

GREATER LONDON AUTHORITY

REQUEST FOR DIRECTOR DECISION – DD2660

Title: GLA LVRW 2024 and Voter ID campaign – phase three

Executive summary:

This decision seeks approval for expenditure of £115,000 in the financial year 2024-25 to assign a delivery partner to undertake community engagement during London Voter Registration Week (LVRW) 2024, and phase three of the GLA Voter ID public awareness campaign. Between January and March 2024, we will: assign a delivery partner following a competitive procurement process; commence the first phase of work; and start developing assets for LVRW 2024 and the next phase of the Voter ID campaign. From April 2024 onwards, subject to final budget approval for 2024-25, we will work with the delivery partner and the London Voter Registration Strategic Partnership to finalise assets; build a broad coalition of support; deliver LVRW 2024; support ongoing public awareness raising around outstanding voting system changes brought in by the Elections Act (2022); and evaluate activity.

This is separate from the £35,000 already approved via MD3122 for this workstream.

Decision:

That the Executive Director for Communities and Skills approves expenditure of £115,000, taking total expenditure to up to £150,000 in the financial year 2024-25, to deliver community engagement during London Voter Registration Week 2024 and phase three of the GLA Voter ID public awareness campaign.

AUTHORISING ASSISTANT DIRECTOR/ HEAD OF UNIT

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

It has my approval.

Name: Tunde Olayinka

Position: Executive Director,
Communities and Skills

Signature:



Date:
13/10/2023

PP Niran Mothada on behalf of Tunde Olayinka

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 and includes:
 - decisions that approved annual London Voter Registration Week (LVRW) activity between 2019 and 2022 via MD2447, ADD2399, MD2680, ADD2483, MD2798, DD2557 and, for 2023, MD3069
 - MD2970, DD2597 and DD2610, which approved expenditure for phase one of the GLA Voter ID public awareness campaign and grants programme
 - MD3122, which approved expenditure for phase two of the GLA Voter ID public awareness campaign and grants programme, and some expenditure towards LVRW 2024
 - MD3069, which approved expenditure for a community delivery partner for LVRW 2023 and Voter ID awareness campaign – phase two.
- 1.2. Research from the Electoral Commission and the Cabinet Office into the state of electoral registers shows that London has one of the lowest voter-registration rates across England. 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 introduced a requirement, from May 2023, for voters to show an accepted form of photo ID to vote in UK Parliamentary, local and other elections, including elections for the Mayor of London and London Assembly. Any voter who does not have an accepted form of identification can apply for a free Voter Authority Certificate from their local authority. The Elections Act also made changes to postal and proxy voting from October 2023, and will remove voting rights from some EU Londoners from May 2024.
- 1.4. It has been ascertained that certain demographics and communities are least likely to have the accepted photo voter ID. This is based on evidence from the Joseph Rowntree Foundation (February 2022); 'London Voices: The Journey to Full Participation' (Trust for London and the3million, December 2021); the initial Electoral Commission evaluation report into the May 2023 English elections (July 2023, updated September 2023); and GLA/YouGov polling (August 2022, March 2023 and August 2023). These groups are made up of:
 - 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.
 - 1.6. Between January and March 2023, the GLA undertook phase one of the impartial Voter ID public awareness campaign. Phase two is occurring between June 2023 and February 2024. Both phases consist of three workstreams:
 - civic society outreach and community engagement using a broad, pan-London coalition model for activity led by the GLA with Shout Out UK
 - Voter ID community awareness grants programme
 - GLA Voter ID general awareness raising of voting system changes, made in the Elections Act (2022), through a marketing and communications campaign.
 - 1.7. The community engagement workstream has increased the coalition of 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.
 - 1.8. The community grants supported activity in community settings for the targeting of under-registered and under-represented groups at risk of being disenfranchised. Grants were awarded to equity-led community groups who produced materials in community languages, and other accessible formats, for online and offline dissemination; and ran in-person events across London.
 - 1.9. The marketing and communications campaign raised awareness organically via London City Hall social media channels (@LDN_gov); social media ads; radio; mainstream and community press; and digital displays across London.
 - 1.10. The evaluation and lessons learnt from these two phases have helped shape the development and delivery of planned activity in 2024-25.
 - 1.11. 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.

2. Objectives and expected outcomes

Objectives

- 2.1. This DD seeks approval to design, deliver and evaluate the community engagement during LVRW 2024, and phase three of the GLA Voter ID public awareness 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/private renting and homeless Londoners; LGBTQ+ Londoners; older Londoners; and low-income Londoners
 - increase coordination and collaboration among statutory bodies, London councils and civil society on accessible, inclusive and representative democratic participation
 - increase trust in the GLA and renewed legitimacy as conveners and reformers on civic and democratic participation.

