

REQUEST FOR ASSISTANT DIRECTOR DECISION – ADD2789

Family Income Maximisation Advice Programme

Executive summary:

This Assistant Director Decision (ADD) approves granting a total of £4,347,000, for the Family Income Maximisation Advice Programme, to a strategic funding partnership between London Legal Support Trust (LLST) and London Citizens Advice (LCA). This expenditure was authorised in Mayoral Decision 3402, which delegated authority to the Assistant Director, Communities and Social Policy, to identify delivery partners and award grants.

This ADD approves the decision to select LLST and LCA as recipients of grant funding, of £2,024,500 and £2,322,500 respectively, for delivery of the Family Income Maximisation Advice Programme across 2025-26, 2026-27 and 2027-28.

The funding through this strategic partnership will increase access to income-maximisation advice through Family Hubs and their wider community networks, for families on low incomes, in at least 12 priority boroughs. It will help support families to ensure their income meets their everyday needs.

Decision:

That the Assistant Director of Communities and Social Policy, pursuant to the delegation granted by Mayoral Decision 3402, approves the following grants to support low-income families to access advice and support through Family Hubs and their wider community networks.:

- £404,900 in 2025-26 (and £860,412.50 in 2026-27, and £759,187.50 in 2027-28) to London Legal Support Trust
- £464,500 in 2025-26 (and £987,062.50 in 2026-27, and £870,937.50 in 2027-28) to London Citizens Advice.

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: Tom Rahilly

Position: Assistant Director of Communities and Social Policy

Signature:



Date:

15/09/2025

PART I – NON-CONFIDENTIAL FACTS AND ADVICE

Decision required – supporting report

1. Introduction and background

- 1.1. This Assistant Director Decision (ADD) approves the selection of London Legal Support Trust (LLST) and London Citizens Advice (LCA) as recipients of £4,347,000 of grant funding. This expenditure was agreed (under Mayoral Decision (MD) 3402) for activity to support low-income families with children to access the necessary support and advice to ensure their income meets their everyday needs, through the Family Income Maximisation Advice Programme.
- 1.2. MD3402 delegated authority to the Assistant Director of Communities and Social Policy to decide which organisations to make grant awards to. This ADD exercises that delegation.
- 1.3. MD3402 approved the following expenditure for a new income maximisation programme for families:
 - up to £1,893,000 for 2025-26
 - up to £2,355,000 for 2026-27
 - up to £995,000 for 2027-28.
- 1.4. This ADD seeks approval for expenditure, agreed through MD3402, to be grant funded in 2025-26 to LLST and LCA as a strategic funding partnership.
- 1.5. A total of £2,024,500 will be grant-funded to LLST, and £2,322,500 to LCA, during the two-year programme.
- 1.6. Each delivery partner will receive a separate funding agreement. Partners will initially receive a funding agreement for the programme's first year. They will then receive a second funding agreement, for the second year of delivery. Delivery periods will not align with financial-year timelines; so each funding agreement will span two financial years.
- 1.7. The strategic funding partnership between LLST and LCA will deliver advice provision to support low-income families with children to access advice and support through Family Hubs and their wider community networks.
- 1.8. This partnership builds on an existing strategic partnership between LLST and LCA that has delivered the Advising Londoners Partnership (ALP) over the past two years.
- 1.9. This work builds on two programmes: Advice in Community Settings and the ALP. These have delivered social welfare advice and support to Londoners since 2021. Expenditure on these programmes was approved by: MD2732; MD2831; MD2869; MD3157; MD3240; and MD2991.

2. Objectives and expected outcomes

Overarching objective

- 2.1. The overarching aim of this programme is to ensure that low-income families with children are supported, so that their income meets their everyday needs. In this way, the programme contributes to the London-level outcome: Londoners' income meets their everyday needs.
- 2.2. This will be met through the following objectives:
 - supporting low-income families with children to maximise their income by accessing their benefit entitlements
 - supporting low-income families with children to access emergency financial support, when they cannot afford basic essentials

- supporting low-income families with children to reduce their financial hardship and material deprivation by addressing advice on wider social welfare issues – such as immigration, employment, childcare entitlement and housing.

