

# GREATER LONDON AUTHORITY

## REQUEST FOR MAYORAL DECISION – MD3205

### Title: GLA Voter ID campaign – phase three

#### Executive summary:

This decision seeks approval for expenditure of £595,000 in the financial year 2024-25 to deliver the next phase of the impartial GLA Voter ID awareness campaign (May/June 2024 to February 2025). This campaign consists of a community grants programme; a marketing and communications campaign, supported by online information on the GLA Democracy Hub; and ongoing voter registration awareness-raising. This activity will be complemented by the annual London Voter Registration Week 2024, which has already been approved by [DD2660](#).

#### Decision:

The Mayor approves:

- expenditure of £595,000, in 2024-25 comprising:
  - £300,000 to support grants, awarded to equity-led groups (focused on the communities least likely to be registered to vote, have an accepted photo Voter ID or be aware of other Elections Act 2022 voting system changes) to deliver awareness-raising and events in trusted and accessible settings
  - £230,000 to deliver a marketing and communications campaign, with pan-London coverage, and a focus on communities at risk of disenfranchisement, while coordinating with 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 accepted photo Voter IDs; and apply for the free Voter Authority Certificate
  - £45,000 to assign a delivery partner by the end of March 2025, following a competitive procurement process, and commence the first phase of work for London Voter Registration Week 2025
- a delegation to the Executive Director for Communities and Skills, to vary the breakdown of this expenditure across the four workstreams detailed above, given current uncertainty around the electoral timetable for the 2024 general election, 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:

31/1/24

## **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 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 following decisions are relevant to this programme:

- MD2447, ADD2399, MD2680, ADD2483, MD2798 and DD2557 approved annual London Voter Registration Week (LVRW) activity between 2019 and 2022
- 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 the Voter ID awareness campaign – phase two; MD3122 approved expenditure for the Voter ID awareness campaign and grants programme – phase two
- DD2660 approved expenditure for a community delivery partner for LVRW 2024 and the Voter ID awareness campaign – phase three.

1.2. Research from the Electoral Commission into the state of the December 2022 electoral registers<sup>1</sup> shows that London has one of the lowest voter-registration rates in England. Not registering to vote has significant consequences for representation and inclusion in London, such as 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 Elections Act) has introduced a requirement for voters to show an accepted form of photographic identification (photo ID) to vote in UK Parliamentary, local and other elections, including elections for the next Mayor of London and London Assembly in May 2024. Any voter who does not have a photo Voter ID 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 removes voting rights from some EU Londoners (this change will come into effect after the May 2024 London elections).

1.4. Evidence from a variety of sources, including GLA polling carried out in March and August 2023, identified that certain demographics and communities are least likely to have the accepted voter ID. These are:

- young Londoners (18-25-year-olds)
- Black, Asian, Minority Ethnic and migrant Londoners, including EU Londoners
- D/deaf and disabled Londoners
- older Londoners
- LGBTQ+ Londoners, with a focus on trans and non-binary Londoners
- low-income Londoners

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<sup>1</sup> Electoral Commission, [2023 report: Electoral registers in the UK](#) (updated 2 October 2023)

- 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. In the financial year 2023-24, between June 2023 and February 2024, the GLA is undertaking phase two of the impartial Voter ID public awareness campaign. This consists of three workstreams:
  - civic society outreach using a broad, pan-London coalition model for activity led by the GLA and a community delivery partner
  - GLA Voter ID community awareness grants programme
  - GLA Voter ID marketing and communications campaign with a community focus, and pan-London coverage.
- 1.6. The phase two coalition activity led by the GLA has established a broad coalition of partners building on the support for the annual GLA LVRW. Coalition partners use the co-designed information resources online and offline with their beneficiaries, and in their wider networks.
- 1.7. The phase two Voter ID community awareness grants support activity in community settings for under-registered and under-represented groups at risk of being disenfranchised. Grants are awarded to equity-led community groups to produce materials in community languages, and other accessible formats, for online and offline dissemination; and to run in-person events and outreach across London.
- 1.8. The phase two Voter ID marketing and communications campaign is raising general awareness organically via London City Hall social media channels (@LDN\_gov), and in communities via social media ads, radio, and mainstream and community press. This coverage will run until the pre-election period begins on 19 March for the 2 May 2024 London elections.
- 1.9. The evaluation and lessons learnt from phases one and two of the Voter ID campaign activity have helped shape the development and delivery of planned activity in 2024-25.
- 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 coordination with other statutory bodies in view of the uncertainty around the electoral timetable for the 2024 general election. Hence, this MD confers delegated powers on the Executive Director for Communities and Skills in case a variation to this budget breakdown is needed at any point in the financial year 2024-25. 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 three 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; D/deaf and disabled Londoners; social and private renting Londoners, and homeless Londoners; LGBTQ+ Londoners; older Londoners; and low-income Londoners (these target groups are based on GLA City Intelligence research)

- increase uptake of accepted 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 GLA Voter ID community grants; and the GLA marketing and communications campaign to address the equalities impact of the Elections 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
- the objectives are complementary to the associated activity taking place during the annual LVRW 2023 (approved through MD3069).

