

GREATER LONDON AUTHORITY

REQUEST FOR MAYORAL DECISION – MD3171

Title: Provision of food insecurity support to the Stamford Hill Charedi Communities

Executive summary:

This Mayoral Decision seeks approval of expenditure of £450,000 in grant funding to the London Borough of Hackney. This is to onward-grant to organisations within the Orthodox Jewish Charedi communities of Stamford Hill, in the London boroughs of Hackney and Haringey, to alleviate food insecurity in these communities.

This support will complement the Mayor's decision under [MD3105](#) to fund and deliver the Holiday Hunger programme.

Decision

That the Mayor approves expenditure of up to £450,000 in grant funding, to be distributed via the GLA's partner Hackney council to the Charedi communities in Haringey and Hackney.

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:

4/12/23

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

Decision required – supporting report

1. Introduction and background

- 1.1. Food insecurity is a significant challenge in London. The 2021-22 Survey of Londoners found that 16 per cent of adults – or around 1.2m adults – had low or very low food security. The current situation is likely to be more pronounced than these figures suggest, as the survey took place while emergency support measures from the government were in place; and before inflationary pressures within the economy began to have significant impacts on food, fuel and other living costs.
- 1.2. In response to these growing living costs, and in addition to making continued funding available for financial hardship-focused work programme, the final GLA: Mayor 2023-24 budget allocated funding for the Holiday Hunger programme. (The budget was published in March 2023, and authorised under cover of MD3103.) The programme, launched in Easter 2023, gives grant funding to delivery partners the Felix Project and the Mayor's Fund for London, to provide more ready-made meals, and recipe-based cook-at-home meals, to London families. This provision is based on surplus food and distributed via a range of delivery vehicles.
- 1.3. The programme is open to all London households, and has no eligibility criteria attached. It has been publicised via a wide range of communications and engagement channels to ensure that Londoners are aware of the support available. Meals are being delivered to a diverse range of community partner organisations in all boroughs across London, predominantly during school holidays.
- 1.4. However, where young people in a specific community are known to have a disproportionately high risk of experiencing food insecurity, and cannot access the Holiday Hunger programme, there is a case for providing targeted support where it is proportionate to do so. This is likely to be the case where members of a group or community have dietary requirements relating to a shared protected characteristic – such as religion or belief – that cannot be catered for within the programme's delivery model.
- 1.5. This decision form seeks approval for expenditure of £450,000 of GLA budget for 2023-24 to provide support to households within the Charedi (Ultra-Orthodox Jewish) communities in Hackney/Haringey as one such group.

2. Objectives and expected outcomes

Overarching objective

- 2.1. The overarching objective of this decision is to alleviate experiences of food insecurity during school holidays within Charedi communities in Hackney/Haringey. This is to be done by providing support to complement and reinforce other food-insecurity initiatives that may not be accessible to these communities. Due to the chosen delivery method, some provision is likely to be made available outside of school holidays.

Delivery method

- 2.2. The support to communities will be delivered via Hackney council. However, it has been agreed that organisations supporting all parts of the Charedi communities in Stamford Hill – located on either side of the boundary between Hackney and Haringey councils – will be funded.
- 2.3. It has been recommended by Hackney and Haringey councils that the funding will be delivered via Hackney's Household Support Fund scheme – which uses funding made available to local authorities by the Department for Work and Pensions. This will enable the funding to be rapidly deployed to community organisations that support the Charedi communities in Hackney/Haringey, via trusted routes and established funding relationships and monitoring systems.

- 2.4. The funding will be allocated between December 2023 and May 2024.
- 2.5. It is expected that the funding will be used for a combination of vouchers for mainstream supermarkets, and direct payments to families with the highest levels of need. Most households targeted by this programme will have at least one household member aged between 7 and 11.
- 2.6. The vouchers will enable households to purchase items such as fruit and vegetables; some household cleaning supplies; sanitary items; and other items that do not need kosher certification. This will free up household budgets to spend money in specialised supermarkets for community-specific foods that may not otherwise be available or affordable.
- 2.7. The use of funding in this way would be a continuation of existing approaches taken by Hackney council to support these communities.
- 2.8. Whilst associated costs to the delivery of this programme are expected, these are incorporated into the budget envelope. Where it is proposed that the programme sits behind existing delivery routes, these are expected to resemble the level of support offered to existing voluntary organisations for the administration of their existing programmes.

Expected outcomes

- 2.9. As the funding is expected to be channelled through Hackney's Household Support Fund scheme, at least in part, the existing monitoring and outcomes frameworks for this scheme will be used. Given the nature of the organisations being funded via these schemes, and the forms of support being provided, the outcomes data is likely to predominantly consist of information on the number of households, including household size and/or make-up of household members supported.
- 2.10. In a previous round of its Household Support Fund (running from October 2022 to March 2023), Hackney provided support to 8,935 children in 1,847 households, with £426,000. The reach of this funding tranche will differ for many reasons – for example, reaching families who have not previously been supported as they have been on waiting lists, are newly in need, or have only recently been referred to services. However, this tranche is anticipated to be of a similar order of magnitude to the previous one.

