

# GREATER LONDON AUTHORITY

## REQUEST FOR DIRECTOR DECISION – DD2597

### Title: Voter ID awareness campaign – expanded

#### Executive summary:

This decision seeks approval for expenditure of £150,000 to expand the GLA Voter ID public awareness campaign. As per MD2970, this will be drawn from central contingency subject to out-turn in the Communities and Skills budget.

#### Decision:

That the Executive Director for Communities and Skills approves expenditure of £150,000 in financial year 2022-23, comprising the following:

- £75,000, to be added to the current £75,000 community grants programme. The total £150,000 grant funding will be made available to eligible organisations (selected via a competitive application process) to raise awareness of the Voting System Changes amongst those most likely to be impacted by these changes.
- £15,000 for the Voter ID public awareness campaign delivery partner to commission a PR agency and ensure a successful campaign launch in January 2023.
- £60,000 for the GLA External Relations team to ensure amplification, reach and impact across appropriate GLA platforms, including social media platforms and the TfL advertising estate.

#### AUTHORISING DIRECTOR

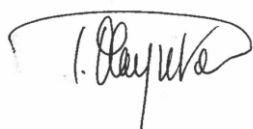
I have reviewed the request and am satisfied it is correct and consistent with the Mayor's plans and priorities.

It has my approval.

**Name:** Tunde Olayinka

**Position:** Executive Director,  
Communities and Skills

**Signature:**



**Date:**

2/9/2022

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

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

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

- 1.1. Civic and democratic participation is a key pillar of social integration. The Greater London Authority (GLA) has statutory powers to further the promotion of social development in London. Supporting active citizenship and democratic participation furthers social cohesion, and fits within this remit. The GLA's Civic and Democratic Participation work programme was established via: MD2447, which approved initial expenditure for a voter registration pilot project in 2019; decisions that approved London Voter Registration Week (LVRW) activity between 2020 and 2022, namely ADD2399, MD2680, ADD2483, MD2798 and DD2557; and MD2970, which approved expenditure for phase one of the GLA Voter ID public awareness campaign and grants programme.
- 1.2. Research from the Electoral Commission ("State of the December 2018 electoral registers", September 2019) and the Cabinet Office ("Atlas of Democratic Variation", January 2019) into the state of electoral registers shows that London has one of the lowest voter registration rates across the UK's regions and nations. Not registering to vote has significant consequences for representation and inclusion in London, including exclusion from selection for jury service and increased difficulties in gaining a credit rating.
- 1.3. The 2019 GLA Survey of Londoners showed that higher levels of wellbeing are associated with active participation; and that some forms of participation are positively linked to belonging to London, including registering to vote, which is also linked to feelings of belonging to a local area. It also revealed that one in three Londoners aged between 16 and 24 are not registered to vote. By contrast, 97 per cent of Londoners aged 65 or over are registered. Other under-registered groups are Londoners from a Black ethnic background (83 per cent registered, compared to 94 per cent of White British Londoners); and social and private renters (85 per cent and 86 per cent registered, respectively, compared with 93 per cent of owner-occupiers).
- 1.4. The Elections Act 2022 has now received royal assent. The Act introduces a requirement for voters to show an approved form of photographic identification in order to vote in UK Parliamentary and other elections, including elections for the Mayor of London and London Assembly ("the introduction of photo Voter ID"). Documents currently listed as acceptable forms of Voter ID include, among others: passports; driving licences; various concessionary travel passes; and photocard parking permits issued as part of the Blue Badge scheme. Any voter who does not have an approved form of identification will be able to apply for a free Voter Card from their local authority.
- 1.5. The Act will also remove voting rights from some EU Londoners. To vote in local elections, EU citizens will have to belong to one of two groups. They must either: be a citizen of an EU member state with which the UK has a voting rights agreement (currently Spain, Portugal, Luxembourg and Poland); or have been resident in the UK before 1 January 2021 and retained lawful immigration status, notwithstanding the UK's withdrawal from the EU ("the EU voting changes"). When discussed together, these two aspects of the Act (the introduction of photo Voter ID, and the EU voting changes) are referred to as the Voting System Changes.
- 1.6. The introduction of photo Voter ID is likely to have a significant impact on Londoners' ability to exercise civic and democratic rights. Those most likely to be impacted are already under-registered and under-represented; have been disproportionately impacted by the COVID-19

pandemic and the cost-of-living crisis; and experience low levels of trust in politics and the democratic systems.

