# **GREATER LONDON AUTHORITY**

## **REQUEST FOR DIRECTOR DECISION – DD2703**

Title: Universal Free School Meals Programme 2024-25

# **Executive Summary:**

The Mayor of London believes that all school children in state-funded primary schools (including state-funded special schools and Alternative Provision), should continue to have access to the provision of universal free school meals (UFSM). The funding will cover the cost of meals within term time for the September 2024 – July 2025 academic year.

This Director Decision seeks approval for the allocation of UFSM funds (as approved in MD3224) and provides a full breakdown of the programme budget for the 2024-25 and 2025-26 financial years. It also provides an update on the current version of the Integrated Impact Assessment (IIA).

The Executive Director of Communities and Skills is asked to approve the total expenditure of up to £140m to deliver on the purpose set out above.

#### **Decision:**

That the Executive Director of Communities and Skills approves:

- 1. expenditure of up to £139.45m which will be allocated to London borough councils (boroughs) as grant funding to continue to deliver UFSM to eligible key stage 2 (KS2) children within London state-funded primary schools for the 2024-25 academic year
- 2. expenditure of up to £406k to support any costs related to any increased meal requirements beyond those for which funding has already been allocated in state-funded primary schools and address issues related to delivery in schools and/or access requirements, including specific needs related to protected characteristics, such as pupils with special educational needs and disabilities (SEND) and pupils who may have specific dietary requirements in connection with their religion or belief
- 3. expenditure of up to £143k to expand and continue the existing work of the UFSM programme evaluation and communications activities.

#### **AUTHORISING DIRECTOR**

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

It has my approval.

1. Rayula

Name: Tunde Olayinka

Position: Executive Director –
Communities & Skills

Signature: Date:

16/07/2024

¹ The census data used to calculate allocations is from January 2024 and is for year 3 − 6 on that date, so the actual cohort in the 2024-25 academic year may vary from these numbers. Additional meal requirements could also arise from population movement between boroughs including refugees and migrants or changes to school pupil capacity.

## PART I - NON-CONFIDENTIAL FACTS AND ADVICE

### Decision required - supporting report

# 1. Introduction and background

- 1.1. In February 2023, the Mayor announced a £130m emergency funding plan to help families with the spiralling cost-of-living by ensuring that primary school children in state-funded primary schools in London receive universal free school meals (UFSM) in the next academic year.
- 1.2. On 9 January 2024 the Mayor of London announced his intention to allocate £140m in his 2024-25 budget to extend the UFSM scheme for another year from September 2024, with a view to continuing to help families.
- 1.3. MD3224 approved expenditure of this budget to cover grants of varying amounts to be allocated to the boroughs and delivered to state-funded primary schools (including state-funded special schools and Alternative Provision), depending on the number of eligible school children in each borough (this includes up to £2.5m to fund an uplift for the additional costs of kosher meals and where exceptional costs arise for children with special educational needs and disabilities (SEND), as well as programme costs).
- 1.4. Children are only eligible for national government funded free school meals (FSM) if they are in a state-funded primary school and are either in key stage 2 (KS2) (year 3 6) and live in households on universal credit earning less than £7,400 a year (after tax and not including benefits), regardless of the number of children in the family, or in key stage 1 (KS1). The Mayor's UFSM scheme is not intended to displace national government funding for KS2 children who are eligible for FSM. The Mayor's UFSM scheme extends eligibility for FSM to any KS2 children in state-funded primary schools who are not eligible for FSM under national government funding. The UFSM policy has been developed to replicate national government eligibility criteria for KS1 so that the FSM policy will effectively continue to be extended to incorporate eligible children in KS2 as well.
- 1.5. MD3224 delegated authority to the Executive Director of Communities and Skills to make programme-level decisions via a director decision (DD) form. This DD confirms the final funding allocations to London boroughs and the detailed breakdown of the approved UFSM budget for 2024-25 and 2025-26. The Deputy Chief of Staff and Deputy Mayor for Children and Families have been consulted on this decision and are content with the detail included.
- 1.6. Detailed information on the UFSM programme, including the approach taken to delivery of the policy in year two of the scheme is set out in MD3224.
- 1.7. In 2023, an Integrated Impact Assessment (IIA) and Equality Impact Assessment (EqIA) plus supplementary analysis on independent schools were undertaken to inform the design and implementation of the policy. This identified areas for further work and/or consideration with regard to implementation of the UFSM programme, including aspects such as mitigation and future monitoring.
- 1.8. The IIA, EqIA and supplementary analysis have been kept up to date to ensure that any new considerations and recommendations are captured (see Appendix A).
- 1.9. The Greater London Authority (GLA) will continue to implement recommendations as outlined in these documents following approval of the decision.
- 1.10. Additional considerations and recommendations which have emerged in the context of the scheme extension include:
  - To support UFSM delivery for the 2024-25 school year, the grant allocation per meal has been increased from £2.65 to £3.00.

