

GREATER LONDON AUTHORITY

REQUEST FOR MAYORAL DECISION – MD3122

Title: GLA Voter ID awareness campaign

Executive summary:

This decision seeks approval for expenditure of up to £1,550,000 in the financial year 2023-24 to deliver the next phase of the impartial GLA Voter ID awareness campaign (April 2023 to February 2024). This campaign consists of a community grants programme; a marketing and communication campaign, supported by online information on the Democracy Hub; and ongoing voter registration awareness raising. This activity will be complemented by the annual London Voter Registration Week 2023 approved by MD3069.

Decision:

The Mayor approves expenditure of up to £1,550,000, in the financial year 2023-24, comprising:

- up to £670,000 to support awareness grants, delivered by equity-led groups focused on the communities least likely to have an approved photo voter ID, to deliver awareness-raising and events in trusted and accessible settings
- up to £825,000 to deliver a targeted marketing and communications campaign, with pan-London coverage, to focus on communities at risk of disenfranchisement; and to complement the activity of the Electoral Commission and individual borough electoral services
- £20,000 to further develop the GLA Democracy Hub (<https://registertovote.london>) as the main information point for Londoners seeking to: register to vote; find out more about approved photo voter IDs; and apply for the free Voter Authority Certificate
- £35,000 to assign a delivery partner by the end of March 2024, following a competitive procurement process and commence the first phase of work for London Voter Registration Week 2024.

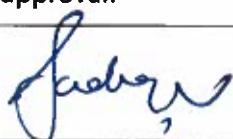
The Mayor approves a delegation to the Executive Director for Communities and Skills, to vary the breakdown of this expenditure across the four workstreams detailed above, in order to comply with the requirement to complement Electoral Commission activity, without the need for a further decision form.

Mayor of London

I confirm that I do not have any disclosable pecuniary interests in the proposed decision and take the decision in compliance with the Code of Conduct for elected Members of the Authority.

The above request has my approval.

Signature:



Date: 11/5/23

PART I – NON-CONFIDENTIAL FACTS AND ADVICE TO THE MAYOR

Decision required – supporting report

1. Introduction and background

- 1.1. Civic and democratic participation is a key pillar of social integration. The GLA has statutory powers to do anything that it considers will further the promotion of social development in Greater London. Supporting active citizenship and democratic participation furthers social cohesion and fits within this remit. The GLA's Civic and Democratic Participation work programme was established in 2019. The relevant decisions for this programme are as follows:
 - decisions that approved annual London Voter Registration Week (LVRW) activity between 2019 and 2022 are MD2447, ADD2399, MD2680, ADD2483, MD2798 and DD2557; and for 2023, MD3069
 - MD2970, DD2597 and DD2610 approved expenditure for phase one of the GLA Voter ID public awareness campaign and grants programme
 - MD3069 approved expenditure for a community delivery partner for LVRW 2023 and Voter ID awareness campaign – phase two.
- 1.2. Research from the Electoral Commission ("Accuracy and Completeness of the 2018 Electoral Registers in Great Britain", September 2019) and the Cabinet Office ("Atlas of Democratic Variation", January 2019) into the state of electoral registers shows that London has one of the lowest voter-registration rates across the UK. Not registering to vote has significant consequences for representation and inclusion in London, including exclusion from selection for jury service and increased difficulties in gaining a credit rating. The GLA, with a coalition of support, has delivered LVRW every year since 2019, engaging with under-registered and under-represented Londoners to support their democratic participation.
- 1.3. The Elections Act 2022 (the Act) introduced a requirement for voters to show an approved form of photo ID to vote in UK Parliamentary, local and other elections – including elections for the Mayor of London and London Assembly – from May 2023. Any voter who does not have an approved form of identification will be able to apply for a free Voter Authority Certificate from their local authority. The Act also makes changes to postal and proxy voting, and removes voting rights from some EU Londoners. Initial analysis on the impact of the introduction of photo ID in local elections across England in May 2023 will be published in June 2023 and a full report in September 2023.
- 1.4. Evidence from the Joseph Rowntree Foundation (February 2022), Trust for London and the 3million ("London Voices: The Journey to Full Participation", December 2021) and GLA polling (August 2022 and March 2023) identifies the demographics and communities that are least likely to have the accepted voter ID. These are:
 - young Londoners (those aged 18-25)
 - Black, Asian, Minority Ethnic and migrant Londoners, including EU Londoners
 - Deaf and disabled Londoners
 - older Londoners
 - LGBTQ+ Londoners, with a focus on trans and non-binary Londoners
 - low-income Londoners

