

REQUEST FOR ASSISTANT DIRECTOR DECISION – ADD2644

Title: Integrated Impact Assessment (IIA) of free school meal provision – procurement

Executive Summary:

This Assistant Director Decision (ADD) seeks approval of expenditure of up to £48,000 to procure a consultant to deliver an Integrated Impact Assessment (IIA).

The IIA will be required to identify the potential key impacts associated with the proposals for the universal free school meal roll-out. This will include ways to avoid and mitigate adverse impacts and enhance beneficial impacts of the proposed policy and will inform the decision-making process. The purpose of the IIA is to promote better integration of social, environmental and economic considerations in the development of key policies and programmes.

The Mayor's budget for 2023-24, approved under the cover of [MD3103](#), allocated £130m in the 2023-24 academic year (commencing in September 2023) to fund free school meals for all primary age children in the state sector who are not eligible for the government's free school meal scheme.

Decision:

That the Assistant Director – Health, Children & Young Londoners approves:

1. expenditure of up to £48,000 to commission an external consultant to conduct an Integrated Impact Assessment (IIA) of the Universal Free School Meals Programme
2. an exemption from the Contracts and Funding Code to allow for the direct award of a contract to ARUP using the budget set out at decision 1 above.

AUTHORISING ASSISTANT DIRECTOR/HEAD OF UNIT

I have reviewed the request and am satisfied it is correct and consistent with the Mayor's plans and priorities.

It has my approval.

Name: Jazz Bhogal

Position: Assistant Director – Health,
Children & Young Londoners

Signature:



Date: 30 May 2023

PART I - NON-CONFIDENTIAL FACTS AND ADVICE

Decision required – supporting report

1. Introduction and background

- 1.1. The Mayor of London believes that all primary school children should have access to a free school meal. In February 2023, the Mayor announced an historic £130m emergency, one-off funding plan to help families with the spiralling cost of living by ensuring that every primary schoolchild in London will receive free school meals in the next academic year.
- 1.2. The Mayor's budget for 2023-24, approved under the cover of [MD3103](#), allocated £130m in the 2023-24 academic year (commencing in September) to fund free school meals for all primary age children in the state sector who are not eligible for the government's free school meal scheme.
- 1.3. Families across London are desperately struggling with the spiralling cost of living and are in urgent need of more support. City Hall has repeatedly called for the Government to provide free school meals to help already stretched families, but their inaction has caused the Mayor to intervene.
- 1.4. Research has shown that hundreds of thousands of schoolchildren live in poverty but do not receive free school meals due to the restrictive eligibility criteria and lack of universal provision. Currently a household on universal credit must earn less than £7,400 a year (after tax and not including benefits), regardless of the number of children in the family, to be eligible. This means that many children from working families in poverty are not entitled to free school meals. Providing universal free school meals not only removes the stigma associated with means-testing but helps improve take-up overall. In Newham, where there is already free school meal provision for primary children, take-up went from 45 per cent before introduction to around 90 per cent in 2022.
- 1.5. This funding will help around 270,000 primary school children in the capital receive free school meals and save families around £440 across the year. This policy will ensure parents are not worrying about how they are going to feed their children during the school day.
- 1.6. This emergency funding is for one year only and the GLA will continue to call on Government to step forward and provide the funding to make this permanent. By funding a one-off scheme, the Mayor will directly impact thousands of children this year. Evidence of impact will initiate thinking on how to embed a sustainable model for universal free school meals in the future.
- 1.7. Recent polling released by the Children's Food Campaign has found that 66 per cent of UK adults think all children in primary schools should receive a free school lunch, which increases to 72 per cent with reference to the cost of living and 73 per cent with reference to Scotland and Wales's individual commitments to universal free school meals policies.
- 1.8. Food insecurity affects children's wellbeing, with children from families experiencing food insecurity more likely to suffer from mental health problems and disorders. Research suggests that making free school meals universal helps reduce stigma and boosts take up among families who need them most. In Newham, the take up of school meals rose from 45 per cent to 90 per cent following the introduction of universal free school meals.
- 1.9. International research has shown that free school lunch programmes result in substantial long-term benefits across health and educational attainment. In Sweden pupils exposed to the program during their entire primary school period have 3 per cent higher lifetime income. The effect was

greater for pupils that were exposed at earlier ages and for pupils from poor households, suggesting that the program reduced socioeconomic inequalities in adulthood.

- 1.10. Following engagement with the GLA Social Policy team and a Public Health consultant, a recommendation was made to conduct an IIA to identify potential impacts of the policy. The GLA has a common approach to IIAs – in the past, the IIA framework has provided a common set of IIA objectives to assess Mayoral strategies. As a result, ARUP were contacted based on their previous experience working with the GLA as outlined under paragraph 1.12 below.

