

# GREATER LONDON AUTHORITY

## REQUEST FOR DIRECTOR DECISION – DD2239

**Title:** European Londoners Online Portal and Campaign

### Executive Summary:

The Social Integration Team seeks approval to spend £90,000 to support European Londoners to access information, advice and support about their rights post-Brexit. Work will include:

- Development of an online portal on London.gov which will direct users to up-to-date information and advice about their rights after the UK leaves the European Union
- Sign-posting vulnerable users to advice and support services that can meet their specific needs
- Development of a campaign as part of #LondonIsOpen to promote messages of welcome to European Londoners during the transition period and raise awareness of how to access their rights
- Outreach work in partnership with civil society to reach groups most at risk of marginalisation post-Brexit

### Decision:

That the Executive Director for Communities and Intelligence approves:

Expenditure of £90,000 to develop an online portal and complementary campaign and outreach to support European Londoners to understand their rights post-Brexit, and signpost the most vulnerable to support and advice services. This £90k funding will be divided as follows:

- £50k development of online portal on London.gov
- £20k development and delivery of the supporting communications campaign
- £20k community outreach work in partnership with civil society via micro-grants

### 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:** Jeff Jacobs

**Position:** Executive Director of Communities and Intelligence

**Signature:**



**Date:**

2.5.2018

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

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

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

1.1 There are approximately one million European nationals living in London and while their rights post-Brexit are still to be confirmed, the Government has stated that they will need to apply for ‘settled status’ to remain in the UK after Brexit.

1.2 In July 2017 the London Assembly EU Exit Working Group hosted a session entitled ‘European Voices: EU Londoners Speak’ and in November 2017 the Social Integration Team hosted a roundtable with civil society and representatives from the legal sector to explore in more depth the issue of EEA+ and third-country nationals<sup>1</sup> at risk of marginalisation post-Brexit.

1.3 Both forums demonstrated that European nationals in London are already reporting serious challenges following the referendum vote in June 2016. Although their rights remain unchanged in law until the date when the UK formally leaves the European Union, there is significant uncertainty over their future status in the UK. This uncertainty has contributed to some immediate challenges for European Londoners including feeling unwelcome, discrimination, hate crime, problems accessing credit and mortgages, difficulties renting private property, problems gaining employment, discriminatory treatment stemming from confusion about entitlements to services, and resulting mental health problems.

1.4 If the Government’s proposed ‘settled status’ scheme goes ahead, some European Londoners will face additional barriers to obtaining the proposed ‘settled status’. These are expected to include<sup>2</sup>:

- People with immigration complexities that make their eligibility for settled status uncertain, for example third-country nationals relying on EU law rights based on CJEU<sup>3</sup> jurisprudence.
- People who might struggle to evidence their eligibility, such as those who have not been given proper records by their employer, have been exploited, or are fleeing domestic violence and therefore do not have access to necessary documentation
- People who are unable to access the system to apply for settled status, for example due to language barriers, disability, or lack of administrative or digital capacity
- People who do not apply, either due to lack of information, lack of support or through lack of trust in the system.

1.5 There is also a shortage of quality advice and support given the pressures services are under and the scale of the challenge. The removal of legal aid from immigration and family reunification cases has further stretched what advice and support is freely accessible. This adds to the stress (and potentially to the costs) facing even those European nationals with a straightforward claim for status.

1.6 The Mayor has committed to launch a new online portal on London.gov to make it easier for European Londoners to get the information they need to stay in the UK after Brexit. A landing page launched by the Mayor on 1 March received a high level of traffic with over 9,500 unique views in its first week, the most visited page on the site at the time. The resource will be developed in partnership with legal advice and support services to ensure that it supports and complements existing activity and capacity, as well as the needs of users.

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<sup>1</sup> EEA+ refers to those countries for whom freedom of movement applies – the European Economic Area plus Switzerland. Third Country Nationals refers to those who are from outside of Europe but are resident in the UK via a family member who is EEA+, or through second citizenship of a EEA+ country.

<sup>2</sup> <http://www.ilpa.org.uk/data/resources/33749/17-12-06-ILPA-briefing-paper-Comprehensive-protection.pdf>

<sup>3</sup> Court of Justice of the European Union

1.7 The online portal will also be complemented by an information campaign that will promote strong messages of welcome to European Londoners and will work directly with communities and civil society, with a focus on those most at risk of marginalisation.

1.8 Alongside this, work is underway with London Councils to host a roundtable with London borough councils to share best practice on supporting European residents including through partnership working with civil society, advice agencies and embassies to meet the needs of residents. Borough councils will be kept up-to-date on the portal and campaign through this, and where possible GLA communications will be coordinated with borough-level marketing.

