

REQUEST FOR ASSISTANT DIRECTOR DECISION – ADD2426

Title: Promotional resources for the Employment Rights Hub

Executive Summary:

Approval is being sought for expenditure of £20,000 to fund resources to promote the Employment Rights Hub and make its content accessible to Londoners who are digitally excluded and/or are not proficient in English.

This £20,000 was approved to be spent on the “launch and promotion of the Employment Rights Hub”, in MD 2461, subject to further delegated approval. This request seeks that approval to spend the funds on promotional activities including:

- physical/downloadable materials summarising the content of the Employment Rights Hub, targeted at Londoners who are digitally excluded.
- physical/downloadable translations of the content of the Employment Rights Hub into the most prevalent languages spoken by the target audience (people at risk of workplace exploitation).
- physical/downloadable resources for charities and non-expert advice centres to help them use the site to support their clients.

These resources will help improve the accessibility and raise awareness of the site and ensure it meets its purpose of increasing awareness of employment rights among Londoners at risk of workplace exploitation.

Decision:

That the Assistant Director of Communities and Social Policy approves:

That the £20,000 set aside for the launch and promotion of the Employment Rights Hub in MD 2461 be spent on the design, production and translation of physical/ downloadable resources to promote the Hub, including translated resources and resources for people who are digitally excluded.

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: Jeanette Bain-Burnett

Position: Assistant Director of
Communities and Social Policy

Signature: J-S. Burnett

Date: 11/2/20

PART I - NON-CONFIDENTIAL FACTS AND ADVICE

Decision required – supporting report

1. Introduction and background

- 1.1 Every person with a job has employment rights, but awareness of these rights is lower than it should be. Londoners who are unaware of their employment rights will be less likely to recognise unfair treatment as illegal, and will not have the tools to challenge and address workplace exploitation. Research from City Intelligence found that 10% of Londoners working full or part-time are not well informed about their rights at work and do not know where to go to find out this information if they needed to¹. Lack of awareness of employment rights and not knowing where to go to find out more was more prevalent among Londoners not educated to degree level (14%), among the lowest income quintile (21%), among Londoners aged 16-24 (19%), and among Londoners in routine and manual occupations (19%). Low income Londoners face a double bind; they are both more likely to be vulnerable to exploitation at work, and less likely to be aware of the rights that protect them from these bad workplace practices.
- 1.2 Those vulnerable to exploitation in the workplace will be largely – but not exclusively – workers in low-paid or insecure employment or self-employment. London's high levels of employment in the service sector (where levels of unionisation are lower) and higher proportion of migrant workers mean that the capital's workers potentially face specific barriers to understanding (and therefore enforcing) their employment rights.
- 1.3 To address this lack of awareness, in October 2019 as part of London Challenge Poverty Week the Mayor launched his online Employment Rights Hub. This is a set of pages on London.gov.uk which signposts workers at risk of exploitation to accurate information on sources of advice. The site provides plain English information about, and definitions of, employment rights and signposts users to trusted third-party information and advice to help them deal with a problem themselves. It also includes a list and interactive map of face-to-face advice centres in London.
- 1.4 As well as helping Londoners better understand and access their rights, the site aims to support the social welfare advice sector by increasing the quality of referrals advice centres receive, by increasing the number of people who present at a centre already informed about their rights.
- 1.5 Stakeholder feedback (from the Employment Law Advice Network, the Litigant in Person network, and individual advice centres) about the Hub has been positive, but all have identified that many of their clients are digitally excluded or not proficient in English (or both) and may struggle to access the content on the Hub as it is displayed currently.
- 1.6 Evidence shows that Londoners who are vulnerable to workplace exploitation are less likely to be proficient in English; migrants are overrepresented in low-paid and low security sectors, and for example Pakistani and Bangladeshi employees are more likely than white employees to earn less than the London Living Wage.
- 1.7 There are also well-evidenced links between poverty, ESOL speakers and digital exclusion. ONS statistics show low-income households are less likely to have an internet connection.
- 1.8 The site content only being available in the English language and online has been identified as a project risk, which could result in a significant proportion of target users being excluded from the content altogether.
- 1.9 To mitigate this risk, the following approach is proposed:

¹ Survey of Londoners, 2019.

- Design and produce translated versions of the content on the Employment Rights Hub, displayed in PDF format and hosted on the web page. This will follow the format used on the EU Londoners Hub on London.gov.uk. Languages will be identified from research on the nationalities and nations of origin of the target users, the languages that other employment websites translate into, and stakeholder feedback.
- Create physical/ downloadable materials summarising some of the key content of the Employment Rights Hub, including telephone numbers to call (e.g. the ACAS helpline) and places to go if users need more information. These will be distributed to community locations where people present with an employment rights issue, including MPs' and Councillors' surgeries and non-expert advice centres. They could also be downloaded and printed by site users directly.
- Create printable/ downloadable guides specifically for non-expert advice centres to help them provide information about employment rights, using the website, to their clients.

1.10 Sending printed resources to places where people seeking to resolve employment right issues present will also help raise awareness of the site itself.

1.11 We will consult with our employment law and social welfare advice sector stakeholders to ensure these materials are appropriate and useful for the target user group.

2. Objectives and expected outcomes

2.1 The objectives are:

- to provide accessible employment rights information, and signpost to sources of further support to Londoners who are digitally excluded;
- to provide accessible employment rights information and signpost to further sources of support to Londoners who are not proficient in English;
- to promote the Employment Rights Hub to a universal audience of Londoners who will be directed to the web pages from the printed materials displayed in community locations; and
- to ensure London's non-expert advice agencies and other community locations have the information and guidance they need to navigate the Employment Rights Hub and signpost their clients to appropriate support.

