

# GREATER LONDON AUTHORITY

## REQUEST FOR DIRECTOR DECISION – DD2321

### Title: Strategic evaluation of social welfare provision in London

#### Executive Summary:

The Equality and Fairness team is seeking approval to spend up to £75,000 to procure an external research organisation to carry out a strategic evaluation of social welfare advice in London. This project will seek to better understand the provision of social welfare advice in London and strategically evaluate GLA activities that relate to social welfare advice provision. The research report produced will also provide recommendations for actions the Mayor could take to bring strategic co-ordination to the provision of advice and legal support or fill gaps in provision, helping to deliver the Mayor's commitment to raise awareness and improve take-up of the various forms of support that low-income families are eligible for in London.

#### Decision:

That the Executive Director of Communities and Intelligence approves:

Expenditure of up to £75,000 to procure an external research organisation to strategically evaluate both the provision of social welfare advice in London and the links to existing areas of Mayoral activity and make appropriate recommendations to the Mayor.

#### AUTHORISING DIRECTOR

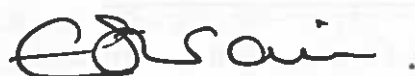
I have reviewed the request and am satisfied it is correct and consistent with the Mayor's plans and priorities.

It has my approval.

Name: ~~Sarah Mulvey~~ Emma Scain.

Position: Executive Director of Communities and Intelligence

Signature:



Date:

7. 2. 19

## PART I - NON-CONFIDENTIAL FACTS AND ADVICE

### Decision required – supporting report

#### 1. Introduction and background

- 1.1. Advice on social welfare is one of the most effective ways of supporting Londoners facing a range of social and economic challenges. Many of these challenges have been exacerbated by the decade of cuts to the provision of social welfare advice and could increase further due to Brexit, or a short-term economic slow-down. Often, if left unresolved these problems can have profound consequences for individuals, their families and ultimately the state.
- 1.2. Social welfare advice is commonly viewed as comprising the following areas:
  - *Welfare benefits*: eligibility and access to welfare benefits, income maximisation (which focuses on promoting the uptake of welfare benefits)
  - *Debt*: advice and guidance on how to avoid debt and how to deal with it when it becomes a problem
  - *Immigration*: the provision of advice on immigration issues, which is subject to its own regulatory framework
  - *Employment*: rights at work, for example around unfair dismissal, unfair treatment, withheld pay
  - *Housing*: access to social housing, advice on housing rights and eviction, including around the management and condition of accommodation, access to assistance when facing or experiencing homelessness
  - *Education*: parents with grievances against local authorities/school governing bodies; issues relating to accessing special educational needs; support to study; free school meals, etc.
  - *Community care*: social care, community support and services
- 1.3. The reduction in funding for social welfare advice provision has both increased the demand for information, advice and support on issues relating to social welfare, whilst also reducing the capacity of the advice sector. This sector is made up of not-for-profit organisations such as law centres; advice agencies including Citizens Advice bureaux and other independent agencies; national charities; local authority provision (diminishing in many areas); or lawyers working on a pro-bono basis (affected by cuts to civil legal aid, local authority funding or the introduction of fees for tribunal cases).
- 1.4. The Low Commission on the future of advice and legal support– established in late 2012 by the Legal Action Group to develop a strategy for addressing these problems, and reporting in 2014 – proposed several recommendations, including for local authorities or groups of local authorities to co-produce or commission local advice and legal support plans with local not-for-profit and commercial agencies, and for the government to establish a National Advice and Legal Support Fund as a contribution to meeting an estimated funding gap for the sector in the UK of some £100 million.<sup>1</sup>
- 1.5. While considerable uncertainty remains around the UK leaving the European Union, whatever the outcome of the negotiations the impact of the current economic and political uncertainty around Brexit will could exacerbate existing trends for low income Londoners in a number of ways, including:
  - the rising cost of living (food, energy, fuel)

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<sup>1</sup> The Low Commission – Report 2014