Delivery method

- 2.3. The new programme will fund a strategic partnership between LLST and LCA.
- 2.4. These delivery partners have been selected because they share a unique ability to provide advice-delivery networks that cover the boroughs this programme is working in. They offer both specialist and generalist advice, on one-off and casework bases.
- 2.5. LLST and LCA, and their advice networks, have a proven track record of working collaboratively to develop local advice partnerships through their delivery of the ALP. This programme seeks to build on these relationships.
- 2.6. LLST and LCA, through their advice networks, are uniquely well placed to work strategically. They are bringing together advice partners, from across the different boroughs, to share practice and inform policy. This builds on their strategic work to date on workforce development and a London Advice Strategy.
- 2.7. MD3402 delegates authority to the Assistant Director, Communities and Social Policy, to identify delivery partners and award grants.
- 2.8. The programme will deliver a package of social welfare legal advice for families through Family Hubs and their wider community networks.
- 2.9. The programme will also train staff and volunteers based in these family settings, through an 'Advice First Aid' model. This will give guidance on how to identify advice needs, and refer into appropriate advice and support.
- 2.10. The programme will include funding for translation services where someone's first language is not English. It will also include support to improve access to advice for those living with a disability, including British Sign Language interpreters.
- 2.11. Delivery is expected to take place in 12 London local authorities – a reduction on the 16 mentioned in MD3402, to ensure maximum impact with the resource available. These 12 London authorities have been chosen based on high levels of children living in deprivation, and of families with someone living with a disability – which is known to increase the risk of financial hardship.
- 2.12. LLST and LCA will use this grant funding to establish partnerships at a borough level between local advice providers and the local authority family support provision. This will be done mainly through Family Hubs, but will also use Children Centre infrastructure, where appropriate.
- 2.13. The local partnerships will adhere to a delivery model that has been developed with input from advice agencies; local authorities; and voluntary and community stakeholders.
- 2.14. As per paragraph 4 of the GLA Contracts and Funding Code, this ADD seeks approval for LCA and LLST to be funded through grant funding, not contracts. This is because the GLA intends to support delivery that aligns with the Mayor's priorities; but this work will be the initiative and activity of third-party advice-delivery organisations.

Expected outcomes

- 2.15. The primary success metrics for the programme will be the number of low-income families with children reached, and the financial gains for those families. It will also seek to employ qualitative methods to capture wider outcomes for low-income families with children – such as wider social justice outcomes, access to employment support, childcare entitlements, and other onward support offers.
- 2.16. Officers are currently working with delivery partners to agree expected outcomes for the programme, based on agreeing the balance between generalist and specialist, one-off and casework advice provided through the programme.

- 2.17. It is currently estimated that the programme will reach between 14,500 – 24,000 families, generating an estimated £5 – 11million in financial gains for them in the first year.
- 2.18. These are provisional figures which will be further refined and agreed before funding agreements are issued to delivery partners.

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; and advance equality of opportunity, and foster good relations, between people who have a protected characteristic and those that do not.
- 3.2. Experiences of financial hardship often interact with other forms of marginalisation, such as disability and racism. This means some groups of Londoners face more barriers to accessing advice and maintaining a claim for support.
- 3.3. Several groups within ‘low-income families with children’ are at higher risk of financial hardship. This is shown in the following examples:
- Families with children make up 40 per cent of all Londoners living in poverty.
 - In London, single adults with children are the most likely to be living in poverty, with 47 per cent of this group living in poverty.
 - In London, Black and Minority Ethnic groups are far more likely to be in poverty (38 per cent) than White Londoners (18 per cent).
 - Bangladeshi Londoners have the highest poverty rate: 62 per cent are counted as being in poverty. This is followed by the “any other Asian background” group, for whom the poverty rate is 47 per cent.
 - Londoners who live in families that include a disabled person are more likely to be in poverty than those living in families that do not include a disabled person. In the three years to 2023-24, 31 per cent of families that included a disabled person were in poverty – this compares to 24 per cent of those without a disabled household member.
 - Overall, more than eight in ten London children in poverty (84 per cent) live in either the social or private rented sectors.
 - A recent report by London Councils suggests there are 90,000 children living in temporary accommodation; this equates to approximately one in every 21 children in London, equivalent to roughly one homeless child in every London classroom.
- 3.4. GLA officers – working with advice delivery partners, borough partners, and wider voluntary and community sector services – will include outreach and engagement approaches to seeking input from smaller grassroots community organisations. These will be organisations that directly support Londoners facing barriers to advice. GLA officers will use this input to identify and reduce those barriers. This will ensure that the highest standards of equality, diversity and inclusion are upheld.
- 3.5. In the first two years of the ALP, 67 per cent of the Londoners LLST and LCA supported had a disability or long-term health condition; and 69 per cent were from a Black, Asian or Minority background.

4. Other considerations

- 4.1. The key risks of appointing LLST and LCA, and mitigations to those risks, are outlined in the table below:

Risk	Mitigation	RAG rating (post-mitigation)

<p><i>Cause:</i> Staff changes at a senior level within the two key delivery partners. The partnership between LLST and LCA currently uses good working relations between the two organisations, and key staff within them.</p> <p><i>Consequence:</i> If there are changes to the key staff within these organisations, it may impact how the two organisations work together; and the speed at which they can resolve emerging issues. This may cause delays to delivery of the programme.</p>	<p>GLA officers to raise this issue with LLST and LCA; and support them to have contingency plans in place for loss of staff, and in the event that they do have changes to their staff to ease the transition of new people into the roles.</p>	<p>Green</p>
<p><i>Cause:</i> Loss of staff within key local advice delivery organisations.</p> <p><i>Consequence:</i> With the provision per borough of two full-time equivalent advice roles, the absence of one member of staff (for example) would have a significant impact on the ability to deliver the service at a borough level.</p>	<p>GLA officers to raise this issue with LLST and LCA; and encourage them to identify where, within their networks, they may be able to reallocate staff capacity to cover any temporary staff absence.</p>	<p>Amber</p>

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 form.

