

**REQUEST FOR ASSISTANT DIRECTOR DECISION – ADD2778****Title: Migration Programme 2025-26****Executive Summary:**

Mayoral Decision (MD) 3386 approved the delivery plan for the Accommodation and Wider Support for Those Who Need It Most programme including the resources allocated to it, and delegated authority to the Assistant Director, Housing Programme and Partnerships (in consultation with the Executive Director for Housing and Land, the Executive Director for Communities and Skills, and the Mayoral Delivery Board) to approve the receipt of any additional funding from central government or other sources to expand or extend existing approved schemes contained in the Accommodation and Wider Support for Those Who Need It Most delivery plan.

This Decision seeks the Assistant Director of Housing Programme and Partnerships' approval for expenditure of £590,000 of GLA budget in 2025-26 financial year to deliver work to support migrants, refugees and people seeking asylum as part of the Accommodation and Support for Those Who Need It programme. It also seeks approval for the receipt and expenditure of £585,600 of grant funding from the Home Office, and receipt and expenditure of up to £1,115,836 of grant funding from the Ministry of Housing, Communities and Local Government (MHCLG).

**Decision:**

That the Assistant Director of Housing Programme and Partnerships approves:

- expenditure of £590,000 of GLA budget for 2025-26 financial year as part of programmes to increase capacity of immigration advice and migration system leadership within the Accommodation and Support for Those Who Need It programme, comprising:
  - £290,000 in grant funding to Refugee Action as a contribution to the costs delivering its Frontline Immigration Advice Programme;
  - £130,000 on the Migrant Employment Rights programme;
  - £30,000 on the Migrant Londoners Hub;
  - £35,000 on the Migrant Advisory Panel;
  - £55,000 on the Humanitarian Response and Coordination work; and
  - £50,000 on Modern Slavery research and the development of a safe reporting pilot;
- receipt of up to £585,600 of grant funding from the Home Office, and expenditure of the same, to meet costs related to the delivery of the London Strategic Migration Partnership and to deliver on a programme of focused on improving the mental wellbeing of people seeking asylum; and
- receipt of up to £1,115,836 of grant funding from the Ministry of Housing, Communities and Local Government (MHCLG), and expenditure of the same, for the delivery of coordination work on Hong Kong and Ukraine arrivals in London alongside a programme of English for Speakers of Other Languages (ESOL). capacity building, including:
  - £303,483 on Welcome and Integration for new arrivals work;
  - £55,000 contributions towards other relevant GLA programmes
  - £635,353 on ESOL capacity building; and
  - £122,000 in GLA staffing costs;
- £70,000 grant funding to London Councils to support a convening and coordination function, funded with £35,000 from the Humanitarian Response and Coordination line in the GLA budget for 25-26 financial year, and £35,000 from the Welcome and Integration for budget line in the MHCLG grant, as stated above.

**AUTHORISING ASSISTANT DIRECTOR/HEAD OF UNIT**

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

**Name:** Natalie Daniels

**Position:** Assistant Director of Housing Programme and Partnerships

**Signature:**



**Date:**

29/08/2025

## **PART I - NON-CONFIDENTIAL FACTS AND ADVICE**

### **Decision required – supporting report**

#### **1. Introduction and background**

- 1.1. Mayoral Decision (MD) 3386 approved the delivery plan for the Accommodation and Wider Support for Those Who Need It Most programme including the resources allocated to it, and delegated authority to the Assistant Director, Housing Programme and Partnerships (in consultation with the Executive Director for Housing and Land, the Executive Director for Communities and Skills, and the Mayoral Delivery Board), as the Senior Responsible Owner (SRO), to approve the receipt of any additional funding from central government or other sources to expand or extend existing approved schemes contained in the Accommodation and Wider Support for Those Who Need It Most delivery plan.
- 1.2. This decision form seeks approval for expenditure of £590,000 of GLA budget for 2025-26 as part of the Migration Team's work to deliver on the Mayoral Mandate for Accommodation and Support for those who need it. This funding will enable the delivery of work to increase capacity of the immigration advice sector in London, and contribute towards migration system leadership, including strategic work on Modern Slavery, Humanitarian Response and lived experience engagement through the Migrant Advisory Panel. It also seeks approval for the receipt of up to £585,600, and expenditure of the same, to support the delivery of the London Strategic Migration Partnership (LSMP) and ESOL capacity. It further seeks approval of receipt of up to £1,115,836, and expenditure of the same, to support delivery of coordination work on Hong Kong and Ukraine arrivals in London and work to support mental health and wellbeing of people seeking asylum. This programme continues work approved under MD3223.
- 1.3. There are three core strands to the Migration Team's work that these budgets contribute towards. The objectives and expected outcomes are set out against these in order to demonstrate how these budgets work together to form the portfolio of work on Migration:
  - Welcome and Integration Support
  - Immigration Advice Capacity
  - LSMP and migration system leadership

