

REQUEST FOR DIRECTOR DECISION – DD2817

Migration programmes 2026-27

Programme: Accommodation and wider support for those who need it most

Executive summary:

Mayoral Decision (MD) 3386 approved the delivery plan for the Accommodation and Wider Support for Those Who Need It Most programme (including the resources allocated to it); and delegated decisions to the Senior Responsible Officer (SRO). MD3496 appointed the Executive Director for Housing and Land as the SRO for the programme.

This DD seeks the Executive Director's approval for expenditure of £590,000 of GLA budget in 2026-27, to deliver work for the programme. It also seeks approval for the receipt and expenditure of grant funding from the Home Office (up to £668,000); and the Ministry of Housing, Communities and Local Government (up to £339,979).

Decision:

That the Executive Director of Housing and Land approves:

- 1) expenditure of £590,000 of GLA budget for 2025-26, to increase capacity of immigration advice and migration-system leadership in the Accommodation and Support for Those Who Need It programme, comprising:
 - £290,000 in grant funding to Refugee Action, as a contribution to the costs of delivering its Frontline Immigration Advice Programme
 - £130,000 on the Migrant Employment Rights programme
 - £30,000 on the Migrant Londoners Hub
 - £35,000 on the Migrants' Advisory Panel
 - £55,000 on the Humanitarian Response and Coordination work
 - £50,000 on Modern Slavery research and the development of a safe reporting pilot
- 2) receipt and expenditure of up to £667,600 of grant funding from the Home Office (comprising £388,000 for the delivery of the London Strategic Migration Partnership; and £279,600 to deliver a programme improving the mental wellbeing of people seeking asylum)
- 3) receipt and expenditure of up to £339,979 of grant funding from the Ministry of Housing, Communities and Local Government (MHCLG), for the delivery of coordination work on MHCLG humanitarian cohorts (including Hongkongers and Ukrainians)
- 4) expenditure of £70,000 grant funding to London Councils, to support a convening and coordination function; this will be funded by a split of GLA budget and MHCLG income, reflecting the breadth of work delivered through this function.

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: Tim Steer

Position: Executive Director, Housing and Land

Date: 10 August 2026

Signature:



PART I – NON-CONFIDENTIAL FACTS AND ADVICE

Decision required – supporting report

1. Introduction and background

- 1.1. Mayoral Decision (MD) 3386 approved the delivery plan for the Accommodation and Wider Support for Those Who Need It Most programme (including the resources allocated to it). It also delegated authority to the Assistant Director, Housing Programme and Partnerships (in consultation with the Executive Director for Housing and Land; the Executive Director for Communities and Skills; and the Mayoral Delivery Board), as the Senior Responsible Owner (SRO). The SRO was given authority to approve the receipt of any additional funding from central government, or other sources, to expand or extend approved schemes in the Accommodation and Wider Support for Those Who Need It Most delivery plan.
- 1.2. MD3496 subsequently appointed the Executive Director for Housing and Land as the SRO for the programme. This DD2817 seeks approval to spend £590,000 of GLA budget for 2026-27, as part of the Migration Team's work to deliver on the Mayoral Mandate for Accommodation and Wider Support for Those Who Need It Most. This funding will help to increase the capacity of London's immigration advice sector; and contribute towards migration system leadership. This includes strategic work on modern slavery, humanitarian response, and lived-experience engagement through the Migrants' Advisory Panel. This DD also seeks approval to receive and spend up to £668,000 from the Home Office, to support the delivery of the London Strategic Migration Partnership (LSMP); and work to support the mental health and wellbeing of people seeking asylum. It further seeks approval to receive and spend up to £339,979 from the Ministry of Housing, Communities and Local Government (MHCLG), for coordination work on Hong Kong, Ukraine and Afghan arrivals in London. This programme continues work approved under ADD2778.
- 1.3. These budgets contribute to three core strands of the Migration Team's work:
 - immigration advice capacity
 - LSMP and migration system leadership
 - welcome and integration support.
- 1.4. The objectives and expected outcomes are set against these, to show how these budgets combine to form the portfolio of work on migration.

2. Objectives and expected outcomes

Immigration advice capacity

- 2.1. This work aims to increase the quality and capacity of immigration advice in London. The current lack of immigration advice can leave people trapped in destitution, homelessness, exploitation and abuse. Many organisations struggle to meet the high bar for qualification, and to work across complex intersects of immigration law and other types of advice – specifically in relation to exploitation in the workplace. There are three programmes of work that deliver this in London:
 - the Frontline Immigration Advice programme
 - the Migrant Employment Rights programme
 - the Migrant Londoners Hub.