- 1.6. The GLA wishes to commission research to better understand the provision of social welfare advice in London and to help strategically evaluate GLA activities that relate to social welfare advice provision (as further described in paragraph 1.9 below). It is proposed to commission an external research organisation who will be expected to use a combination of qualitative and quantitative research methods to meet the overarching research aims. Based on the research, the research organisation will also be required to make recommendations for actions the Mayor could make to bring strategic co-ordination to the provision of advice and legal support or fill gaps in provision. The research will focus on a smaller number of areas of social welfare advice, most likely, the provision of advice on welfare benefits, immigration, employment, debt and housing.
- 1.7. As such, this is a timely piece of research that will identify strategic opportunities for the Mayor to support the provision of welfare advice in London as demand increases due to the potentially negative impact of Brexit on both low-income Londoners and the social welfare advice sector.
- 1.8. The research company will be procured in accordance with the Public Contract Regulations (if applicable) and GLA's Contracts and Funding Code and TfL Procurement will support the procurement of this piece of work.
- 1.9. Through the low-income Londoners sub-group, officers have been able to identify a wide range of projects in development or delivery that involve signposting to, investing in, researching or providing co-ordination for, the provision of advice on social welfare law to Londoners. Relevant projects with approvals or budget submissions in place include:

[illegible]

	- Publishing guidance for Young Londoners with insecure immigration status, as well as guidance for services working with young people	
<b>Education &amp; Youth</b>	- Launching a campaign to increase the awareness of early education and childcare entitlements amongst London families and how they can access this provision	<b>MD 2361</b>
<b>Skills &amp; Employment</b>	- Funding the provision of social welfare advice within all of the GLA's ESF programmes. For example, the Adult Education Budget-European Social Fund programme on parental employment ensures all available statutory support and entitlements are met before ESF supports any extra childcare costs.	<b>MD2375</b>

1.10. In addition, there are a range of other emerging policy initiatives where the provision of social welfare advice is likely to be directly relevant. These include:

- The **Health** team are publishing a 'Social Prescribing Vision' to promote the potential of social prescribing to secure better health outcomes for Londoners – the Mayor's health justice task-and-finish group found that 20% of people going through social prescribing required advice on legal or social welfare issues
- **Community Engagement** will potentially run a 'Data Expedition' with the Advice Services Alliance to look at the provision of social welfare advice in a defined local area in London
- **Housing and Land** are looking at the extent to which local authorities provide housing advice, either in-house or through the services they commission
- **Housing and Land** are also interested in the "duty to refer" that is part of the Homelessness Reduction Act 2017, which recently came into effect and the impact it will have on the number of people facing or experiencing homelessness who are referred for advice
- The **Food** team are promoting Healthy Start vouchers, where take-up levels are significantly lower than eligibility
- As part of the 'London Needs You Alive' campaign, the **Community Engagement** team have been exploring the potential for working with informal social hubs as a route to promoting awareness and information on knife crime.

1.11. The number of projects that the GLA is either already developing or may wish to develop has prompted this proposal to take a more strategic approach to work involving social welfare advice provision in policies and programmes at the GLA and in the wider sector.

## 2. Objectives and expected outcomes

2.1 The *objectives* of this piece of research are to:

1. Better understand the role and impact of the social welfare advice sector in London, including borough, civil society and other public provision. This will cover issues like:
  - The shift to online processes for accessing benefits and the impact on those who need additional/face-to-face support (including the specific impact of the roll-out of Universal Credit)
  - The existence of 'advice deserts' and potential approaches to extending provision into those areas