- The price per meal for the London scheme has been uplifted from £2.65 to £3.00 to reflect feedback following the first year of implementation.
- 1.11. On pupil health, new evidence from the Institute for Social and Economic Research, Child Poverty Action Group (CPAG) and National Education Union (NEU)<sup>2</sup> shows that FSMs can have a positive effect on child obesity rates, eating habits, improved home-school relationships and uptake amongst government FSM eligible pupils.

# 2. Objectives and expected outcomes

- 2.1. The programme objectives are as follows:
  - to help mitigate the impact of the cost-of-living crisis by saving London's families just over £500 per eligible child per year of the scheme
  - to reduce the burden on families and the anxiety parents feel around school meals
  - to ensure children in KS2 in state-funded primary schools receive a nutritious and balanced meal each day
  - to give eligible children in KS2 in state-funded primary schools the best chance to succeed at school and live a healthy life
  - to demonstrate the Mayor's role and commitment to address the impact of the cost-of-living on families, including other available sources of support.
- 2.2. The programme outputs (as with the current year of the scheme) will carry out activities as follows:
  - grants to all boroughs implementing the scheme to fund UFSM to all KS2 children attending state-funded primary schools, who are not eligible for the government FSM scheme. This includes an uplifted price per meal and actions which were recommended within the IIA such as Kosher food uplift for state-funded primary schools.
  - communications to inform schools and raise awareness amongst families, including the ongoing need for eligible parents to register for the national government FSM scheme; this is to mitigate against the risk of a drop in income for schools, where such income is linked to the number of children eligible for FSM under the government scheme, such as the pupil premium grant.
  - robust monitoring and evaluation to measure outcomes such as the policy's impact on families' financial circumstances, changes in mental health, education and overall wellbeing.
- 2.3. Expected programme outcomes are as follows:
  - London's primary-age children attending state-funded primary schools who are not entitled to FSM provided by the government, will continue to have access to at least one nutritious meal a day during term-time.
  - Awareness of the Mayor's scheme increases, leading to increased take-up of the meals.
  - Mitigation of some of the impacts of the cost-of-living crisis will continue as evidenced in the programme monitoring and evaluation these include increased household food security; decreased indebtedness; improved educational outcomes; UFSM is also expected to positively affect the physical and mental health of children in London.

<sup>&</sup>lt;sup>2</sup> Child Poverty Action Group and National Education Union, <u>The Universalism Multiplier</u>, December 2023.

• Increased number of families apply for government funded FSM who were not aware that they were eligible.