The Frontline Immigration Advice programme

- 2.2. The Frontline Immigration Advice programme grant-funds Refugee Action to deliver training and support to organisations across London. It enables organisations to establish or expand their immigration-advice capacity at Immigration Advice Authority (IAA) Levels 1 and 2. (These are qualifications set by the IAA; organisations must achieve these to provide immigration advice at certain levels of complexity.) This work has a particular impact for communities who are under-served in both basic and complex immigration advice (due to a limited number of advisers, and barriers to accessing mainstream advice provision). This programme targets a specific, underfunded part of the immigration-advice sector. The long-term aim is to create a pipeline of access to other funding – including Legal Aid; and other GLA-commissioned services that support work on rough sleeping and violence against women and girls. For the second year running, this programme will partly focus on serving the Windrush generation and their descendants.

Migrant Employment Rights programme

- 2.3. The proposal is that the Migrant Employment Rights Programme will increase the capacity of immigration advice, where employment and immigration meet. This will be achieved by deepening partnership working; and increasing direct provision. The work will involve directly commissioning advice to build partnerships between organisations focused on workers' rights, and specialist immigration advice providers. This will expand user access; and create system change that better addresses this under-served intersect. This work is supported by our collaboration with the Citizenship and Integration Initiative, which places frontline experts into the Migration Team (on a secondment basis), using philanthropic funds. This means the team can benefit from added specialisation.

The Migrant Londoners Hub

- 2.4. The Migrant Londoners Hub is a commissioned service giving access to a centralised source of good-quality information and signposting. Its work helps Londoners with immigration needs to understand their status, rights and entitlements. The aim is that all Londoners can access the information they need, as early as possible. This reduces pressure on advice services; and means people are more likely to seek advice at the earliest opportunity. This, in turn, prevents cases from increasing in complexity and urgency; and minimises the harms caused by immigration precarity.
- 2.5. The budget for these three programmes is shown in the table below:

Programme	GLA programme budget	MHCLG budget
Frontline Immigration Advice	£290,000	
Migrant Employment Rights	£130,000	
Migrant Londoners Hub	£30,000	£20,000

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

London Strategic Migration Partnership

- 2.6. Through the LSMP's work, and wider GLA support, the Migration programme steers London through humanitarian crises and evacuations; and helps to deliver government priorities in relation to asylum; resettlement; and courses in English for Speakers of Other Languages (ESOL). It also seeks to effect systems change through targeted interventions that require the GLA's convening power; the GLA's commitment to protect migrant workers from exploitation is a priority here.
- 2.7. The LSMP budget primarily covers GLA staffing. There is additional funding to host the LSMP Board and other relevant meetings; and cover expenses incurred, and activities that support the delivery of the LSMP's functions. The LSMP's work centres around convening the LSMP Board, its sub-groups,

and its task-and-finish groups to deliver against the Board's priorities; and to deliver core functions to boroughs and other partners.

2.8. The Board's goals include:

- helping London to play its part in meeting national humanitarian commitments
- developing new approaches to accommodating and supporting people seeking asylum
- enabling access to high-quality and appropriate ESOL courses, to support economic participation, social integration and wellbeing.

2.9. The team also delivers a core service to boroughs as single points of contact; and provides an accommodation-matching service to support boroughs' refugee resettlement work. So far, over 2,100 individuals have been matched and resettled in London.

Asylum Therapeutic Support

2.10. For the second year running the LSMP has also received an additional grant; the aim of this is to protect vulnerable asylum-seeking people, by delivering a trauma-informed therapeutic support service. In 2026-27, the grant total is £279,600; this could be increased if other strategic migration partnerships do not use their full allocation. People seeking asylum in the UK often face profound and complex mental health challenges, stemming from experiences of trauma, displacement and prolonged uncertainty. Many have fled war, persecution or violence; they may also have endured exploitation, bereavement or torture. Through the Asylum Therapeutic Support Grants, the GLA will grant-fund local authorities and Integrated Care Boards (or their equivalents) in London to deliver this work. The aim is to focus on groups and sub-regions with the greatest unmet needs. This funding will comprise:

- £247,100 of programme delivery
- £32,500 as a contribution towards staffing costs.

2.11. This means efficiencies can be made in the Welcome and Integration Support programme, by reallocating some staff time towards programme delivery.

