

GREATER LONDON AUTHORITY

REQUEST FOR MAYORAL DECISION – MD3281

Community Recovery Programme and Humanitarian Schemes

Executive summary:

This decision form seeks approval for receipt and expenditure of £600,000 of grant funding from the Ministry of Housing, Communities and Local Government (MHCLG), to deliver on the community recovery programme; receipt and expenditure of £70,000 of grant funding from MHCLG to support Ukrainians in London in 2024-25; and the provision of £70,000 in grant funding to London Councils for migration coordination work to be delivered in partnership with the GLA. It also seeks the Mayor's approval to receive and spend £560,860 of grant funding from MHCLG, to continue delivering the London Hong Kong Welcome and Integration Programme.

Decision:

That the Mayor approves:

- approval to receive £600,000 of grant funding from the Ministry of Housing, Communities and Local Government (MHCLG) as part of the Community Recovery Fund
- approval to receive and spend £70,000 of grant funding from the MHCLG to support Ukrainians in London in 2024-25
- expenditure of up to £70,000 from the GLA budget for 2025-26 to grant fund London Councils to undertake migration coordination work with London boroughs, subject to the annual budget-setting process
- receipt of £560,860 of grant funding from MHCLG as part of the Hong Kong Welcome and Integration Programme
- expenditure of £560,860 towards continuing the Hong Kong Welcome and Integration Programme
- expenditure of the £600,000 grant monies received from MHCLG (first decision above) by way of a grant to London Councils as the responsible body for the provision of onward grants to eligible London borough councils.

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:

26/1/24

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

Decision required – supporting report

1. Introduction and background

- 1.1. Following the riots that occurred across the UK in the Summer of 2024, MHCLG have launched funding for local authorities significantly affected by the public disorder. The aim of this funding is to deliver work in connection with immediate action to safeguard life or property, to prevent suffering or severe inconvenience, to reduce risk of further disorder in the future, and to rebuild social trust and promote community cohesion between communities. The GLA is in receipt of £600,000 funding in total for 2024-25, inclusive of £510,000 revenue and £90,000 capital funding.
- 1.2. Funding has been provided by MHCLG to the London Strategic Migration Partnership (LSMP) since 2022 to support arrivals to London from Ukraine, including arrivals under the Homes for Ukraine Scheme. Coordination of London boroughs is provided in partnership between the GLA and London Councils, focused on facilitating engagement with voluntary and community sector organisations and providing a strategic link into the LSMP.
- 1.3. The GLA Migration team is also looking at ways to improve coordination across London local government, and proposes investing up to £70,000 to enable London Councils to dedicate capacity to this work. It is crucial to collaborate with London Councils and London boroughs to deliver system leadership on complex migration-related work. This work will include engagement with boroughs and community groups; convening; and policy work to support refugees, people seeking asylum and vulnerable migrant groups, including Ukrainian and other evacuees from humanitarian crises. The exact focus of the work will be agreed in consultation between the GLA and London Councils; and will deliver against London's priorities, as agreed in discussion with partners across the London system. The work will be monitored and steered through regular weekly check-ins and oversight provided by senior strategic leaders, and will continue to contribute to the LSMP Board.
- 1.4. In July 2020, the UK government introduced a new immigration route for Hong Kong British National (Overseas) (Hong Kong BN(O)) status holders which enabled them and their families to live, work and study in the UK. To help new arrivals settle in the UK, in 2021 the government launched a £43m Integration Programme to improve access to housing, work and educational support; and ensure arrivals from Hong Kong could integrate and thrive in their communities. As part of this, the Ministry of Housing, Communities and Local Government (MHCLG) provided £5m to establish a total of 12 'welcome hubs' across the UK: one in every region in England, plus one each in Scotland, Wales and Northern Ireland. The aim of these hubs is to coordinate support for, and give practical advice and assistance to, new arrivals from Hong Kong, enabling their access to services and social integration. The sum of £917,000 per year was apportioned to the GLA to administer through the LSMP for this purpose, with income and expenditure approved under MD2831, DD2576, MD3029 and MD3118. This decision seeks approval for the receipt and expenditure of grant funding to continue this work into a fourth year. The funding amount for London has been reduced from previous years, as MHCLG has based its funding model on data taken from recent research indicating where Hongkongers live.¹