1.9 The London Strategic Migration Partnership (LSMP) and the Migrant and Refugee Advisory Panel (MRAP) represent further opportunities for partnership working with local authorities, civil society, and the Home Office to ensure European Londoners can access their rights. The LSMP and MRAP have a dedicated workstream on vulnerable European Londoners that seeks to manage the impact of the EU Referendum result on London. Work with them includes building an understanding of barriers to vulnerable EU nationals in London securing status in the UK, and working with London stakeholders to increase awareness of EU nationals and other migrants' rights.

1.10 The following groups have been highlighted as being at risk of marginalisation because they are most likely to be affected by the additional barriers outlined above (paragraph 1.3):

- Those with limited English language proficiency, literacy or administrative confidence
- Children and young people, especially those in care or those who are separated from their family
- Disabled people
- Older people
- Carers
- Roma EEA+ nationals
- EEA+ nationals in the LGBT community
- Non-EEA family members of EEA nationals
- Those with retained and derived rights, including third-country nationals relying on EU law rights based on CJEU jurisprudence, such as Zambrano carers
- EEA+ nationals in detention centres and facing removal
- EEA+ nationals living in houses in multiple occupation
- EEA+ nationals in precarious work and those who have fallen out of work
- EEA+ nationals who are homeless
- EEA+ nationals who are victims of trafficking
- EEA+ nationals who have made unsuccessful applications for permanent residence.

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

Objectives:

2.1 Development of an online portal on London.gov where users can access up-to-date information and advice about their rights after the UK leaves the European Union, and to signpost users to appropriate advice and support services.

2.2 Development of a campaign as part of #LondonIsOpen to promote messages of welcome to European Londoners.

2.3 Community engagement and outreach work in partnership with civil society to engage with groups most at risk of marginalisation. This will include micro-grants to add capacity for civil society to deliver events for target groups. Specifically, the micro-grants will be of up to £1k each and will:

- Be delivered through an online call-to-action for established community groups with a demonstrable expertise. Bids will be assessed based on the organisation's ability to deliver a successful event, and ability to reach audiences most at risk of marginalisation post-Brexit.
- Provide resource for community organisations to do outreach with European Londoners at risk of marginalisation. Grant funding could go towards venue hire and translation services to ensure events are as accessible as possible for target audiences.
- With the agreement of the legal sector, connect community organisations to potential pro bono legal advisers to support the event
- Enable organisations to disseminate printed materials from the campaign promoting messages of welcome, and provide a suggested framework for delivery of a successful event that will enable smaller organisations to engage
- Organisations will provide a short pro forma report after the outreach work has been completed which will outline the numbers of residents reached, the support provided, and any outcomes or follow-up work being undertaken. This will inform project monitoring to ensure funds are appropriately spent and will ensure that diverse audiences are reached.

#### Expected outcomes:

2.4 A trusted resource for European Londoners to access quality information and guidance and be signposted to advice and support services. Given the web-traffic to the existing landing page, it is anticipated that up to 3,000 people a week will access this support online.

2.5 Strong messages of welcome and belonging that mitigate the risks that European Londoners will face discrimination or prolonged uncertainty about their rights post-Brexit.

2.6 Community engagement and outreach with vulnerable groups at risk of marginalisation that empowers as many European Londoners as possible to secure their status to remain.

2.7 A platform to support Mayoral advocacy on citizens' rights that meets the needs of Londoners.

#### Proposed break-down of expenditure:

Activity	Budget
Development of online portal on London.gov. This will be developed by the GLA Digital team, using existing functionality where possible. An external consultant/organisation will be commissioned to develop information and guidance resources, drawing together existing resources or developing new resources as appropriate. An organisation will also be commissioned to map and quality assure advice and support services.	£50k
Development and delivery of the supporting communications campaign. This will be developed and run by the GLA Marketing team. Expenditure will be on campaign materials.	£20k
Community engagement and outreach work in partnership with civil society. Small grants will be provided to support community groups to set up information events aimed at vulnerable European Londoners.	£20k
<b>Total</b>	<b>£90k</b>

### 3 Equality comments

Equality, integration and inclusion are the drivers behind this programme. This work to develop a portal directing European Londoners to information and support aims to reduce uncertainty, feelings of being unwelcome and discrimination facing vulnerable migrant groups. It will also seek to empower European Londoners to access their right to remain after the UK leaves the European Union.

Any commissioning processes will ask potential partners to demonstrate how their projects are inclusive of a diverse group and actively work to eliminate discrimination on the basis of the nine characteristics protected in the Equality Act 2010. In order 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 to enable them to participate, whilst ensuring that activities are open and accessible to all Londoners.

The guidance and resources will be produced in accordance with best practice for accessible communications.