2.2. The outcomes are:

- an increased number of Londoners will be aware of the Employment Rights Hub – as measured by unique page views which will in turn lead to an increased ability to challenge unfair work practices and access employment justice;
- an increased number of Londoners who are digitally excluded will be aware of their employment rights and how to enforce them;
- an increased number of Londoners who are not proficient in English will be aware of their employment rights and how to enforce them; and
- an improved/ more streamlined referral process between community locations and social welfare advice services.

3. Equality comments

3.1 Equality is a key driver of the Employment Rights Hub project. The project is specifically aimed to advance equality of opportunity between people who have different levels of socio-economic status.

Access to employment rights information, advice and support is one of the most effective ways of protecting Londoners from exploitation in the workplace, which we know is most prevalent among low paid and low security sectors.

- 3.2 The specific duties of the Equality Act 2010, require the Mayor to prepare and publish objectives for meeting the aim of the general equality duty. The Mayor has done this through the objectives set out in *Inclusive London*, his Equality, Diversity and Inclusion Strategy. This project will contribute directly to realising Objective 20 in that strategy, to “help ensure London’s employers have fair and inclusive employment practices”. This objective is underpinned by evidence that women, those with caring responsibilities and disabled people are more likely to work part-time; that young people are over-represented in low-wage sectors; and that Pakistani and Bangladeshi employees are more likely than white employees to earn less than the London Living Wage. It is also informed by evidence that many women are forced to leave their jobs because of harassment and discrimination during pregnancy, maternity leave and on their return to work². The development of the Employment Rights Hub has been informed by this evidence and by other evidence of who is at the greatest risk of exploitation in the workplace. The promotion of the Hub will continue to take this evidence into account.
- 3.3 The decision to spend these funds on translated and offline resources will improve the accessibility of the Hub to people who are not proficient in English and/ or are digitally excluded. This is informed by evidence that a high proportion of the people working in London’s low-paid and low-security sectors, for example the service sector, are migrants who are less likely to be proficient in English. The main determinant of digital exclusion is age but other significant factors – often combined with socio-economic status – include disability, learning difficulties, ethnic origin, location, culture and language. Low-income households are less likely to have an internet connection³. Translated resources will include an Easy Read version of the site, which will improve its accessibility for people with a learning disability.

4. Other considerations

- 4.1 The Mayor’s manifesto contained a commitment to establishing an Economic Fairness team at City Hall that would work to deliver a range of pledges through an Economic Fairness work programme. One of the key elements of this programme is “Working with central government, local authorities, local authorities, trade unions, civil society, financial institutions and Londoners to tackle poverty, financial exclusion and other issues that affect low income Londoners in particular”. This work is part of the above commitment, and will support Londoners on low incomes by protecting them from workplace exploitation.
- 4.2 The Mayor’s Economic Fairness programme seeks to promote the London Living Wage, work with business to create apprenticeships, encourage sustainability and good corporate citizenship, and root out and tackle unacceptable practices such as blacklisting. The team exists to forge a new business compact - based on exemplary standards in pay and employment rights for workers. And it seeks to expand opportunities for people with disabilities to work and gain skills.
- 4.3 After Brexit there is a moderate risk that the details of employment rights law may change, meaning that translated documents may need to be updated. To mitigate this, when identifying a supplier of translation services, we will ensure the supplier is briefed to be prepared to update documents where necessary. We will apply learnings from the EU Londoners Hub project which also created translations of complex legal information which was liable to change.

² EDI Evidence Base (2018) and Survey of Londoners (2019)

³<https://www.ons.gov.uk/peoplepopulationandcommunity/householdcharacteristics/homeinternetandsocialmediausage/articles/exploringtheukdigitaldivide/2019-03-04#what-other-patterns-are-there-in-internet-usage>

- 4.4 The Employment Rights Hub signposts users of the site to other trusted online resources to further inform them about their employment issue. This useful feature of the website is less useful for users who are digitally excluded and will access the content through offline materials. To address this issue, the resources for digitally excluded Londoners will include the number of the Advisory, Conciliatory and Arbitration Service (ACAS) helpline, and will recommend users to ask a friend to help them access the further resources linked on the Employment Rights Hub. We will also work in partnership with community stakeholders – including London borough library services – to raise awareness of the Hub among people who help digitally excluded Londoners with employment issues get online.
- 4.5 There are no known conflicts of interests or interests to declare associated with this decision.

5. Financial comments

- 5.1 Approval is sought for expenditure of £20,000 towards the design, production and translation of resources to promote the Employment Rights Hub.
- 5.2 This expenditure will be funded from the Equality and Fairness 2019/20 programme budget held within the Communities and Social Policy unit.

6. Planned delivery approach and next steps

Activity	Timeline
Procurement of translation contract	Feb 2020
Procurement of printable/ downloadable resources	Feb 2020
Printable/ downloadable resources created	March 2020
Distribution of resources	April – June 2020
Delivery End Date	June 2020

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

If YES, for what reason:

Until what date: (a date is required if deferring)

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:

Lizzie Mahoney has drafted this report in accordance with GLA procedures and confirms the following:

✓

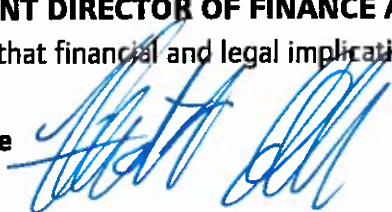
Corporate Investment Board

This decision was agreed by the Corporate Investment Board on 10 February 2020.

ASSISTANT DIRECTOR OF FINANCE AND GOVERNANCE:

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

Signature



Date

10/2/20