- social and private renting Londoners, and Londoners in precarious housing, including homeless Londoners.
- 1.5. The GLA is developing and coordinating activity with the London Voter Registration Strategic Partnership (LVRSP), which is made up of representatives from professional and statutory bodies (the Association of Electoral Administrators and the Electoral Commission) and civil society organisations. Between January and March 2023, the GLA undertook phase one of the impartial Voter ID public awareness campaign. This consisted of three workstreams:
 - civic-society outreach, using a broad, pan-London coalition model for activity led by the GLA with Shout Out UK (SOUK)
 - Voter ID community awareness grants programme
 - GLA Voter ID: general awareness-raising of photo voter ID requirements through marketing and communications.
 - 1.6. The phase-one coalition activity led by the GLA and SOUK has established a coalition of over 200 partners, building on the support for the annual GLA LVRW. Coalition partners used the co-designed information resources online and offline with their beneficiaries, and in their wider networks.
 - 1.7. The phase-one Voter ID community-awareness grants supported activity in community settings for the target under-registered and under-represented groups at risk of being disenfranchised. Grants were awarded to equity-led community groups who have produced materials in community languages, and other accessible formats, for online and offline dissemination; and who have run in-person events across London.
 - 1.8. The phase-one Voter ID marketing and communications campaign raised general awareness organically via London City Hall social media channels (@LDN_gov); social media ads; radio; mainstream and community press; and posters on the Docklands Light Railway (DLR) network.
 - 1.9. The evaluation and lessons learnt from this first phase of the Voter ID campaign activity have helped shape the development and delivery of planned activity in 2023-24.
 - 1.10. Across the programme and through each strand of work, impartiality has been maintained in the messaging, design and delivery of resources and activity. This will continue into the next phase.
 - 1.11. This budget breakdown is flexible and will be reviewed depending on the Electoral Commission marketing and communications activity in preparation for the May 2024 London elections. Hence, this MD confers delegated powers to the Executive Director for Communities and Skills in case a variation to this budget breakdown is needed at any point in 2023-24. Decisions taken under the delegation will be recorded in writing.

2. Objectives and expected outcomes

Objectives

- 2.1. This MD seeks approval to design, deliver and evaluate phase two of the Voter ID campaign. The objectives are to:
 - raise awareness about civic and democratic rights and recent changes to these rights – particularly among young Londoners; Black, Asian, Minority Ethnic and migrant Londoners, including EU Londoners; Deaf and disabled Londoners; social and private renting and homeless Londoners; LGBTQ+ Londoners; older and low-income Londoners (target groups based on GLA City Intelligence research)
 - increase uptake of acceptable forms of photo ID to vote, and applications to the free Voter Authority Certificate, via the GLA coalition of support; borough electoral services support; the

Voter ID community grants; and the GLA marketing and communications campaign to address the equalities impact of the Act

- increase coordination and collaboration among statutory bodies, London councils and civil society on accessible, inclusive and representative democratic participation
- increase the number of organisations, in the civic society sector, engaged in London's democracy and democratic participation activity
- increase trust in the GLA and renewed legitimacy as conveners and reformers on civic and democratic participation.

2.2. The objectives are complementary to the associated activity taking place during the annual LVRW 2023 (approved through MD3069).

2.3. Activity to raise awareness of photo voter ID, and sign-up for the free Voter Authority Certificate, will be delivered through:

- the Voter ID community awareness grants programme
- the GLA marketing and communications campaign
- a broad, pan-London coalition of support to amplify GLA messaging and disseminate information resources.