Expected outcomes

2.2. The expected outcomes include:

- an increase in applications to access civic and democratic rights
- an increase in political literacy uptake among education partners
- an increase in the number of organisations in the civic society sector engaged in GLA democratic participation activity and London's democracy.

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; homeless, social and private renting Londoners; older Londoners; and those from a low socio-economic background. These are the Londoners currently less likely to be registered or represented in the democratic system, or to possess an approved photo ID. Many of these Londoners share protected characteristics, 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 DD, and in previous related decisions documents, 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 2019-23, and phases one and two of the Voter ID campaign; and continue to take legal | 1 | 3 | G |

| | | | | |
|--|--|---|---|---|
| | <p>advice, where appropriate, throughout the design and delivery phases of LVRW 2024 and phase three of the Voter ID campaign.</p> <ul style="list-style-type: none"> • 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. • 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. | | | |
| <p>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.</p> | <ul style="list-style-type: none"> • Build on the non-party political, impartial and non-election-specific character of all LVRW (2019-23), phases one and two of the 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; use of @LDN_gov/London City Hall social media platforms; and non-partisan messaging, cross-party engagement and pan-London delivery. • Monitor activity and materials to ensure that all partners, collaborators, grantees and coalition members operate to deliver activity led or funded by the GLA in an impartial and non-party-political manner. | 1 | 3 | G |
| <p>Delivery – the risks associated with the external context and activity not getting delivered.</p> | <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 any pre-election period (including those for the 2024 Mayor of London/London Assembly elections, and the next general election) on @LDN_gov/London City Hall social media. | 1 | 4 | G |

| | | | | |
|--|--|---|---|---|
| | <ul style="list-style-type: none"> Continue to engage with the Electoral Commission and the Association of Electoral Administrators (London branch) to align and coordinate activity and avoid duplication. | | | |
| Impact and reach – LVRW 2024 and the Voter ID public awareness campaign do not have a wide enough reach or impact | <ul style="list-style-type: none"> Apply lessons learned from past LVRWs and Voter ID awareness activity. Regularly review 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 an increase in apathy, in the context of reduced trust in public institutions and the democratic process. | 1 | 3 | G |

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 the approval of this DD (and all other relevant decision documents), 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 (registertovote.london).
- 4.6. In early 2025, 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 2025-26 that will build on, but not be limited to, the public awareness activity and other relevant activity delivered in the previous financial years.
- 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 £115,000 to assign a delivery partner to undertake community engagement during LVRW 2024, and phase three of the GLA Voter ID public awareness campaign.

| Programme | 2024-25 |
|---|-----------------|
| Community delivery partner – LVRW 2024 and phase three of the Voter ID campaign | £115,000 |
| Total | £115,000 |

- 5.2. The expenditure will be funded from the Voter Registration baseline budget held within the Communities and Social Policy Unit for 2024-25. The programme sits within the EDI foundation.
- 5.3. This is separate from the £35,000 already approved via MD3122, thus taking total expenditure to up to £150,000 in 2024-25 for this workstream.
- 5.4. Funding for future financial years will be subject to the annual budget-setting process and is subject to change. The expenditure of £115,000 in 2024- is within the agreed planned budget and will be confirmed as part of the annual budget-setting process.

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, particularly among under-registered and under-represented communities, and raising 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 DD 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 which has taken place is referred to at paragraphs 4.3 and 4.4, above.
- 6.2. As highlighted in MD3122 and other relevant decision documents, and reaffirmed in this DD, 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 or 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 Elections Act 2022 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 Government Publicity. Any materials produced should be reviewed to ensure compliance with the above. As noted above, no public voter registration activity should take place during any pre-election period (including those for the 2024 Mayor of London/London Assembly elections and the next general election on @LDN_gov/London City Hall) social media.
- 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; and 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

| Activity | Timeline |
|--|---|
| Procurement of contract | December 2023/ January 2024 |
| Appoint delivery partner for LVRW 2024 and phase 3 of Voter ID public awareness campaign | By end of February 2024 |
| LVRW potential launch and delivery start date | September 2024 |
| LVRW delivery end date | September 2024 |
| LVRW final evaluation | Start: September 2024 End: November 2024 |
| Voter ID public awareness campaign phase 3 potential launch and delivery start date | June 2024 |
| Voter ID public awareness campaign phase 3 delivery end date | February 2025 |
| Voter ID campaign final evaluation | Start: February 2025 End: April 2025 |
| Project closure | May 2025 |

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:

✓

Assistant Director/Head of Service:

Navprit Rai has reviewed the documentation and is satisfied for it to be referred to the Sponsoring Director for approval.

✓

Advice:

The Finance, Governance and Legal teams have commented on this proposal.

✓

Corporate Investment Board


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

✓

INTERIM CHIEF FINANCE OFFICER:

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

Signature:



Date:

13/10/2023