- 1.7. At this stage, and until the final list of acceptable photographic voter ID is finalised and published via secondary legislation, we cannot estimate how many Londoners lack any form of ID. However, looking at individual forms of ID, the GLA City Intelligence team has estimated that:
- around 550,000 Londoners do not have a passport (data source: detailed EU/EFTA Passport held, Ward Tool, 2018)
  - over 2,600,000 Londoners do not have a full driving licence, with females less likely to have a driving licence (42 per cent) than males (32 per cent) (data source: National Travel Survey, 2019)
  - 26 per cent of Londoners aged between 60 and 65 do not have an Oyster photocard (data source: TfL, active cards in 2022)
  - only around one in five (18 per cent) of disabled Londoners would be able to present a Freedom Pass as ID, if required (data source: Taxicard and Freedom Pass usage statistics 2020-21, London Councils).
- 1.8. It is also important that EU Londoners are made aware of the EU voting changes. As noted above, EU citizens will have to belong to one of two groups to be able to participate in UK elections. This will further complicate awareness of democratic rights, at a time when EU Londoners are the most under-registered community by nationality with only 69 per cent registered (ONS data, January to December 2018). It is therefore important that those EU Londoners who will be eligible to vote are aware of their rights.
- 1.9. In drafting the proposals contained in this DD, and in MD2970, GLA officers have consulted extensively with the Electoral Commission, the Association of Electoral Administrators (London branch) and civil society organisations led by communities most likely to be disproportionately impacted by the legislation. Officers have also considered evidence from “London Voices: The Journey to Full Participation” (Trust for London and The 3Million, December 2021); and evidence from the Joseph Rowntree Foundation (February 2022) which found that 1.7 million low-income voters could be disenfranchised.
- 1.10. The proposals are consistent with the work of the London Voter Registration Strategic Partnership (LVRSP), which is made up of representatives from professional and statutory bodies (the Association of Electoral Administrators (London branch) and the Electoral Commission), and civil society organisations. The GLA established the LVRSP in 2019, and continues to collaborate and coordinate closely with it, as part of the wider Civic and Democratic Participation programme and advocacy on key non-party political, impartial civic and democratic participation activity and advocacy.

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

### Objectives

- 2.1. Now that the Elections Act has received Royal Assent, this DD seeks approval for expenditure to increase the Voter ID public awareness campaign, initially approved via MD2970.
- 2.2. This addition is required to ensure:

- appropriate GLA grant funding is made available to support community-led organisations to raise awareness amongst Londoners most likely to be impacted. GLA officers will continue to seek match funding from other charitable and philanthropic funders for phase two of the Voter ID public awareness campaign grants programme (for financial year 2023-24)
- Shout Out UK – the delivery partner for the Voter ID public awareness campaign, appointed via a competitive procurement process in July 2022 – can commission a PR agency and ensure a successful campaign launch in January 2023
- the GLA External Relations team have the funds necessary to ensure phase one of the Voter ID public awareness campaign has sufficient amplification, reach and impact across appropriate GLA platforms, including social media platforms and, for e.g., the TfL ads estate.

2.3. The GLA intends to launch the grants programme in 2022, aimed at organisations led by under-registered and under-represented communities. Bidding organisations will need to: evidence a track record of delivering impartial and impactful civic and democratic engagement activity; and have an impeccable non-party political reputation. The objectives of this first phase of the grants programme are as follows:

- To support organisations led by: Black, Asian, Ethnic Minority and migrant Londoners, including EU Londoners; young Londoners; Deaf and disabled Londoners; LGBTQ+ Londoners; older Londoners; and low-income, social and private renters. This support will enable these organisations to deliver impartial activity in their respective communities and across London. These are the most under-registered and under-represented groups in London, and could be disproportionately impacted by the Voting System Changes.
- To ensure activity is delivered in local communities by trusted and influential community-led organisations through in-person awareness-raising and informational activity in familiar settings.

#### Expected outcomes

2.4. The overall expected outcomes of the public awareness campaigns and the grants programme will build on the established reputation and success of LVRW activity. These include:

- raised awareness among London's under-registered and under-represented communities about changes to civic and democratic rights
- raised awareness among Londoners who lack photo voter ID that they can apply for a free Voter Card – this includes, in particular, young Londoners; Black, Asian, Minority Ethnic and migrant Londoners (including Commonwealth and EU Londoners, in line with voting rights); social and private renters; LGBTQ+ Londoners; and older and low-income Londoners
- increased support for the capacity and activity of London borough councils and civil society organisations, using assets created as part of the GLA-coordinated campaign, as they engage under-registered and under-represented communities at risk of being disenfranchised.

### **3. Equality comments**

3.1. Under the Public Sector Equality Duty in section 149 of the Equality Act 2010, as a public authority, the Mayor and the GLA must have due regard to the need to eliminate unlawful discrimination, harassment and victimisation, and any conduct that is prohibited by or under the Act; and to

advance equality of opportunity, and foster good relations, between people who share a protected characteristic and those who do not. Protected characteristics under the Equality Act are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation, and marriage or civil partnership status (the duty in respect of this last characteristic is to eliminate unlawful discrimination only).

