

Consultation on London & Partners transparency policy



LONDON
& PARTNERS

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Foreword

I am delighted to publish this consultation paper on London & Partners policy on transparency.

London & Partners is proud of its track record of success in generating jobs and economic benefit through its work to attract international investment, businesses, students, events, congresses and visitors to the capital.

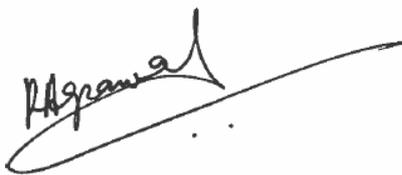
As a not-for-profit organisation, half of our funding comes from the Greater London Authority with additional grants from EU and national government. We leverage these funds through the support of private sector businesses who provide advice, cash and in-kind support that allows us to deliver more for London and Londoners. It is only through this public-private partnership that we can generate returns of £15 to the London economy for each £1 that we spend.

This unique arrangement raises important questions of how we balance our responsibilities to both groups, operating as a trusted commercial partner and a transparent custodian of public money.

We currently publish extensive information on our strategy, business plan, and performance against our key objectives. Whilst we have also adopted increased levels of transparency in recent years, we recognise that we can do more in relation to how we spend public funds and in being clearer about our decision-making and the beneficiaries of our work.

This document sets out significant additional steps that we intend to take to publish more data and information in four key areas as well as making it more easily accessible. At the same time, we recognise the importance of preserving London & Partners status as a not-for-profit limited company which has significant benefits which improves its effectiveness for London. We will therefore ensure that the additional measures we adopt will not impinge on our ability to operate in a commercial and agile way and protect commercially sensitive information about our partners and clients.

We very much welcome your views on our approach and the specific questions posed in this consultation document. The closing date for submissions is Monday 11th February 2019.

A handwritten signature in black ink, appearing to read 'Rajesh Agrawal', with a long horizontal flourish extending to the right.

Rajesh Agrawal
Chairman, London & Partners

About London & Partners

Our mission

London & Partners is the Mayor of London's official promotional agency. We exist to support the Mayor's priorities by promoting London internationally as a leading world city in which to invest, work, study and visit.

Our work helps achieve 'good growth' for London and Londoners, as outlined in the Mayor's economic development strategy.

We do this by focusing on:

- building London's international reputation
- attracting international audiences and convincing them to choose London
- guiding international audiences to make the most of all that London has to offer
- helping to retain and grow London's businesses

We tell London's story brilliantly to an international audience and we do this in partnership with organisations and people who have a stake in London's international promotion.

Our remit is broad:

- We help overseas businesses set up in London, help London businesses win business overseas through the Mayor's International Business Programme, support companies to grow in London through our Business Growth Programme and attract capital investment into regeneration projects.
- We work to maintain and strengthen London's position as one of the most popular visitor destinations in the world.
- We are the home of London's official convention bureau; helping meetings, events and congresses come to London.
- We provide expertise, coordination and guidance for those looking to stage a major sporting or cultural event in the city; and
- We promote London and its world-class universities to overseas prospective students.

How we are run

London & Partners is a not-for-profit public-private partnership, funded by the Mayor of London, European and national funds, our network of partners and other commercial ventures. All the income we generate is re-invested into London's international promotion to maintain London's position as a world-leading city.

London & Partners is a company limited by guarantee with 5 members made up of the Mayor and key business organisations, who jointly control the company. The company is run by a private sector-led Board chaired by the Deputy Mayor for Business.

The Board is committed to high standards of corporate governance.

Our commitment to transparency

Whilst London & Partners is not a public body, we recognise the importance of being accountable for how we spend taxpayers' money. Approximately half our income is received from an annual grant from the GLA. In addition, we receive public sector funding for specific programmes from the European Regional Development Fund and through national agencies such as Visit Britain.

We also rely on the support of private sector partners in a wide range of ways including membership fees, commercial contracts to deliver specific services, sponsorship of activity and in-kind contributions to campaigns and activities. They provide this support because of our track record of delivery for London businesses and our status as a non-political non-governmental organisation. The contribution from business significantly increases the impact for London taxpayers for their investment. For every £1 invested by taxpayers, £2 is spent on international promotion, providing outstanding value for London.

We have adopted increased levels of transparency in recent years and these arrangements are now reflected in our funding agreement with the GLA. A full review of our governance and relationship with the GLA was undertaken in 2016 which agreed that current arrangements struck the right balance of the need for transparency with the need to operate as a commercial organisation at arms-length from the GLA.

