of ownership of activities and projects which stakeholders themselves lead or deliver on
- 2. the level of partnership activities
- 3. regular review of what and how we do things in light of feedback and evaluation eg a review of the Borough Liaison programme and related activities as a direct result of comments from the boroughs.
- 4. attendance at events, forums, conferences etc is a valid quantitative measure for some engagement activities
- 5. the borough engagement program allows us to have direct access to and dialogue with with senior individuals in boroughs, across the GLA group. Meetings are followed up with action point letters, and delivery is monitored.

11 Action and implementation

This framework will take time and effort to implement across the GLA group. A detailed action plan arising from the best value review has been prepared.

Each organisation within the GLA group will tailor this strategic framework to their own needs and identify suitable objectives and measures and will ensure that appropriate actions, resources and planning are put in place to achieve the objectives.