Links to Mayoral strategies and priorities

- 4.3. The family income maximisation programme is consistent with the Mayor's commitment to reducing inequalities and ensuring that Londoners' incomes meet their everyday needs. The following data is relevant to this:
- Recent data points to over 700,000 London children living in poverty after housing costs (i.e., after their rent or mortgage costs have been deducted from their income).
 - 65 per cent of London constituencies have a child poverty rate of at least 31 per cent.
 - There is a high level of inequality in London, with a difference of 38 percentage points between the parliamentary constituencies with the highest child poverty rate (Bethnal Green and Stepney) and the lowest (Richmond Park).
 - In 2023-24, almost half (45 per cent) of children living in London households in poverty are classed as materially deprived (up from 32 per cent in 2022-23).
 - Families made up of a single adult with children are the most likely to be in poverty. In London, 47 per cent of these family types are counted as being in poverty.
 - Families with children make up more than a third of all Londoners in poverty (40 per cent).
- 4.4. This programme helps deliver the commitment to help Londoners through the cost-of-living crisis, by providing essential advice services.
- 4.5. It will also support the commitment to giving young Londoners the opportunity to thrive. It will do so by ensuring parents are aware of available support through childcare entitlements; and the support provided by local authority and health partners working through the Family Hub/Children Centre infrastructure.

Funding route

- 4.6. This ADD seeks approval to award the expenditure agreed through MD3402 for the new Family Income Maximisation Advice Programme, through grant funding to LCA and LLST.
- 4.7. LCA and LLST are uniquely positioned to onward-fund a network of advice providers that can reach the 12 boroughs selected to receive advice capacity as part of this programme.
- 4.8. LCA and LLST already have existing relationships in these boroughs. They can build on these relationships when developing local partnerships to deliver this programme.

Subsidy control

- 4.9. GLA officers have analysed the proposal for the Family Advice Programme funding against the Statutory Guidance for the UK subsidy control regime.¹ They have assessed that the subsidy control regime is non-applicable in these circumstances, because the proposed financial assistance does not constitute a subsidy.
- 4.10. In particular, the proposed financial assistance to LLST and LCA fails to satisfy Limb B of the four-limbed test set out in the Subsidy Control Act 2022, as neither organisation is classed as an enterprise. They are both charities, and neither of them are engaged in economic activity to offer goods or services on a market. They provide free, charitable support (in the form of expert advice) to low-income Londoners; and depend entirely on donations or ringfenced grants to fund their operations.
- 4.11. This proposal is 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 set out in the Subsidy Control Act 2022. As such, no further assessment of the proposal against the subsidy control principles is deemed necessary.

5. Financial comments

- 5.1. This ADD approves the spend of £4,347,000, already approved through MD3402, on a grant of £2,322,500 to LCA and £2,024,500 on a grant to LLST.

	2025-26	2026-27	2027-28
Family income maximisation advice programme budget, approved for LCA and LLST	£869,400	£1,847,475	£1,630,125
Total	£ 869,400	£1,847,475	£1,630,125

- 5.2. This comes from £1,893,000 in 2025-26, £2,355,000 in 2026-27, and £995,000 in 2027-28 already agreed through MD3402.

	2025-26	2026-27	2027-28
Family income maximisation advice programme budget, approved by MD3402	£1.893m	£2.355m	£955,000
Total	£1.893m	£2.355m	£955,000

- 5.3. This is funded from the Income Maximisation programme budget, which is part of the Reducing Inequalities delivery plan.
- 5.4. Funding for future financial years will be subject to the annual budget-setting process and is subject to change. The expenditure of up to £1,847,475 in 2026-27, and up to 1,630,125 in 2027-28, is

¹ BEIS, [Statutory Guidance for the United Kingdom Subsidy Control Regime](#), November 2022

assumed to be affordable. This can only be confirmed when the GLA, Mayor Budget for each year is formally approved.

- 5.5. Grant agreements with LCA and LLST will span financial years; and will include break clauses to reflect the potential for changes to GLA budget arrangements in 2026-27 and 2027-28.

6. Planned delivery approach and next steps

- 6.1. The project will be delivered according to the following timetable:

Activity	Timeline
Grant agreements for new programme signed by delivery partners	September 2025
Partnerships between advice organisations and local authorities agreed via memoranda of understanding	December 2025
Delivery of advice through the new programme starts	January 2026
First quarterly report is received	May 2026
Monitoring and evaluation	January 2026–December 2027
Learning	Throughout
Delivery end date	December 2027
End of programme evaluation	Spring 2028
Staffing	Throughout

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 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:

Elizabeth Mahoney 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 15 September 2025.

✓

ASSISTANT DIRECTOR, FINANCIAL SERVICES:

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

Signature:**Date:**

15/09/2025