2. Objectives and expected outcomes

Community Recovery Fund

- 2.1. The £600,000 grant funding from MHCLG will be used to contribute towards local authority work on community cohesion, with a focus on work that reduces the risk of further disorder in the future and rebuilds social trust, promoting cohesion between communities. The full £600,000 will be provided to London Councils by way of a grant. London Councils will act as the responsible body for the grant

¹ British Future, [From HK to UK: Hong Kongers and their new lives in Britain](#), November 2023

funding and, as such, will provide onward grants to eligible London boroughs. It should be noted that London Councils will not be retaining any of the £600,000 grant funding in order to cover its own costs. Instead, London Councils will use all of the funding for onward grants to London borough councils. The GLA will work closely with London Councils, as it administers the funding to London boroughs.

Ukraine support

- 2.2. This funding will be used to maintain the team's capacity to support this work and to contribute towards relevant streams of work to improve access to advice and support. This will be primarily through a combination of advocacy and engagement work delivered in partnership with London Councils, and grant funding to specialist advice services to meet the needs of Ukrainians, including matters related to immigration advice, employment, housing and psychosocial support, as appropriate. This may also include contributing towards existing GLA programmes that meet these needs, to enable them to provide bespoke support to the Ukrainian community. Delivery of work will need to comply with the terms of the grant agreement.
- 2.3. Subject to approval from the MHCLG the intention is for any underspend from the 2024-25 financial year to be carried forward and allocated in 2025-26 towards the same purpose.

Migration coordination

- 2.4. By investing up to £70,000 in London Councils' capacity to support work on migration in London, at a system level, we seek to improve consistency of engagement with London boroughs; and ensure robust governance around migration-related work in London centred on the LSMP. The funding will cover London Councils' salary and delivery costs; and the work will be overseen by a grant agreement. Principles of engagement to this agreement (decided on by the GLA and London Councils) will enable joint oversight of work commissioned through this funding. This will build on the recommendations of our partnership review with London Councils, embedding our joint strategic approach to engagement across the capital. This additional capacity will enable the GLA to work more closely with London boroughs via London Councils; to navigate systemic challenges and improve outcomes for migrant Londoners. Delivery will be monitored through regular joint meetings with London Councils and the GLA, with oversight provided by senior strategic leaders and the LSMP Board.

Hong Kong Welcome and Integration Programme

Purpose

- 2.5. Year four of the Hong Kong Programme includes funding for staffing, and a range of interventions that support civil society and other statutory services. These include: service provision to meet the needs of Hongkongers; development and support to organisations specialising in providing services to, and led by, Hongkongers; work to support access to mental health and wellbeing services for Hongkongers; and support for wider GLA programmes to ensure tailored service to Hongkongers. In this fourth year of the programme, approval is sought to receive income, and enable its expenditure against the programme's core deliverables.

Deliverables

- 2.6. Funding for year four of the Hong Kong Welcome Programme will provide for the core staffing of the Hong Kong team. Four FTE fixed-term positions will be retained to oversee our programme of support to welcome and integrate new arrivals from Hong Kong. It is intended that these four positions will be extended, provided that parallel approval can be obtained through the Establishment Control process. This funding will run from August 2024 to July 2025, and will therefore sit across two financial years. It will contribute towards several initiatives, which are detailed in the table below.
- 2.7. Our approach in year four will be to prioritise strategic support to organisations serving the Hong Kong BN(O) community. In this way, we will enable them to become more sustainable and better integrated into the network of mainstream services. Our delivery method will combine: direct

engagement and support with local authorities and civil society; scoping and capacity building that enables mental health services to better engage with the Hong Kong BN(O) community; and mentoring that helps organisations obtain recognised accreditation, and access wider funding opportunities beyond the Welcome Hub. We will also provide direct grant funding support to organisations working with Hong Kong BN(O)s in areas where there is an identified need, and other sources of funding are unavailable.

2.8. The confirmed grant of £560,860 will be broken down as shown in the table below:

Programme	Estimated Budget allocation
Staffing for four FTE, and core programme budget including expenses, audit and other ad hoc costs	£251,000
Building the capacity of civil society, local authorities and other services to understand the needs of, and support, Hongkongers	£252,000
Supporting Hongkongers' mental health and wellbeing, including budget for events and celebration of Hongkongers	£57,860

3. Equality comments

3.1. Under section 149 of the Equality Act 2010, as a public authority, the GLA must have 'due regard' of the Public Sector Equality Duty, that is, the need to:

- eliminate unlawful discrimination, harassment and victimisation
- advance equality of opportunity
- foster good relations between people who have a protected characteristic and those who do not.

