

GREATER LONDON AUTHORITY

REQUEST FOR DIRECTOR DECISION – DD2740

Easter 2025 recipe kit food box delivery

Executive summary:

This Director Decision (DD) seeks approval to provide funding of up to £190,800, as a contribution to the Mayor's Fund for London project to deliver up to 13,000 recipe kit food boxes (the equivalent of 66,000 meals) to community organisations supporting low-income families over the 2025 Easter school holidays. The project relates to the transition from the Free Holiday Meals programme to the Holiday Hope programme and falls under the Supporting and Inspiring Young Londoners mandate.

The DD authorises expenditure of budget allocated to work on advice and food insecurity programmes in the GLA: Mayor Budget 2024-25, and approved by MD3250. It also authorises the repurposing of budget previously approved for expenditure on advice and food insecurity programmes by MD3285, against which there is a forecast underspend.

Decision:

That the Executive Director of Communities and Skills approves expenditure of up to £190,800 in grant funding to the Mayor's Fund for London, as a contribution of its costs to deliver its project recipe kit food boxes over the 2025 Easter school holidays. This comprises £75,800 forecast underspend on activity approved by MD3285, and an additional £115,000.

AUTHORISING DIRECTOR

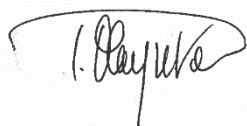
I have reviewed the request and am satisfied it is correct and consistent with the Mayor's plans and priorities.

It has my approval.

Name: Tunde Olayinka

Position: Executive Director,
Communities and Skills

Signature:



Date:

10/03/2025

PART I – NON-CONFIDENTIAL FACTS AND ADVICE

Decision required – supporting report

1 Introduction and background

- 1.1. This Director Decision (DD) seeks approval for expenditure of up to £198,000, as a contribution to the costs of the Mayor's Fund for London project to deliver recipe kit food boxes to community organisations supporting low-income families over the 2025 Easter school holidays.
- 1.2. The proposed expenditure relies on using the remaining funding (£115,000) allocated to work on advice and food insecurity under MD3250; and repurposing £75,800 funding for one element of work on advice and food insecurity (namely, the commissioning of research and analysis to inform the delivery of current, and the development of future, work programmes) approved by the Mayor under cover of MD3285, against which there is a total forecast underspend of £142,000.
- 1.3. The new Holiday Hope programme is a core mayoral delivery priority within the proposed Supporting and Inspiring Young Londoners programme. It replaces the Free Holiday Meals (FHM) programme as the Mayor's flagship holiday provision intervention. The Mayor's Fund for London's project aligns with the overarching aims of those programmes. The initial phase of activity for the Holiday Hope programme is taking place over February half-term and Easter holidays 2025. The final delivery period of FHM took place in February half-term 2025 (MD3234 refers).
- 1.4. The Holiday Hope programme provides a range of positive opportunities for young Londoners, and responds to the significant challenges they face over the holidays – particularly around safety, positive opportunities and food insecurity. Whilst the programme includes an element of food provision, it does not include funding for recipe kit food box provision – as had been the case under FHM.
- 1.5. Some organisations previously receiving food boxes under FHM may be able to access alternative provision over Easter/Passover 2025. However, it is likely that up to 450 organisations will be unable to, for a variety of reasons. These include:
 - insufficient infrastructure/capacity to receive bulk food deliveries from alternative providers
 - the alternative forms of provision that are immediately available over Easter are incompatible with the cultural/dietary requirements of the communities they serve
 - insufficient time/capacity to source alternative provision in time for Easter/Passover.
- 1.6. This project from the Mayor's Fund for London will use existing delivery channels established during the FHM programme. This includes those supporting the provision of Kosher Passover meal kits, designed to meet the needs of organisations supporting the Orthodox Jewish community.
- 1.7. This proposal is neither an extension of the FHM programme nor part of the Holiday Hope programme. It is a temporary, targeted and one-off measure, taken as part of the GLA's transition to the Holiday Hope programme. The proposal's aim is to support organisations serving communities at risk of acute food insecurity over the Easter/Passover period, whilst they put in place longer-term mechanisms to access alternative support during future holiday periods.

