

## REQUEST FOR DIRECTOR DECISION – DD2763

### Title: Continuation of income maximisation and employment rights activity 2025-26

#### Executive Summary:

The Director Decision (DD) seeks approval for expenditure of up to £220,000 in 2025-26 on the continuation of existing work with London boroughs to promote the uptake of underclaimed benefits, as well as the ongoing maintenance and promotion of the Cost-of-Living and Employment Rights Hubs on London.gov.uk.

Activity on benefit take-up campaigns and promoting the Cost-of-Living Hub relates to the “income maximisation and child poverty” project proposed for inclusion in the draft Reducing Inequalities Delivery Plan, for which approval is being sought separately. It will draw from the overall budget for that delivery plan and builds on Mayoral Decision (MD) 3402 which authorised expenditure on income maximisation advice activity and staffing costs.

Activity to promote the Employment Rights Hub relates to delivery of the proposed projects and priorities set out in the Supporting Londoners to Benefit from Growth delivery plan for which approval is also being sought separately.

#### Decision:

That the Executive Director of Communities and Skills approves the expenditure of up to £220,000 in 2025-26 on the continuation of existing work to support Londoners to understand and realise their rights and entitlements and maximise their incomes, comprising:

- £180,000 in 2025-26 in grant funding to fund a fourth phase of the Mayor’s Benefit Uptake campaign work
- £40,000 in 2025-26 on the continued maintenance and promotion of the Cost of Living and Employment Rights Hubs on London.gov.uk

#### AUTHORISING DIRECTOR

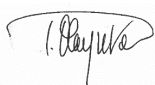
I have reviewed the request and am satisfied it is correct and consistent with the Mayor’s plans and priorities.

It has my approval.

**Name:** Tunde Olayinka

**Position:** Executive Director  
Communities and Skills

**Signature:**



**Date:** 02/10/2025

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

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

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

- 1.1. This Director Decision (DD) seeks approval to spend up to £220k from the GLA Mayor budget for 2025-26 on activity to help Londoners on low-incomes and those at risk of employment rights abuses understand and access their full range of rights and entitlements. The activity will work towards ensuring that Londoners incomes meet their everyday needs and that they are supported to benefit from economic growth.
- 1.2. Expenditure on the activities set out in this DD is part of the overall programme budget for income maximisation/child poverty which sits under the Reducing Inequalities mandate and draft delivery plan, which will be the subject of a future decision form.
- 1.3. This proposal forms part of a wider programme of income maximisation which includes a new Family Income Maximisation Advice programme which was authorised under cover of Mayoral Decision (MD) 3402. All the proposed activity is a continuation/development of existing projects that drew on funding from the GLA Mayor Budget for 2024-25 under cover of MD3285. DD2605 and MD3157 refer to earlier phases of the work that took place in 2022/23 and 2024-25 respectively.
- 1.4. To date, three phases of campaigns activity delivered in partnership with London boroughs and the software and analytics social enterprise Policy in Practice (PiP) to promote the uptake of underclaimed benefits like Pension Credit, Attendance Allowance, and Healthy Start Vouchers have been run. This activity has reached more than 30,000 households, helping over 10,000 of them to successfully claim ongoing entitlements worth more than £40m a year in total.
- 1.5. The Cost of Living and Employment Rights Hubs (which are both hosted on London.gov.uk) contain information and guidance on a wide range of financial entitlements and employment rights and signpost users to trusted and expert sources of advice and support. Collectively they have been viewed over 800,000 times since they were established and since April 2024 around 10,000 users have completed calculations using the embedded benefit calculator tool on the Cost-of-Living Hub, through which over £5m in benefits that are potentially going unclaimed were identified.

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

##### Element 1- Benefit Uptake Campaign (phase 4)

##### *Overarching objectives*

- 2.1. The overarching objective of this activity is to help Londoners ensure that their incomes meet every day needs by promoting the take-up of underclaimed benefits amongst households that have an underlying eligibility.