- The potential to design a common framework for referrals into social welfare advice, including the role that anchor institutions (such as schools, GP surgeries), individuals, (MPs/councillors, police, social or charity workers) or informal social hubs (hair shops/barbers/school gates) could play as referral routes into sources of advice
  - Highlighting new and smart ways to increase access to advice that increase reach and/or lower cost
  - The impact that high quality advice provision can have on low income Londoners.
- II. Contribute to ongoing policy work relating to the effects that Brexit could have on low-income Londoners and any resulting fall in living standards, or reshaping of London's economy
  - III. Assess the appetite among other providers, funders, local councils and sources of pro-bono support to collaborate and coordinate more in this sector, and the role the GLA could play in supporting this
  - IV. Evaluate the range of GLA activities outlined in Section 1 to better understand how the Mayor's involvement in the social welfare advice sector can be as strategic as possible. This could potentially include investigating the continuing relevance of the Low Commission's recommendation for local authorities or groups of local authorities to co-produce local advice and support plans
  - V. Provide recommendations for actions the Mayor could take – either on his own, or in conjunction with London boroughs, civil society partners or private firms – to bring strategic co-ordination to the provision of advice and legal support or fill gaps in provision
  - VI. Inform any policy or funding 'asks' of government that the Mayor could make around social welfare advice provision in London.

## 2.2 The *expected outputs* of the project include:

- Extensive literature review;
- Mapping of and data analysis on provision of social welfare advice in at least three fields (from anchor institutions through to informal social hubs);
- Interviews with a wide range of diverse providers (and potentially recipients) of advice;
- Interviews and review of performance info on relevant GLA projects;
- Impact assessment of advice services; and
- Policy development to consider potential for (and shape of) common referral framework, as well as recommendations.

## 2.3 The *expected outcome* of the project is for the successful organisation to produce a comprehensive report which will contain:

- A detailed picture of the state of the social welfare advice provision sector in London (including how austerity has impacted on the level of provision as well as how the roll-out of Universal Credit is affecting provision in London.)
- A strategic overview of internal GLA programmes and projects that have social welfare advice provision as an element of their design.
- A set of recommendations for the Mayor which will inform GLA policy and activity in this policy area.

- Identified and prioritised key partners, stakeholders and organisations who are interested in collaborating with the GLA to address priority issues highlighted within the report.

### 3. Equality comments

- 3.1. Under Section 149 of the Equality Act 2010, as a public authority, the Mayor of London must have 'due regard' to the need to (i) eliminate unlawful discrimination, harassment and victimisation; (ii) advance equality of opportunity between people who share a relevant protected characteristic and those who do not; and (iii) foster good relations between people who share a relevant protected characteristic and those who do not.
- 3.2. A recent *Cumulative Impact Assessment* of recent reforms to welfare provision, undertaken by GLA Intelligence highlighted that:
  - London's poorer households will lose more from tax and welfare changes than richer households
  - Households with children and at least one disabled adult or child are expected to lose an average over £4,000, and lone parents over £3,500
  - Welfare and tax reform will have a greater negative impact on women than men
  - Of all the changes analysed, the benefit freeze will have the greatest average impact on households in London
  - Poorer households where all members are of a Black ethnic background stand to lose more from welfare and tax reform than Asian and White households
  - Non-UK nationals will lose more than UK nationals across the income distribution
  - Households with children and those with a disability will lose considerably more on average than households without a disability or children
  - Depending on the poverty measure used, tax and welfare reform will increase the number of children in poverty by 100-150,000, an 8-percentage point increase in the child poverty rate.
- 3.3. The Mayor's Equality, Diversity and Inclusion Strategy contains an objective to: "Work with government, boroughs, early years and childcare providers and businesses to help address the root causes of child poverty. These include affordability of housing, childcare, transport, low pay and lack of flexible working, as well as the welfare system. The evidence base commissioned for the Mayor's equality, diversity and inclusion strategy highlights the following issues relating to child poverty:
  - Growing proportion of children living in poverty are from working families
  - Majority of children living in poverty in London now live in the private rented sector
  - Some BAME groups, migrants and families with non-working mothers are at greater risk of living in poverty than others
  - Women and children – especially those from BAME groups – and disabled people have lost out from welfare reforms
- 3.4. The strategy commits the Mayor to "raising awareness, and improving take-up, of the various forms of support for which low-income families are eligible. The provision of social welfare advice is a key form through which this can be achieved".
- 3.5. The impact of advice on vulnerable groups was found to be particularly significant in the evidence reviewed by the Low Commission<sup>2</sup>. Vulnerable groups that were considered included young adults, disabled people and those with mental health issues.
  - 3.5.1. *Young people*: There was consistent evidence that unresolved social welfare problems have a large impact on many areas of young people's lives, including their mental and