Migrants' Advisory Panel

2.12. The Migrants' Advisory Panel supports our convening and system leadership work. It does so by including Londoners with lived experience – recognising that structured consultation and co-design with migrant Londoners themselves leads to stronger, more relevant GLA programmes. The Panel reflects all types of immigration status; and helps the GLA Group understand the intersecting needs of migrants who face additional barriers and vulnerabilities. The Panel's work to date has included input into the Good Work Standard; the Police and Crime Plan; and the GLA's ESOL Strategy. A partner organisation is commissioned to deliver this support.

Humanitarian Response

2.13. The humanitarian-response capacity fulfils a necessary part of London's resilience to humanitarian and migration crises. This work interacts with London resilience structures; and often, will directly take the lead where crises fall outside Gold Command Structures. To date, this work has included:

- the initial response work on Afghan and Ukraine arrivals to the UK
- dealing with evacuation of British nationals, and their families, from conflict zones
- addressing urgent challenges (such as the transition to e-visas, and various acute asylum pressures) as they arise.

2.14. This is reactive funding, that helps the Migration team be agile in its response to humanitarian need. With new crises regularly emerging over the past few years, this funding has enabled the team to: convene emergency summits, and rapidly deploy funding, to meet London's urgent needs around advice and information. This funding further supports London Councils' capacity, through a direct grant fund, to:

- facilitate work with boroughs
- enable ongoing shared leadership
- carry out wider work that fulfils a system-leadership role on sanctuary and humanitarian response.

Modern Slavery

2.15. The Modern Slavery pilot programme (delivered with MOPAC) is carrying out research and creating a blueprint to safely report of migrant victims of crime. It particularly focuses on migrant victims of modern slavery; and survivors of violence against women and girls. Migrant victims of crime are often scared to report these crimes to the authorities, out of fear of being reported to immigration enforcement. This is often manipulated and weaponised by abusers to further their control. This research deepens our understanding of how statutory services can better support victims, and safeguard them from harm. Ways to do this include a victim-first approach; and work towards what partners refer to as 'a firewall' for migrant victims' data, enabling them to safely report crime. The second year of the pilot (following a year of research) is being implemented in select London local authorities. Close partnership work continues with the Mayor's Office for Policing and Crime, and the Metropolitan Police Service (MPS). The 2026-27 programme will refine the secure reporting model and bring together partners to consider its expansion.

2.16. This work is supported by our collaboration with the Citizenship and Integration Initiative. This is a collaborative model with philanthropic funders who directly fund secondments from civil society organisations into the GLA.

2.17. The budget for this work is shown in the table below:

Programme	GLA programme budget	MHCLG budget	Home Office budget
LSMP staffing and minor delivery expenses			£388,000
Asylum Therapeutic Support Grants, including staffing			£279,600
Migrants' Advisory Panel	£35,000		
Humanitarian response and coordination (including direct grant to London Councils)	£55,000	£35,000	
Modern slavery	£50,000		

Welcome and integration support

2.18. MHCLG funding enables a programme to support the welcome and integration of Hong Kong, Ukraine and Afghan arrivals in the UK. This work could be expanded to other groups supported through MHCLG programmes. Our main mechanism for support is through investment in community-led and specialist support services that have trust and reach into communities. This work also involves coordination and strategic engagement in support of Government led humanitarian routes and support programmes.

- 2.19. London is home to an estimated 47,000 Hongkongers who have arrived in the UK on the British National (Overseas) (BN(O)) visa; and over 32,000 Ukrainians who have arrived through the government schemes. (There are many Ukrainians who were already living in London, and cannot return home due to the invasion of Ukraine.) To date, our work has:
- supported around 35,000 direct engagements with members of the Hong Kong BN(O) community
 - supported over 5,000 direct engagements with members of the Ukrainian community
 - delivered a programme of advice, public outreach, resources and information to London's Hongkonger and Ukrainian communities.
- 2.20. MHCLG funding for the Hongkonger and Ukrainian communities (now in its sixth year of delivery) is now combined into one grant-funding agreement. Consequently, this phase of work will fund interventions working across both communities. Its focus is on addressing priority needs that are common to both – including support with employment, and wider work-readiness (including wellbeing and help to secure UK-residency rights).
- 2.21. The work will include ongoing spend of funds approved under ADD2778 (where permitted funding was allowed to be carried forward by MHCLG). For 2026-27, we have budgeted to carry forward £48,084 from 2025-26.
- 2.22. The tables at 2.5 and 2.14, above, set out an allocation of £55,000 from the MHCLG pot that will contribute to each theme of work. This includes contributions of:
- £20,000 towards the Migrant Londoners Hub
 - £35,000 towards London Councils' strategic coordination.
- 2.23. Funds will sit alongside our system-leadership role convening the LSMP. They will include investment in training to support services' welcome and integration of Afghan arrivals.
- 2.24. We propose to use MHCLG funding to:
- collaborate with London Councils, to support a convening and coordination function as part of our system leadership role
 - support the Migrant Londoners Hub, as hosting information online for Ukraine and Hong Kong communities is a requirement of our grant agreement.