However, we are committed to reviewing and improving our transparency arrangements to ensure we are as open as possible about how we use public funds. Our aim is to align our arrangements with the GLA Group Framework Agreement and Local Government Transparency code to the extent that they do not undermine the company's approach to corporate governance, have a detrimental impact on our commercial and other relationships with private sector partners and do not create an unduly significant administrative and financial burden to implement and administer. In addition, we plan to strengthen our corporate governance framework to be consistent with best practice set out by the Financial Reporting Council's Corporate Governance Code.

1. Transparency arrangements

The information we publish will focus on four key areas:

- Our strategy, business plans, how we track our performance against targets and the outcomes we deliver for London;
- Ensuring that we deliver value for money by spending money wisely and publish relevant procurement information;
- Information in relation to our people recognising that we are unable to divulge the salaries of individual members of staff.
- Our corporate governance framework including details of the board and sub-committees, delegation of authority, code of conduct and key policies.

Strategy and performance

We already publish our corporate strategy and annual business plans as well as quarterly reports which track our performance against our key performance indicators and an annual review which summarises the key activities in the year.

We also intend to conduct an independent audit of our annual results against our key performance indicators each year commencing with an audit of our 2019/20 results. The results of the audit will be published in our Annual Report.

In addition, we propose to publish details of the companies we have helped through of our business support programmes except where individual companies have requested that their details be kept confidential.

Consultation Questions:

- Q1: Do you agree with our proposal to conduct an independent audit of our annual results?
- Q2: Do you agree with our proposal to publish details of companies that we have helped through our business support programmes except where companies have requested that their details be kept confidential?
- Q3: Is there any additional information in relation to our strategy, planning and delivery of our corporate objectives that you consider we should publish?

Value for money

We are committed to driving efficiencies across the organisation and are proud of our return on investment in generating £15 of benefit to the London economy for every £1 we spend. We recognise the benefit of greater transparency in how we spend taxpayers' money.

Spend

Currently we publish our budget within our annual business plan, details of contracts of over £150,000 and our audited annual accounts.

In the future we propose to publish details of all expenditure exceeding £250 on a quarterly basis.

Procurement

Until now we have followed a rigorous procurement policy requiring:

- three written quotes for expenditure over £5k;
- a business case signed off by the Management Committee followed by a formal tender process for expenditure over £50k;
- a business case signed off by the London & Partners Board followed by a formal tender process for expenditure over £150k.

In the past we have considered whether we are a 'contracting authority' and thereby subject to public procurement rules. An internal review and subsequent audit conducted by the GLA in the second quarter of 2018 did not highlight any issues with our existing procurement practice, nor did we receive any concerns from anyone else.

However, we have recently reviewed the position and as part of our initiative to increase transparency and accountability, we consider that it would be appropriate for us to fully align our procurement procedures with the Public Contracts Regulations 2015 for London & Partners. We will not adopt the Regulations for London & Partners Ventures or Dot London Domains as these are commercial subsidiaries which do not receive any public funds.

As a result of this we will publish notifications of tenders issued by London & Partners over the threshold in an OJEU Notice on the Official Journal of the European Union and on the Contracts Finder website. Where we advertise contracts below the threshold but over £25,000 we will advertise them on Contracts Finder.

Consultation Questions:

- Q4: Do you agree with our proposal to publish details of all expenditure exceeding £250 on a quarterly basis?
- Q5: Is there any other information in relation to our proposed revised approach to procurement that you consider we should publish?

Our people

Currently we publish our Reward and Recognition policy including numbers of employees within each pay band, a gifts and hospitality register for senior staff and our gender and ethnicity pay gap reports. All current vacancies are advertised on our corporate website at <https://www.londonandpartners.com/contact-us/work-for-us>.

In addition, we propose to publish an organisation chart for senior staff covering staff in the top three levels of the organisation with the following information: grade, job title, department/team, permanent or temporary and minimum salaries of each level.

Consultation Questions:

Q6: Do you agree with our proposal to publish an organisation chart for senior staff?

Q7: Is there any other information in relation to our people that you consider we should publish?

Governance

London & Partners' corporate governance is overseen by its board. The board is made up of up to ten non-executive directors and two executive directors – the CEO and Managing Director, Operations and Governance. The Mayor appoints the Chair and one other director. Other non-executive directors are appointed by the members of the company on the recommendation of the board.

Currently we publish the following information:

- Biographies of board members
- Board members register of interests
- Summary board minutes
- Key policies
- Audited annual accounts

In the future we plan to publish full minutes of board meetings and also publish:

- Terms of reference of London & Partners board and sub-committees
- The delegation of authority of decision-making between the board and executives
- A comprehensive annual report containing the audited accounts including information on the evaluation of board performance, the board's policy on diversity, the work of the individual sub-committees and the results of the audit of London & Partners annual results against key performance indicators.