<sup>2</sup> The business case for social welfare advice services, Low Commission evidence review, August 2014

physical health; social and emotional well-being; education, employment and training; quality of life; youth offending and staying safe from harm. A report by Youth Access (2011), the largest provider of advice and counselling services to young people outlines how social welfare problems disproportionately impact on disadvantaged adults, resulting in substantial cost to wider society.<sup>3</sup>

3.5.2. *Disabled people* - Scope (2011) illustrated that the removal of legal aid for welfare benefits cases had a substantial, immediate impact on disabled people, and that these changes offset the measures put in place by the government to support disabled people to get into work and out of poverty. There is a danger that if disabled people are no longer able to access advice there will be significant impact on their ability to maintain independence, reduce their capacity to cope with the additional costs, and potentially undermine their ability to remain employed.<sup>4</sup>

3.5.3. *People with mental health issues* - There is increasing evidence that debt advice can reduce the risk of unmanageable debt and prevent the onset of mental health problems. An independent value for money review conducted by Citizens Advice (2010) noted other benefits from receiving and acting on advice include better health, stress relief and self-confidence.<sup>5</sup>

3.5.4. *Ethnic Minority communities* - There was also justifiable concern at the equality implications of the legal aid changes and funding cuts noting the changes to scope could have a disproportionate impact on individuals with protected characteristics (predominantly gender, race or disability). The Low Commission repeatedly heard concerns that there are likely to be specific impacts on black and minority ethnic communities because of the loss of immigration advice from legal aid.

3.6. Particular attention will be paid to the groups identified in sections 3.2 and 3.5 who have been most affected by the welfare reform changes. The report will highlight how these groups access social welfare advice and how the sector can better serve these vulnerable groups.

3.7. The successful research organisation will be expected to engage with and consult closely with advice providers from across the spectrum of advice organisations so that the voice of all Londoners who access social welfare advice can be heard and can help to shape the research findings. For example, funding to women-only services in London has been drastically reduced in the last decade. Many women's organisations have closed and many are under threat of closure because of the funding crisis. While demand for women-only services rose by 83%, funding fell by 50%.<sup>6</sup> The successful research organisation would be expected to engage with this sub-section (and others) of the sector to understand the specific issues related to providing social welfare advice to those who need it in London.

3.8. Specialist organisations, such as those led by BAME, LGBT+ or disabled people are often excluded from much-needed support to deliver advice for intersectional Londoners because of how equality legislation is interpreted by public bodies.<sup>7,8</sup>

3.9. The long-term aim of this project would be to help strategically shape the social welfare advice sector so that it is fit for purpose and supports all Londoners, especially the groups outlined above to access the advice and support they need to meet the challenges of living in London.

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<sup>3</sup> James Kenrick, *Young people's access to advice – the evidence: key research evidence on young people's access to advice on social welfare issues*, Youth Access, 2009, available [here](#)

<sup>4</sup> Cristina Sarb and Marc Bush, *Legal aid in welfare: the tool we can't afford to lose*, Scope, 2011, available [here](#)

<sup>5</sup> Dr Bob Dobbie, *BIS has commissioned an independent value for money review of Citizens Advice and Citizens Advice Scotland*, Department for Business, Innovation and Skills, Ref URN 11/520, October 2010, available [here](#)

<sup>6</sup> *Hearing women's voices: Why women 2018*, Women's Resource Centre, 2018

<sup>7</sup> *Invisible Women*, Fawcett Society and the Young Women's Trust, 2018 for the APPG on Sex Equality

