

GREATER LONDON AUTHORITY

REQUEST FOR MAYORAL DECISION – MD3157

Title: Robust Safety Net work programme 2023-24

Executive summary:

This Mayoral Decision (MD) seeks approval for expenditure of £3,655,500 on activities that make up the financial hardship team's work in 2023-24. This includes funding to extend work (authorised under cover of MD2991) that helps Londoners mitigate high living costs. It does so by connecting them with information and advice to help them access their financial (and other relevant) rights and entitlements. This expenditure draws on budget that was allocated to work on this issue in the GLA:Mayor budget for 2023-24 (MD3103), including £5m to continue the provision of London-wide advice services.

Decision:

That the Mayor approves the expenditure of £3,655,500 on a programme of work in 2023-24 to support Londoners on low incomes and those struggling with living costs. This expenditure comprises:

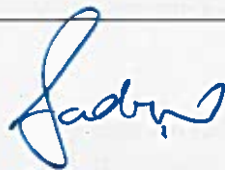
1. £2,500,000 in grant funding awarded to the Royal Courts of Justice and Islington Citizens Advice Bureaux, and to the London Legal Support Trust, to: sustain enhanced adviser capacity across the networks of 28 London Citizens Advice offices and 38 Advice Centres of Excellence; improve community outreach; and upskill community-based staff and volunteers
2. £458,000 to extend support to 11 partnerships funded through the Advice in Community Settings grant programme, including evaluation
3. £275,000 to run a second pension credit uptake campaign, with a focus on building systemic collaborative approaches
4. £150,000 for continued maintenance, promotion and evaluation of the Cost of Living Hub
5. £120,000 to support a multi-borough pilot to implement a local welfare assistance evaluation framework
6. £15,000 for continued maintenance and promotion of the Employment Rights Hub
7. up to £137,500 on a range of commissioned research and analysis to support the delivery and development of this and future work programmes.

Mayor of London

I confirm that I do not have any disclosable pecuniary interests in the proposed decision and take the decision in compliance with the Code of Conduct for elected Members of the Authority.

The above request has my approval.

Signature:



Date:

2/8/23

PART I – NON-CONFIDENTIAL FACTS AND ADVICE TO THE MAYOR

Decision required – supporting report

1. Introduction and background

- 1.1. This Mayoral Decision (MD) seeks approval for expenditure from the GLA Mayor budget for 2023-24 for activity to support Londoners on low-incomes, and those struggling with high living costs. The MD describes the use of elements of the budget, allocated under cover of MD3103, to continue the provision of London-wide advice services relating to problem debt, welfare benefits and other issues.
- 1.2. The activity described in this MD extends the period during which work previously authorised under MD2991 can continue. Other elements of the financial hardship team's work in 2023-24 are covered by the following decision documents:
 - MD3129 to fund the next iteration of the Mayor's Food Roots programme
 - MD3105 to fund the Mayor's emergency free holiday meals programme
 - ADD2646 to fund lesson learning research for cost-of-living provision during winter 2022-23.
- 1.3. The Mayor has committed to help Londoners to mitigate the worst effects of the cost-of-living crisis. Meanwhile, several partners have committed to take action so that every Londoner can access the support they need to avoid or escape financial hardship.
- 1.4. There are several barriers to the realisation of these ambitions: shortcomings in the national welfare benefit system; low levels of awareness of rights and entitlements amongst Londoners; variable and in some cases inaccessible local welfare systems; and an over-reliance on informal crisis-support mechanisms, such as food aid, which are often delivered by small voluntary organisations.
- 1.5. The cost-of-living crisis has exacerbated these challenges – particularly by placing a greater emphasis on the local and informal organisations that are playing such a crucial role in helping Londoners to understand and access the support available.

2. Objectives and expected outcomes

Element 1 – continued investment in community-based advice and support services

Context and purpose

- 2.1. [MD2991](#) authorised expenditure of £2.3m to fund two pan-London advice infrastructure bodies to increase and maintain expert advice capacity across their networks. This allowed the London Citizens Advice and London Legal Support Trust (LLST) networks to act as 'community anchors', offering advice and support in dealing with the cost of living to as many Londoners as possible.
- 2.2. To date, the funding has enabled the two networks to reach a combined 14,000 Londoners with advice and support, leading to combined increases in income of more than £5.7m. Management information for the advice provided to date indicates that the funded provision has been particularly effective in reaching communities likely to have a high need for advice and support.

Approvals and delivery method

- 2.3. This MD seeks approval to extend and slightly increase the funding for these two networks, to allow them to continue providing support to Londoners for a second 12-month period. This will cover expenditure of £1,300,000 to provide grant funding directly to the Royal Courts of Justice and

Islington Citizens Advice Bureaux (collectively, RCJ Advice);¹ and £1,200,000 to provide grant funding to the LLST to increase adviser capacity across the network of 28 London Citizens Advice offices and 38 London Advice Centres of Excellence.

