

GREATER LONDON AUTHORITY

REQUEST FOR MAYORAL DECISION – MD3285

Financial Hardship work programme 2024-25

Executive summary:

This Mayoral Decision (MD) seeks approval for expenditure of £3,181,000 in 2024-25, on activities that make up the financial hardship team's work; and a further £940,000 in 2025-26. The work programme aims to support Londoners experiencing financial hardship, by connecting them with information and advice to help them access their financial (and other relevant) rights and entitlements. This MD authorises expenditure of budget that was allocated to work on this issue in the GLA: Mayor budget for 2024-25 and approved by MD3250. This includes £4.2m to extend income maximisation schemes to help Londoners facing financial challenges.

Decision:

That the Mayor approves:

- expenditure of £3,181,000 on a programme of work in 2024-25, and £940,000 in 2025-26, to support Londoners on low incomes and those struggling with living costs; this expenditure comprises:
 - £2,700,000 in grant funding to London Citizens Advice (LCA), and the London Legal Support Trust, to: sustain enhanced adviser capacity across the networks of 28 LCA offices and 38 Advice Centres of Excellence; improve community outreach; and upskill community-based staff and volunteers
 - £442,000 in additional grant funding to extend the Food Roots programme
 - £200,000 on the extended provision of learning support programme, Healthy Start trainer and programme evaluator services required to extend the Food Roots programme
 - £340,000 to run further phases of the pension credit uptake campaign, and develop further use cases based on recent pilots
 - £150,000 to fund the implementation of a local welfare assistance evaluation framework
 - £150,000 on a range of commissioned research and analysis to support the delivery and development of this and future work programmes
 - £124,000 for continued maintenance, promotion and evaluation of the Cost-of-Living Hub
 - £15,000 for continued maintenance and promotion of the Employment Rights Hub
- an exemption from the requirement of the GLA's Contracts and Funding Code to competitively procure learning support programme, Healthy Start trainer and programme evaluator services (with a total value of £200,000, as noted above).

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:

14/8/24

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

Decision required – supporting report

1. Introduction and background

- 1.1. This Mayoral Decision (MD) seeks approval for expenditure, from the GLA Mayor budget for 2024-25, for activity to support Londoners on low-incomes, and those struggling with high living costs. The MD describes the use of elements of the budget, allocated in MD3250, to continue the provision of London-wide advice services relating to problem debt, welfare benefits and other issues.
- 1.2. The activity proposed in this MD is required to extend the period during which work authorised under MD3157 can continue. Other elements of the financial hardship team's work in 2024-25 are covered by the following decision documents:
 - MD3240 (Advice in Community Settings grant programme 2024-25)
 - MD3234 (Free Holiday Meals Programme Year 2)
 - MD3264 (The Felix Project Multibank pilot)
 - a Delegated Authority Record authorising expenditure on targeted pay-per-view advertising of the Cost-of-Living Hub.
- 1.3. The Mayor has committed to help Londoners mitigate the worst effects of the cost-of-living crisis. Meanwhile several partners have committed to take action so that every Londoner can access the support they need to avoid or escape financial hardship.
- 1.4. There are several barriers to realising these ambitions: low awareness of rights and entitlements amongst Londoners; variable (and in some cases, inaccessible) local welfare systems; and an over-reliance on informal crisis support mechanisms, such as food aid, which are often delivered by small voluntary organisations.
- 1.5. The cost-of-living crisis has exacerbated these challenges – particularly by placing a greater emphasis on the local and informal organisations that play such a crucial role in helping Londoners understand and access the support available.

2. Objectives and expected outcomes

Element 1 – continued investment in community-based advice and support services

Context and purpose

- 2.1. In June 2022 the Mayor authorised expenditure of £2.3m to fund two pan-London advice infrastructure bodies for 12 months to increase and maintain expert advice capacity across their networks (MD2991). This allowed the networks London Citizens Advice (LCA) and the London Legal Support Trust (LLST) to act as “community anchors”, offering as many Londoners as possible advice and support in dealing with the cost-of-living crisis.
- 2.2. Funding was distributed across both networks, to support the creation of over 40 new crisis navigation and specialist adviser posts, with coverage in every London borough. Funding was also used to deliver Advice First Aid training to local community partners, to help them identify and navigate local support services on behalf of service users or members of the community.
- 2.3. Following the success of the programme in its first year, the Mayor authorised a further £2.5m for both networks to continue delivery for a further 12 months, from September 2023 to October 2024 (MD3157).

- 2.4. Up to March 2024, the funding has enabled the two networks to reach over 43,000 Londoners combined, leading to total increases in their incomes of more than £17m.
- 2.5. This MD seeks approval for expenditure of £2.7m to extend and slightly increase the funding for these two networks, so they can continue providing support to Londoners for a third 12-month period. Demand for cost-of-living advice remains high, as Londoners on low and no incomes continue to see their incomes fall short of expenditure, and issues with problem debt and maintaining housing rise.
- 2.6. As in previous years, it is anticipated that the funding will go towards a mix of: covering the salaries of specialist advice and crisis navigation staff; and supporting the development of links and referral routes into surrounding community organisations, through initiatives such as Advice First Aid training.