3. Equality comments

- 3.1. 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 Act
 - advance equality of opportunity between people who share a relevant protected characteristic and persons who do not share it
 - foster good relations between people who share a protected characteristic and those who do not.
- 3.2. Through this decision, the GLA is seeking to channel support to groups that share a protected characteristic, where young people are known to have a disproportionately high risk of experiencing food insecurity, and are unable to access the Holiday Hunger programme due to the delivery model being implemented for that programme. (Specifically, this refers to the distribution of meals or meal kits prepared using redistributed surplus food, where the meals/meal equivalents are incompatible with their dietary requirements.)
- 3.3. There are a range of factors indicating that London's Charedi communities have high levels of food insecurity and cannot access the Holiday Hunger programme. They are therefore potentially in need of additional support to help serve the programme goals of reducing the extent of holiday food insecurity.

- 3.4. There is a lack of official data on the size and nature of London's Charedi communities. However, evidence indicates two clusters of significantly sized communities within London: one on the Hackney/Haringey border in the Stamford Hill area; and another across three areas of the borough of Barnet (Golders Green, Hendon and Edgware). The available data suggests that the communities are of similar size.
- 3.5. There is also evidence that London's Charedi communities experience relatively high levels of poverty/relative low income; and that they experience additional financial pressures as a result of larger-than-average family sizes. (This leaves low-income Charedi households particularly affected by policies such as the two-child benefit limit.) These pressures also arise from the additional costs associated with observing a strict kosher diet. However, there are potential differences between the Stamford Hill and Barnet communities. Small area data shows that poverty rates in the wards across Stamford Hill with significant Charedi populations (Cazenove, Stamford Hill West, Springfield and Woodberry Down in Hackney; and Seven Sisters in Haringey) range between 16.5 per cent and 25.3 per cent, compared to a London-wide average of 14.2 per cent. Across the Barnet wards (Hendon, Golders Green and Edgware), the rates are between 12.9 per cent and 15.1 per cent.
- 3.6. As referenced above, groups sharing protected characteristics could be excluded from the Holiday Hunger programme due to dietary requirements linked to religious practices. Whilst the meals and meal equivalents being distributed through the programme include options that will be appropriate for most religious groups, delivery partners have been clear they will not be appropriate for those observing a strict kosher diet. This is specifically related to issues of kosher certification of prepared food, which needs to be prepared with specific ingredients and under supervision, in a certified environment (which is unrelated to hygiene).
- 3.7. It is recognised that there may be other communities, with protected characteristics, that have some barriers accessing the Mayoral initiatives addressing food insecurity. However, it appears that that Stamford Hill's Charedi community is the sole identifiable community, of significant size, that is likely to experience a higher-than-average risk of food insecurity, and to be unable to access the alleviative support the GLA is currently providing, by virtue of dietary requirements.

4. Other considerations

Key risks and issues

Risk	Current probability	Current impact	RAG	Mitigation
Volatility of food prices impacts the buying power of fixed-income households.	3	3	A	Provision of funding into a community with good internal welfare services reduces risk to individual residents.
Inflation in the price of kosher food, making it unaffordable.	3	3	A	Provide support to sector organisations to establish cash-first options; and work with residents to build economies of scale.
Speed of delivery required from partners puts pressure on services and risks delays.	2	2	A	Investment in organisational capacity alongside food provision to ensure that programme is delivered at scale. Ensure robust partnership arrangements and governance are in place to track need.

Conflicts of interest

- 4.1. There are no conflicts of interest to note for any of the officers involved in the drafting or clearance of this decision form.

Links to Mayoral strategies and priorities

- 4.2. This work links to the Mayor's delivery of the Robust Safety Net Recovery Mission, described in [MD2732](#). This aims to ensure that, by 2025, all Londoners can access the support they need to avoid or alleviate financial hardship. This includes work to ensure that Londoners who need crisis support and emergency food aid can access it.
- 4.3. It contributes to the delivery of: the Healthy Place Healthy Weight Recovery Mission, which aims to ensure that by 2025, all London's families will find it easier to eat healthy food and be active where they live, learn, shop, work and play; and the Building Strong Communities Mission (which aims to ensure that by 2025, all Londoners will have access to a community hub ensuring they can volunteer, get support and build strong community networks).

Considerations for the provision of grant funding

- 4.4. This programme has been informed by consultation with the two local authorities working to support Charedi Londoners facing food poverty. This ensures it meets the most urgent needs of Charedi Londoners, and complements other regional and local initiatives to fill gaps in provision for families.
- 4.5. It is considered that the funding proposed in this decision constitutes the award of grant payment funding, rather than a contract for services under the GLA's Contracts and Funding Code. This is for the following reasons:
- it would support and expand existing third-party (rather than GLA) projects that align with the Mayor's priorities, but is the initiative of the third party in question; in this case support for community organisations and individuals through Hackney council's Household Support Fund scheme
 - the GLA would not receive a direct or indirect benefit as a result; the benefits would instead accrue to Charedi Londoners.
- 4.6. The strategy of providing grant funding directly to Hackney and Haringey councils' Household Support Funds has been chosen for the following reasons:
- Hackney and Haringey share the largest Charedi population in London
 - while there are other Charedi communities in London, that which is found in Hackney and Haringey has a higher level of financial deprivation than any other, and a significantly higher percentage of young people in independent schools (who, therefore, do not qualify for universal free school meals)
 - Hackney and Haringey councils both have pre-existing contractual relationships within the Charedi community. As a result, they are far better placed than the GLA to deliver this programme at speed.