The breakdown of this funding is shown in the table below:

Programme	MHCLG budget
Welcome and integration work for new arrivals, primarily funded through grant funding of civil society and commissioning of complementary services	£131,979
Staffing	£153,000

3. Equality comments

- 3.1. Under section 149 of the Equality Act 2010, as a public authority, the GLA must have 'due regard' of the Public Sector Equality Duty, that is, the need to:
- eliminate unlawful discrimination, harassment and victimisation
 - advance equality of opportunity

- foster good relations between people who have a protected characteristic and those who do not.
- 3.2. Equality, integration and inclusion are the drivers behind these programmes. All these programmes seek to tackle the inequalities that pose barriers to migrants, refugees and people seeking asylum. These barriers can prevent Londoners from fully participating in their communities. The related work of these programmes includes improving access to services that, in turn, promote Londoners' access to their rights and entitlements.
- 3.3. Any commissioning and grant-making processes will ask potential partners to show how their projects:
- are inclusive of a diverse group
 - actively work to eliminate discrimination based on the nine characteristics protected in the Equality Act 2010.

To ensure the highest standards of equality, diversity and inclusion are upheld, the GLA will use outreach and engagement approaches to target activities at particular groups that are less able to engage, or face greater barriers to engagement. This will enable them to participate, while ensuring that activities are open and accessible to all Londoners.

4. Other considerations

- 4.1. The risks and mitigations are outlined in the table below:

Risk	Mitigation	Probability	Impact	RAG rating
Inadequate due diligence of programme activities and procurement. This could compromise the safety of service users; or lead to funds not being directed towards the intended beneficiaries.	Robust contracting management; close working with grant services; internal agreement on process around due diligence.	2	4	Amber
GLA capacity to manage the programmes is limited – resulting in delays that hinder impact.	Pool funding to create efficiencies to deliver multiple income-funded programmes. This means we can continue engagement across various statutory and civil society partners, whilst directly supporting grant-funding programmes.	2	4	Amber
Projects require long-term intervention, limiting the effectiveness of short-term project funding.	Focus funding in areas that support wider infrastructure, with a focus on sustainability beyond initial funding.	3	3	Amber
Organisations commissioned and funded to carry out work fail to deliver to expected quality, or to time.	Set clear, specific parameters for delivery; build in regular milestones to check progress; establish governance to oversee new programmes.	2	2	Green

Conflicts of interest

- 4.2. There are no conflicts of interest for any of the officers involved in the drafting or clearance of this decision form. Appropriate mitigations will be put in place, throughout all tendering and grant programmes, to remove relevant officials from a decision-making role regarding funding, where any conflict does arise. This applies to GLA officers and those funded to deliver work on our behalf. All commissioned services will be procured competitively and in accordance with the Contracts and Funding Code.

Links to Mayoral strategies and priorities

- 4.3. This work sits under the delivery plan for Accommodation and Support for Those Who Need It Most, which focuses on vulnerable migrants.

Consultation and impact assessment

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

Subsidy control

- 4.5. GLA officers have carried out an analysis of the proposal against the Statutory Guidance for the UK Subsidy Control Regime (Statutory Guidance). Officers have assessed that the Subsidy Control Regime does not apply to the proposed award of grant funding to either Refugee Action or London Councils. This is because neither instance of proposed financial assistance meets all four limbs of the four-limbed test.
- 4.6. In particular, the proposed financial assistance fails to satisfy Limb B of the four-limbed test set out in the Subsidy Control Act 2022 (the SC Act). This is because the beneficiaries of the funding are not acting in the capacity of an enterprise.
- 4.7. The rationale for this is as follows:
- Whilst Refugee Action undertakes some (albeit limited) ancillary economic activities, its primary purpose (and that in respect of which the funding is to be awarded) is to provide support to refugees on a non-economic basis. The Statutory Guidance provides that such financial assistance is unlikely to satisfy Limb B of the four-limbed test.
 - London Councils is a public body – specifically, a joint committee established pursuant to the Local Government Act 1972. The activity in respect of which the funding is to be awarded is non-economic in nature; and concerns London Councils' discharge of its public functions. Again, the Statutory Guidance provides that such financial assistance is unlikely to satisfy Limb B of the four-limbed test.