Outcomes and deliverables

- 2.7. Extending funding for a third 12-month period would help the networks to ensure more Londoners know their legal rights and entitlements, and have the support they need to assert them, in the context of continued high demand for advice services in London.
- 2.8. The GLA would also seek to ensure a continued focus on promoting Advice First Aid, as part of a drive to strengthen links between advice and community organisations. It would also engage with delivery partners to establish how the programme can be flexible to address emerging needs in certain boroughs, or based on demand for certain types of services (such as housing advice), or based on Mayoral priorities, such as the manifesto commitment to make childcare entitlements an explicit part of our work with advice services.
- 2.9. Based on delivery to date, the ambition would be to reach: a further 25,000 Londoners with direct advice and support over the 12 months, achieving financial gains of over £8m; and a further 12,000 Londoners with wider community engagement and training, including Advice First Aid.
- 2.10. However, it is recognised that these figures would be subject to a range of variables that are impossible to predict, and in some cases may be impossible to control. These include the ability to retain, recruit and adequately remunerate advisers; the volume and complexity of client caseloads; and the success of community referral routes.

| Deliverables | 2024-25 expenditure to be agreed under this decision | 2025-26 expenditure to be agreed under this decision | Total expenditure to be agreed under this decision |
|---|---|---|---|
| Continued funding for 24 full-time equivalent (FTE) crisis navigators, and 18 FTE specialist advisers, in LCA/LLST law centres. | £2,025,000 | £675,000 | £2,700,000 |
| Advice First Aid training sessions for community organisations, delivered in all 32 London boroughs | | | |

Element 2 – extension of the Food Roots programme

Context and purpose

- 2.11. The Food Roots programme has run in several forms since 2021. It supports local food partnerships across London boroughs to embed more sustainable and resilient approaches to tackling food insecurity in their communities. In May 2023, the Mayor approved expenditure of £1.24m for a new 12-month Food Roots programme, focused specifically on embedding support for financial hardship into emergency food provision across London (MD3129).

- 2.12. The original Food Roots Incubator programme ran from May 2021 to August 2022. It supported and invested in 10 local food partnerships to help them: strengthen new relationships formed during the pandemic; and develop in ways that did not embed emergency food aid as the solution to food insecurity. Food Roots crisis grants were awarded to food partnerships in 30 different London boroughs in early 2023. Focussed on supporting the sector in the cost-of-living crisis, these crisis grants supported new and continuing best practice in partnership working and cash-first support, despite the acute capacity pressures that food-aid providers were experiencing.
- 2.13. This 12-month programme is currently funding coordinator capacity in 22 food partnerships; an accompanying learning support programme; tailored mentoring; Healthy Start training; and an independent programme evaluation. So far, the programme is supporting new and established partnerships to increase Healthy Start uptake in their areas; develop sustainable funding plans for their partnership work; and share resources, including via cross-sector working. In addition, eight emergency food providers within these partnerships have begun a supported journey towards providing holistic support which addresses the root causes of food insecurity in their communities, commonly referred to as 'wraparound support'.
- 2.14. This MD seeks approval for expenditure of £642,000 to extend Food Roots in its current form for six months. Need for emergency food provision remains high, with the Trussell Trust reporting 2023-24 as its busiest ever year. The expenditure comprises £442,000 of additional grant funding across 21 current borough recipients; and £200,000 in charges payable relating to the extended provision of learning support programme, Healthy Start trainer and programme evaluator services.
- 2.15. A six-month extension of grant funding will allow current grantees to embed the learning from the busy 12-month programme, and take meaningful steps towards delivery model shift. It will also improve grantees' readiness for the end of Food Roots within this financial year.
- 2.16. The extended provision of learning support programme, Healthy Start trainer and programme evaluator services is required, for the reasons set out at the second, third and fourth bullet points at paragraph 2.23, below.
- 2.17. The services in question were originally procured for 12 months, without an express right to extend provision as proposed. Officers acknowledge that section 9 of the GLA's Contract and Funding Code requires, where the expected value of contract for services is between £10,000 and £150,000, that such services are procured completely, or called off from an accessible framework. However, section 10 provides that an exemption from this requirement may be approved where a supplier has had previous involvement in a specific current project; or where the services concerned are a continuation of existing work that cannot be separated from the new project/work.
- 2.18. Here the current providers (detailed below) have each provided services for 12 months:
- the Social Investment Consultancy: learning support programme, including curriculum – current contract value £100,000, proposed contract extension value £50,000
 - Citizens Advice Southwark: Healthy Start trainer services – current contract value £90,000, proposed contract extension value £60,000
 - ICF: programme evaluator services – current contract value £120,000, proposed contract extension value £60,000

Those services are of the same, or a very similar, nature to those in respect of which approval is sought under cover of this MD. Given these organisations' previous experience of service provision to the GLA, and the GLA's specific needs, they are in an ideal position to provide the services optimally. It is unlikely that any other provider would be able to provide a more competitive tender. Accordingly, the Mayor's approval of an exemption from the requirements of section 9 of the GLA's Contract and

Funding Code is sought. The remainder of the learning support budget, £30,000, will be spent on newly procured mentoring services.