##### *Delivery method*

- 2.2. This DD seeks approval for expenditure of up to £180,000 on a fourth phase of Benefit take-up campaign activity in partnership with London boroughs and the software and analytics social enterprise Policy in Practice (PiP)
- 2.3. The funding will allow PiP to carry out initial engagement activity with boroughs before providing them with data analysis and campaign support, assisting them to use locally held administrative data to identify and contact households that are eligible for, but not claiming:
  - Pension Credit (a means tested benefit for older people on low incomes)

- Attendance Allowance (a disability benefit for older people)
  - Healthy Start Vouchers (vouchers that can be used to purchase fresh fruit and vegetables or baby formula for expectant or recent parents on low incomes)
- 2.4. The contact with residents will primarily be made by letter, but text messages will also be used where evidence from previous campaigns suggests it is a more suitable communication channel.
  - 2.5. The funding will also allow PiP to develop and pilot a new campaign that will help boroughs to identify and contact households with a disabled person that may be eligible for but not claiming certain disability benefits or other forms of financial support.
  - 2.6. The pilot will use the same methodology as the previous campaigns referenced in paragraph 1.4 and is likely to focus on supporting individuals that are claiming the Universal Credit Health Element (an additional payment through the benefit Universal Credit to cover the cost of disability/a long-term health condition) but not claiming Personal Independence Payment (a non-means tested benefit to cover the additional costs of living with a disability).
  - 2.7. Following the delivery of communications to residents, participating boroughs will track the outcome of the contact using administrative data which will allow PiP to report the number of households that make a successful claim for the benefits in question, along with the annual and estimated lifetime value (in monetary terms) of each claim.
  - 2.8. The exact number of boroughs that will take part in each campaign (and the pilot) is dependent on how many agree to take part following the initial engagement phase. However, in the most recent phase of the campaign activity described in paragraph 1.4, 26 boroughs took part in a Pension Credit campaign, and 16 took part in Attendance Allowance and Healthy Start Campaigns. Previous pilot campaigns have typically involved three to five boroughs.

#### *Expected outcomes*

- 2.9. The outcomes of the three full campaigns and the pilot will depend on the number of boroughs that take part in each, along with a number of other variables. However, based on previous campaign phases it is estimated that across all campaign activity around 40,000 households could be identified and contacted achieving collective annual financial gains for Londoners of around £12m.

#### Element 2- Maintenance and promotion of Cost of Living and Employment Rights digital hubs

##### *Overarching objectives*

- 2.10. The overarching objective of this activity is to help Londoners ensure that their incomes meet every day needs and that they are supported to benefit from economic growth by raising awareness of a wide range of financial rights and entitlements and workplace rights, as well as the support available to realise them.

##### *Delivery method*

- 2.11. This DD seeks approval to spend up to £40k on updating the Cost of Living and Employment Rights Hubs on London.gov.uk and promoting them to the Londoners who would most benefit from the information they contain.
- 2.12. It is anticipated that around a quarter of the budget will be used to cover the ongoing operational costs of key assets on the Hubs, including the embedded London-specific benefit entitlement checker on the Cost-of-Living Hub, a tool which provides users with information about the benefits and wider support they may be entitled to based on various financial and household information they input, and

updates to the content of the Employment Rights Hub in line with changes introduced by the government's Employment Rights Bill.

- 2.13. The exact use of the funding for promotional activity and its split between the two Hubs is yet to be determined and will be finalised following further conversations with the GLA's External Relations and Digital teams, ensuring both maximum reach amongst target groups and value for money. However, it is anticipated that activity will most likely focus on delivering various forms of targeted social media promotion of the Hubs and their key assets to groups that would benefit most from the information they contain including (but not limited to) working-age disabled households, younger Londoners, Londoners in insecure work or low-paid work, and migrant workers.
- 2.14. This targeted promotional activity will be complemented by a variety of alternative zero-cost promotional activity that forms of a wider communication plan. This could include, for example, regularly disseminating links via stakeholder communications/networks, encouraging the use or promotion of the Hubs amongst delivery partners across a range of GLA projects, and using Mayoral/Deputy Mayoral comms channels to promote the hubs and key assets.

#### *Expected outcomes*

- 2.15. The outcomes of the promotional activity for both the Cost of Living Hub and the Employment Rights Hub will depend on several variables including how the budget is split between them, the extent to which promotional activity focusses on intensive promotion to a narrow target audience versus lighter touch promotion to a wider audience, and the social media channels that are used. However, based on previous paid-for promotion, it is estimated that it would result in around 60,000 additional users engaging with the hubs and their content.