- 3.2. Compliance with the Act may involve, in particular, removing or minimising any disadvantage suffered by those who share a relevant protected characteristic, taking steps to meet the needs of such people; and encouraging them to participate in public life, or in any other activity where their participation is disproportionately low, including tackling prejudice and promoting understanding. In limited circumstances this may require treating people with a protected characteristic more favourably than those without one.
- 3.3. This programme of work sits under the GLA Equality, Diversity and Inclusion (EDI) cross-cutting principles, as it has a focus on tackling inequalities and barriers to civic and democratic participation among: Black, Asian, Minority Ethnic and migrant Londoners, including EU and Commonwealth Londoners; young Londoners; Deaf and disabled Londoners; LGBTQ+ Londoners; social and private renting Londoners; older Londoners; and those from a low socio-economic background. These are the Londoners currently less likely to be registered or represented in the democratic system, or to possess a photo ID. Many of these Londoners share protected characteristics, and have been disproportionately impacted by the COVID-19 pandemic and the cost-of-living crisis. The GLA will be working with Londoners that have protected characteristics to design and deliver impartial public awareness information and activity that is accessible, inclusive and impactful. It is considered that the proposals contained in this DD, and in MD2970, will help many of these Londoners to better understand the Voting System Changes, and their civic and democratic rights – thus removing or minimising disadvantage that could otherwise arise, and encouraging participation in public life.

#### 4. Other considerations

##### 4.1. Key risks and issues

Risk	Mitigation	Current probability (1-4)	Current impact (1-4)	RAG
<b>Reputational</b> – risk that activities are perceived as being for any party’s electoral gain, rather than for the social development of the city and its communities.	<ul style="list-style-type: none"> <li>For the grants programme – commission organisations that: are led by communities disproportionately impacted by the changes to civic and democratic rights; have a successful track record of running impartial civic and democratic activity in person and in communities; and can employ solid evaluation tools.</li> <li>Build on the non-party political, impartial and non-election-specific character of all LVRW (2019-22) assets and activities.</li> <li>Ensure any activity is based on best practice and clear evidence.</li> <li>Maintain impartiality via use of the GLA logo on information material; use of</li> </ul>	1	3	G

	@LDN_gov / London City Hall social media platforms; and through non-partisan messaging, cross-party engagement and pan-London delivery.			
<b>Delivery</b> – the risks associated with the external context and activity not getting delivered	<ul style="list-style-type: none"> <li>Activity will take place after LVRW 2022 (19-25 September).</li> <li>Activity will be regularly monitored and reviewed to enable a swift response to the external public health and political contexts.</li> <li>If activity is not delivered, there will be an increase in democratic inequality among under-represented and under-registered Londoners; and an increase in apathy, in the context of reduced trust in public institutions and the democratic process.</li> </ul>	<b>1</b>	<b>4</b>	<b>G</b>

#### *Links to Mayoral strategies and priorities*

- 4.2. This project is key to delivering on the high-level objective made in the Mayor’s Social Integration strategy, All of Us, to “equip more Londoners to participate in democratic processes”. It builds on the commitments set out in the Mayor’s EDI strategy, focusing on addressing the inequalities and barriers that are particularly detrimental to civic and democratic participation across London, but especially among under-registered and under-represented Londoners.
- 4.3. Throughout the passage of the Elections Bill, the Mayor has made representations to the Minister for the Constitution and cross-party parliamentarians from both Houses of Parliament, stressing the negative equality implications of introducing a limited list of acceptable photo voter IDs, and of removing voting rights from some EU Londoners.

#### *Consultation and impact assessments*

- 4.4. Since 2017, the GLA has been running extensive engagement on its Civic and Democratic Participation programme of work and advocacy, with a diverse range of statutory and civil society stakeholders.
- 4.5. From 2021, and prior to seeking approval of this DD (and obtaining approval of MD2970), the GLA consulted with all bodies and persons that it considered appropriate. These included statutory bodies and civil society organisations.
- 4.6. Further consultation, carried out since the Act received royal assent, has shown that the initial £75,000 allocated to the community grants programme would not be sufficient. Hence this DD seeks a further £75,000 to ensure appropriate funding for community-led organisations to run impartial awareness-raising activity, aimed at Londoners at risk of being disenfranchised.
- 4.7. Further consultation has also shown that the activities and materials co-designed and co-delivered with under-registered and under-represented London communities need to be amplified via appropriate GLA channels. Hence, the GLA External Relations team require a budget to ensure the reach and impact of the #NoVoteNoVoice marketing and social media campaign.
- 4.8. In early March 2023, the delivery partner and the GLA, in consultation with appropriate statutory bodies and civil society partners, will review reach and impact; produce an evaluation brief; and use this brief to inform proposals for phase two activity in financial year 2023-24 that will build on,

but not be limited to, the public awareness activity and grants programme delivered in financial year 2022-23.