- 2.4. As with the first 12-month delivery period, it is anticipated that the funding would go towards a mix of covering the salaries of specialist advice and crisis navigation staff; and supporting the development of links and referral routes into surrounding community organisations, through initiatives such as the promotion of 'Advice First Aid' training. The increased costs reflect the need to cover increases in staff salaries.
- 2.5. The LLST and the Centres of Excellence will contribute a range of resources to the project, including drawing on existing specialist adviser and supervisor resource to supplement the new roles funded by the GLA; and providing training and communications materials, case management and other IT systems, and physical space to carry out face-to-face advice sessions.

Outcomes and deliverables

- 2.6. Extending funding for to these two networks for a second 12-month period would not only continue to support Londoners' awareness of their legal rights and entitlements, and of how to assert them. The GLA would also seek to ensure a greater focus on promoting London Citizens Advice's 'Advice First Aid' training offer as part of a drive to further strengthen links with community organisations.
- 2.7. On the basis of delivery to date, there would be an ambition to reach a further 23,000 Londoners with advice and support over the course of the second 12 months of funding; and to achieve financial gains of roughly £5m, in addition to those secured already. However, it is recognised that these figures would be subject to a range of variables that are impossible to predict in advance – and that and in some cases may be impossible to control. These include the ability to retain and recruit advisers; the volume and complexity of client caseloads; and the success of community referral routes.

Deliverables	2023-24 expenditure to be agreed under this decision
Continued funding for 24 full-time equivalent (FTE) crisis navigators and 18 FTE specialist advisers in London Citizens Advice/LLST law centres. 'Advice First Aid' training sessions for community organisations delivered in all 32 London Boroughs	£2,500,000

Element 2 – Advice in Community Settings (AICS)

Context and purpose

- 2.8. MD2869 authorised expenditure of £860,000 over two years, to fund 11 partnerships across the capital to embed advice in a variety of community settings. This work would support the most excluded Londoners, and those with complex needs; and would build on the success of the 2019-20 welfare advice in schools pilot with Child Poverty Action Group.
- 2.9. To date, the funding has enabled partnerships to reach 3,600 Londoners; and led to combined increases in income of £1.7m. In total, 6,500 Londoners are expected to have been supported by the programme by the end of year two.
- 2.10. The recent interim evaluation report highlighted the success of the programme in embedding community partnerships, as well as its effectiveness in reaching groups that are underserved by

¹ This is a single legal entity, rather than two separate organisations.

traditional models of advice provision, with around a third of all advice seekers seen by the programme having not accessed advice services before.

Approvals and delivery method

- 2.11. This MD seeks approval for funding of £458,000 to ensure the legacy of the programme beyond its conclusion in 2024; and to support partnerships to secure further funding.
- 2.12. This includes £63,080 to extend the contract of the evaluator for the programme until June 2024, the end of year two of the programme.
- 2.13. This also includes £85,000 for flexible wraparound funding for partnerships, including training and knowledge-sharing opportunities.
- 2.14. This funding may also be used for per-day funding for the evaluator to support partnerships to identify and apply for further funding.
- 2.15. The remainder of the funding would be used for a per-partnership extension of grant funding of an estimated £309,920. It is envisaged this funding would effectively act as an extension of the programme by six months beyond the end of the 2023-24 financial year, although the exact nature of the funding will vary per partnership.

Outcomes and deliverables

- 2.16. Extending the evaluator’s contract by one year will enable longer-term indicators to be tracked, including the impact of the programme on beneficiaries’ longer-term health, wellbeing and resilience. The evaluator will also support partnerships to identify and apply for further funding.
- 2.17. Further wraparound funding will help further embed partnerships, and allow the sharing of good practice to increase the effectiveness and efficiency of service design. A flexible approach will be taken with support based on needs as they arise.
- 2.18. An extension of the programme by six months would result in an estimated 1,800 additional Londoners reached.

Deliverables	2023-24 expenditure to be agreed under this decision
Extend support to 11 partnerships funded through the AiCS grant programme, including evaluation.	£458,000

Element 3 – Pension Credit uptake

Context and purpose

- 2.19. DD2605 authorised expenditure of £125,000 to fund the software and analytics social enterprise Policy in Practice (PiP) to work with participating London boroughs to deliver a data-driven campaign to identify, proactively engage with and support older households to claim the state benefit Pension Credit. Pension Credit is a state benefit that ensures a minimum income level for people of pensionable age. This funding allowed PiP to offer a managed service to 18 London boroughs to deliver the campaign – putting in place and revising data-sharing arrangements; completing data analysis; developing an integration platform between the Lower Income Family Tracker (LIFT) and messaging service; and undertaking client management, project management and reporting. The LIFT is a dashboard that uses council administrative data to identify financially struggling residents, design interventions and track the effectiveness of these interventions.
- 2.20. To date, the campaign has included 18 boroughs sending letters to just under 8,500 older households. Most households have received two letters each. The most recent data shows that around 1,685 older people have made a successful claim for Pension Credit. It is estimated that an average annual claim is

worth just over £3,770, creating an annual gain of around £6.3m from Phase 1 of the campaign. This number is expected to increase over the next couple of months as older people make a claim, and the Department for Work and Pensions processes claims from Phase 1 of the campaign.