2 Objectives and expected outcomes

- 2.1. The overarching objective for this proposal is to reduce the prevalence/risk of food insecurity amongst low-income families over the Easter/Passover period 2025.

- 2.2. The funding will allow the Mayor's Fund for London to deliver up to 13,000 recipe kit food boxes (equivalent to 66,000 meals), to up to 215 community organisations in its network, over the Easter/Passover holiday period. This work will use two of the Fund's existing delivery channels:

Recipe kits	Number of boxes	Number of meals	Total cost
Take and Make (inclusive of Easter festive kits)	6,000	24,000	£93,300
Create and Make (inclusive of Kosher Passover kits)	7,000	42,000	£97,500
Total	13,000	66,000	£190,800

- 2.3. In the run-up to the Easter holidays, the Mayor's Fund for London will invite expressions of interest for this provision from organisations in its network. Applicants with specific dietary/cultural requirements, or those unable to receive/manage bulk surplus food deliveries, will be prioritised.
- 2.4. Throughout the project, GLA offices will also work with the Mayor's Fund for London to (as far as possible) support organisations in its network to identify and access alternative sources of holiday provision for future holiday periods.

3. Equality comments

- 3.1. Under section 149 of the Equality Act 2010, as a public authority, the GLA must have 'due regard' under the Public Sector Equality Duty, to the need to:
- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010
 - advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
 - foster good relations between people who share a relevant protected characteristic and persons who do not share it.
- 3.2. Equality, integration and inclusion are the drivers behind this proposal. It supports the realisation of two Mayoral mandates – supporting and inspiring young London, and reducing inequalities – by working to ensure that Londoners of all backgrounds feel welcome, and can play a full and equal part in the life of our city by accessing nutritious food. This proposal also contributes to commitments to ensure children and young Londoners achieve the health and learning outcomes they need to thrive at every stage of development; and that they have the positive opportunities needed to be successful.
- 3.3. Experiences of food insecurity often intersect with other forms of marginalisation, such as disability and racism. Londoners from Black, Asian and Ethnic Minority backgrounds are disproportionately impacted by barriers in accessing housing, good work, secure healthcare and other entitlements that can increase vulnerability to food insecurity. Immigration policies, such as the 'no recourse to public funds' condition, often disproportionately impact families from Black and Minority Ethnic backgrounds, limiting their access to a welfare safety net. This makes direct interventions ensuring access to good-quality food all the more important.
- 3.4. The proposal helps to enable food provision that is diverse and celebrates dishes, ingredients and cooking skills that represent London's diverse communities, and meets dietary requirements and preferences. The recipe kits that will be supplied have been co-designed with a diverse range of young Londoners and low-income families, to ensure the offer is culturally appropriate.
- 3.5. To ensure the highest standards of equality, diversity and inclusion are upheld, the GLA will also work with delivery partners to use outreach and engagement approaches to target activities at particular groups that are less able to engage, or that face greater barriers to engagement. This will enable them to participate, while ensuring that activities are open and accessible to all Londoners. This includes the

provision of Kosher food boxes to organisations supporting the Charedi Jewish community, which experiences high levels of food insecurity over the Passover period.

4. Other considerations

4.1 The key risks and issues are outlined below:

Risk/issue	Mitigation	Probability: 1 (low) to 5 (high)	Impact: 1 (low) to 5 (high)	RAG
Food provision fails to reach the communities with the highest needs.	GLA officers and the Mayor's Fund for London meet in advance to agree any specific areas of groups to target, based on 'cold spots'.	3	2	Amber
Requests for food provision outweigh current funded provision.	GLA officers will prioritise organisations unable to access alternative provision; and support the Mayor's Fund for London in issuing comms signposting to other provision for those who can accept it.	4	3	Amber
Organisations benefitting from food provision will be unable to access support in future holiday periods.	GLA officers will support the Mayor's Fund for London in identifying and connecting its partners with alternative provision for future holidays.	3	2	Amber

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

4.3 This proposal is consistent with the Mayor's commitment to help Londoners meet their everyday living costs. According to the latest YouGov polling commissioned by City Hall, 40 per cent of those that are financially struggling have regularly or occasionally reduced their purchases of food and essential items, or gone without.