# Implementation and budget breakdown

- 2.4. Up to £139.45m of the UFSM budget will continue to be allocated to boroughs for delivery and implementation of the UFSM scheme. Final funding allocations for UFSM are based on the number of state-funded primary school pupils at KS2 on census day in January 2024 (minus the number of such pupils who were eligible on that date for the government FSM scheme). The GLA will pay £3.00 as the price per meal, meaning the total expected number of pupils eligible for UFSM in each borough has been multiplied by £3.00 per day in the academic year (190 days) to finalise allocations with an assumed 90 per cent uptake.
- 2.5. Boroughs will be funded on the basis of an assumed 90 per cent uptake rate. Borough claims in May 2024 showed that 12 per cent of schools claimed for additional funding, due to their uptake rates being above 90 per cent. The proposed funding mechanism is that boroughs will receive 50 per cent of their initial allocation within five working days of a signed grant agreement being received by the GLA. Following this, a further 25 per cent will be made available in December 2024 and April 2025 respectively. Funding must be claimed via the GLA Open Project System. This approach replicates the successful funding model used in the first year of the programme.
- 2.6. £6.5m of reserve funding was added to the UFSM budget as part of the 2024-25 budget setting process to cover this funding for schools where uptake is above 90 per cent. Each school will have the opportunity to secure additional funding if they can evidence that uptake of the scheme has exceeded 90 per cent. The process for claiming this additional funding will replicate the first year of the programme, in that schools will provide boroughs with evidence of meal uptake on a pre-agreed date and then claims for extra funding will be reviewed on a borough-by-borough basis according to uptake of the scheme and verified by the GLA. Any additional payments will follow the final 25 per cent claim in April 2025, and any such funding will be issued via the relevant borough with boroughs responsible for quality-assuring applications. Since only £665,381.88 was used for the first year of the programme, this surplus is more than sufficient to cover additional uptake of meals for the 2024-25 academic year.
- 2.7. Up to £410k from the budget has been allocated to support state-funded primary school pupil fluctuations, implementation issues for schools and/or those related to access requirements in boroughs, including specific needs related to protected characteristics, such as pupils with SEND and pupils who may have a specific dietary requirement in connection with their religion or belief.
- 2.8. The seven boroughs that include Jewish faith schools will receive a further allocation on top of their substantive UFSM grant funding uplift of £0.85 per kosher meal for children in Jewish state-funded primary schools. This will be made available alongside their initial allocation and will be funded at an assumed uptake rate of 100 per cent to offer additional funding flexibility to support any wider costs arising for schools when delivering kosher meals.
- 2.9. The full breakdown of funding allocations to each borough can be found in Appendix B.
- 2.10. The grant conditions stipulate that the funding must be spent on delivery and implementation of the UFSM scheme, but the GLA will not require detailed evidence of expenditure. As part of the grant conditions, grant recipients will be expected to attend 1-1 meetings with nominated borough leads. These meetings allow for any issues to be raised and worked though. The principles of the grant encourage boroughs to support initiatives to ensure high ethical and quality standards through the scheme, such as adhering to national food standards, paying staff London Living Wage, and considering sustainable catering arrangements.

- 2.11. Partnership working is vital to the extension of the UFSM scheme for 2024-25. UFSM officers will continue to have regular check-ins with the boroughs via the Partnership Advisory Group<sup>3</sup> and one-to-one check-ins with each borough.
- 2.12. Up to £45,000 has been allocated to expand and continue the existing work of the UFSM programme evaluation, the primary objectives of which are to:
  - establish whether the UFSM policy achieved its primary goal of alleviating the pressures that families face from general increases in cost of living, including food-price inflation
  - monitor the policy implementation
  - evaluate the impact of the UFSM programme on wider outcomes such as families' financial circumstances, changes in mental health, education and overall wellbeing
  - evaluate the impact of the policy on state-funded primary school pupils according to their demographics and protected characteristics
  - monitor UFSM meal uptake amongst state-funded primary school pupils
  - identify whether UFSM has an effect on the uptake of government FSM funding for statefunded primary school pupils, and specifically children from the most deprived backgrounds.
- 2.13. Up to £100,000 has been allocated to stakeholder engagement across two academic years, the primary objectives for 2024-25 of which are to:
  - engage with schools, boroughs and partners to support ongoing implementation
  - provide support to maintain or increase pupil premium funding/auto-enrolment good practice
  - demonstrate the policy's impact on state-funded primary school pupils and families.
- 2.14. A full breakdown of the £140m programme budget is provided below:

2025-26 Total 2024-25 £92,967,073.96 £46,483,536.98 £139,450,610.94 Borough allocations Surplus to cover meal uptake above 90 per cent £-Monitoring and evaluation £28,806.67 £14,403.33 £43,210.00 £66,538.00 Stakeholder engagement £33,269.00 £99,807.00 Pupil fluctuations, implementation issues and related work £270,914.71 £135,457.35 £406,372.06 £93,333,333.33 £46,666,666.67 £140,000,000.00

<sup>&</sup>lt;sup>3</sup> The Partnership Advisory Group provides guidance and expert input into the development and implementation of the UFSM policy. Membership includes representatives from each borough from across London.