2.4. Further details on the aims and expected outcomes for each strand are set out below.

Voter ID community awareness grants programme

Objectives

- 2.5. The aims of the grants programme are to support voter registration; raise awareness of the need for approved photo ID to vote; and increase take-up of the free Voter Authority Certificate. The grant is targeted at under-registered and under-represented Londoners at risk of being disenfranchised.
- 2.6. The phase-two grants programme will offer grants based on the size of the target community; geographic spread; and scope and scale of the planned activity. The grant fund will be open to equity-led organisations, who are best placed to reach the groups least likely to have appropriate photo ID. The grants programme would be managed by an external agency.

Expected outcomes

2.7. Delivery online and at a grassroots level will take place between July 2023 and February 2024. The expected metrics include:

- the number of Londoners reached via online and offline events
- the number of Londoners reached via the social media platforms of grantees
- the number of Londoners who apply for an approved photo voter ID
- the number of Londoners who apply for a free Voter Authority Certificate
- an increase in the number of participants who say they now: understand the voting system changes; have trust in the democratic system; and are more likely to participate, in the future, in civic and democratic life
- an increase in the confidence of civil-society organisations to undertake impartial democratic participation activity and imbed this in their core work.

GLA marketing and communications campaign

Objectives

- 2.8. Phase two of the Voter ID marketing and communications campaign will start in May 2023 and run until February 2024. It will be delivered in two sub-phases:
- May 2023 to November 2023: a clear focus on targeting groups disproportionately at risk of disenfranchisement.
 - December 2023 to February 2024: pan-London general awareness-raising and ongoing support for communities at disproportionate risk of disenfranchisement. This will run alongside expected general awareness activity delivered by the Electoral Commission.
- 2.9. Activity will be a mix of online and offline communication, using a range of channels such as: targeted out-of-home (digital outdoor) advertising; video on demand (short video across all screens to help deliver key messages through broadcast); social media ads; community radio and press; and pay-per-click marketing.
- 2.10. This GLA marketing and communications activity will be coordinated with the Electoral Commission in preparation for the May 2024 elections.

Expected outcomes

- 2.11. The reach and impact of this workstream will be measured in:
- reach, impressions and engagements for the social media activity
 - the number of panels – including print and digital billboards, bus stops, and DLR posters
 - clicks and visits to the GLA Democracy Hub (<https://registertovote.london>)
 - GLA opinion polls on voter ID awareness.

Support for further development of the GLA Democracy Hub

Objectives

- 2.12. The GLA Democracy Hub (<https://registertovote.london>) is the repository for all the LVRW and Voter ID resources in various formats (print, video, audio, British Sign Language and easy-read, as well as being available in community languages). Besides telling the story of our journey, impact and success, it is also where GLA social media ads are guiding Londoners who need to check they are registered to vote, or have an approved form of photo voter ID; and it is where they can click through to the gov.uk portal to apply for a free Voter Authority Certificate. In March 2023, over 60,000 users visited the hub.
- 2.13. The website needs further development to improve the user journey – to add new resources as they are developed, and ensure its longevity.

Expected outcomes

- 2.14. The expected outcomes for the enhancements to the GLA Democracy Hub include:
- improved user satisfaction and user engagement, as measured through length of time spent on the site/each page
 - increased numbers of Londoners clicking through to the gov.uk links to apply to register to vote, or for the free Voter Authority Certificate.