#### **2. Objectives and expected outcomes**

##### Welcome and Integration Support

- 2.1. This programme of work is funded by Ministry of Housing, Communities and Local Government funding to support the welcome and integration of Hong Kong and Ukraine arrivals. Our main mechanism for support is through investment in community-led support services that have trust and reach into communities, alongside coordination, strategic engagement and support for central government and statutory authorities' delivery of these humanitarian routes and accompanying support programmes. This funding has recently been brought together as part of the Government's 'place-based' approach, and sits alongside wider work for Afghan arrivals, people seeking asylum and refugees led by the LSMP.
- 2.2. London is home to an estimated 40-50,000 Hongkongers who have arrived in the UK on the British National (Overseas) visa and our work has supported around 40,000 engagements with members of the Hong Kong community. Now in its fifth year of delivery, this phase of work is focused on building legacy through targeted work with Hong Kong led and specialist civil society, and embedding learning and best practice within service delivery to meet the cultural and linguistic needs of Hongkongers, and ensure a trauma-informed approach.

- 2.3. London hosts nearly 30,000 Ukrainians through the Government schemes, alongside many more who have been unable to return home due to the invasion of Ukraine. The funding proposed has focused on support for Ukrainian led and specialist support services in London to meet Ukrainian's priority needs, including immigration advice and support to help Ukrainians access their rights to residency in the UK.
- 2.4. We propose to use funding from MHCLG to fund collaboration with London Councils to support a convening and coordination function as part of our system leadership role, and towards the Migrant Londoners Hub as hosting information online for Ukraine and Hong Kong communities is a requirement of our grant agreement.
- 2.5. MHCLG are also providing funding to deliver a new English Language Integration Programme. The programme aims to improve English language learning opportunities and outcomes for specified refugee and migrant cohorts and to support integration through informal learning and community-based initiatives. Funding is split across two strands: capacity building for ESOL provision (£211,784.34) and local-level informal English learning (£423,568.68). However, there is some flexibility to rebalance funding between these two strands. This funding aligns with the Mayor's Mandate for Supporting Londoners to Benefit from Growth.

<b>Programme</b>	<b>MHCLG budget</b>
Welcome and integration work for new arrivals, primarily funded through grant funding of civil society and commissioning of complementary services	£303,483
Contributions towards other GLA programmes, including the Migrant Londoners Hub	£55,000
ESOL capacity building	£635,353
Staffing	£122,000

#### Immigration Advice Capacity

- 2.6. This programme of work aims to increase the quality and capacity of immigration advice in London. The current lack of immigration advice can leave people trapped in destitution, homelessness, exploitation, and abuse. Many organisations struggle to meet the high bar for qualification, and to work across complex intersects of immigration law and other types of advice, specifically in relation to exploitation in the workplace. There are three programmes of work that deliver this in London, set out below.
- 2.7. The Frontline Immigration Advice Programme grant funds Refugee Action to deliver training and support to organisations on a pan-London basis, enabling organisations to establish or expand their immigration advice capacity at Level 1 and Level 2 IAA – this refers to the Immigration Advice Authority and refers to the necessary qualification of organisations to provide immigration advice and at what level of complexity they can provide advice at. This work has a particular impact for communities who are underserved in both basic and complex immigration advice, both due to limited number of advisors and barriers to mainstream advice provision. This programme targets a specific underfunded part of the immigration advice sector that would ultimately provide an essential future pipeline for other funding including Legal Aid. This year this programme will include an element of focus on serving the Windrush generation and their descendants.
- 2.8. The Migrant Employment Rights Programme commissions an organisation to deliver bespoke training on the specific intersection of employment rights and immigration, to address a gap in specialist provision across London. Many migrants experiencing exploitation in the workplace require advice

that addresses both the immigration and employment rights issues, but there is a gap in organisations and advisers that are able to work across this complex intersect. This programme deploys extensive training as well as specialist supervision that sustainably upskills organisations. This work is supported by our collaboration with the Citizenship and Integration Initiative, which seconds frontline experts into the Migration Team to provide additional specialism.

- 2.9. The Migrant Londoners Hub is a commissioned service that provides access to a centralised source of good quality information and signposting to support Londoners with immigration needs to understand their status, rights and entitlements. The aim is that all Londoners have access to the information they need as early as possible, reducing pressure on advice services and ensuring that people are more likely to seek advice at the earliest opportunity, preventing cases from increasing in complexity and urgency, and the harms caused by immigration precarity.