### **3. Equality comments**

- 3.1. The proposals set out in this DD are specifically designed to benefit Londoners on low-incomes and Londoners who are at risk of unfair treatment in the labour market such as underpayment of wages, discriminatory practices or more extreme abuses such as modern slavery. There is a significant intersection between both groups and Londoners with protected characteristics as defined under the Equalities Act. For example:
- Age: 35 per cent of London's children live in relative poverty, compared 26 per cent for total poverty and 47 per cent of single-parent households live in relative poverty. In addition, 22 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. Younger Londoners are more likely to be in low-paid insecure work and are therefore more vulnerable to labour market abuse, and older Londoners are more likely than other age groups to face age-related discrimination in the workplace.
  - Disability: 31 per cent of London's households with a disabled person live in relative poverty, compared to 24 per cent of households in which no one is disabled. Disabled Londoners are more likely to face discrimination in the workplace and barriers to employment than non-disabled people.
  - Ethnicity: 38 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. Black, Asian, and Minority Ethnic Londoners are more likely to be in low-paid and insecure work than White Londoners and are therefore more vulnerable to labour market abuse. They are also at higher risk of discrimination in the workplace.
  - Migrant Londoners: face a particularly high risk of destitution (especially those with no recourse to public funds) and are also at higher risk of labour market abuses.

3.2. Various aspects of the proposals set out in this DD will specifically benefit Londoners with protected characteristics, for example:

- The delivery of a targeted benefit uptake activity on Pension Credit will benefit older Londoners
- The delivery of a targeted benefit uptake activity on Attendance Allowance will benefit older Londoners with a disability
- The delivery of a targeted benefit uptake activity on Healthy Start Vouchers will benefit families with young children
- The delivery of targeted benefit uptake activity on disability benefits will benefit Disabled Londoners
- Promotional activity of the Cost-of-Living and Employment Rights Hubs is likely to focus on some groups with protected characteristics including Disabled Londoners, younger Londoners, and Migrant Londoners

#### 4. Other considerations

##### *Key risks*

4.1. Key risks are as follows:

<b>Risk</b>	<b>Mitigation</b>	<b>RAG (post-mitigation)</b>
<p><i>Cause:</i> Less boroughs than anticipated agree to take part in benefit take-up campaigns</p> <p><i>Consequence:</i> This could lead to lower-than-anticipated financial gains and programme reach</p>	Officers will work with PiP in the initial engagement phase of the project to encourage maximum take up of the campaign support offer and utilise existing borough stakeholder networks to promote the project.	
<p><i>Cause:</i> There are delays in benefit take-up campaigns going live</p> <p><i>Consequence:</i> Londoners that would benefit from additional financial support over the winter months (when living costs are higher) are unable to claim support in time</p>	Campaigns that support Londoners most at risk of increased costs over the winter (older Londoners and disabled Londoners) will be prioritised to ensure campaigns take place as early as possible, with other less time sensitive campaigns to be delivered subsequently	
<p><i>Cause:</i> Government announce substantive changes to welfare benefits, wider cost-of-living support, or Employment Rights.</p> <p><i>Consequence:</i> The content on the Cost-of-Living and Employment Rights Hubs become out of date whilst (or shortly before) it is being promoted to Londoners which could lead to incorrect action being taken by Londoners and reputational damage to the Mayor/GLA</p>	Officers will monitor key Government announcements, particularly those announced at the Autumn budget 2025 and in relation to the Employment Rights Bill and ensure that content changes are prioritised to ensure content remains up to date.	

### *Considerations for the provision of grant funding and subsidy control*

- 4.2. Under Element 1 of the proposal (see sections 2.1 to 2.9, above), it is intended that a direct grant award is made to PiP to work in partnership with boroughs to deliver a fourth phase uptake campaign they delivered with GLA funding in 2022-23 (see DD2605), 2023-24 (see MD3157), and 2024-25 (see MD3285).
- 4.3. It is proposed that the direct funding to PiP 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):
- 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
- 4.4. GLA officers have analysed the proposal to provide financial assistance to PiP against the Statutory Guidance for the UK subsidy control regime.<sup>1</sup> They have assessed that the subsidy control regime is non-applicable in these circumstances because the proposed financial assistance does not constitute a subsidy.
- 4.5. Although PiP does engage in some economic activity (e.g. it charges a licensing fee to boroughs for its analytics dashboard service), it does not receive funding for either additional data analysis or targeted campaigns activity with boroughs (which is the subject of 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.
- 4.6. 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.
- 4.7. It anticipated that the proposals described in Element 2 of this DD (see sections 2.10 to 2.15, above) will be delivered via a mix of small external procurements of goods or services or internal budget transfers to cover the cost of in-house digital communications activity. Regardless of approach, all provision of funding will be carried out in compliance with the Contracts and Funding Code, with advice sought from the GLA Governance, TfL legal, or TfL procurement teams as required.