3. Equality comments

- 3.1. Under the Public Sector Equality Duty in section 149 of the Equality Act 2010, as a public authority, the Mayor and the GLA must have due regard to the need to eliminate unlawful discrimination, harassment, victimisation and any other conduct that is prohibited by or under the 2010 Act; and to advance equality of opportunity, and foster good relations, between people who share a protected characteristic and those who do not. Protected characteristics under the Equality Act are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation, and marriage or civil partnership status (the duty in respect of this last characteristic is to eliminate unlawful discrimination only).
- 3.2. Compliance with the duty may involve, in particular, removing or minimising any disadvantage suffered by those who share a relevant protected characteristic; taking steps to meet the needs of such people; and encouraging them to participate in public life, or in any other activity where their participation is disproportionately low, including tackling prejudice and promoting understanding. In limited circumstances this may require treating people with a protected characteristic more favourably than those without one.
- 3.3. This programme of work sits under the GLA equality, diversity and inclusion (EDI) cross-cutting principles, as it has a focus on tackling inequalities and barriers to civic and democratic participation among: Black, Asian, Minority Ethnic and migrant Londoners, including EU and Commonwealth Londoners; young Londoners; Deaf and disabled Londoners; LGBTQ+ Londoners; social and private renting Londoners; older Londoners; and those from a low socio-economic background. These Londoners are less likely to be registered or represented in the democratic system, or to possess an approved photo ID. Many share protected characteristics, and have been disproportionately impacted by the COVID-19 pandemic and the cost-of-living crisis. To address these inequities, the GLA will be working with Londoners that have protected characteristics to design and deliver impartial public-awareness information and activity that is accessible, inclusive and impactful. It is considered that the proposals contained in this MD, and in previous related decisions, will help many of these Londoners to better understand the voting system changes, and their civic and democratic rights – thus removing or minimising disadvantage that could otherwise arise, and encouraging participation in public life.

4. Other considerations

Key risks and issues

- 4.1. The key risks and issues are outlined below.

Risk	Mitigation	Current probability (1-4)	Current impact (1-4)	RAG
Legal: risk of activities transgressing the legal parameters in which the GLA must operate	<ul style="list-style-type: none">• Apply legal advice already provided in the run-up to, and throughout, LVRW 2019-22 and phase one of the Voter ID campaign; and continue to take legal advice, where appropriate, throughout the design and delivery phases of LVRW 2023 and phase two of the Voter ID campaign.• Apply legal advice already provided in the run-up to, and throughout, any public awareness-raising activity; and continue to take legal advice, where appropriate, throughout the design and delivery phases of the work.	1	3	G

	<ul style="list-style-type: none"> • Coordinate the GLA's activity in this area with the planned activities of local authority electoral services and the Electoral Commission. • Ensure clear separation of this work from the role of the Greater London Returning Officer (GLRO) and the Mayor of London. • Continue working with the LVRSP to provide guidance and advice; and ensure any activities facilitate, coordinate or cooperate with the activities of local authorities. 			
Reputational: risk that activities are perceived as being for any party's electoral gain, rather than for the social development of the city and its communities	<ul style="list-style-type: none"> • Build on the non-party political, impartial and non-election-specific character of all LVRW (2019-22) and phase-one Voter ID campaign assets and activities, and the broad civil-society coalition of support. • Build on ongoing cross-party support for all activity. • Ensure any activity is based on lessons learned, clear evidence and good practice. • Maintain impartiality via use of the GLA logo on information material; the @LDN_gov/London City Hall social media platforms; and non-partisan messaging, cross-party engagement and pan-London delivery. • Monitor activity to ensure that all partners, collaborators, grantees and coalition members operate to deliver GLA-led or GLA-funded activity in an impartial and non-party political manner. 	1	3	G
Delivery: the risks associated with the external context and activity not getting delivered	<ul style="list-style-type: none"> • Activity will be regularly monitored and reviewed to enable a swift response to the external public health and political contexts. • Ensure no public voter-registration activity takes place during the 2024 pre-election period on @LDN_gov/London City Hall social media. • Continue to engage with the Electoral Commission and the Association of Electoral Administrators (London branch) to align and coordinate activity and avoid duplication. 	1	4	G
Impact and reach: LVRW 2023 and the Voter ID public	<ul style="list-style-type: none"> • Apply lessons learned from past LVRWs and phase one of the voter ID awareness activity. 	1	3	G

awareness campaign do not have a wide enough reach or impact	<ul style="list-style-type: none"> • Regular review of planned activity and public awareness polls. • Build on the LVRSP and coalition of civil society partners. • If activity is not delivered, there will be an increase in: democratic inequality among under-represented and under-registered Londoners; and apathy, in the context of reduced trust in public institutions and the democratic process. 			
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Links to Mayoral strategies and priorities