<b>Programme</b>	<b>GLA Programme Budget</b>	<b>MHCLG budget</b>
Frontline Immigration Advice Programme	£290,000	
Migrant Employment Rights Programme	£130,000	
Migrant Londoners Hub	£30,000	£20,000

#### London Strategic Migration Partnership (LSMP), and migration system leadership

- 2.10. Through the work of the LSMP and wider GLA support, this programme steers London through humanitarian crisis, evacuations, and helps to deliver government priorities in relation to asylum, resettlement, and ESOL. It also seeks to effect systems change through targeted interventions that require the GLA's convening power, with a priority focus on delivering the GLA's commitment to protect migrant workers from exploitation.
- 2.11. The London Strategic Migration Partnership budget primarily covers GLA staffing, with additional funding for hosting the LSMP Board and expenses incurred. The work of the LSMP centres around convening the LSMP Board, its sub-groups and task and finish groups as well delivering core functions to boroughs including matching resettled refugees to accommodation in London. Goals of the Board include enabling London to play its part in meeting national humanitarian commitments, developing new approaches to accommodating and supporting people seeking asylum, and enabling access to high-quality and appropriate English for speakers of other languages to support economic participation, social integration and wellbeing. The team also deliver a core service to boroughs as single points of contact, and providing an accommodation matching service to support boroughs refugee resettlement work – this has so far included enabling over 1,000 individuals to be matched and resettled in London.
- 2.12. The LSMP has also received an additional grant of £197,600 this financial year with the aim of protecting vulnerable asylum-seeking people by delivering a trauma-informed therapeutic support service. People seeking asylum in the UK often face profound and complex mental health challenges stemming from experiences of trauma, displacement, and prolonged uncertainty. Many have fled war, persecution, or violence, and may have endured exploitation, bereavement, or torture. The GLA will grant fund local authorities and Integrated Care Boards (ICBs), or their equivalents, in London to deliver this work, with the aim of addressing the needs of groups where there is evidence they have higher needs that are not being currently met by existing services, with a focus on protected characteristics to improve equality and inclusion.
- 2.13. The Migrant Advisory Panel supports our convening and system leadership work through the inclusion of lived experience, in recognition that structured consultation and co-design with migrant Londoners themselves enables stronger and more relevant GLA programmes. The Panel reflects all types of

immigration status and supports the GLA Group to understand the intersecting needs of migrants who face additional barriers and vulnerabilities. Their work to date has included input into the Good Work Standard, the Policing and Crime Plan and the GLA's ESOL Strategy. A partner organisation is commissioned to deliver this support.

- 2.14. The Humanitarian Response capacity fulfils a necessary part of London's resilience to humanitarian and migration crises, interacting with London Resilience Structures and often directly taking the lead where crises fall outside of Gold Command Structures. To date this has included the initial response work on Afghan and Ukraine arrivals, dealing with evacuation of British nationals and their families from conflict zones and addressing urgent challenges including the transition to e-visas and various acute asylum pressures as they arise. This is reactive funding to support the Migration Team to be agile towards responding to humanitarian need, with new crises emerging during most years this funding has enabled the team to convene emergency summits, and rapidly deploy funding to meet urgent advice and information needs in London. This funding further supports capacity within London Councils through a direct grant fund to facilitate work with boroughs and to enable ongoing shared leadership.
- 2.15. The Modern Slavery programme is investing in commissioned research in collaboration with MOPAC to create a blueprint for safe reporting of migrant victims of crime, with a particular focus on migrant victims of slavery and survivors of violence against women and girls. Migrant victims of crime often fear reporting to the authorities, out of fear of being referred to immigration enforcement – something often manipulated and weaponised by abuses to further their control. This research furthers our understanding of practical ways to progress statutory services' desire to support victims and safeguard them from harm through enabling a victim first approach, and work towards a firewall for migrant victims to safely report crime. This work is supported by our collaboration with the Citizenship and Integration Initiative alongside the Employment Rights programme outlined above.
- 2.16.

<b>Programme</b>	<b>GLA Programme Budget</b>	<b>MHCLG budget</b>	<b>Home Office</b>
London Strategic Migration Partnership staffing and minor delivery expenses			£388,000
Mental health for people seeking asylum			£197,600
Migrant Advisory Panel	£35,000		
Humanitarian Response and coordination	£55,000	£35,000	
Modern Slavery	£50,000		

### **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. All these programmes seek to tackle the inequalities that pose barriers to migrants, refugees and people seeking asylum. 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:

<b>Risk</b>	<b>Mitigation</b>	<b>Probability</b>	<b>Impact</b>	<b>Red Amber Green (RAG) rating</b>
Inadequate due diligence of programme activities and procurement that could compromise safety of people using the services, or lead to funds not being directed towards intended beneficiaries	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 resulting in delays that hinder impact.	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
Projects require long-term intervention, limiting the effectiveness of short-term project funding.	Focus funding in areas that support wider infrastructure, with a focus on sustainability beyond initial funding.	3	3	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

Conflicts of interest

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

#### Links to Mayoral strategies and priorities

- 4.3. This work sits under the Mayoral mandate and associated delivery plan for Accommodation and Support for those who need it which has a focus on vulnerable migrants.