- 4.9. No conflict of interest was identified in the drafting or clearance of this decision document.

## 5. Financial comments

- 5.1. Approval is being sought for expenditure of £150,000 towards increased activity, as part of phase one of the GLA Voter ID public awareness campaign. This expenditure is detailed below.

Activity	2022-23
Upgrade grants programme aimed at organisations led by communities disproportionately impacted to run outreach activity	£75,000
Commission PR agency to work with delivery partner on the launch of the Voter ID public awareness campaign	£15,000
Budget for GLA marketing and social media amplification	£60,000
<b>TOTAL</b>	<b>£150,000</b>

- 5.2. The expenditure will be funded from GLA Reserves (specifically Grant Unapplied), in line with approval under MD2970.
- 5.3. In line with previous Civic and Democratic Participation programme procurement processes, the GLA reserves the right to ask any service provider, including grantees, to cease activities. It is a condition of any contract that the chosen service providers, including grantees, seek explicit permission from the GLA's authorised representative (identified in the funding contract) before commencing any work, or producing any public communication, to ensure impartiality at all times in terms of messaging, engagement and delivery. Any unauthorised activity shall not be paid and will be deemed as not instructed by the GLA.

## 6. Legal comments

- 6.1 Under Section 30(1) of the Greater London Authority Act 1999 (as amended) (GLA Act), the GLA has a General Power to do anything that furthers the promotion of social development in Greater London. As noted above in this DD, and in MD2970, it is considered that raising awareness of the Voting System Changes, particularly among under-registered and under-represented communities, will promote and support democratic participation and further social cohesion. On this basis, the activities proposed in this DD continue to fall within the GLA's General Power.
- 6.2 As highlighted in MD2970, and reaffirmed in this DD, the GLA has the legal remit to carry out this activity in collaboration and coordination with statutory and public bodies. Sections 2 and 3 highlight how the proposed activities will facilitate and support the activities of those bodies in promoting awareness of the Voting System Changes, including amongst under-registered and under-represented communities, and are in line with GLA's responsibility to tackle inequality.
- 6.3 Legal advice should be taken, as appropriate, throughout the design and delivery phases to ensure the proposed activities constitute cooperation and coordination with the activities of relevant public bodies. Similarly, it will be prudent for the GLA to continue working with the LVRSP to provide guidance and advice; and to ensure that any activities facilitate, coordinate or cooperate with the activities of the Electoral Commission and borough electoral services.

- 6.4 Importantly, and in any event, the GLA's activities and published materials (including those published by grantees or other service providers) in this area must at all times be apolitical, objective, factual and neutral. They must not seek, or be capable of being perceived to seek, to affect public support for, or opposition to, the Voting System Changes, provisions of the Elections Act or any other such related matters. They must not be capable of being perceived as designed to affect public support (positively or negatively) for a political party or a candidate in an election; and they must comply with the GLA's Use of Resources Guidance and the Code of Practice on Local Government Publicity. In addition, the GLA's activities in this area must at all times be kept separate and distinct from the functions of the Greater London Returning Officer, whose actual and perceived impartiality is vital. Any materials produced should be reviewed to ensure compliance with the above.
- 6.5 To the extent that expenditure concerns the award of grant funding:
- that it is distributed fairly, transparently, in manner that affords value for money, and in accordance with the requirements of the GLA's Contracts and Funding Code
  - that grant-funding agreements are put in place between, and executed by, the GLA and recipients before any commitment to fund is made.

## 7. Planned delivery approach and next steps

Activity	Timeline
Launch of phase one Voter ID awareness campaign – grants programme	By end of October 2022
Delivery partner to appoint PR agency for Voter ID public awareness launch	By end of November 2022
Launch of phase one Voter ID awareness campaign, coordinated with the Electoral Commission's national campaign, and grantees – led outreach activity in community settings	By end of January 2023
Delivery end date – phase one	By end of March 2023
Evaluation – phase one	By end of March 2023

## Appendices and supporting papers:

N/A



**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 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:**

Dr. Elisabeth Pop has drafted this report in accordance with GLA procedures and confirms the following:

✓

**Assistant Director:**

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.

✓

**Corporate Investment Board**

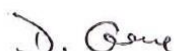
A summary of this decision was reviewed by the Corporate Investment Board on the 22 August 2022.

✓

**EXECUTIVE DIRECTOR, RESOURCES:**

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

**Signature**



**Date**

**2/9/22**