- 4.2. This project is key to delivering on the high-level objective cited in the Mayor's Social Integration strategy, All of Us, to "equip more Londoners to participate in democratic processes". It builds on the commitments set out in the Mayor's EDI strategy, focusing on addressing the inequalities and barriers that are particularly detrimental to civic and democratic participation across London, but especially among under-registered and under-represented Londoners.

Consultation and impact assessments

- 4.3. Since 2017, the GLA has been running extensive engagement on its Civic and Democratic Participation programme of work and advocacy, with a diverse range of statutory and civil society stakeholders.
- 4.4. From 2021, and prior to seeking approval of this MD (and obtaining approval for MD2970, DD2597, DD2610 and MD3069), the GLA consulted with all bodies and persons that it considered appropriate. These included statutory bodies and civil-society organisations.
- 4.5. All the activities and materials co-designed and co-delivered with under-registered and under-represented London communities will be amplified via appropriate GLA channels and hosted on the GLA Democracy Hub (<https://registertovote.london>).
- 4.6. In early 2024, the delivery partner and the GLA, in consultation with appropriate statutory bodies and civil-society partners, will: review reach and impact; produce an evaluation brief; and use this brief to inform activity in 2024-25 that will build on, but not be limited to, the public awareness activity and other relevant activity delivered in 2022-23 and 2023-24.
- 4.7. No conflict of interest was identified in the drafting or clearance of this decision document.

5. Financial comments

- 5.1. Approval is being sought for expenditure of up to £1,550,000 towards the next phase of the Voter ID awareness campaign and its workstreams.

Programme	2023-24
Voter ID community awareness grants programme	Up to £670,000
Voter ID marketing and communications campaign	Up to £825,000
Democracy Hub development	£20,000
Contract delivery partner for LVRW 2024	£35,000
Total	£1,550,000

- 5.2. The expenditure will be funded from the £1,710,000 Voter Registration programme budget held within the Communities and Social Policy Unit for 2023-24. The programme sits within the EDI foundation.

- 5.3. This budget breakdown is flexible and will be reviewed depending on the Electoral Commission marketing and communications activity in preparation for the May 2024 London elections. Hence, this MD confers delegated powers to the Executive Director for Communities and Skills to vary the breakdown of this expenditure across the four workstreams, the variation must be contained within the total approved amount of £1,550,000. Decisions taken under the delegation will be recorded in writing.