4.4 The proposals set out in this decision document will contribute towards the following Mayoral themes, set out in the Mayor's Draft Consolidated Budget for 2025-26:

- Social justice: reducing inequalities – working towards ensuring that Londoners' incomes meet their everyday needs.
- Children and young people: supporting and Inspiring young London – working towards ensuring that children and young Londoners achieve the health and learning outcomes they need to thrive at every stage of development, and have the positive opportunities needed to be successful.

4.5 The proposed funding award has been informed by the first two years of FHM delivery. It addresses a temporary gap in provision over the Easter holiday period, identified through conversations with key stakeholders.

4.6 Officers consider that the funding proposed in this decision constitutes the award of grant payment funding, rather than a contract for services under the GLA's Contracts and Funding Code. This is because:

- it will support an existing third-party (rather than GLA) project that aligns with the Mayor's priorities, but is the initiative of the third party in question
- the GLA will not receive a direct or indirect benefit as a result; the benefits would instead accrue to solely to Londoners.

4.7 The strategy of providing grant funding directly to the organisation in question has been chosen for the following reasons:

- From the GLA's ongoing convening of, and engagement with, the food aid sector in London and additional open-source research, the Mayor's Fund for London has been identified as the only organisation that provides free, culturally appropriate food to families and young people, through the established delivery mechanism of Create and Make, and Take and Make, on a pan-London basis.
- It is the only organisation that has the infrastructure, delivery mechanisms and relationships with community partners to enable the delivery of holiday food provision in this format, and according to the required scale and timeframe, to organisations that otherwise will not receive any provision.
- The upcoming Easter holiday period has been identified as posing a high risk to families living in or at risk of food insecurity. This is due to reemerging pressures on living costs, and gaps in both GLA and government-funded holiday provision. As such, it requires an urgent response. Funding the Mayor's Fund for London directly (rather than carrying out a lengthy competitive grant-application process that would be resource-intensive for the GLA and bidding organisations) is the quickest, most efficient way to deliver holiday provision over the Easter holiday period.

4.8 The Mayor's Fund for London's project is the only one currently capable of delivering this intervention in a cost-effective way. It has been delivering a similar project, aligning with the aims of this proposal, for the past two years. It has the infrastructure and relationships in place to deliver this intervention within the very short timeframe required, and to achieve successful delivery over the Easter holiday period.

4.9 To ensure that the project is established within the short timeframe required, officers propose issuing a Deed of Variation to the existing grant agreement between the GLA and the Mayor's Fund for London for delivery of the Free Holiday Meals programme. Whilst the final delivery window under this agreement was completed over February half-term, the agreement does not expire until 31 May 2025 to allow for final reporting. Officers consider this approach to be appropriate as the proposal set out in this decision works towards the same objectives as those set out in the existing agreement. It also uses identical delivery channels and methods.

4.10 GLA officers have carried out an analysis of the proposal 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.

4.11 In particular, the proposed financial assistance fails to satisfy Limb B of the four-limbed test set out in the Subsidy Control Act 2022, as neither of the beneficiaries of the funding are classed as enterprises. The Mayor's Fund for London is a charitable organisation; it is not engaged in economic activity to offer goods or services on a market. It provides free, charitable support (in the form of food aid and activities) to low-income Londoners; and is entirely dependent on donations or ringfenced grants to fund its operations.