2.2. There will be activity to raise awareness of photo Voter ID; support to apply for the free Voter Authority Certificate, or to register to vote; and to raise awareness of changes to postal and proxy voting, and the voting rights of some EU Londoners. This be delivered via the following:

- the GLA 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.

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

#### GLA Voter ID community awareness grants programme

##### *Objectives*

- 2.4. The aim of the grants programme is to support voter registration, increase awareness and take up of accepted photo ID to vote and of the free Voter Authority Certificate, and to increase awareness of changes to postal and proxy voting, and the voting rights of some EU Londoners. The grants are targeted at under-registered and under-represented Londoners at risk of being disenfranchised.
- 2.5. The phase three 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 possess accepted photo Voter ID. The grants programme would be managed by an external agency.

##### *Expected outcomes*

- 2.6. Delivery online and in person will take place between July 2024 and February 2025. 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 supported to register to vote
  - the number of Londoners who apply for an accepted photo Voter ID or the free Voter Authority Certificate

- an increase in the number of participants who say they now understand the voting system changes and the democratic system; and who 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 it in their core work.

#### GLA marketing and communications campaign

##### *Objectives*

- 2.7. Phase three of the Voter ID marketing and communications campaign will start after the May 2024 Mayor of London and London Assembly elections; and run until February 2025. It will be a pan-London general awareness-raising campaign, while maintaining a focus on the channels used by communities at risk of disenfranchisement.
- 2.8. Activity will be a mix of online and offline communications, using a range of channels shown to best perform during phase one and two.
- 2.9. This GLA marketing and communications activity will be coordinated with statutory organisations, including the Electoral Commission and borough electoral services, in preparation for the general election expected in 2024 – which can take place at any time before the end of January 2025.

##### *Expected outcomes*

- 2.10. The reach and impact of this workstream will be measured in:
  - reach, impressions and engagements for social media activity
  - number of plays and impacts for physical marketing displays
  - clicks and visits to the GLA Democracy Hub ([registertovote.london](https://registertovote.london/))
  - GLA opinion polls on voter ID awareness and other relevant voting system changes.

#### Support for further development of the GLA Democracy Hub

##### *Objectives*

- 2.11. 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, easy-read and community languages). Besides telling the story of our journey, impact and success, it is also where GLA social media ads are directing Londoners who need to check they are registered to vote/have an accepted form of photo Voter ID. Londoners can also click through, from the Hub, to the gov.uk portal to apply for a free Voter Authority Certificate.
- 2.12. The website needs further development and maintenance to improve the user journey; add new resources as they are developed; and ensure its longevity.

##### *Expected outcomes*

- 2.13. The expected outcomes for the enhancements to the GLA Democracy Hub include:
  - improved user satisfaction and user engagement, as measured through time spent on the site/each page
  - increased numbers of Londoners clicking through to the gov.uk links to register to vote, or apply 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) foundation, 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; D/deaf and disabled Londoners; LGBTQ+ Londoners; social and private renting Londoners, and Londoners in precarious housing, including homeless 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 accepted photo ID. Many of these Londoners with protected characteristics have been disproportionately impacted by the COVID-19 pandemic and the cost-of-living crisis.
- 3.4. To address these inequities, the GLA will be working with Londoners that have protected characteristics to co-design and co-deliver impartial public-awareness information and activity that is accessible, inclusive, impartial and impactful. It is considered that the proposals contained in this Mayoral Decision (MD), and in previous related decision forms, 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"><li>• 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 advice, where appropriate, throughout the design and delivery phases of LVRW 2024 and phase three of the Voter ID campaign.</li><li>• Coordinate the GLA's activity in this area with the planned activities of local authority electoral services and the Electoral Commission.</li></ul>	1	3	G