3.2. Equality, integration and inclusion are the drivers behind these programmes. They support the delivery of the Mayor's Social Integration Strategy, All of Us. These programmes also help address challenges highlighted in other missions, including commitments to support young people and to build stronger communities. All these programmes seek to tackle the inequalities that pose barriers to Hongkongers and people seeking asylum or subject to immigration control. These barriers can prevent Londoners from fully participating in their communities. The related work of these programmes includes improving access to services that, in turn, promote Londoners' access to their rights and entitlements.

3.3. Any commissioning and grant-making processes will ask potential partners to demonstrate how their projects: are inclusive of a diverse group; and actively work to eliminate discrimination based on the nine characteristics protected in the Equality Act 2010. To ensure the highest standards of equality, diversity and inclusion are upheld, the GLA will use outreach and engagement approaches to target activities at particular groups that are less able to engage, or face greater barriers to engagement. This will enable them to participate, while ensuring that activities are open and accessible to all Londoners.

4. Other considerations

4.1. The risks and mitigations are outlined in the table below:

Risk	Mitigation	Probability	Impact	RAG
Inadequate due diligence of programme activities and procurement.	Robust contracting management, close working with grant services, internal agreement on process around due diligence.	2	4	A

GLA capacity is limited to manage the programmes.	Maintain the team's current capacity, enabling us to continue engagement across various statutory and civil society partners whilst supporting direct grant funding programmes.	2	4	A
Organisations commissioned and funded to carry out work fail to deliver to expected quality or to time.	Set clear, specific parameters for delivery; build in regular milestones to check progress; establish governance to oversee new programmes.	2	2	G
Projects require long-term intervention, limiting the effectiveness of short-term project funding.	Make intentions for extension on grants/contracts clear, subject to securing further funding for this work in 2025-26; focus funding in areas that support wider infrastructure, with a focus on sustainability beyond initial funding.	3	3	A

Conflicts 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. The team that will be administering these projects includes staff who are members of the Hong Kong community; and those who have worked or volunteered with other refugee and migrant-sector organisations. Appropriate mitigations will be put in place throughout all tendering and grant programmes to remove relevant officials from a decision-making role regarding funding where any conflict does arise. This applies to GLA officers and those funded to deliver work on our behalf. All commissioned services will be procured competitively in accordance with the Contracts and Funding Code (the "Code").

Links to Mayoral strategies and priorities

- 4.3. This work links to the Mayor's Strategy for Social Integration, All of Us. This includes confronting barriers and discrimination faced by migrants and refugees; and supporting Londoners with insecure immigration status to access their legal rights to citizenship and residence.

Consultation and impact assessment

- 4.4. The design of this programme has been informed by research and engagement with Hongkongers, and organisations working closely with new arrivals from Hong Kong. The work is being overseen by a steering group of expert organisations and includes the voices of Hongkongers.

Subsidy control

- 4.5. GLA officers have carried out a subsidy control analysis of the proposed grants to London Councils of up to £70,000 for its migration coordination work with London boroughs and £600,000 for onward grants to London boroughs in relation to the Community Recovery Fund. Officers have assessed that the Subsidy Control Regime does not apply to the proposed grants, because the proposed financial assistance does not meet all four limbs of the four-limbed test set out in the Subsidy Control Act 2022 (the "SC Act").
- 4.6. In particular, the proposed financial assistance fails to satisfy Limb B of the four-limbed test set out in the SC Act, as the beneficiary of the funding is not classed as an enterprise. Furthermore, the £600,000 grant relating to the Community Recovery Fund will be provided by London Councils via onward grants to London boroughs, which will in turn use the grant funding to carry out their public functions.

- 4.7. This conclusion is consistent with the example set out in the Statutory Guidance for the UK Subsidy Control Regime in section 2.17, which states: “Examples of financial assistance that may not meet this test include support for an organisation that carries out non-economic activities with some ancillary economic activities (e.g., renting out equipment for less than 20 per cent of the time, or providing a café or gift shop)”.