# 3. Equality comments

- 3.1. Section 149(1) of the Equality Act 2010 provides that, in the exercise of their functions, public authorities of which the Mayor is one must comply with the public sector equality duty by having 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. To build on the analysis undertaken for the first year of the Mayor of London's UFSM programme, and in the context of an additional year extension, keeping the IIA and EqIA plus supplementary analysis on state schools up to date to ensure that any new considerations that have emerged since the programme launch in September 2023 should inform roll-out of the second year of the scheme (see Appendix A).
- 3.3. MD3224 provides a detailed overview of the EqIA findings.
- 3.4. Research suggests that children receiving UFSM have improved attendance and are able to concentrate better in the classroom. Children on UFSM make between 4-8 weeks' more progress in Maths and English than similar pupils in comparison areas. Improvements in attainment were strongest for pupils from less affluent families<sup>4</sup>. Every £1 invested in healthy school meals could deliver £1.71 in increased educational outcomes, better health and longer-term economic benefits<sup>5</sup>.
- 3.5. The IIA, EqIA and supplementary analysis also identifies and analyses where there were individuals with protected characteristics, who have specific dietary requirements which are associated with higher meal costs. This includes pupils with SEND, and pupils who may have a specific dietary requirement in connection with their religion or belief; and identifies that kosher meals in state-funded Jewish schools generally come in at higher costs, and that this is generally related to the higher price of kosher-certified food, including staples such as kosher meat, bread, dairy and eggs.
- 3.6. It is anticipated that additional costs associated with these specific access needs will continue to be incurred in the second year of the programme. Additional funding will therefore continue to be made available to cover the higher price of providing kosher meals at £3.50 in year one, increasing to £3.85 per meal for year two for Jewish state-funded schools, as well as any exceptional costs arising for state-funded special schools to support the higher cost of meals for pupils with SEND where needed. The extent of these additional costs is dependent on local catering contracts and therefore the benefit of this additional offer will vary depending on the price per meal agreed locally. This could depend on a number of factors including the availability of appropriate caterers and the size and scale of contracts.
- 3.7. The eligibility for the Mayor's UFSM scheme replicates, and is consistent with, the government's FSM programme (which covers children within state-funded primary schools who are in KS1 and other children in KS2 where they live in households on universal credit earning less than £7,400 a year). That means that both programmes together cover state-funded primary schools in London, including faith schools, but not private or independent schools.
- 3.8. To date, programme monitoring has not identified negative impacts on pupil premium income for state-funded primary schools in London. Additionally, changes to pupils' FSM eligibility in March

<sup>5</sup> Impact on Urban Health, Expanding free school meals: a cost benefit analysis, October 2022.

<sup>&</sup>lt;sup>4</sup> Department for Education, <u>Free school meals pilot: impact report</u>, 2012.

- 2025 may affect pupil premium funding for state-funded primary schools. The GLA will continue to work with partners to monitor any trends in this area.
- 3.9. The GLA will continue to support boroughs in their adoption of auto-enrolment through an opt out grant process along with facilitating London-wide enabling initiatives to ensure all eligible pupils are registered with the government FSM scheme. This will help to ensure that income for schools from the pupil premium remains unaffected.

## 4. Other considerations

Key risks

4.1. Key risks and issues are highlighted in the table below.

Risk	RAG*	Mitigation
Insufficient robust data on pupil premium registrations.  Transitional protection will end in March 2025 which will impact the status of pupil premium already in school. This may mean pupils (families) have to register annually to be eligible for government funding.	R	<ul> <li>Analysis of Department for Education Census data has been conducted periodically. Data following March 2024 will reveal the allocations for the next academic year, and any changes to pupils eligible for pupil premium at a borough level.</li> <li>Continue to engage boroughs and schools to understand proportions of families applying for funding, drivers to any changes, and develop appropriate support response.</li> <li>The GLA will convene boroughs on process of auto-enrolment for pupil premium.</li> <li>The GLA will support boroughs with additional funds to implement or work towards auto-enrolment.</li> </ul>
Unclear how schools will adapt to a second year of the scheme, and whether their current infrastructure will be adequate.	R	<ul> <li>Monitor implementation of scheme and capital need.</li> <li>Borough review meetings.</li> <li>Ongoing Opinion Research with schools.</li> <li>Flexible funding response via the use of additional funding where appropriate.</li> </ul>
Unforeseen issues related to access to the UFSM programme by children with protected characteristics arise.	A	<ul> <li>Funding is allocated to address issues of access, which arise in-year.</li> <li>Provision made for additional funding for faith-based meals and exceptional costs for special schools.</li> <li>Ongoing monitoring of UFSM uptake and wider implementation of programme.</li> </ul>