- 2.19. This would help ensure longevity by reducing the loss of skilled and experienced staff due to funding uncertainty; and giving new relationships, developed during the last 12 months, longer to embed.
- 2.20. The extension will also give organisations more time to apply their learning from the programme, and access external funding for their partnership – including via the Sustainable Funding mentor strand within the programme. These considerations are central to achieving the Food Roots objective of improved sustainability for the sector.
- 2.21. The ‘food partnerships’ described in this document are (typically) borough-wide local partnerships that provide support to Londoners experiencing food insecurity. They involve local authorities, voluntary and community sector (VCS) organisations, and businesses. Many of them were formed at the height of the pandemic.

Outcomes and deliverables

- 2.22. The aim of Food Roots is to help food-aid partnerships across London to develop and embed more sustainable ways of working. This will enable them to better support Londoners who are forced to rely on emergency food aid. The work of the programme includes supporting the delivery of cash-first support by emergency and other community food providers.
- 2.23. The programme budget will be used for the following purposes:
 - Provide six months’ continuity grant funding for the existing 21 food partnerships, allowing them to maintain their dedicated part-time or full-time coordinator. These coordinators develop, share and embed best practice; build relationships between organisations; help address any short-term delivery challenges by finding cross-organisation solutions; and provide partnerships with a strategic link to other work ongoing in London.
 - Extend the existing learning support partner contract, to continue to support grantees by facilitating peer-learning and delivering learning sessions; and to develop a community of practice across London. The extension will ensure that grantees are supported for the duration of their funding, and give more time for new cross-London relationships to embed and be productive.
 - Expand the dedicated Healthy Start training and support offer for partnerships to help increase the uptake of Healthy Start vouchers, as an introduction to cash-first delivery in their settings. The training offer will be expanded to include statutory organisations such as primary care settings and local authorities. This will increase the longevity of the work, and provide more opportunities for collaborative working between statutory organisations and the VCS.
 - Continue to provide personalised support for grantees, via best practice mentoring. As in the current programme delivery, mentoring will focus on specific areas that grantees and their networks need more intensive support with, to address barriers to the sustainability and resilience of their work.
 - Extend the current programme evaluation, to assess impact; demonstrate the value of best practice; and enable partnerships to obtain longer longer-term funding from sustainable sources. Extending the evaluation alongside the grants programme will enable another round of surveys and interviews, and allow the supplier to do more work on local data capture with interested grantees. This will likely produce richer data from grantees and capture more outcomes, as projects have been running longer and had time to implement – and see the consequences of – changes made as a result of the programme.
- 2.24. Expenditure for the programme evaluator and the learning support partner will be at the same level as the first 12 months of the programme, pro-rata. Grant-funding levels will receive an uplift to acknowledge the impact of inflation and the cost-of-living crisis; and ensure that front-line work can

remain effective. Expenditure on the Healthy Start training will be increased from its pro-rata level, to include funding for additional training offered to statutory organisations. Expenditure for the mentoring within the learning support partner will be reduced slightly from its pro-rata level, because a six-month extension limits the options for new procurement.

| Deliverables | 2024-25 expenditure to be agreed under this decision | 2025-26 expenditure to be agreed under this decision | Total expenditure to be agreed under this decision |
|--|---|---|---|
| 21 food partnership grants, covering the cost of a full- or part-time staff member for 22 partnerships across London | £442,000 | £0 | £442,000 |
| Learning support programme, including curriculum & mentoring | £40,000 | £40,000 | £80,000 |
| Healthy Start trainer | £30,000 | £30,000 | £60,000 |
| Programme evaluator | £30,000 | £30,000 | £60,000 |
| Total | £542,000 | £100,000 | £642,000 |

Element 3 – uptake campaigns and local welfare evaluation

Benefit uptake campaigns

Context and purpose

- 2.25. The Mayor authorised expenditure of £275,000 to fund the software and analytics social enterprise Policy in Practice (PiP) to work with participating London boroughs, to deliver data-driven benefit-uptake campaigns (MD3157). This funding has allowed PiP to: deliver a second data-driven campaign to identify older households eligible for Pension Credit; and to support them in claiming this benefit, which ensures a minimum income level for people of pensionable age.
- 2.26. PiP has offered a managed service to 25 boroughs, and created increased automation in the digital tool used by boroughs to deliver the campaign. This will enable boroughs to take more of a lead in delivering campaign activity in the future. Results of this second campaign are currently being quality-checked.
- 2.27. Funding has also been used to pilot a similar data-driven campaign approach to support uptake of Attendance Allowance, Healthy Start and Free School Meals (FSM). At least three boroughs are involved in each of these pilots. Delivery of the pilots is under way, with evaluation results expected in August.
- 2.28. This MD is seeking approval to deliver a third Pension Credit campaign; and build on one or more of the benefit-uptake pilots. The expenditure for Phase 3 of the campaign will be £340,000. This will provide funding for PiP to work in partnership with participating boroughs, to take a data-driven approach to increasing benefit uptake.
- 2.29. Part of this expenditure will support participating boroughs to repeat a third Pension Credit campaign. The campaign will make use of the LIFT tool developed by PiP; and will be informed by the IFS research into effective messaging to engage older people and maximise uptake.
- 2.30. The remaining funding will be used to build on one or more of the pilot campaigns. This activity will be informed by evaluations of the pilots, which are expected in August. However, it is likely to involve scaling up the campaign for one or more of the benefits, or delivering further pilots to test specific delivery challenges highlighted through the pilots.