Approvals and delivery method

- 2.21. This MD is seeking approval to repeat and extend the Pension Credit – Phase 1 campaign in Autumn-Winter 2023-24. The expenditure for Phase 2 of the campaign will be £275,000. This will provide funding to PiP to work in partnership with participating boroughs to take a data-driven approach to increasing benefit uptake.
- 2.22. Around half of this expenditure will support participating boroughs to repeat a second Pension Credit uptake campaign. Building from Phase 1 of the campaign, and the development of the integration platform, Phase 2 will develop increased automation, enabling boroughs to take more of the lead on delivering the campaign. This will create the system infrastructure for boroughs to use more independently in the future. The remaining budget for Phase 2 of the Pension Credit campaign will be allocated to supporting boroughs with data governance, creating communications with boroughs, the communications plan, project management and reporting.
- 2.23. The remaining expenditure will provide funding for additional use cases. This funding will apply a similar data-driven approach, and make use of the system infrastructure from Phases 1 and 2. The benefits discussed with PiP and boroughs include the following: Attendance Allowance (in combination with Pension Credit Uptake), free school meals, and social tariffs for water.

Outcomes and deliverables

- 2.24. There is good evidence from Islington Council that follow-up Pension Credit campaigns can achieve considerable success as households reach State Pension age, and older households decide to make a claim after receiving repeat communications. Phase 2 of the campaign will seek to work with the 18 boroughs who took part in Phase 1, and an additional five boroughs, to expand the campaign to around two-thirds of London boroughs. The number of older households contacted will depend on which boroughs take part. However, it is estimated that around 9,000-12,000 older households will be contacted; and that around 1,800-2,400 older people will make a successful claim for Pension Credit as part of Phase 2. It is therefore expected that financial gains would be around £6.3m to £8.4m.
- 2.25. The exact outcomes and deliverables for the additional use cases will be agreed when the focus of the campaigns and participating boroughs have been confirmed. For example, in potential trials of free school meals and social tariffs for water, for each a minimum of two councils would be expected to take part, and a minimum of 100 households in each borough would be contacted.

Deliverables	2023-24 expenditure to be agreed under this decision
Delivery of a Phase 2 Pension Credit Campaign with participating boroughs in partnership with PiP. Delivery of a small number of trial additional use cases, applying a similar data-driven approach to uptake campaigns, with participating boroughs in partnership with PiP.	£275,000

Element 4 – Cost of Living Hub

Context and purpose

- 2.26. In April 2022, the GLA launched the Cost of Living Hub on London.gov.uk, which signposts Londoners to trusted information and advice about a wide range of rights, entitlements and other sources of support.

- 2.27. In May 2022, [MD2991](#) allocated an additional £500k to the hub to improve the usability, accessibility and awareness of the Cost of Living Hub; and included a grant-funding programme for digital tools designed to support Londoners to understand their rights and entitlements.
- 2.28. In 2022-23 the Cost of Living Hub met its full-year target of 300,000 unique page views. A variety of new content was also added, including a Warm Bank directory, video content, translated materials and the funded digital tools.
- 2.29. As part of the funding for the Cost of Living Hub in 2022-23, leaflets were also developed and 110,000 copies printed, with key content from the hub. These were targeted at low-income households at higher risk of digital exclusion.

Approvals and delivery method

- 2.30. A review of the Cost of Living Hub's content and structure is currently being conducted to identify any improvements that can be made ahead of late Autumn and Winter. This includes engagement with key stakeholders, and user research to better understand the hub's audience and their needs.
- 2.31. Approval is sought for £150,000 to action the results of this review, which may include restructuring the Cost of Living Hub; developing new content; and marketing the hub to ensure it is reaching its target audience.
- 2.32. This funding could also be used to, again, develop and print offline leaflets; and develop further translated materials (digital and hard copy). The exact level of funding allocated to this will depend on the results of the review.

Outcomes and deliverables

- 2.33. The Cost of Living Hub will be updated, in line with the findings from the research, to reflect the needs of users going into late autumn and winter.
- 2.34. Paper leaflets with key content from the hub will be produced and delivered, although the exact number will depend on the results of the review.
- 2.35. For 2023-24, the full-year target of 300,000 unique page views will be maintained. However, the review will also aim to identify alternative metrics that can be used to evaluate the hub's performance.

Deliverables	2023-24 expenditure to be agreed under this decision
Continued maintenance, promotion and evaluation (supported by research where appropriate) of the Cost of Living Hub.	£150,000
Paper leaflets with key information from the hub targeted at low-income households at higher risk of digital exclusion.	