Consultation Questions:

Q8: Do you agree with our proposal to publish full minutes of board meetings?

Q9: Do you agree with our proposal to publish the terms of reference of London & Partners board and sub-committees and delegation of authority?

Q10: Do you agree with our proposal to publish a comprehensive annual report and accounts?

Q11: Is there any other information that you consider we should publish or measures we should adopt in relation to our corporate governance?

2. Finding information

All the information we publish is available through our corporate website at www.londonandpartners.com.

We have already taken steps to improve access to information on transparency through a dedicated web page at <https://www.londonandpartners.com/about-us/governance-and-transparency>.

We will also ensure that all information is updated every six months.

Consultation Question:

Q12: Are there any other measures that you consider we should take to make it easier to find or access information about London & Partners on our corporate website?

3. Accountability

We recognise that as a beneficiary of public funds, we have a responsibility to account for their use and to follow the reporting processes set out by the various bodies from whom we receive funds.

Currently we receive public funds from:

- the Greater London Authority
- EU funds through the European Regional Development Fund administered by the Greater London Authority on behalf of Department of Communities and Local Government
- British Tourist Authority for any funds from the Department of Culture, Media and Sport received from Visit Britain and the Discover England Fund

In addition, we regularly appear before the London Assembly to discuss how we spend our public grant, respond positively to requests for information from them and invite them to attend our Annual General Meeting. The GLA also has the right to deploy internal auditors to access the records of L&P to review grant expenditure.

In the future we propose to publish a policy and process for handling correspondence from the public, press and elected politicians.

We will also open our Annual General Meeting to our main public and private sector stakeholders.

Consultation Questions:

- Q13: Do you agree with the proposal to publish a policy and process for handling correspondence from the public, press and elected politicians?
- Q14: Do you agree that we should open our Annual General Meeting to our main public and private stakeholders?
- Q15: Are there any other measures that you consider we should take to make London & Partners more accountable for how it spends public funds?

4. Continuous Improvement

We are committed as an organisation to continuous improvement and use the European Foundation for Quality Management (EFQM) business excellence model to monitor to self-assess and monitor our performance.

We will conduct internal audits to review our approach to transparency and ensure the information we have agreed to publish is easily accessible and up-to-date. The London & Partners board will review the transparency measures on an annual basis.

5. Responding to this Consultation

We welcome your response to this consultation by Monday, 11 February 2019.

Please email responses to

corporateaffairs@londonandpartners.com or post them to:

Transparency Consultation
Corporate Affairs
London & Partners
6th Floor
2 More London Riverside
London SE12RR

Following receipt of your responses, we shall produce a final version of the Transparency Policy in mid-March together with a report containing analysis of the feedback received and our responses to points raised. Please indicate when responding if you would like your response to remain unpublished.

The aim is to publish the final report and begin to implement the new arrangements from 1 April 2019 onwards.

Appendix I

Consultation Questions

- Q1: Do you agree with our proposal to conduct an independent audit of our annual results?
- Q2: Do you agree that we should publish details of companies that we have helped through our business support programmes except where companies have requested that their details be kept confidential?
- Q3: Is there any additional information in relation to our strategy, planning and delivery of our corporate objectives that you consider we should publish?
- Q4: Do you agree with our proposal to publish details of all expenditure exceeding £250 on a quarterly basis?
- Q5: Is there any other information in relation to our proposed revised approach to procurement that you consider we should publish?
- Q6: Do you agree with our proposal to publish an organisation chart for senior staff?
- Q7: Is there any other information in relation to our people that you consider we should publish?
- Q8: Do you agree with our proposal to publish full minutes of board meetings?
- Q9: Do you agree with our proposal to publish the terms of reference of London & Partners board and sub-committees and delegation of authority?
- Q10: Do you agree with our proposal to publish a comprehensive annual report and accounts?
- Q11: Is there any other information that you consider we should publish or measures we should adopt in relation to our corporate governance?
- Q12: Are there any other measures that you consider we should take to make it easier to find or access information about London & Partners on our corporate website?
- Q13: Do you agree with the proposal to publish a policy and process for handling correspondence from the public, press and elected politicians?
- Q14: Do you agree that we should open our Annual General Meeting to our main public and private stakeholders?
- Q15: Are there any other measures that you consider we should take to make London & Partners more accountable for how it spends public funds?

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