

GREATER LONDON AUTHORITY

REQUEST FOR DIRECTOR DECISION – DD2610

Title: Voter ID public awareness campaign – expanded

Executive Summary:

This decision seeks approval to repurpose £50,000 from the £205,000 (over two years) budget allocated to Building Stronger Communities via [MD2854](#) for 'improving social integration', to be used to support a Voter ID public awareness campaign, specifically to be used on the GLA social media campaign.

Decision:

That the Executive Director for Communities and Skills approves expenditure of £50,000, as an additional resource for the GLA voter ID public awareness campaign, to have the funds necessary in phase one of said campaign to increase the reach and impact across social media platforms, and to help to ensure all eligible Londoners are made aware of Voting System Changes enacted by the Elections Act 2022. This takes total expenditure on amplifying awareness activity via GLA social media channels to £125,000.

AUTHORISING DIRECTOR

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

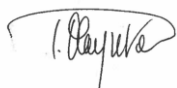
It has my approval.

Name: Tunde Olayinka

Position: Executive Director,
Communities and Skills

Signature:

Date: 07/11/2022



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 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 and DD2597, which approved expenditure for phase one of the GLA voter ID public awareness campaign and grants programme.
- 1.2. Research from the Electoral Commission ("Accuracy and Completeness of the 2018 Electoral Registers in Great Britain", 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. 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. Any voter who does not have an approved form of identification will be able to apply for a free Voter Authority Certificate from their local authority. Regulations are expected to be made in due course implementing the detail of these requirements.
- 1.5. The Act removes 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 taken 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. The voter ID public awareness campaign aims to: reduce this impact by raising awareness of the requirement to have photo ID; and drive behaviour change by sharing information of suitable photo ID and where to get a free Voter Authority Certificate if needed.

- 1.7. Further consultation, carried out since the Act received royal assent, has shown that the initial £75,000 allocated to GLA marketing and social media amplification would not afford sufficient reach and impact. Hence this DD seeks a further £50,000 to increase the reach and impact at scale, across GLA social media platforms, of the GLA public awareness campaign encouraging all eligible Londoners to be aware of the Voting System Changes.
- 1.8. In drafting the proposals contained in this DD, in DD2597 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 the Joseph Rowntree Foundation (February 2022), which found that 1.7m low-income voters could be disenfranchised; and from “London Voices: The Journey to Full Participation” (Trust for London and the3million, December 2021).
- 1.9. 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 2022 is law, this DD seeks approval for expenditure to increase the GLA voter ID public awareness social media campaign, initially approved via MD2970 and DD2597.
- 2.2. This addition is required to ensure there are sufficient funds in phase one of the voter ID public awareness campaign to run a general programme of awareness-raising; increase the reach and impact across GLA social media platforms; and thus ensure all eligible Londoners are aware of the Voting System Changes enacted by the Elections Act 2022.

Expected outcomes

- 2.3. The overall expected outcome of the voter ID public awareness campaign is to build on the established reputation and success of LVRW activity. It will do so via the following:
 - appropriate reach and impact via GLA social media channels estimated at a minimum 1m for phase one
 - raised awareness among all eligible Londoners that they will need photo identification to be able to vote in the May 2024 elections

- raised awareness among London's under-registered and under-represented communities about changes to civic and democratic rights, especially among 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.

2.4 Raised awareness and thus success in this first phase will be measured using GLA social media metrics around reach and engagement; our delivery partner's metrics around the size and impact of the coalition of support and co-designed public awareness materials; and the size of activities run by our successful Voter ID Grants Programme grantees.

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 duty 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. To address these inequities 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, in DD2597 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

Key risks and issues

4.1. The key risks and issues are outlined below.

| Risk | Mitigation | Current probability (1-4) | Current impact (1-4) | RAG |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|----------------------|-----|
| Reputational – 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"> Build on the non-party political, impartial and non-election-specific character of all LVRW (2019-22) assets and activities. Ensure any activity is based on best practice and clear evidence. Maintain impartiality via use of the GLA logo on information material; use of @LDN_gov / London City Hall social media platforms; and non-partisan messaging, cross-party engagement and pan-London delivery. | 1 | 3 | G |
| Delivery – the risks associated with the external context and activity not getting delivered | <ul style="list-style-type: none"> Activity will take place after LVRW 2022 (14-20 November). Activity will be regularly monitored and reviewed to enable a swift response to the external public health and political contexts. 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. | 1 | 4 | G |
| Impact and reach – the voter ID public awareness campaign does not have a wide enough reach or impact | <ul style="list-style-type: none"> Commission a PR agency that offers experts in the field and has a successful track record of running impartial and impactful public awareness campaigns. Regular review of planned activity and public awareness polls. Flexibility within the plan and budget to adjust levels of content in response to what is working well. | | | |

Links to Mayoral strategies and priorities

4.2. This project is key to delivering on the high-level objective cited 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 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 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 and DD2597), 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 GLA marketing and social media amplification would not be sufficient. Hence, this ADD seeks a further £50,000 to increase the reach and impact of phase one of the GLA public awareness campaign across GLA social media platforms, and to ensure at least 1m eligible Londoners are aware of the Voting System Changes by the end of March 2023.
- 4.7. All the activities and materials co-designed and co-delivered with under-registered and under-represented London communities will be amplified via appropriate GLA channels.
- 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 in 2022-23 of £50,000 towards increased GLA social media activity, as part of phase one of the GLA voter ID public awareness campaign.
- 5.2. The expenditure will be funded from the Social Integration budget, within the Communities and Social Policy unit. This is in line with budget allocations for 2022-23.

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, in DD2597 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 activity proposed in this DD falls within the GLA's general power.

- 6.2. As highlighted in MD2970 and DD2597, 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 social media 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.

7. Planned delivery approach and next steps

| Activity | Timeline |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|
| Launch of phase one voter ID awareness campaign – grants programme | 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 of digital campaign impact and reach, reports due from delivery partners for voter ID public awareness campaign and Voter ID Grants Programme – 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 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/Head of Service:

Tom Rahilly name 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.

✓

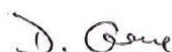
Corporate Investment Board

A summary of this decision was reviewed by the Corporate Investment Board on 7 November 2022.

EXECUTIVE DIRECTOR, RESOURCES:

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

Signature



Date

10/11/22