Element 5 – local welfare assistance evaluation framework

Context and purpose

- 2.36. MD2869 approved expenditure of £50,000 to fund research examining the effectiveness and impact of local welfare assistance (LWA) with seven participating boroughs. LWA is a form of one-off crisis support councils can provide to residents. This support can be cash, vouchers or the purchasing of goods, and has been a devolved decision since 2013. The research was completed by PiP and the final report with recommendations published in January 2023.
- 2.37. A central recommendation in the report is the implementation of an evaluation framework for LWA. The purpose of the evaluation framework at the borough level is to ensure LWA is meeting its desired outcomes by providing a regular assessment of how schemes are operating, and identifying areas for improvement. At the London level, a consistent evaluation framework that is used by several boroughs

will allow for peer review and help boroughs improve how their schemes operate. It will also allow the GLA and London Councils to assess how LWA is being delivered across London, and its impact; and to advocate for long-term funding for this important element of support for preventing and responding to financial hardship.

Approvals and delivery method

- 2.38. This MD seeks approval to spend £125,000 to develop and implement the LWA evaluation framework. This work is expected to involve the development of a digital product for the administration of LWA; this product will incorporate the data collection for the framework.
- 2.39. The expenditure will fund the development of the digital product with a group of boroughs. The digital product will be developed by an external partner, or a digital team within a council. The model for the management of the product and access to the product by councils will be decided through consultation with councils. Some of the expenditure will be used to support the longer-term management of the product.

Outcomes and deliverables

- 2.40. The main deliverable for this expenditure will be the development of a digital product that enables the implementation of the evaluation framework. The data from the evaluation framework will allow boroughs to regularly assess the effectiveness of schemes, and support service improvement for Londoners. A small group of three to five boroughs is expected to take part in developing the digital product. Once the digital product is launched, it is anticipated that more boroughs will begin to use it to administer and evaluate their schemes.
- 2.41. The digital product will enable the sharing of insights from a range of boroughs into the outcomes achieved by different boroughs LWA schemes. This will help to drive service improvement and make the case for long-term funding for LWA from central government.

Deliverables	2023-24 expenditure to be agreed under this decision
Develop a digital product with boroughs for the administration and evaluation of LWA.	£125,000
Provide resources to allow boroughs to have access to the digital product.	

Element 6 – Employment Rights Hub

Context and purpose

- 2.42. First launched in 2019, the Employment Rights Hub on London.gov.uk provides Londoners with information about their rights at work in 20 languages; and signposts them to trusted expert advice on how to enforce these rights. Since its launch, the hub has been continuously updated to improve the user journey and reflect the changing nature of work in London. It has been continuously promoted to Londoners (primarily via targeted social media adverts), and to date has received 280,000 unique page views.
- 2.43. In June 2023, company insolvencies were 27 per cent higher than the same month the previous year, and far higher than at any point since June 2019 (including during the pandemic).² This change was driven, in part, by historic levels of inflation. In 2022, the number of days lost to strike action was the highest since 1989. As such, the need for information and advice about rights relating to, for example, redundancy, pay or trade union membership is high. It is likely to remain so whilst high inflation and the threat of recession persists.

² The Insolvency Service, [Commentary – Monthly Insolvency Statistics June 2023](#), 18 July 2023

- 2.44. [Research](#) commissioned by the GLA and published at the start of June found high levels of employment rights abuses and exploitation amongst London’s migrant labour force. It is well established that breaches most commonly affect low-paid workers and workers with protected characteristics.
- 2.45. Over the coming months, therefore, the Employment Rights Hub will remain an important resource to help Londoners understand and enforce their rights at work.

Approvals and delivery method

- 2.46. ADD2631 authorised expenditure of £15,000 to fund the targeted dissemination of social media assets promoting the Employment Rights Hub across a six-month period, from February 2023 to June 2023. Approval is being sought through this decision for expenditure of a further £15,000 to continue the ongoing promotion of the same/similar assets until the end of March 2024.
- 2.47. As with previous promotional activity, social media assets would be targeted at the groups known to be more likely to experience violations of their rights at work. These include workers in low-paid and precarious employment; migrant workers; and Londoners with protected characteristics.

Outcomes and deliverables

- 2.48. The proposed promotional activity is expected to result in:
- an increased number of Londoners who understand their rights at work and how to enforce them
 - improved access to free and high-quality information about rights at work amongst Londoners at risk of employment rights abuses.
- 2.49. The impact of the awareness-raising activity will be tracked by monitoring click-throughs from social media assets and/or unique page views of the Employment Rights Hub. Based on previous promotional activity of this nature, we expect that click-throughs to the hub will exceed 60,000.