Outcomes and deliverables

- 2.31. The most recent data from the second Pension Credit campaign has indicated real value in running repeat campaigns. There is also good evidence of this from Islington Council, where follow-up Pension Credit campaigns have achieved considerable success as households reach state-pension age, and older households decide to make a claim after repeat communications. Phase 3 of the campaign will look to work with all 32 London boroughs. Based on delivery over the past year, we can expect the next phase of the campaign to reach approximately 16,000 Londoners, with around 1,600 older people making a successful Pension Credit claim. This amounts to around £7m in financial gains over the year.
- 2.32. The exact outcomes and deliverables for data-driven campaign activity for Healthy Start, Attendance Allowance and/or FSM will be agreed by officers once the full evaluations have been received.

| Deliverables | 2024-25 expenditure to be agreed under this decision | 2025-26 expenditure to be agreed under this decision | Total expenditure to be agreed under this decision |
|---|---|---|---|
| Delivery of a Phase 3 Pension Credit campaign with participating boroughs in partnership with PiP. Scaling up and/or delivering additional pilots of data-driven campaigns for Healthy Start, FSM and Attendance Allowance. | £225,000 | £115,000 | £340,000 |

Output and outcomes framework for local welfare and support schemes

Context and purpose

- 2.33. Research funded by the GLA and London Councils, and published in 2023, highlighted the significant role local welfare assistance (LWA) plays in supporting households facing financial hardship. The study advocated for the rollout of a common evaluation framework for LWA, to give boroughs consistent measures to understand the value of their offer; and to demonstrate and learn from successes. Consequently, preparations were made to introduce a common framework for LWA, including a new digital system using funding approved by the Mayor under MD3157 to aid its adoption by boroughs.
- 2.34. Consultation with key stakeholders led to refinements to the project scope. This included: a shift to a broader framework that reflects wider local welfare and support schemes, recognised to help households in financial hardship; and development of an agile tool that can be integrated with existing IT systems, rather than requiring a new digital system. While the overarching objectives are unchanged, this led to an adjusted approach and delayed delivery timescales. During this period, funding authorised under cover of MD3157 was used to begin the development of the expanded framework.
- 2.35. This MD seeks approval for £150,000 funding to complete and trial the expanded framework. The completed framework will initially be tested with a small number of boroughs to assess its adoption. The pilot phase will be supported with guidance materials, practical support and resource for participating boroughs. Insights gained from the pilot will be used to inform necessary adjustments to the framework; and lead to the creation of a user toolkit resource to aid broader adoption and usability.
- 2.36. Depending on the results of the pilot phase, the next step would be for the framework to be rolled out to additional boroughs on a voluntary basis. This is expected to take place from 2025-26 onwards, and to be conducted in collaboration with stakeholders such as London Councils.

Outcomes and deliverables

- 2.37. The common framework will provide boroughs with consistent measures to understand: whether models are achieving their intended outcomes; the capability to evaluate full local welfare and support

offers; and the data to communicate the effectiveness of schemes. These capabilities will support improved service design and delivery, and increased recognition and resource for local welfare and support schemes. In this way, it will contribute towards the ultimate aim to improve the safety net for Londoners.

2.38. The main deliverables for this expenditure are as follows:

- **Output and outcomes framework** – a standardised, user-friendly framework for local welfare and support schemes. The framework will be tailored to the requirements of its intended users and audiences. It will be tested during the pilot phase, with data on local welfare and support schemes collected, analysed and shared.
- **Implementation guidance** – detailed instructions for test boroughs detailing how to adopt and implement the framework for purpose of the pilot. This will feature practical and analytical guidance to support test boroughs adoption of the framework – for example, approaches to data collection, data-sharing considerations, and analysis methodologies.
- **Pilot phase and support** – pilot implementation with a small number of test boroughs. This will be enabled via guidance, practical support and resource (e.g., technical expertise, contributions to staff costs, and support to tailor IT systems in line with the agile tool). to support boroughs’ participation in the pilot.
- **Lessons from the pilot** – insights and learning from the pilot will be captured at each stage, with a focus on identifying successful approaches to implementation and considerations for boroughs. This will inform refinements to the framework and the creation of a user toolkit for the next stage of the project.
- **Strategic planning document** – an informed approach for the next stage of the project, with outline for how to expand the use of the framework. This will include strategies to encourage broader adoption; identification of suitable opportunities and partners; and consideration of risks and enablers to maximise the framework’s reach and impact across London boroughs.

| Deliverables | 2024-25 expenditure to be agreed under this decision | 2025-26 expenditure to be agreed under this decision | Total expenditure to be agreed under this decision |
|--|---|---|---|
| Development and pilot of output and outcomes framework for local welfare and support schemes | £100,000 | £50,000 | £150,000 |

Element 4 – research and analysis

Context and purpose

2.39. The challenges faced by Londoners experiencing financial hardship are constantly changing. There have been several interventions over the past two years, the efficacy of which need evaluating. And at the start of a new mayoral term, there may be new priorities that require options to be developed. Therefore there is an ongoing need to refresh and update the evidence base that underpins the GLA’s rationale for acting.