6. Legal comments

- 6.1. Under section 30 of the Greater London Authority Act 1999 (as amended) (GLA Act), the GLA has a general power to do anything that it considers will further the promotion of social development in Greater London. As noted above, and in all previous related decision documents, it is considered that increasing awareness of, and participation by the electorate in, elections generally – including through increased voter registration rates and raised awareness of the voting system changes, particularly among under-registered and under-represented communities – will promote and support democratic participation and further social cohesion. On this basis, the activity proposed in this MD falls within the GLA's general power. Pursuant to section 32(1) of the GLA Act, the general power is exercisable only after consultation with such bodies or persons as the GLA may consider appropriate in the particular case. Consultation and engagement that has taken place is referred to at paragraphs 4.3 and 4.4, above.
- 6.2. As highlighted in MD2970 and MD3069, and reaffirmed in this MD, the GLA has the legal remit to carry out this activity in collaboration and coordination with statutory and public bodies. Sections 2 and 3 highlight how the proposed activities: will facilitate and support the activities of those bodies in promoting awareness of the voting-system changes, including amongst under-registered and under-represented communities; and are in line with GLA's responsibility to tackle inequality.
- 6.3. The GLA's activities in this area must at all times be apolitical, and must not be perceived to be associated with the promotion of any political party, individual politician or potential candidate. They must also be kept distinct from the functions of the GLRO, who must maintain both actual and perceived impartiality.
- 6.4. Legal advice should be taken, as appropriate, throughout the design and delivery phases to ensure all proposed activities constitute cooperation and coordination with the activities of relevant public bodies. Similarly, it will be prudent for the GLA to continue working with the LVRSP to provide guidance and advice; and to ensure that any activities facilitate, or coordinate or cooperate with, the activities of the Electoral Commission and borough electoral services.
- 6.5. Importantly, and in any event, the GLA's activities and published materials (including those published by grantees or other service providers) in this area must at all times be apolitical, objective, factual and neutral. They must not seek, or be capable of being perceived to seek, to affect public support for, or opposition to, the voting system changes, provisions of the Act or any other such related matters. They must not be capable of being perceived as designed to affect public support (positively or negatively) for a political party or a candidate in an election; and they must comply with the GLA's Use of Resources Guidance and the Code of Practice on Local Authority Publicity. Any materials produced should be reviewed to ensure compliance with the above.
- 6.6. Officers should ensure, in the purchase of works, services or supplies, that those works, services or supplies are procured by Transport for London Procurement in accordance with the GLA's Contracts and Funding Code. Officers should also ensure that appropriate contracts (containing termination-for-convenience provisions exercisable at sole discretion of the GLA) are entered into and executed by the GLA and counterparties before their commencement.

7. Planned delivery approach and next steps

7.1. The timeline below shows an integrated timeline covering LVRW 2023 and phase two of the Voter ID campaign (in italics: the activity for LVRW 2023 approved by MD3069).

Activity	Timeline
<i>Appoint the community delivery partner for phase two of the Voter ID campaign and LVRW 2023</i>	<i>March 2023</i>
Voter ID phase two marketing and communications – targeted campaign	May to November 2023
Appoint community grants management partner	May 2023
Launch Voter ID community grants programme	June 2023
Award community grants	July 2023
<i>LVRW 2023</i>	<i>18-24 September 2023</i>
Voter ID phase three marketing and communications	December 2023 to February 2024
Voter ID campaign final evaluation (self-evaluation): start date	February 2024
Voter ID campaign final evaluation (self-evaluation): end date	April 2024
Project closure	May 2024

Appendices and supporting papers:

None

Public access to information

Information in this form (Part 1) is subject to the Freedom of Information Act 2000 (FoIA) and will be made available on the GLA website within one working day of approval.

If immediate publication risks compromising the implementation of the decision (for example, to complete a procurement process), it can be deferred until a specific date. Deferral periods should be kept to the shortest length strictly necessary. **Note:** This form (Part 1) will be published either within one working day after it has been approved or on the defer date.

Part 1 – Deferral

Is the publication of Part 1 of this approval to be deferred? NO

Part 2 – Sensitive information

Only the facts or advice that would be exempt from disclosure under the FoIA should be included in the separate Part 2 form, together with the legal rationale for non-publication.

Is there a part 2 form – NO

ORIGINATING OFFICER DECLARATION:

Drafting officer to
confirm the
following (✓)

Drafting officer:

Dr. Elisabeth Pop has drafted this report in accordance with GLA procedures and confirms the following:

✓

Sponsoring Director:

Tunde Olayinka has reviewed the request and is satisfied it is correct and consistent with the Mayor's plans and priorities.

✓

Mayoral Adviser:

Debbie Weekes-Bernard has been consulted about the proposal and agrees the recommendations.

✓

Advice:

The Finance and Legal teams have commented on this proposal.

✓

Corporate Investment Board

This decision was agreed by the Corporate Investment Board on 9 May 2023.

✓

EXECUTIVE DIRECTOR, RESOURCES:

I confirm that financial and legal implications have been appropriately considered in the preparation of this report.

Signature:

Date:

D. Gane

10/05/2023

CHIEF OF STAFF:

I am satisfied that this is an appropriate request to be submitted to the Mayor.

Signature:

Date:

D. Bellamy

09/05/2023