Deliverables	2023-24 expenditure to be agreed under this decision
A targeted social media advertisement campaign to promote the Employment Rights Hub.	£15,000

Element 7 – commissioned research

Context and purpose

- 2.50. The nature of the challenges faced by Londoners experiencing financial hardship constantly changes. Therefore, there is an ongoing need to refresh and update the evidence base that helps the GLA and other policymakers understand how to address them. Over the past 12 to 18 months, the GLA (along with other strategic and delivery partners across London) has quickly put in place a range of interventions to help meet these new challenges. Activity to explore how effective some of these interventions were/are, and how they could be better tailored or built upon, would be highly beneficial to ensure that Londoners struggling to make ends meet are more effectively supported in the future; and that interventions put in place meet the needs of London’s diverse population.
- 2.51. Therefore, this MD seeks approval to invest in a range of additional research, analysis and learning activity. This will:
- ensure the successful delivery of this programme of work
 - inform the development of new or scaled-up forms of support/approaches to supporting Londoners experiencing financial hardship

- ensure better understanding of the strategic role the GLA could play in coordinating and supporting city-wide approaches to assisting Londoners experiencing financial hardship.

Approvals and delivery method

- 2.52. ADD2646 authorised expenditure of £25,000 (with £12,500 of costs covered by London Councils) to commission research into the effectiveness of the delivery of cost-of-living support to Londoners over the 2022-23 Winter period. Approval is sought, through this decision, for further expenditure of up to £137,500 to commission a range of additional research and analysis that builds on this initial winter learning research to help fill intelligence gaps and support the development of future approaches.
- 2.53. The number and nature of the projects commissioned will depend on the findings of the winter learning research; the results of ongoing conversations with various internal and external stakeholders to help refine and prioritise further research questions/topics; and the budget remaining from the total envelope (£137,500). However, some of the topics expected to be prioritised include:
- the extent to which benefit conditionality is acting as a driver of advice demand
 - potential future approaches to local (i.e. borough-level) hardship prevention/alleviation
 - the GLA's future role in tackling holiday hunger
 - general development of the evidence/knowledge base to support future decisions relating to the GLA's role in addressing the drivers of financial hardship.
- 2.54. It is anticipated that all research projects will be commissioned. However, should the GLA receive a proposal from an external organisation seeking funding for research/analysis that is consistent with the Mayor's priorities, and the aims and objectives of this intended programme of research and analysis, the option to provide funding via grant will be explored.
- 2.55. Regardless of the approach taken, all funding will be distributed in accordance with the GLA's Contracts and Funding Code.

Outcomes and deliverables

- 2.56. The delivery of this programme of research and analysis is expected to result in:
- improved understanding of the nature of financial hardship in London and the impact of the cost-of-living crisis on different groups of Londoners (and the services that support them)
 - better designed and delivered interventions that support Londoners experiencing financial hardship, and better respond to the needs of specific communities
 - a set of tangible options for future interventions/collective activity to support Londoners experiencing financial hardship
 - improved understanding of the strategic role the GLA can play in tackling financial hardship/elements of financial hardship in London.

Deliverables	2023-24 expenditure to be agreed under this decision
Four to six commissioned/funded research or analysis projects	£137,500

3. Equality comments

- 3.1. In taking the decisions requested, the Mayor 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; advance equality of opportunity between persons who share a

relevant protected characteristic (age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation) and persons who do not share it; and foster good relations between persons who share a relevant protected characteristic and persons who do not share it (section 149 of the Equality Act 2010).

3.2. Several groups of Londoners with protected characteristics are at greater risk of financial hardship and particularly vulnerable to the rising cost of living.

3.3. Examples of these protected characteristics include the following:

- Age: one-third of London's children (33 per cent) live in relative poverty, compared to a quarter (25 per cent) for total poverty and almost a quarter (24 per cent) for severe poverty. Almost half (47 per cent) of single-parent households live in relative poverty. In addition, almost a quarter (23 per cent) of older people in London live in relative poverty; and one in 10 live in material deprivation (11 per cent) – both rates are the highest for any English region.
- Disability: one-third of London's households with a disabled person (33 per cent) live in relative poverty, compared to just over a fifth of households in which no one is disabled (22 per cent).
- Race: one-third of households headed by someone from a Black, Asian or Minority Ethnic background (33 per cent) are in relative poverty, compared to just under a fifth of households headed by someone from a White background (18 per cent).
- Migrant Londoners – especially those with no recourse to public funds – face a particularly high risk of destitution.

3.4. The work set out above will be available to and benefit all Londoners. However, it has been designed to provide support to Londoners with protected characteristics. For example:

- The development of partnerships between advice agencies and community organisations will support Londoners experiencing barriers to accessing services. These include Deaf and disabled Londoners; Black, Asian and Minority Ethnic Londoners; younger Londoners; and migrant Londoners. This will advance equality of opportunity in relation to accessing services and forms of support.
- Increased access to rights and entitlements will lead to financial gains for Londoners with protected characteristics.
- The investment in community-based advice services will provide an effective support option for Londoners who lack either ability or confidence in using digital resources; and those with more complex needs that cannot be served with digital resources.
- Advice funding, particularly of specialist legal advice, will benefit Londoners with no recourse to public funds who require immigration advice.
- The uptake campaign focus on Pension Credit will support older Londoners living on some of the lowest incomes.