5. Financial comments

- 5.1. Approval is sought for the following.

- receipt and expenditure of £600,000 of grant funding from the MHCLG as part of the Community Recovery Fund for 2024-25 financial year
- receipt and expenditure of up to £560,860 towards the continuation of the Hong Kong Welcome and Integration Programme for 2024-25 and for part of 2025-26 financial year to 27 July 2025
- receipt and expenditure of £70,000 of grant funding from the Ministry of Housing, Communities and Local Government (MHCLG) to support Ukrainians in London in 2024-25 financial year
- expenditure of up to £70,000 from the core GLA funds for 2025-26 to grant fund London Councils to deliver migration.

- 5.2. The GLA funded expenditure of £70,000 from the GLA Migration programme budget in 2025-26 is assumed to be affordable. Funding for future financial years is subject to the annual budget-setting process and is subject to change. However, this can only be confirmed when the budget allocation is formally approved as part of the annual budget-setting and approval process.

- 5.3. Contracts that commit the GLA in future years are subject to appropriate break clauses.

6. Legal comments

Power to undertake the requested decisions

- 6.1. The decisions requested of the Mayor fall within the general powers of the Mayor in section 30 of the Greater London Authority Act (GLA Act) 1999 to do anything that he 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 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:
- pay due regard to the principle that there should be equality of opportunity for all people
 - 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
 - consult with appropriate bodies or persons.
- 6.2. In taking the decisions requested of him, the Mayor must have due regard to the Public Sector Equality Duty; namely the need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Equality Act 2010; advance equality of opportunity between persons who share a relevant protected characteristic (race, disability, age, sex, sexual orientation, religion or belief, pregnancy and maternity, and gender reassignment) and persons who do not share it; and foster good

relations between persons who share a relevant protected characteristic and persons who do not share it. To this end, the Mayor should have particular regard to section 3, above, of this report.

Receipt by the GLA of grant funding

- 6.3. The first, second and fourth decisions, above, seek approval of the receipt by the GLA of a total of £1,230,860 of grant funding from MHCLG for the Community Recovery Fund, to support Ukrainians in London and for the Hong Kong Welcome and Integration Programme. Officers are reminded to ensure that the GLA comply with any conditions, which MHCLG places upon the use of the grant funding.

Expenditure on projects

- 6.4. The second, third, fifth and sixth decisions, above, seek approval of expenditure of a total of £1,300,860 towards various projects. Officers are reminded of the need to comply with the Code when procuring services or providing grant funding in furtherance of the projects. Moreover, 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. Finally, officers should have regard to the requirements of the SC Act, when considering the allocation of grant funding.

Provision of grant funding by the GLA

- 6.5. The third and sixth decisions seek approval of expenditure by way of two grants to London councils as follows: (i) a grant of up to £70,000 relating to migration coordination work with London boroughs; (ii) 600,000 for distribution to London borough councils by way of onward grants. As set out in paragraphs 1.3 and 2.4, the funding will allow London Councils to collaborate with London boroughs in relation to complex migration-related matters. To that end, the GLA will be funding London Councils collaboration with London boroughs. 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 Code. Furthermore, officers are reminded to put in place an appropriate funding agreement between the GLA and London Councils, before the GLA provides any of the funding.

Subsidy control

- 6.6. 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. Officers have set out at paragraphs 4.5 to 4.7, above, that the proposed grants to London Councils fail to meet limb B of the four-limbed test on the basis that the recipients of the funding are not acting as enterprises. Accordingly, the proposed funding would not amount to a subsidy within the meaning of the SC Act.

7. Planned delivery approach and next steps

- 7.1. The Hong Kong and Ukraine programmes will be delivered according to the following indicative timetable:

Activity	Timeline
Scoping and programme development	November – January 2024
Grant funding and/or commissioning services	January 2024 – March 2025
Programme delivery	April – September 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:

Philip Baker 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.

✓

Mayoral Delivery Board

This decision was agreed by the Mayoral Delivery Board on 25 November 2024.

CHIEF FINANCE OFFICER:

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

Signature:

Fay Hurren

Date:

26 November 2024

CHIEF OF STAFF:

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

Signature:

D. Bellamy

Date:

26 November 2024