Subsidy control

- 4.7. GLA officers have carried out an analysis of the proposal against the Statutory Guidance for the UK Subsidy Control Regime.¹ They have assessed that the Subsidy Control Regime is non-applicable in these circumstances, because the proposed financial assistance does not constitute a subsidy.

¹ BEIS, [Statutory Guidance for the United Kingdom Subsidy Control Regime](#), November 2022

- 4.8. In particular, the proposed financial assistance fails to satisfy Limb B of the four-limbed test set out in the Subsidy Control Act, as the immediate recipient of the funding (Hackney council) is a public body carrying out a public function – namely providing support to charitable organisations supporting local communities – that falls within its statutory remit. Furthermore, the ultimate beneficiaries of the funding are charitable organisations, who are not engaged in economic activity to offer goods or services on a market. They provide free, charitable support to low-income Londoners, and depend entirely on donations or ringfenced grants to fund their operations.
- 4.9. This proposal is consistent with the example set out in the Statutory Guidance for the UK Subsidy Control Regime (section 2.17, page 26). This states that “a ringfenced grant to a charity for its non-economic activities (even if the charity also provides some goods or services on the market)” is unlikely to meet the four-limbed test. As such, no further assessment of the proposal against the Subsidy Control Principles is deemed necessary.

5. Financial comments

- 5.1. Approval is sought for the expenditure of up to £450,000 in grant funding, to be distributed via the GLA’s partner, Hackney council, to the Charedi Communities in Haringey/Hackney in 2023-24.
- 5.2. This will be funded by a transfer from the programme budget for the Health, and Children and Young Londoners teams, to the Holiday Hunger programme budget, within the Communities and Social Policy unit.
- 5.3. There is sufficient budget to cover this expenditure of £450,000 in 2023-24.

6. Legal comments

- 6.1. The decisions requested of the Mayor fall within the general powers in section 30 of the Greater London Authority Act 1999 (GLA Act) exercisable by the Mayor on behalf of the GLA to do anything that he considers will further any one or more of the GLA’s principal purposes. Those principal purposes include the promotion of social development in Greater London. Section 34 of the GLA Act also allows the Mayor to do anything that is calculated to facilitate, or is conducive or incidental to, the exercise of any functions of the GLA exercisable by the Mayor. In formulating the proposals in respect of which a decision is sought, officers have complied with the GLA’s related statutory duties to:
- have due regard to the principle that there should be equality of opportunity for all people (section 33(1) of the GLA Act)
 - consider how the proposals are best calculated to promote the improvement of health of persons living in Greater London, promote the reduction of health inequalities between persons in Greater London, contribute towards the achievement of sustainable development in the United Kingdom and contribute towards the mitigation of, or adaptation to, climate change in the United Kingdom (section 30(5) of the GLA Act)
 - consult with bodies or persons as the GLA may consider appropriate in the particular case (section 32(1) of the GLA Act).
- 6.2. In taking the decisions requested of him, the Mayor must have due regard to the need to eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by or under the Equality Act 2010 (“the Act”); advance equality of opportunity between people who share a relevant protected characteristic (race, disability, age, sex, sexual orientation, religion or belief, pregnancy and maternity, and gender reassignment) and people who do not share it; and foster good relations between persons who share a relevant protected characteristic and persons who do not (section 149 of the Act). To this end, the Mayor should have particular regard to section 3 (above).

- 6.3. The decision, above, seeks approval for a grant of up to £450,000 to Hackney council. This grant is a conditional gift, rather than a contract for services and supplies. As explained at 2.9 and 4.6, above, the recipient will use the funding to carry out its public functions. An appropriate funding agreement should be put in place between the GLA and Hackney council before any funding is provided.
- 6.4. The Subsidy Control Act 2022 requires that grant funding be assessed in relation to a four-limbed test. Officers have made this assessment at paragraphs 4.7 to 4.9, above, and have concluded that the proposed funding does not amount to an unlawful subsidy.

7. Planned delivery approach and next step

Activity	Timeline
Finalise grant agreement	December 2023
First tranche provided	December 2023
Data returned	January 2024
Second tranche provided	February 2024
Data returned	March 2024
Third tranche delivered	April 2024
Data returned	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 – Yes

ORIGINATING OFFICER DECLARATION:

Drafting officer to
confirm the
following (✓)

Drafting officer:

Phillip Vaughan 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 27 November 2023.

✓

INTERIM CHIEF FINANCE OFFICER:

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

Signature:



Date:

30/11/2023

CHIEF OF STAFF:

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

Signature:



Date:

30/11/2023