3.5. The equality impacts of each programme that is receiving the funding under this MD will be kept under review and will be assisted by the routine collection of various monitoring data.

4. Other considerations

4.1. The key risks and issues are as follows:

Risk/issues	Mitigation
<p>The scale of the cost-of-living pressures Londoners are facing may limit the impact of this programme of work.</p>	<p>Awareness-raising activity and the delivery of advice interventions will be flexible; and will be targeted at the communities with the most acute needs to maximise their impact.</p> <p>Analytics data from digital products and monitoring data from funded advice interventions will yield intelligence on the scale of the problem and its policy drivers. This could be used to lobby government for additional support at a national level, or leverage additional funding from London-based partners.</p>
<p>Despite funding increased capacity in the advice sector, advice services may continue to be overwhelmed.</p>	<p>The Advice First Aid training aspect of the funding proposals will increase the number of Londoners who can be helped with simple queries by non-experts; and improve the quality of referrals to expert advice services.</p> <p>The continued development of new and improved resources on the Cost of Living Hub will increase the number of Londoners who can self-serve and deal with simple queries themselves.</p>
<p>Information on the Cost of Living Hub could become outdated.</p>	<p>Officers will monitor key changes to funding pots and schemes; and periodically update the hub when appropriate.</p>
<p>Information provided digitally is inaccessible to Londoners who do not have the necessary digital skills to navigate them.</p>	<p>The provision of face-to-face advice, as set out in Elements 1 and 2, serves to pick up cases where Londoners cannot self-serve via digital resources and tools. This also contains provisions for those with language barriers; and for whom complex cases mean that generalised advice is not suitable to their needs.</p> <p>Hard-copy leaflets setting out key information from the Cost of Living Hub will also be designed, printed and distributed to help support digitally excluded Londoners.</p>

Considerations for the provision of grant funding and subsidy control

- 4.2. Under Element 1 of the proposals (see sections 2.1 to 2.7, above) direct grant awards to RJC Advice and the LLST are intended to be made. These organisations will act as responsible bodies for the funding, which they will then grant to a wide range of community organisations.
- 4.3. It is proposed that the funding constitutes the award of grant-payment funding, rather than contracts for services, because:
- it would support existing third-party (rather than GLA) projects that align with the Mayor's priorities, but are the initiatives of the third parties in question
 - the GLA would not receive a direct or indirect benefit as a result, with the benefits accruing instead to Londoners.
- 4.4. The strategy of granting funds to two recipients, who will act as responsible bodies for the funding, is being proposed for the following reasons:

- They represent the only two London-based advice networks capable of (in partnership) delivering the range, depth and quality of advice needed to effectively support Londoners with varying advice needs in every borough.
 - In combination, the two networks consist of more than 60 independent organisations – most, if not all, of whom would be likely bidders for an open grant process. Therefore, cascading funding through the two strategic partners represents the most efficient way of distributing funding to a large number of organisations.
 - The cost-of-living crisis continues to require an urgent response. Funding these networks directly (rather than carrying out a lengthy competitive grant application process that would be resource-intensive for both the GLA and bidding organisations) is the quickest and most efficient way to increase advice capacity across the capital.
 - The coordination role of the infrastructure organisations will allow us to effectively target the communities in London that currently have the poorest access to advice.
 - Proposals include a training offer for a large number of community organisations beyond the advice providers in the two partner networks. This increases the number of beneficiaries from the funding, and helps create sustainable relationships within the London advice sector.
 - It sustains and continues to build on the additional advisor capacity generated across both networks as a consequence of GLA funding in 2022-23 (see MD2991).
- 4.5. There is some overlap between these two networks – four of the London Citizens Advice offices are currently among the 38 Centres of Excellence – so it will be stipulated in the grant agreement with the LLST that their funding is for non-Citizens Advice Centres of Excellence only, to avoid duplication.
- 4.6. GLA officers have carried out an analysis of the proposal against the Statutory Guidance for the UK subsidy control regime.³ They have assessed that the subsidy control regime is non-applicable in these circumstances because the proposed financial assistance does not constitute a subsidy.
- 4.7. In particular, the proposed financial assistance fails to satisfy Limb B of the four-limbed test set out in the Subsidy Control Act 2022, as neither of the beneficiaries of the funding are classed as enterprises. Both RCJ Advice and the LLST are charitable organisations, and neither of them are engaged in economic activity to offer goods or services on a market. They provide free, charitable support (in the form of expert advice) to low-income Londoners, and are entirely dependent on donations or ringfenced grants to fund their operations.
- 4.8. This proposal is consistent with the example set out in the Statutory Guidance in paragraph 2.17, on page 26. This example states that “a ringfenced grant to a charity for its non-economic activities (even if the charity also provides some goods or services on the market)” is unlikely to meet the four-limbed test. As such, no further assessment of the proposal against the subsidy control principles is deemed necessary.
- 4.9. Under Element 3 of the proposals (see sections 2.19 to 2.25, above) it is intended to make a direct grant award to PiP to work in partnership with boroughs to deliver a second phase of the Pension Credit uptake campaign they delivered with GLA funding in 2022-23 (see DD2605).
- 4.10. It is proposed that the funding constitutes the award of grant-payment funding, rather than a contract for services, because:
- it would support an existing third-party (rather than GLA) project that aligns with the Mayor’s priorities, but is the initiative of the third party in question