Exemption from the Contracts and Funding Code

- 1.11. Section 9 of the Contracts and Funding Code (the “Code”) sets out procurement routes for different values. A contract of this size would normally be required to be put out to tender. However, Section 10 of the Code sets out the grounds under which there can be an exemption to normal procurement processes.
- 1.12. Decision 2 of this decision seeks the approval of an exemption from the requirement of the Code to award a consultancy contract to ARUP without first running a competitive procurement. Section 10.1 of the Code provides that a contract may be awarded directly on the basis of the service provider’s previous involvement in a specific current project or the continuation of existing work that cannot be separated from the new project/work. To that end, ARUP is a professional services firm headquartered in London that provides design, engineering, architecture, planning, and advisory services across every aspect of the built environment.
- 1.13. In 2016, the GLA commissioned ARUP to complete a full review of the London Plan, reflecting the Mayor’s priorities for London over the period up to 2041. ARUP is known by the GLA to deliver on high quality, fast paced work at a competitive price. ARUP is also a supplier on Transport for London’s (TfL’s) Procurement Framework. .

2. Objectives and expected outcomes

- 2.1. The IIA process is a tool for identifying the potential key impacts associated with the proposals for the universal free school meal roll-out, including ways to avoid and mitigate adverse impacts and enhance beneficial impacts. The purpose of the IIA is to promote better integration of social, environmental and economic considerations in the development of key policies and programmes. It will assist in informing the decision-making process, to usefully inform policy direction and withstand the significant public and political scrutiny that the policy may attract.
- 2.2. The IIA will include the following assessments:
 - Equalities Impact Assessment (EqIA)
 - Economic and Business Impact Assessment (EBIA)
 - Health Impact Assessment (HIA)
 - Environmental Impact Assessment (EA).
- 2.3. Due to the nature of this policy, a decision has been made not to conduct a ‘Community Safety Impact Assessment’. This assessment is more suited to assessments of spatial plans where there is the opportunity to design out opportunities for crime, for example, which does not apply in this case. There are also cost and time implications for this additional assessment, which would exceed the current budget sets for this piece and risk additional delays.

Outputs:

- 2.4. An initial report setting out the scope of the assessments will be developed.
- 2.5. Early findings will be included in an internal report which will cover the key assessments. This would provide a high-level outline of the baseline for each topic and the early findings emerging from the assessment of impacts, provided for internal use only.
- 2.6. The report will include the findings from a series of stakeholder engagement activities. Conducting stakeholder engagement is standard practice and advised within SEA Regulations. The GLA may be open to scrutiny if it excludes from the process.
- 2.7. A final IIA Report will be produced.

3. Equality comments

- 3.1. Section 149(1) of the Equality Act 2010 provides that, in the exercise of their functions, public authorities – of whom the Mayor is one – must have due regard to the need to:
 - eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010
 - advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
 - foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 3.2. Relevant protected characteristics are age, disability, gender re-assignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 3.3. The Mayor's Equality, Diversity and Inclusion Strategy sets out how the Mayor will help address the inequalities, barriers and discrimination experienced by groups protected by the Equality Act 2010. In this strategy the Mayor of London has, for the first time, gone beyond these legal duties; and contributed to addressing wider issues such as poverty and socio-economic inequality, as well as the challenges and disadvantage facing different groups in London including young people.
- 3.4. By ensuring all children who are living on the poverty line have a nutritious meal once a day during term time the scheme will work towards tackling the underlying determinants of ill health – including food poverty and cost of living. While this scheme could lead to wider benefits relating to health and educational outcomes of children, it is fundamentally framed as an emergency cost of living intervention. This will complement the Mayor of London's funding for holiday hunger.
- 3.5. In London, more than 2.3m Londoners live below the poverty line and 33 per cent of adults have skipped meals to save money so that their children can eat. 13 per cent of Londoners say they have been unable to buy food and other essential items in the last six months or have had to rely on outside support such as food banks. This policy seeks to improve this, with evaluation processes embedded to understand impact.
- 3.6. To ensure the GLA complies with the Public Sector Equality Duty, officers are requesting the completion of an EqIA. The EqIA will undertake a distributional appraisal of savings on food costs to households and an empirical analysis of benefits to associated businesses and the wider economy. The EqIA will identify whether people with protected characteristics would be disproportionately or differentially affected by the proposals. In particular, schools outside the

mainstream education system and communities with protected characteristics will be investigated.