4.12 This proposal is consistent with the example set out in section 2.17 of the Statutory Guidance (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

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

test. As such, no further assessment of the proposal against the Subsidy Control Principles is deemed necessary.

5. Financial comments

- 5.1 This Director Decision (DD) seeks approval for expenditure in 2024-25 financial year of up to £190,800 in grant funding to the Mayor's Fund for London as a contribution to its costs to deliver its project recipe kit food boxes over the 2025 Easter school holidays.
- 5.2 The expenditure proposed relies upon the use of the remaining funding (£115,000) allocated to work on advice and food insecurity under MD3250; and the repurposing of £75,800 funding for one element of work on advice and food insecurity approved by the Mayor under cover of MD3285 against which there is a total forecast underspend of £142,000
- 5.3 This expenditure of £190,800 will be funded from the Low Income and Food programme budget in the Financial Hardship team in 2024-25 financial year.
- 5.4 This expenditure is affordable within the confirmed 2024-25 budget for this programme.

6. Legal comments

- 6.1. The foregoing paragraphs of this report indicate that the decisions requested of the Director concern the exercise of the GLA's general powers, falling within the GLA's statutory powers to do such things considered to further, or that are facilitative of, or conducive or incidental to, the promotion of economic development and wealth creation, social development or improvement of the environment, in Greater London.
- 6.2. In implementing the proposals in respect of which a decision is sought, officers should comply with the GLA's related statutory duties to:
 - pay due regard to the principle that there should be equality of opportunity for all people
 - consider how the proposals will promote the improvement of health of persons, health inequalities between persons and to contribute towards the achievement of sustainable development in the UK
 - consult with appropriate bodies.
- 6.3. In taking the decisions requested, the Director must have due regard to the Public Sector Equality Duty under section 149 of the Equality Act 2010 – 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 (race, disability, age, sex, sexual orientation, religion or belief, pregnancy and maternity, and gender reassignment) and persons who do not. To this end, the Director should have particular regard to paragraph 3 (above) of this report.
- 6.4. The decisions requested of the Director indicate that the proposed funding amounts to the provision of grant funding and not a not the payment for services. Officers must ensure that the funding is distributed fairly; transparently; and in accordance with the GLA's equalities, and with the requirements of section 12 of the GLA's Contracts and Funding Code.
- 6.5. Furthermore, officers must ensure that:

- no reliance is placed upon any forecast underspend until that has been confirmed and that they are satisfied that it is recoverable as such (where applicable, taking into account the terms on which that expenditure was committed)
- an appropriate funding agreement is put in place between, and executed by, the GLA and the recipient before any commitment to fund is made to the Mayor's Fund for London.

Subsidy control

6.6. 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 4.10 to 4.12, above, and have concluded that the proposed funding does not amount to a subsidy.

7. Planned delivery approach and next steps

7.1 This work will be delivered according to the following schedule:

Activity	Timeline
Entry into funding agreement with Mayor's Fund for London	10 March 2025
Announcement	N/A
Delivery start date	10 March
Final evaluation start and finish (self)	Finish 22 April
Delivery end date	22 April
Project closure	30 May

Appendices and supporting papers:

None

Public access to information

Information in this form (Part 1) is subject to the Freedom of Information Act 2000 (FoIA) and will be made available on the GLA website within one working day of approval.

If immediate publication risks compromising the implementation of the decision (for example, to complete a procurement process), it can be deferred until a specific date. Deferral periods should be kept to the shortest length strictly necessary. **Note:** This form (Part 1) will be published either within one working day after it has been approved or on the defer date.

Part 1 – Deferral

Is the publication of Part 1 of this approval to be deferred? YES

If YES, for what reason: to allow for drafting and issuing of Mayoral comms, should they be required.

Until what date: 1 May 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:

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

✓

Assistant Director/Head of Service:

Tom Rahilly, AD Communities and Social Policy 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 10 March 2025.

✓

CHIEF FINANCE OFFICER:

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

Signature:



Date:

10/03/2025