³ BEIS, [Statutory Guidance for the United Kingdom Subsidy Control Regime](#), November 2022

- the GLA would not receive a direct or indirect benefit as a result, with the benefits accruing instead to Londoners.

4.11. PiP is in a unique position to deliver the project for the following reasons:

- PiP has data-sharing arrangements in place with 18 London boroughs who took part in Phase 1 of the campaign, meaning this resource intensive side of the project has been completed
- PiP has delivered Phase 1 of the campaign at scale, with 18 boroughs achieving a high success rate (around 20 per cent)
- PiP is used to delivering high-quality data analysis for local authorities, and has considerable skills and experience relevant to the delivery of the project in terms of data management, client relations and policy knowledge.

4.12. Given the pressing needs of the cost-of-living crisis and the success of Phase 1 it is proposed to award the funding to PiP rather than running a grant-application process. This is considered to provide value for money for the following reasons:

- PiP has delivered Phase 1 of the campaign with 18 boroughs, putting it in a strong and unique position to continue to deliver and expand the project. It would not be possible to create this with another organisation in the timeframe available.
- PiP has developed digital solutions that can be further developed to provide councils with a self-service option for the campaign. It would not be possible for another organisation to do so in the timeframe.
- PiP has shown, through Phase 1, considerable experience working with several London boroughs on projects and programmes, meaning it can deliver at scale. Boroughs have reported being very satisfied with the working relationship.
- PiP has experience of carrying out the data analysis, setting up and using the communication systems, project reporting and project evaluation.
- PiP regularly works with local authorities, meaning it is used to tailoring approaches to local needs and responding to organisational requirements.
- PiP has a wide range of roles and skills within the organisation that are relevant to the project – for example, data analysts, technology experts, policy specialists and client managers.
- For a project operating at a London scale, and the potential for considerable financial gain among households, the cost of the project is reasonable.

4.13. GLA officers have carried out an analysis of the proposal against the Statutory Guidance for the UK subsidy control regime. They have assessed that the subsidy control regime is non-applicable in these circumstances because the proposed financial assistance does not constitute a subsidy.

4.14. Although PiP does engage in some economic activity (e.g. it charges boroughs for its LIFT service), it does not receive funding for either additional data analysis or targeted campaigns activity with boroughs (which is the subject for this proposal). Therefore the proposal does not satisfy Limb B of the four-limbed test set out in the Subsidy Control Act, as the financial assistance will be ring-fenced and will only be used to fund non-economic activity.

4.15. As such, no further assessment of the proposal against the subsidy control principles is deemed necessary.

4.16. This funding would allow councils to make the most effective use of their data and deliver the communications campaign. By funding the project, an approach that has proven successful in

encouraging Pension Credit uptake can be scaled up. It will also provide further evidence for councils considering funding such activity in future.

- 4.17. Councils are expected to provide their own resources to support the project. For example, some councils will decide to send out the communications themselves; and some will provide benefit-adviser capacity to support older people with more complex needs in making a claim.

Links to Mayoral strategies and priorities

- 4.18. This activity described in this decision document seeks to help Londoners mitigate the rising cost of living, which is a current Mayoral priority under the wider Getting London Back on its Feet priority.
- 4.19. Providing this grant funding will contribute towards the Robust Safety Net recovery mission's goal of ensuring that all Londoners can access the support they need to escape or avoid financial hardship.

Conflicts of interest

- 4.20. There are no conflicts of interest to note for anyone involved in the drafting or clearance of the form.

Consultation and engagement

- 4.21. Consultation and engagement activity will continue to take place as required as part of the programme of work described in this MD.
- 4.22. Key stakeholders we anticipate regularly consulting and engaging with include (but are not limited to):
- London boroughs
 - voluntary and community sector organisations (particularly those supporting Londoners experiencing financial hardship)
 - organisations that represent the interests of different racial, ethnic, faith, or other equity groups.