2.40. This MD seeks approval to invest in a range of additional research, analysis and learning activity. This will:

- ensure the successful delivery of the broad work programme

- inform the development of new or scaled-up forms of support/approaches to supporting Londoners experiencing financial hardship
- ensure a better understanding of the strategic role the GLA could play in coordinating and supporting city-wide approaches to assisting Londoners experiencing financial hardship.

Outcomes and deliverables

- 2.41. Under MD3240 (Advice in Community Settings) and MD3264 (The Felix Multibank pilot), the Mayor authorised expenditure on projects that included evaluation. Other initiatives approved through this MD will also have dedicated evaluation elements. Approval is sought through this MD for further expenditure of up to £150,000 to commission a range of additional research and analysis. This will build on this evaluation activity to help fill intelligence gaps and support the development of future approaches.
- 2.42. The number and nature of the projects commissioned will depend several factors, including the results of organisation-wide strategic planning processes. This will help to refine and prioritise research questions/topics.
- 2.43. It is anticipated that all research projects will be commissioned. However, should the GLA receive a proposal from an external organisation seeking funding for research/analysis that is consistent with the Mayor's priorities, and with the aims and objectives of this intended programme of research and analysis, the option to provide funding via grant agreement will be explored.

| Deliverables | 2024-25 expenditure to be agreed under this decision |
|---|---|
| Five to seven commissioned/funded research of analysis projects | £150,000 |

Element 5 – maintenance, promotion and evaluation of the Cost-of-Living Hub

Context and purpose

- 2.44. In 2022, the GLA launched the Cost-of-Living Hub on london.gov.uk. This signposts Londoners to trusted information and advice about a wide range of advice, entitlements and other forms of support.
- 2.45. In August 2023, the Mayor approved the allocation of £150,000 to the hub for continued maintenance, promotion and evaluation (MD3157).
- 2.46. In winter 2023, following user research and evaluation, the hub received a major update. Its structure and layout was changed, and content was refreshed, to make it easier to navigate and more relevant for users. Following the redesign, the hub saw a significant increase in its engagement rate (a measure of how many users stay on a page for a certain length of time) on key pages.
- 2.47. As part of funding for the Cost-of-Living Hub in 2023-24, 250,000 leaflets were produced, with key content from the hub. These were targeted at low-income households at higher risk of digital exclusion.

Approvals and delivery method

- 2.48. Approval is sought for £124,000 to promote the hub, develop new content, and ensure its accessibility. The 2023-24 promotion of the hub will be reviewed to identify any improvements needed for 2024-25 activity.
- 2.49. This funding could also be used to produce printed leaflets, and develop further translated materials.

Outcomes and deliverables

- 2.50. The content and structure of the Cost-of-Living Hub will continue to be monitored and updated in response to emerging cost of living issues.
- 2.51. Printed leaflets with key content from the hub will be delivered, although the exact number will depend on the review mentioned at 2.48, above.
- 2.52. For 2024-25, a target of 225,000 total users will be set. Alternative metrics of the hub's performance will continue to be explored.

| Deliverables | 2024-25 expenditure to be agreed under this decision |
|---|---|
| Continued maintenance, promotion and evaluation (supported by research where appropriate) of the Cost-of-Living Hub. Printed leaflets with key information from the hub targeted at low-income households at higher risk of digital exclusion. | £124,000 |

Element 6 – maintenance and promotion of the Employment Rights Hub

Context and purpose

- 2.53. Many workers are made vulnerable to employment-rights abuses by wide gaps in the public's knowledge of such rights, and of how to advocate for themselves and access support. Poor employment practices contribute to high levels of in-work poverty, weakening the case for work being a route out of poverty. Evidence shows low-paid workers and those with protected characteristics are most likely to experience breaches in their employment rights. For example, one in three UK workers earning at or around the wage floor are being paid less than the statutory minimum wage.
- 2.54. The Employment Rights Hub provides Londoners with access to information about employment rights. The hub helps users to understand key matters related to their rights, and what to do if they require support. It includes signposts to trusted organisations. The hub contains an automatic translation function to ensure Londoners who speak English as a second or other language can access it in their preferred language.
- 2.55. Since its launch in 2019, the hub has been continuously updated to improve the user journey and reflect the changing nature of work in London. The hub has been actively promoted to Londoners, including social media adverts targeted at Londoners most vulnerable to employment rights abuses. In 2023-24, the Employment Rights Hub had over 39,000 users.
- 2.56. This MD seeks approval for expenditure of £15,000 for the promotion of the Employment Rights Hub, building upon successful approaches proven to engage Londoners with the hub. Continued maintenance will ensure Londoners have access to new and up-to-date information related to changes in employment rights, the nature of work in London and sources of support. Overall, this will help to ensure Londoners have ready access to information about their employment rights; and how they can access support when needed.