	<ul style="list-style-type: none"> <li>• Ensure clear separation of this work from the role of the Greater London Returning Officer (GLRO) and the Mayor of London.</li> <li>• Continue working with the LVRSP to provide guidance and advice; and ensure any activities facilitate, coordinate or cooperate with the activities of local authorities.</li> </ul>			
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"> <li>• Build on the non-party political, impartial and non-election-specific character of all LVRWs (2019-23); phases one and two of the Voter ID campaign assets and activities; and the broad civil society coalition of support.</li> <li>• Build on ongoing cross-party support for all activity.</li> <li>• Ensure any activity is based on lessons learned, clear evidence and good practice.</li> <li>• 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.</li> <li>• Monitor activity to ensure that all partners, collaborators, grantees and coalition members operate to deliver GLA-led or funded activity in an impartial and non-party political manner.</li> </ul>	1	3	G
Delivery: the risks associated with the external context and activity not getting delivered	<ul style="list-style-type: none"> <li>• Activity will be regularly monitored and reviewed to enable a swift response to the external public health and political contexts.</li> <li>• Ensure no public voter registration activity takes place during the pre-election period for the 2024 Mayor of London and London Assembly election, or in the lead-up to the next general election, on the @LDN_gov/London City Hall social media platforms.</li> <li>• Continue to engage with the Electoral Commission and the Association of Electoral Administrators (London branch) to align and coordinate activity and avoid duplication.</li> </ul>	1	4	G
Impact and reach: LVRW 2024 and the Voter ID public awareness campaign – phase three – do not have a wide enough reach or impact	<ul style="list-style-type: none"> <li>• Apply lessons learned from past LVRWs and phases one and two of the voter ID awareness activity.</li> <li>• Regular review of planned activity, via community insight and public awareness polls.</li> <li>• Build on the LVRSP and coalition of civil society partners.</li> <li>• If activity is not delivered, there will be an increase in democratic inequality among</li> </ul>	1	3	G

	under-represented and under-registered Londoners; and an increase in 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, and especially among under-registered and under-represented Londoners. It also sits under the "Social Justice" theme in the [FY 2024-25 budget](#).

#### 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, MD3069, MD3122 and DD2660), the GLA consulted with all bodies and persons that it considered appropriate on the equalities impact of the Elections Act. 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](https://www.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 in the financial year 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 £595,000 towards the next phase of the GLA Voter ID awareness campaign and its workstreams.

<b>Programme</b>	<b>2024-25</b>
Voter ID community awareness grants programme	£300,000
Voter ID marketing and communications campaign	£230,000
Democracy Hub development	£20,000
Contract delivery partner for LVRW 2024	£45,000
<b>Total</b>	<b>£595,000</b>

- 5.2. The expenditure will be funded from the £710,000 Voter Registration programme budget corresponding to the GLA Civic and Democratic Participation programme. This is held within the Communities and Social Policy Unit for 2024-25. The programme sits within the EDI foundation.
- 5.3. This budget breakdown is flexible, and will be reviewed depending on confirmation of the electoral timetable for the 2024 general election, which needs to take place before the end of January 2025. Hence, this MD confers delegated powers on the Executive Director for Communities and Skills in case



a variation to this budget breakdown is need at any point in the financial year 2024-25. Decisions taken under the delegation will be recorded in writing.

- 5.4. Funding for future financial years is subject to the annual budget setting process and subject to change. The expenditure of £595,000 from the Voter Registration budget in the 2024-25 financial year is assumed to be affordable and can only be confirmed when the budget allocation is formally approved as part of the annual budget setting and approval process.
- 5.5. Any contracts that commit the GLA in future years will be subject to appropriate break clauses.

## **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 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 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 MD3122 and DD2660, 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, above, 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. 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.
- 6.4. 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 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. They must also be kept distinct from the functions of the GLRO, who must maintain both actual and perceived impartiality. Any materials produced should be reviewed to ensure compliance with the above.
- 6.5. Officers should ensure, in the purchase of works, services or supplies, that: those works, services or supplies are procured by TfL Procurement, where applicable, 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**

- 7.1. The timeline below shows an integrated timeline covering LVRW 2024 and phase three of the GLA Voter ID campaign (in italics: the activity for LVRW 2024 approved by DD2660).

<b>Activity</b>	<b>Timeline</b>
Appoint the community delivery partner for phase three of the Voter ID campaign and LVRW 2024	March 2024
Voter ID marketing and communications campaign - phase three	June 2024 – February 2025
Appoint community grants management partner	May 2024
Launch Voter ID community grants – phase three	June 2024
Delivery Voter ID grants programme – phase three	July 2024 – February 2025
LVRW 2024	16 – 22 September 2024
Voter ID campaign final evaluation (self-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:

✓

#### Sponsoring Director:

Niran Mothada 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

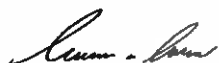
This decision was agreed by the Corporate Investment Board on 29 January 2024.

✓

### INTERIM CHIEF FINANCE OFFICER:

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

**Signature:**



**Date:**

30/01/2024

### CHIEF OF STAFF:

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

**Signature:**



**Date:**

29/01/2024