4. Other considerations

4.1. Key risks and issues

<u>Risk</u>	<u>Likelihood</u>	<u>Impact</u>	<u>Mitigation</u>	<u>RAG</u>
Supplier is not appointed in time and the work is delayed.	Medium	High	IIA outputs will be used to support programme implementation rather than design and will inform sustainability strand of the project providing future value.	R
Scope of the IIA is reduced due to timing of cost pressures.	Medium	High	Officers will ensure that the scope remains robust enough to ensure the aim is achieved 'promote better integration of social, environmental and economic considerations in the development of key policies and programmes'.	R
IIA is not correctly conducted resulting in poor support against significant public and political scrutiny that the policy may attract.	Low	High	Officers will work closely to ensure the correct process is followed which will require the assessments to have an evidence-based methodology.	G
IIA does not go ahead and therefore does not inform policy development which could impact on the success of the policy	Low	Low	It is unlikely that the procurement does not go ahead.	G

Links to Mayoral strategies and priorities

- 4.2. This programme links to the Mayor's delivery of the Robust Safety Net Recovery Mission, which aims to ensure that, by 2025, all Londoners can access the support they need to avoid and alleviate financial hardship. Provision of free school meals through this programme will ensure children have at least one meal a day and reduce financial burden on parents.
- 4.3. It also contributes to the delivery of the Healthy Place, Healthy Weight Recovery Mission which aims to ensure that, by 2025, all London's families find it easier to eat healthy food and be active where they live, learn, shop, work and play. This programme provides an opportunity to promote whole school approaches to supporting the health of London's families through a set of agreed grant principles and engagement with boroughs and schools. Work through the Universal Free

School Meal programme compliments and builds on the GLA's existing support to schools through the Healthy Schools London award scheme.

- 4.4. Primarily this programme seeks to reduce the impact of the cost-of-living crisis on low-income families, which is a priority under the Getting London Back on its feet Mayoral priority.
- 4.5. Evidence suggests that the provision of free school meals has a positive impact on children's physical and mental health. Both of which are priorities within the Mayor's Health Inequalities strategy and the partnership Vision for London's Health and Care. The learning from this one-year programme has the potential to inform additional roll out of free school provision which would help work towards the Mayor's goal of London becoming the world's healthiest and fairest city.
- 4.6. There are no conflicts of interest to note for any of the officers involved in the drafting or clearance of this decision.

5. Financial comments

- 5.1. Approval is being sought for expenditure of up to £48,000 to procure an external consultant to conduct an IIA of the Universal Free School Meals Programme.
- 5.2. This will be funded from the 2023-24 HIS Programme budget.
- 5.3. There is sufficient budget within the approved 2023-24 budget to meet the expenditure of up to £48,000 in the HIS Programme budget.
- 5.4. The commission of the external consultant will be subject to satisfactory completion of the assessment on the consultant's employment status.

6. Legal comments

Power to Undertake the Requested Decisions

- 6.1. The foregoing sections of this report indicate that the proposed IIA, and decisions requested of the Assistant Director – Health, Children & Young Londoners concern the exercise of the Authority's general powers and fall within the Authority's statutory power to do such things considered to further or which are facilitative of, conducive or incidental to the promotion of economic development and wealth creation, social development and promoting the environment in Greater London and in formulating the proposals in respect of which a decision is sought, officers have complied with the Authority's related statutory duties to:
 - pay due regard to the principle that there should be equality of opportunity for all people
 - consider how the proposals will promote the improvement of health of persons, health inequalities between persons and to contribute towards the achievement of sustainable development in the United Kingdom
 - consult with appropriate bodies.
- 6.2. In taking the decisions requested, the Assistant Director must have due regard to the Public Sector Equality Duty; namely the need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Equality Act 2010, and to advance equality of opportunity between persons who share a relevant protected characteristic (age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief;

sex; sexual orientation) and persons who do not share it and foster good relations between persons who share a relevant protected characteristic and persons who do not share it (section 149 of the Equality Act 2010). To this end, the Assistant Director should have particular regard to section 3 (above) of this report.

Exemption from the Contracts and Funding Code

- 6.3. The procurement of the consultancy services from ARUP is valued at up to £48,000. Section 9 of the Code requires that the Authority undertake a formal tender process or make a call off from a suitable framework for procurements with a value between £10,000 and £150,000. However, section 10 of the Code also provides that an exemption from this requirement may be justified on the basis of the service provider's previous involvement in a specific current project or the continuation of existing work that cannot be separated from the new project/work. The officers have set out at paragraph 1.11 and 1.12 above the reasons why the procurement of ARUP falls within the said exemption. Accordingly, the Assistant Director may approve the exemption, if she be so minded.

7. Planned delivery approach and next steps

Activity	Timeline
Procurement of contract [for externally delivered projects]	May 2023
Delivery Start Date [for project proposals]	June 2023
Delivery End Date [for project proposals]	July 2023
Project Closure: [for project proposals]	September 2023

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 either be published 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

If YES, for what reason:

n/a

Until what date: (a date is required if deferring)

Part 2 – Sensitive information

Only the facts or advice that would be exempt from disclosure under 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:

Sara-Jane Millar and Ciara Cox has drafted this report in accordance with GLA procedures and confirms the following:

✓

Corporate Investment Board

This decision was agreed by the Corporate Investment Board on the 30 May 2023.

ASSISTANT DIRECTOR OF FINANCE AND GOVERNANCE:

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

Signature



Date 30 May 2023