Outcomes and deliverables

- 2.57. The proposed promotional activity is expected to result in:
- more Londoners understanding their rights at work, and how to enforce them and/or access further support
 - continued access to high-quality, accessible and up-to-date information about rights at work amongst Londoners at risk of employment-rights abuses.
- 2.58. For 2024-25 a target of 30,000 total users will be set. Alternative metrics of the hub's performance will continue to be explored.

| Deliverables | 2024-25 expenditure to be agreed under this decision |
|---|---|
| A targeted outreach campaign to promote the Employment Rights Hub | £15,000 |

3. Equality comments

- 3.1. In taking the decisions requested, 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; and advance equality of opportunity, and foster good relations, between persons who share a relevant protected characteristic (age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation) and persons who do not share it (section 149 of the Equality Act 2010).
- 3.2. Several groups of Londoners with protected characteristics are at greater risk of financial hardship and particularly vulnerable to the rising cost of living.
- 3.3. Examples of these protected characteristics include the following:
 - Age: 33 per cent of London's children live in relative poverty, compared 25 per cent for total poverty and 24 per cent for severe poverty; and 47 per cent of single-parent households live in relative poverty. In addition, 23 per cent of older people in London live in relative poverty; and 11 per cent live in material deprivation – both rates are the highest for any English region.
 - Disability: 33 per cent of London's households with a disabled person live in relative poverty, compared to 22 per cent of households in which no one is disabled.
 - Ethnicity: 33 per cent of households headed by someone from a Black, Asian or Minority Ethnic background are in relative poverty, compared to 18 per cent of households headed by someone from a White background.
 - Migrant Londoners – especially those with no recourse to public funds – face a particularly high risk of destitution.
- 3.4. The work set out above will be available to and benefit all Londoners. However, it has been designed to provide support to Londoners with protected characteristics. For example:
 - The development of partnerships between advice agencies and community organisations will support Londoners experiencing barriers to accessing services. These include Deaf and disabled Londoners; Black, Asian and Minority Ethnic Londoners; younger Londoners; and migrant Londoners. This will advance equality of opportunity in relation to accessing services and forms of support.
 - Increased access to rights and entitlements will lead to financial gains for Londoners with protected characteristics.
 - The investment in community-based advice services will provide an effective support option for Londoners who lack either ability or confidence in using digital resources; and those with more complex needs that cannot be served with digital resources.
 - Funding of advice, particularly specialist legal advice, will benefit Londoners with no recourse to public funds who require immigration advice.
 - The uptake campaign focus on Pension Credit will support older Londoners living on some of the lowest incomes.

4. Other considerations

4.1. The key risks and issues are as follows:

| Risk/issues | Mitigation |
|---|--|
| The scale of the cost-of-living pressures Londoners face may limit this work's impact. | Awareness-raising activity, and the delivery of advice interventions, will be flexible; and will be targeted at the communities with the most acute needs to maximise their impact. Analytics data from digital products, and monitoring data from funded advice interventions, will yield intelligence on the problem's scale of and policy drivers. This could be used to lobby government for additional support at a national level, or leverage additional funding from London-based partners. |
| Despite funding increased capacity in the advice sector, advice services may remain overwhelmed. | The Advice First Aid training will mean more Londoners can be helped with simple queries by non-experts; and improve the quality of referrals to expert advice services. The continued development of new and improved resources on the Cost-of-Living Hub will mean more Londoners can self-serve and deal with simple queries themselves. |
| Information on the Cost-of-Living Hub could become outdated. | Officers will monitor key changes to funding pots and schemes; and periodically update the hub when appropriate. |
| Information provided digitally is inaccessible to Londoners who lack the necessary digital skills to navigate them. | The provision of face-to-face advice, as set out in Elements 1 and 2, serves to pick up cases where Londoners cannot self-serve via digital resources and tools. This also contains provisions for those with language barriers; and for whom complex cases mean that generalised advice is not suitable to their needs. Hard-copy leaflets setting out key information from the Cost-of-Living Hub will also be designed, printed and distributed to help support digitally excluded Londoners. |

Considerations for the provision of grant funding and subsidy control

- 4.2. Under Element 1 of the proposals (see sections 2.1 to 2.10, above), it is intended that direct grant awards are made to LCA¹ and the LLST. These organisations will act as responsible bodies for the funding, which they will then grant to a wide range of community organisations.
- 4.3. Under Element 2 of the proposals (see sections 2.11 to 2.24, above), it is intended that direct grant awards are made to several organisations – a mix of charities and local authorities – to extend the delivery of existing activity under the Food Roots programme. All grant recipients were originally selected for the programme following an open and competitive grant application process.
- 4.4. Under Element 3 of the proposals (see sections 2.25 to 2.38, above), it is intended that a direct grant award is made to PiP to work in partnership with boroughs to deliver a third phase of the Pension Credit uptake campaign they delivered with GLA funding in 2022-23 (see DD2605) and 2023-24 (see MD 3157).
- 4.5. It is proposed that the direct funding to all organisations constitutes the award of grant-payment funding, rather than contracts for services. This is because, in line with the Contracts and Funding Code (the Code):

¹ LCA is a new charity that has been established to act as an overarching body representing the entire London network of Citizens Advice offices. It is intended to be the recipient of funding for the activity set out in Element 1 of this proposal. It replaces Royal Courts of Justice and Islington Citizens Advice (RCJ Advice) which had, up to this point, acted as the lead office representing the London network and was the recipient of previous funding from the GLA (see MD2991 and MD3157).