### 4 Other considerations

#### a) Key risks and issues

Risk	Mitigation measures	Current probability (1-4)	Current impact (1-4)	RAG	GLA Lead
Information and signposting information could become outdated	Commissioned partners will be responsible for keeping resources up-to-date and ongoing resource for maintenance will be assigned to the project for this purpose.	2	4	A	Web team/ Social Integration Team
Signposting could increase the pressure on advice and support services in London.	The signposting resource will be developed in partnership with the advice and support sector to ensure that it meets their needs. Users will be provided with the resources to self-help where possible and option to triage users in being signposted to support and advice services will be explored	3	3	A	Social Integration Team
Detailed information on settled status cannot be provided until Government negotiation with the EU are completed and the Home Office have established a system	The project lead is in touch with the Home Office to understand timelines. Communications and information hosted on the portal can be phased meaning the site	3	2	A	Social Integration Team

for settled status applications.	can be active prior to launch of the Government system.				
Commissioned partners fail to deliver resources to expected quality or to time.	Set clear and specific parameters for commission; build in regular milestones to check progress; work with trusted partners where possible.	2	2	G	Social Integration Team

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

This work forms part of the Mayor's Social Integration Strategy, to remove barriers to integration relating to ability to access legal rights to citizenship and residence.

#### *c) Impact assessments and consultations.*

In July 2017 the London Assembly EU Exit Working Group hosted a session entitled 'European Voices: EU Londoners Speak' and in November 2017 the Social Integration Team hosted a roundtable with civil society and representatives from the legal sector to explore in more depth the issue of EEA+ and third-country nationals<sup>4</sup> at risk of marginalisation post-Brexit. In March 2018 the London Strategic Migration Partnership invited the Immigration Law Practitioners' Association (ILPA) to discuss the concerns of the legal sector in relation to citizens' rights post-Brexit. The portal will be designed in consultation with the advice and support sector, and user testing will ensure it is fit for purpose.

### **5 Financial comments**

- 5.1 The expenditure of up to £90,000, will be funded from the 2018-19 EU Citizen Advice Service Programme budget held within the Communities and Social Policy Unit.

### **6 Legal comments**

- 6.1 The foregoing sections of this report indicate that the decisions requested of the Director fall within the statutory powers of the Authority to promote and/or to do anything which is facilitative of or conducive or incidental to social development within Greater London and in formulating the proposals in respect of which a decision is sought officers have complied with the Authority's related statutory duties to:
- (a) pay due regard to the principle that there should be equality of opportunity for all people;
  - (b) 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
  - (c) consult with appropriate bodies.
- 6.2 In taking the decisions requested of him, 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 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 and foster good relations between persons who share a relevant protected characteristic and persons who

<sup>4</sup> EEA+ refers to those countries for whom freedom of movement applies – the European Economic Area plus Switzerland. Third Country Nationals refers to those who are from outside of Europe but are resident in the UK via a family member who is EEA+, or through second citizenship of a EEA+ country.

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 Officers must ensure that any external services required for the European Londoners Online Portal and Campaign project be procured in accordance with the Authority's Contracts and Funding Code (the "Code") and with the assistance of Transport for London's procurement team. Furthermore, officers must ensure that appropriate contractual documentation be executed by both the Authority and the relevant contractor prior to the commencement of the required services.

## 7. Planned delivery approach and next steps

	Activity	Timeline
1	Announcement and holding page uploaded to the GLA website. Londoners are able to register their interest.	1 March 2018
2	Inception meeting with internal stakeholders – including digital business analysts, campaigns and marketing, legal, social integration team, and employment and skills team. Set up as internal management group to include commissioned service providers.	March 2018
3	Engagement with stakeholders in the advice and support sector; engagement with communities and European Londoners. Establish an expert panel of three to five external people to oversee the commissioned work, with reports to the internal management group as appropriate.	May 2018
4	Commission information and guidance resources for interim website and for final portal. Commission a consultant/organisation to map and quality assure advice and support services. Web development work, where necessary, to host signposting by GLA Digital.	June 2018
5	Host roundtable with London boroughs to share best practice on supporting European residents.	June 2018
6	Launch signposting resource to advice and support	August 2018
7	Launch full portal when settled status and process for applications is confirmed by central Government, Launch phase 2 of the welcome campaign that prompts action to secure settled status (led by GLA Marketing).	September – November 2018 (TBC)
8	Launch micro-grant programme with small grants to support community groups to set up information events aimed at vulnerable European Londoners, with access to welcome campaign materials, connections to pro-bona legal advisers, and a framework for delivery.	September 2018
9	Community engagement events with priority groups between the launch of the settled status applications and the next major milestone when the UK formally leave the EU - 29 March 2019	September – March 2019 (TBC)

**Public access to information**

Information in this form (Part 1) is subject to the Freedom of Information Act 2000 (FOI Act) 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 approval 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: Until messaging on new micro-grant funding for community groups has been completed.

Until what date: 4 May 2018.

**Part 2 Confidentiality:** Only the facts or advice considered to be exempt from disclosure under the FOI Act should be 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 that:

✓

**Assistant Director/Head of Service:**

Julia Slay 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:**

The Corporate Investment Board reviewed this proposal on 30 April 2018.

**EXECUTIVE DIRECTOR, RESOURCES:**

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

Signature

*M. D. Allen*

Date

1.5.18