<sup>8</sup> The emphasis being on delivering gender-neutral services



#### 4. Other considerations

##### A) key risks and issues

Risk and Issues	Impact	Mitigation
The funding cycle for small providers of social welfare advice starts in Q1/April annually, which can lead to change as funding is cut or renewed.	This can impact on the data collected for this research (Services delivered in previous Q4 may no longer be funded in Q1)	Manage expectations and ensure that audience understands that this is a 'snap shot' of the sector
Potential scale of the problem is not met by the research scope and resources	The research findings may highlight a gap too large for City Hall to tackle alone,	Ensure involvement of funders, boroughs and other stakeholder in the research and that stakeholders understand the limits of the research and the levers for action that City Hall have.
Advice organisations unable to input into the research as they are too stretch to engage with researchers.	Incomplete picture of the sector	Ensure that the time the research engage with the participating organisations is used well, is focused and flexible.

##### B) links to Mayoral strategies and priorities

- 4.1 The Mayor's manifesto contained a commitment to *"Make London a fairer and more tolerant city, open and accessible to all, and one in which all can live and prosper free from prejudice"*. He also committed 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, trade unions, civil society, financial institutions and Londoners to tackle poverty, financial exclusion and other issues that affect low income Londoners in particular."*
- 4.2 In *'An Inclusive London'* the Mayor's equality, diversity and inclusion strategy, the mayor's vision for a fairer, more equal London is outlined. Several objectives in the strategy commit to working with partners (councils, government, the voluntary sector and communities) to address issues like homelessness, fuel poverty and child poverty and ensuring provision of early years in London is used to help close the disadvantage gaps between groups of children.
- 4.3 In *'All of Us'* – the social integration strategy for London, the Mayor outlines his vision for a socially integrated London underpinned by equality, community and participation. If the gaps in access, opportunity and wealth in a community are too great it threatens social integration. And in the *Skills for Londoners* strategy the Mayor outlines how he will make sure 'Londoners, employers and businesses get the skills they need to succeed in a fair, inclusive society and thriving economy.'
- 4.4 In the *'London Food Strategy'*, the Mayor commits to tackling food insecurity, and notes that welfare changes and benefits sanctions are the main reason people visit foodbanks for emergency food provision. Food insecurity, triggered by a crisis in financial or personal circumstances, may also be a long-term experience of consistently not being able to access a healthy diet or afford to eat well. This can be even more the case for marginalised groups such as older people, homeless people, disabled people, asylum seekers, unemployed people, teenagers and young adults.



## 5 Financial comments

- 5.1 The expenditure of up to £75,000 will be funded from the 2018-19 (£30,000), and 2019-20 (£45,000) Social Mobility Programme budget held with the Communities and Social Policy Unit.

## 6 Legal comments

- 6.1 The foregoing sections of this report indicate that:

(a) 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 which are facilitative of, conducive or incidental to the promotion of economic development and wealth creation, social development or the promotion of the improvement of the environment in Greater London; and 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 United Kingdom; and
- 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 (race, disability, gender, age, sexual orientation, religion or belief, pregnancy and maternity and gender reassignment) 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.

- 6.3 The procurement of the research organisation should be undertaken in accordance with the GLA's Contracts and Funding Code and in consultation with Transport for London's procurement team, who will determine the procurement strategy.

- 6.4 Officers must ensure that appropriate contract documentation is put in place and executed by the successful bidder(s) and the GLA before the commencement of services.

## 7 Planned delivery approach and next steps

Activity	Timeline
Procurement of contract	25 February 2019
Delivery Start Date	31 March 2019
Interim Progress Report	15 July 2019
Delivery End Date	31 October 2019

### 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? YES**

If YES, for what reason: Publication of this decision should to deferred to ensure best value for money is secured from the bidder for the contract during the procurement process.

Until what date: **31<sup>st</sup> March 2019**)

**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:**

Siobhán McKenna has drafted this report in accordance with GLA procedures and confirms the following:

✓

**Assistant Director/Head of Service:**

Kathleen Kelly 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**

This decision was agreed by the Corporate Investment Board on 4 February 2019.

**EXECUTIVE DIRECTOR, RESOURCES:**

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

Signature

*M. J. Allen*

Date

7.2.19