- it would support existing third-party (rather than GLA) projects that align with the Mayor's priorities, but are the initiatives of the third parties in question
- the GLA would not receive a direct or indirect benefit as a result, with the benefits accruing instead to Londoners.

- 4.6. The rationale for the provision of direct funding to all organisations is set out in Appendix A.
- 4.7. GLA officers have analysed the proposals against the Statutory Guidance for the UK subsidy control regime.² They have assessed that the subsidy control regime is non-applicable in these circumstances because the proposed financial assistance does not constitute a subsidy.
- 4.8. In particular, the proposed financial assistance to LCA and the LLST, and the grant awards to organisations under Food Roots, fail to satisfy Limb B of the four-limbed test set out in the Subsidy Control Act 2022, as none of the organisations are classified as an enterprise. They are all either local authorities or charities, none of whom are engaged in economic activity to offer goods or services in a market. The funding will be used to enable the provision of free and/or charitable support (in the form of expert advice or food aid) to low-income Londoners.
- 4.9. These proposals are consistent with the example set out in the Statutory Guidance in paragraph 2.17, on page 26. This example states that "a ringfenced grant to a charity for its non-economic activities (even if the charity also provides some goods or services on the market)" is unlikely to meet the four-limbed test. As such, no further assessment of the proposal against the subsidy control principles is deemed necessary.
- 4.10. Although PiP does engage in some economic activity (e.g., it charges boroughs for its LIFT service), it does not receive funding for either additional data analysis or targeted campaigns activity with boroughs (which is the subject for this proposal). Therefore the proposal does not satisfy Limb B of the four-limbed test set out in the Subsidy Control Act, as the financial assistance will be ring-fenced and will only be used to fund non-economic activity.
- 4.11. This funding would allow councils to make the most effective use of their data and deliver the communications campaign. By funding the project, an approach that has proven successful in encouraging Pension Credit uptake can be scaled up. It will also provide further evidence for councils considering funding such activity in future.
- 4.12. Councils are expected to provide their own resources to support the project. For example, some councils will decide to send out the communications themselves; and some will provide benefit-adviser capacity to support older people with more complex needs in making a claim.

Links to Mayoral strategies and priorities

- 4.13. This activity described in this decision document will contribute to the following priority themes set out by the Mayor in the GLA: Mayor Budget 2024-25:
- **Social justice:** working to ensure that Londoners of all backgrounds feel welcome, and can play a full and equal part, in the life of our city (through increasing incomes, particularly amongst the most disadvantaged groups).
 - **Health:** reducing London's health inequalities – that is, reducing the link between Londoners' health outcomes and their incomes or backgrounds – and working with partners to ensure Londoners have the best health outcomes (through increasing incomes and improving access to healthy food).

² BEIS, [Statutory Guidance for the United Kingdom Subsidy Control Regime](#), November 2022

- **Housing:** increasing the numbers of Londoners who have a safe, decent and affordable home (through increasing incomes and the provision of housing advice as part of wider advice programmes).

4.14. The activity described also contributes to Mayoral commitments to: maintain support for his pension credit uptake drive; and continue working with partners such as LCA and the LLST to provide essential advice services.

Conflicts of interest

4.15. There are no conflicts of interest to note for anyone involved in the drafting or clearance of the form.

5. Financial comments

5.1. Approval is being sought for expenditure of £4.121m, over 2024-25 and 2025-26. for the Financial Hardship work programme 2024-25. This expenditure is detailed in the table below.

| Workstream element | Approval for expenditure in 2024-25 | Approval for expenditure in 2025-26 | Total approvals |
|---|--|--|------------------------|
| Grant funding for LCA and LLST | £2,025,000 | £675,000 | £2,700,000 |
| Food Roots grant funding and procured support | £542,000 | £100,000 | £642,000 |
| Uptake campaigns/awareness-raising and local welfare outcomes framework | £225,000 | £115,000 | £340,000 |
| Output and outcomes framework for local welfare and support schemes | £100,000 | £50,000 | £150,000 |
| Commissioned research | £150,000 | £0 | £150,000 |
| Cost-of-Living Hub | £124,000 | £0 | £124,000 |
| Employment Rights Hub | £15,000 | £0 | £15,000 |
| Total | £3,181,000 | 940,000 | 4,121,000 |

5.2. This expenditure of £4.121m in 2024-25 and 2025-26 will be funded from the Low Income and Foods programme budget in the Financial Hardship team.