5. Financial comments

5.1. Approval is sought to:

- spend £590,000 of the GLA budget for 2026-27, to increase the capacity of immigration advice and migration system leadership within the Accommodation and Support for Those Who Need It programme
- receive and spend up to £668,000 of grant funding from the Home Office in 2026-27, to meet costs related to the delivery of the LSMP (including £279,600 to improve the mental wellbeing of people seeking asylum)

- receive and spend up to £339,979 of grant funding from MHCLG in 2026-27, to deliver coordination work on MHCLG humanitarian cohorts (including Hongkongers and Ukrainians)
- grant-fund London Councils up to £70,000, to support a convening and coordination function – this will be funded by a 50/50 split from the GLA Humanitarian Response budget, and from within the £339,979 grant income from MHCLG; this reflects the breadth of work delivered through this function.

5.2. This spend is detailed below.

Programme	GLA programme budget	MHCLG budget	Home Office budget
Frontline Immigration Advice programme	£290,000		
Migrant Employment Rights programme	£130,000		
Migrant Londoners Hub	£30,000	£20,000	
Support delivery of coordination work on Hong Kong, Ukraine and Afghan arrivals in London		£284,979	
LSMP			£388,400
Migrants' Advisory Panel	£35,000		
Humanitarian response and coordination	£55,000	£35,000	
Modern slavery research, and the development of a safe-reporting pilot	£50,000		
Supporting the mental health and wellbeing of people seeking asylum			£279,600
Total	£590,000	£339,979	£668,000

5.3. The proposed expenditure of £590,000 will be financed by GLA resources, as agreed in the budget for 2026-27. It will be funded from the Migration Support budget in 2026-27.

6. Legal comments

Legal powers

6.1. The foregoing sections of this report indicate that the decisions requested of the Executive Director of Housing and Land (the Director) concern the exercise of the GLA's general powers; and fall within the GLA's statutory power to do such things considered to further, or that are facilitative of, or conducive or incidental to, the promotion of social development in Greater London. 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
- 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.

- 6.2. In taking the decisions requested, the Director 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, 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). To this end, the Director should have particular regard to section 3 (above) of this report.

Receipt of funding

- 6.3. This decision seeks approval to receive funding from the Home Office and the MHCLG. Officers are reminded to comply with the conditions those funders have placed upon the use of the funding.

Procurement and funding

- 6.4. This decision also seeks approval to spend:

- £590,000 (for various aspects of the Accommodation and Support for Those Who Need It programme)
- £667,600 (for the delivery of the London Strategic Migration Partnership and a mental wellbeing programme)
- £339,979 (for the delivery of coordination work on MHCLG humanitarian cohorts (including Hongkongers and Ukrainians))

Officers are reminded to comply with the requirements of the GLA's Contracts and Funding Code when they: procure services or supplies in furtherance of the project; or award grant funding. Furthermore, officers are reminded to put in place appropriate contracts and grant agreements between the GLA and the relevant service providers and/or recipients.

Subsidy control

- 6.5. The SC Act requires that grant funding is assessed in relation to its four-limbed test. Officers have made this assessment at paragraphs 4.5 to 4.7, above; and have concluded that the proposed funding grants do not amount to a subsidy within the meaning of the SC Act.

7. Planned delivery approach and next steps

- 7.1. Next steps are as follows:

Activity	Timeline
Sign grant agreement with Refugee Action to deliver the Frontline Immigration Advice Programme; and confirm contract extension for modern slavery research	August 2026
Engage procurement on route to market/contract extensions for Migrant Londoners Hub and Migrants' Advisory Panel	July 2026
Finalise evaluation for the second year of the Employment Rights Programme	February 2027
Grant funding and/or commissioning welcome and integration programmes	October 2026
Grant funding and/or commissioning asylum therapeutic support	October 2026

Appendices and supporting papers:
None.

Public access to information

Information in this form (Part 1) is subject to the Freedom of Information Act 2000 (Fozia) 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.

Strategic Programmes

Does this decision seek approval for activity falling within the remit of a programme delivery plan? YES

If YES, which programme/s does this fall within: Accommodation and Wider Support for Those Who Need It Most

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 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:

Hannah Boylan 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 10 August 2026.

CHIEF FINANCE OFFICER:

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

Signature

Fay Hammond

Date 11 August 2026