		<ul> <li>Investigation of food offered and extent to meeting pupil needs, drivers of lower uptake.</li> </ul>
Variable catering and procurement models could lead to impact delivery including poor quality meals, high levels of food waste and variable impacts on environment.	A	<ul> <li>Monitor impact of higher price point on food offered.</li> <li>Review opportunities to embed sustainable practices to procurement and food waste.</li> </ul>
Monitoring and evaluation approach was set up on basis that this was a one-year emergency intervention so will need to shift to reflect its now a longer running policy.	G	<ul> <li>Year 1 evaluation strategy includes ongoing monitoring of insight and a comprehensive programme including a Process Evaluation and Impact Evaluation. Early findings will be produced in Autumn 2024.</li> <li>Year 2 evaluation strategy will continue with Impact Evaluation, producing robust data by end of 2025.</li> <li>Year 2 evaluation will be enhanced with supplementary deep-dive studies to fill any potential evidence gaps identified in the IIA Refresh, Theory of Change, Literature Review and expert stakeholder engagement.</li> <li>The GLA will continue to engage experts in-year and set up appropriate governance structures to guide and enhance the Evaluation Strategy.</li> <li>To data, evidence highlights significant benefits of UFSM relating to education, mental health, financial stability and physical health.</li> </ul>

<sup>\*</sup>Red = highly likelihood and/or high impact; amber = medium likelihood and/or impact; green = low likelihood and/or impact.

## Conflict of interest

4.2. 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

- 4.3. The continuation of the programme is a priority for the Mayor and he intends to work to make UFSM permanent for all state primary school children.
- 4.4. 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 UFSM through this programme will ensure children in state-funded primary schools have at least one meal a day and reduce financial burden on parents.
- 4.5. Primarily this programme seeks to reduce the impact of the cost-of-living crisis on low-income families.

#### 5. Financial comments

- 5.1. This decision seeks approval for the following, totalling £140m, as broken down below:
  - 1. expenditure of up to £139.45m which will be allocated to boroughs to continue to deliver UFSM to KS2 children within London state-funded primary schools for the 2024-25 academic year
  - 2. expenditure of up to £406k to support pupil number fluctuations and address issues related to implementation in schools and/or to access requirements, including specific needs related to protected characteristics, such as pupils with SEND and pupils who may have specific dietary requirements in connection with their religion or belief
  - 3. expenditure of up to £143k to expand and continue the existing work of the UFSM programme evaluation and communications activities.
- 5.2. The table below provides a full breakdown:

	2024-25	2025-26	Total
	£000	£000	£000
Borough allocations	£92,967.1	£46,483.5	£139,450.6
Monitoring and evaluation	£28.8	£14.4	£43.2
Stakeholder engagement	£66.5	£33.3	£99.8
Pupil fluctuations,			
implementation issues and related			
work	£270.9	£135.5	£406.4
Total	£93,333.3	£46,666.7	£140,000

- 5.3. The expenditure of £140m will be funded from the UFSM programme budget over 2024-25 and 2025-26 financial years and is subject to the outcome of the normal budget setting process for future financial years.
- 5.4. The expenditure of £93.3m in 2024-25 financial year is affordable and confirmed in the 2024-25 approved UFSM budget. The expenditure of £46.7m from the UFSM programme budget in 2025-26 financial year is agreed in principle and is subject to the outcome of the normal budget setting process for future financial years.
- 5.5. Any contract that commits the GLA in future years are subject to appropriate break clauses.