#### Consultation and impact assessment

- 4.4. The design of this programme has been informed by research and engagement with specialist partners working in the migration sector and delivery will be shaped through our governance structures including the Migrant Londoners Panel.

#### Subsidy control

- 4.5. GLA officers have carried out an analysis of the proposal against the Statutory Guidance for the UK Subsidy Control Regime ("Statutory Guidance"). Officers have assessed that the Subsidy Control Regime does not apply to the proposed award of grant funding to either Refugee Action or London Councils because the proposed financial assistance to both does not meet all four limbs of the four-limbed test.
- 4.6. In particular, the proposed financial assistance fails to satisfy Limb B of the four-limbed test set out in the Subsidy Control Act 2022 (the SC Act), as the beneficiaries of the funding are not acting in the capacity of an enterprise.
- 4.7. The rationale is that:
- whilst Refugee Action undertake some limited ancillary economic activities, it's primary purpose and that in respect of which the funding is to be awarded to provide support to refugees on a non-economic basis. The Statutory Guidance provides that such financial assistance is unlikely to satisfy Limb B of the four-limbed test.; and
  - London Councils is a public body, specifically a joint committee established pursuant to the Local Government Act 1972 and the activity in respect of which the funding is proposed to be awarded is non-economic in nature and concerns London Councils' discharge of its public functions. Again, the Statutory Guidance provides that such financial assistance is unlikely to satisfy Limb B of the four-limbed test.

## **5. Financial comments**

- 5.1. The Mayor's approval is sought for:
- expenditure of £590,000 of GLA budget for 2025-26 as part of programmes to increase capacity of immigration advice and migration system leadership within the Accommodation and Support for Those Who Need It mandate.
  - receipt of up to £388,000 of grant funding from the Home Office in 2025-26 financial year, and expenditure of the same, to meet costs related to the delivery of the London Strategic Migration Partnership
  - receipt and expenditure of up to £480,483 of grant funding from the Ministry of Housing, Communities and Local Government (MHCLG) for the delivery of coordination work on Hong Kong and Ukraine arrivals.

- receipt and expenditure of £635,353 from MHCLG on ESOL capacity building, split across two strands: capacity building for ESOL provision (£211,784.34) and local-level informal English learning (£423,568.68) with some flexibility to rebalance funding between these two strands.
- receipt and expenditure of £197,600 from the Home Office on work to support the mental health and wellbeing of people seeking asylum.

5.2. This expenditure is detailed below.

<b>Programme</b>	<b>GLA Programme Budget</b>	<b>MHCLG budget</b>	<b>Home Office</b>
Frontline Immigration Advice Programme	£290,000		
Migrant Employment Rights Programme	£130,000		
Migrant Londoners Hub	£30,000	£20,000	
Welcome and integration work for new arrivals, primarily funded through grant funding of civil society and commissioning of complementary services		£303,483	
Staffing		£122,000	
London Strategic Migration Partnership			£388,000
Migrant Advisory Panel	£35,000		
Humanitarian Response and coordination	£55,000	£35,000	
Modern Slavery	£50,000		
ESOL capacity building		£635,353	
Supporting the mental health and wellbeing of people seeking asylum			£197,600
<b>Total</b>	<b>£590,000</b>	<b>£1,115,836</b>	<b>£585,600</b>

5.3. The Expenditure of £590,000 will be funded from the GLA Migration Support budget in 2025-26 financial year and it is included in the GLA budget approved in February 2025.

## 6. Planned delivery approach and next steps

<b>Activity</b>	<b>Timeline</b>
Sign Grant Agreement with Refugee Action to deliver the Frontline Immigration Advice Programme; confirm contact extension for Modern Slavery research; Employment Rights Programme	August 2025
Engage procurement on route to market / contract extensions for Migrant Londoners Hub; Migrant Advisory Panel	August 2025
Evaluation of the first year of Employment Rights Programme finalised	August 2025
Grant funding and / or commissioning welcome and integration programmes	October 2025



**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 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 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:**

Hannah Boylan has drafted this report in accordance with GLA procedures and confirms the following:

✓

**Mayoral Delivery Board**

A summary of this decision was reviewed by the Mayoral Delivery Board on 26 August 2025.

✓

**ASSISTANT DIRECTOR, FINANCIAL SERVICES:**

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

**Signature:****Date:**

27/08/2025