5.3. The expenditure of £3.181m in 2024-25 from the Low Income and Food budget is affordable within the confirmed 2024-25 budget for this programme.

5.4. Funding for future financial years is subject to the annual budget-setting process, and subject to change. The expenditure of £940k in 2025-26 is agreed in principle, and 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 will be subject to appropriate break clauses.

6. Legal comments

6.1. The decisions requested of the Mayor fall within the general powers of the GLA (exercisable by the Mayor) in section 30 of the Greater London Authority Act 1999 (GLA Act) to do anything that 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 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 under section 33 of the GLA Act
- consider how the proposals will promote the improvement of health of persons, health inequalities between persons and to contribute towards the achievement of sustainable development in the United Kingdom under section 30(4) and (5) of the GLA Act
- consult with appropriate bodies under section 32 of the 1999 Act.

- 6.2. In taking the decisions requested, 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 and to foster good relations between persons who share a relevant protected characteristic (age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation) and persons who do not share it (section 149 of the Equality Act 2010). To this end, the Mayor should have particular regard to section 3 (above) of this report.
- 6.3. The provision of additional grant funding to LCA, the LLST, PiP and current Food Roots funding recipients may be viewed as a conditional gift rather than a contract for services. Section 12 of the Code provides that decisions to award grant funding should generally be made on the basis of the outcome of a transparent, competitive application process. However, the officers have set out at in sections 4.2 to 4.12, above, why it is proposed that the GLA provide additional funding to those bodies without further competition on this occasion. The officers must ensure that an appropriate funding agreement be put in place between the Authority and each of the recipients before any part of the funding be paid.
- 6.4. The Subsidy Control Act 2022 requires that grant funding be assessed in relation to its four-limbed test. Officers have made this assessment at paragraphs 4.7 to 4.10, and have concluded that the additional funding proposed does not amount to an unlawful subsidy.
- 6.5. Section 9.1 of the Code requires the GLA to call-off services with a value of that concerned here from a suitable framework, where possible; or if not, to undertake a formal tender process that will be managed by TfL Procurement in respect of the services. However, the Mayor may approve an exemption from this requirement under section 10 of the Code, upon certain specified grounds. One of those grounds is that a contract may let without competition where a supplier has had previous involvement in a specific current project; or the services concerned continue existing work that cannot be separated from the new project/work. Officers have indicated at paragraph 2.14, above, that this ground applies; and that the proposed extension of the GLA's current contracts for learning support programme, Healthy Start trainer and programme evaluator services affords value for money. On this basis the Mayor may approve the proposed exemption if satisfied with the content of this report.
- 6.6. To the extent that the remaining expenditure proposed:
- the award of grant funding, officers must ensure that such funding must be awarded on a fair and transparent basis in accordance with the Code, and appropriate funding agreements must be entered into and executed by the GLA and counterparties before commencement of the same
 - the purchase of works, services or supplies, officers must ensure that those works, services or supplies are procured by TfL Procurement in accordance with the Code, and appropriate contracts are entered into and executed by the GLA and counterparties before commencement of the same
 - staffing matters, officers must ensure that all relevant GLA HR protocols are followed and related separate approvals (where applicable) are obtained.
- 6.7. If the Mayor makes the decisions sought officers must also ensure that:
- no reliance is placed on, nor commitments made in reliance of, future budgets remaining subject to the outcome of the budget-setting process for future financial years

- the GLA's current funding agreements with LCA, LLST, PiP and Food Roots funding recipients are varied in accordance with those agreements before any commitment to provide the additional funding is made or any funded activity commences
- the GLA's current contracts for learning support programme, Healthy Start trainer and programme evaluator services are varied in accordance with those contracts before the commencement of the extended services.

7. Planned delivery approach and next steps

| Activity | Contract/grant award phase | Development/ set-up phase | Delivery phase |
|---|----------------------------|---------------------------|-------------------------------|
| Grant funding for LCA and LLST | August – September 2024 | September 2024 | October 2024 – September 2025 |
| Food Roots grant funding and procured support | August – September 2024 | September 2024 | October 2024 – April 2025 |
| Uptake campaigns/ awareness-raising | August – October 2024 | October 2024 | October 2024 – March 2026 |
| Local welfare outcomes framework | August – October 2024 | October 2024 | October 2024 – March 2026 |
| Commissioned research | | | |
| Cost-of-Living Hub | August – September 2024 | October 2024 | November 2024 – March 2025 |
| Employment Rights Hub | August – September 2024 | October 2024 | November 2024 – March 2025 |

Appendices and supporting papers:

Appendix A: Rationale for direct provision of grant funding to London Citizens Advice and London Legal Support Trust.

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? YES

If YES, for what reason: To align with public announcements and programme launches.

Until what date: 1 January 2025.

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:

Daniel Drillsma-Milgrom 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.

✓

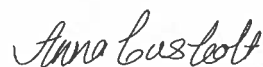
Mayoral Delivery Board

This decision was agreed by the Mayoral Delivery Board on 22 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:

29 July 2024

pp. Anna Casbolt, Assistant Director Financial Services.

CHIEF OF STAFF:

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

Signature



Date

29 July 2024