#### 6. Legal comments

Power to undertake the requested decisions

- 6.1 Section 30 of the Greater London Authority Act 1999 (GLA Act) provides that the GLA has the power to do anything which it considers will further any one or more of its principal purposes. Those principal purposes include furthering the promotion of social development in Greater London. Section 34 of the GLA Act also allows the GLA to do anything which is calculated to facilitate, or is conducive or incidental to, the exercise of any functions of the GLA exercisable by the Mayor. These powers are sufficiently broad to cover the proposed use of the funds in this decision for which approval is sought. In formulating the proposals in respect of which a decision is sought, officers have complied with the GLA's related statutory duties to:
  - pay due regard to the principle that there should be equality of opportunity for all people (section 33(1) of GLA Act)

- consider how the proposals are best calculated to promote the improvement of health of persons 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 appropriate bodies or persons (section 32(1) of the GLA Act).
- 6.2 In taking the requested decisions, the Executive Director of Communities and Skills (the Director) must comply with the public sector equality duty and therefore the Director should have particular regard to section 3 (above) of this decision form.

## **Grant funding**

6.3 Decision 1, above, seeks approval of a budget of £139.45m which will be allocated to boroughs as funding. The funding will allow the boroughs to continue to deliver UFSM to KS2 children within London state-funded primary schools for the 2024-25 academic year. To that end, the GLA will be funding the provision of UFSM by the boroughs to school children. Accordingly, there is no direct benefit to the GLA and the funding may be viewed as a grant rather than a contract. Officers are reminded to comply with section 12 of the Contracts and Funding Code (the Code). Furthermore, prior to the provision of the additional funding, officers must put in place either deeds of variation of existing funding agreements or new funding agreements between the GLA and the recipient boroughs.

# Subsidy control

6.4 The Subsidy Control Act 2022 (the SC Act) requires that grant funding be assessed in accordance with a four-limbed test in order to see whether the grant funding amounts to a subsidy within the meaning of the SC Act. As explained in decision 1 above, the grant funding will be provided to local boroughs to provide UFSM. In providing the UFSM, the boroughs will be providing a public service. To that end, the proposed grant funding does not meet the second limb of the four-limbed test and, therefore, does not amount to a subsidy.

#### Procurement

6.5 Decisions 2 and 3, above, seek approval for expenditure of £410,000 and £145,000 respectively to assist the implementation, evaluation and communications of the USFM programme in 2024-25. Officers are reminded to comply with the requirements of the Contracts and Funding Code, when they procure services or supplies in furtherance of the USFM programme. Furthermore, officers are reminded to put in place appropriate contracts between the GLA and the relevant service providers/suppliers before the commencement of the relevant services or supplies.

# 7. Planned delivery approach and next steps

7.1. In the majority of cases, the boroughs will be acting as responsible bodies for the GLA's grant funding and then providing on-grants to the eligible schools in their area. In turn, those schools will then use the on-granted funds to procure catering services. However, in a limited number of cases, some boroughs will use the GLA's grant funding themselves to procure catering services on behalf of the eligible schools in their area.

Expected milestones	Time frame
Borough engagement and implementation	July – September 2024
Grant agreement signatures and commence	July 2024
grant process	

Launch	September 2024
Monitoring and evaluation	Evaluation continuing from Year 1. New activity set up in July 2024.

# Appendices and supporting papers:

Appendix A – UFSM Integrated Impact Assessment: Policy Extension – Addendum Appendix B – UFSM Funding Allocations 2024-25 academic year (by borough)

#### **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 <u>or</u> 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 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:  Matthew Kleebauer has drafted this report in accordance with GLA procedures and confirms the following:	✓
Assistant Director/Head of Service: <u>Jazz Bhogal</u> has reviewed the documentation and is satisfied for it to be referred to the Sponsoring Director for approval.	✓
Financial and Legal advice:  The Finance and Legal teams have commented on this proposal, and this decision reflects their comments.	✓
Mayoral Delivery Board A summary of this decision was reviewed by the Mayoral Delivery Board on 8 July 2024.	✓

### **INTERIM CHIEF FINANCE OFFICER:**

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

**Signature: Date:** 12/07/2024