5. Financial comments

- 5.1. This MD seeks approval for the expenditure of £3,655,500 on a programme of work in 2023-24 to support Londoners on low-incomes and those struggling with living costs. This expenditure comprises:
- £2,500,000 in grant funding awarded to RCJ Advice and to the LLST to: sustain enhanced adviser capacity across the networks of 28 London Citizens Advice offices and 38 Advice Centres of Excellence; and improve community outreach and upskill community-based staff and volunteers
 - £458,000 to extend support to 11 partnerships funded through the AiCS grant programme, including evaluation
 - £275,000 to run a second Pension Credit uptake campaign, with a focus on building systemic collaborative approaches
 - £150,000 for continued maintenance, promotion and evaluation of the Cost of Living Hub
 - £120,000 to support a multi-borough pilot to implement a LWA evaluation framework
 - £15,000 for continued maintenance and promotion of the Employment Rights Hub
 - up to £137,500 on a range of commissioned research and analysis to support the delivery and development of this and future work programmes.

- 5.2. £2,883,000 would be funded from the Cost-of-Living programme budget and £772,500 from the Low Income and Food programme budget, both held by the Equalities and Fairness team.
- 5.3. There is sufficient budget within the 2023-24 approved budget to meet the expenditure of £3,655,500 within the Equalities and Fairness team's core budget.

6. Legal comments

Power to undertake the requested decisions

6.1. The decisions requested of the Mayor fall within the general powers of the GLA (exercisable by the Mayor) in section 30 of the Greater London Authority Act 1999 (GLA Act) to do anything which it considers will further any one or more of its principal purposes. Those principal purposes include furthering the promotion of social development in Greater London. Section 34 of the GLA Act also allows the Mayor to do anything which is calculated to facilitate, or is conducive or incidental to, the exercise of any functions of the GLA exercisable by the Mayor. 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 under section 33 of the 1999 Act
- 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 under section 30(4) and (5) of the 1999 Act
- consult with appropriate bodies under section 32 of the 1999 Act.

6.2. In taking the decisions requested, the Mayor 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; to advance equality of opportunity between persons who share a relevant protected characteristic (age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation) and persons who do not share it; and to foster good relations between persons who share a relevant protected characteristic and persons who do not share it (section 149 of the Equality Act 2010). To this end, the Mayor should have particular regard to section 3 (above) of this report.

Grant funding

6.3. The proposed grants to RJC Advice and LLST may be viewed as a conditional gift rather than a contract for services. Section 12 of the Code provides that decisions to award grant funding should generally be made on the basis of the outcome of a transparent, competitive application process. However, the officers have set out at paragraphs 4.2 to 4.5 above the reasons why it is proposed that the GLA directly fund RJC Advice and LLST on this occasion. The officers must ensure that an appropriate funding agreement be put in place between the Authority and each of the recipients before any part of the funding be paid.

6.4. The legal comments in MD2869 continue to apply to the Advice in Community Settings grant programme. Furthermore, appropriate grant variation documentation should be put in place between the GLA and the various recipients, where this is required to continue the funding programme.

Subsidy control

6.5. The Subsidy Control Act 2022 requires that grant funding comply with its four-limb test. The officers have set out at paragraphs 4.6 to 4.17 above how the proposed grants comply with those tests.

Procurement

6.6. The officers are reminded to comply with the Code when undertaking the procurement of services and/or supplies in furtherance of the various programmes the subject of this decision form.

7. Planned delivery approach and next steps

7.1. The schedule for this activity is detailed in the table below.

Activity	Contract/grant award phase	Development/ set-up phase	Delivery phase
Grant funding for London Citizens Advice and LLST	August – September 2023	September – October 2023	October 2023 – September 2024
Extended support for AiCS partnerships	August – October 2023	N/A	October 2023 – September 2024
Pension Credit uptake campaign	August – September 2023	September – October 2023	October 2023 – February 2024
Cost of Living Hub	August 2023	August 2023	October – December 2023
LWA evaluation framework	August 2023	October – December 2023	January 2023 – June 2024
Maintenance and promotion of Employment Rights Hub	NA	NA	August 2023 – February 2024
Commissioned research and analysis	August – October 2023	October – November 2023	November 2023 – February 2024

Appendices and supporting papers:

None.

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 be published either 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: Public-facing comms activity planned linked to the activity authorised by this MD.

Until what date (a date is required if deferring): 31 October 2023

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:

Dan Drillsma-Milgrom has drafted this report in accordance with GLA procedures and confirms the following:

✓

Sponsoring Director:

Tunde Olayinka has reviewed the request and is satisfied it is correct and consistent with the Mayor's plans and priorities.

✓

Mayoral Adviser:

Debbie Weekes-Bernard has been consulted about the proposal and agrees the recommendations.

✓

Advice:

The Finance and Legal teams have commented on this proposal.

✓

Corporate Investment Board

This decision was agreed by the Corporate Investment Board on 31 July 2023.

✓

INTERIM CHIEF FINANCE OFFICER:

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

Signature:

Anno Lustot

Date:

02/08/2023

PP on behalf of Enver Enver

CHIEF OF STAFF:

I am satisfied that this is an appropriate request to be submitted to the Mayor.

Signature:

D. Zelkay

Date:

02/08/2023