### *Links to Mayoral Strategies and Priorities*

- 4.8. The proposals set out in this DD directly contribute to the Reducing Inequalities and Supporting Londoners to Benefit from Growth Mayoral mandates, for which delivery plans are currently in preparation for the Mayor's approval.

### *Conflicts of interest*

- 4.9. 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 sought for the expenditure of up to £220,000 in 2025/26 on the continuation of existing work to support Londoners to understand and realise their rights and entitlements and maximise their incomes, comprising:
- £180,000 in 2025/26 to fund a fourth phase of the Mayor's benefit uptake campaign work with London boroughs

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

- £40,000 in 2025/26 on the continued maintenance and promotion of the Cost of Living and Employment Rights hubs on London.gov.uk
- 5.2. This reflects a portion of the overall programme budget for income maximisation/child poverty. Approval is being sought for the overall budget as part of MD3391: Reducing inequalities.
- 5.3. This expenditure of up to £220,000 in 2025/26 financial year will be funded from the Low-Income and Food programme budget in the Financial Hardship team.

## 6. Legal comments

- 6.1. The foregoing sections of this report indicate that the decisions requested of the Executive Director of Communities and Skills concern the exercise of the Authority's general powers; falling within the Authority's statutory powers to do such things considered to further or which are facilitative of, conducive or incidental to the promotion of economic development and wealth creation and social development in Greater London; and in formulating the proposals in respect of which a decision is sought officers have complied with the Authority's related statutory duties to:
- (a) pay due regard to the principle that there should be equality of opportunity for all people;
  - (b) 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; and
  - (c) consult with appropriate bodies.
- 6.2. In taking the decisions requested, the Executive Director of Communities and Skills 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 to advance equality of opportunity 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 and foster good relations between persons who share a relevant protected characteristic and persons who do not share it (section 149 of the Equality Act 2010). To this end, the Executive Director of Communities and Skills should have particular regard to section 3 (above) of this report.
- 6.3. The proposed grant funding to Policy in Practice (PiP) is considered to be a grant rather than a contract for services, as it supports third-party initiatives that align with the Mayor's priorities but are not directly commissioned by the GLA. As such, the grant award is subject to the GLA's Contracts and Funding Code. Officers must ensure that appropriate grant agreements are put in place and that all relevant due diligence is undertaken.
- 6.4. GLA officers have assessed the proposed grant funding against the Subsidy Control Act 2022 and accompanying statutory guidance. The funding is not considered a subsidy for the purposes of the Act, as it does not confer an economic advantage on PiP in respect of its commercial activities. The funding is ring-fenced for non-economic activity and therefore does not satisfy the criteria under Limb B of the four-limbed test.
- 6.5. Any procurement activity under the proposal must be carried out in accordance with the GLA's Contracts and Funding Code, and officers should seek advice from TfL Procurement as appropriate.

## 7. Planned delivery approach and next steps

Activity	Timeline
Grant agreement issued to PiP	Early October '25
Finalise digital hub promotion strategies	End October '25
Benefit uptake engagement and planning phase	Throughout October '25

Initial benefit uptake campaigns (Pension Credit and disability benefits)	November '25 to January '26
Digital Hub promotional activity (phase 1)	November to December '25
Digital Hub promotion activity (phase 2)	January to March '26
Subsequent benefit uptake campaigns (Attendance Allowance and Healthy Start Vouchers)	January to April '26
Benefit uptake campaign monitoring and reporting	May to August '26

**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:

Nick MacAndrews has drafted this report in accordance with GLA procedures and confirms the following:

✓

#### Assistant Director/Head of Service:

Tom Rahilly has reviewed the documentation and is satisfied for it to be referred to the Sponsoring Director for approval.

✓

#### Financial and Legal advice:

The Finance and Legal teams have commented on this proposal, and this decision reflects their comments.

✓

#### Mayoral Delivery Board

A summary of this decision was reviewed by the Mayoral Delivery Board on 29 September 2025.

✓

### CHIEF FINANCE OFFICER:

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

**Signature**

*Fay Hammond*

**Date**

**08/10/2025**