

Capital improvement

A proposal for a new in-work poverty
benchmark for London employers

Richard Hyde
Jake Shepherd
Matthew Oakley

SMF

**Social Market
Foundation**

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In addition, we would like to thank those organisations that responded either in writing or verbally to the selective consultation exercise we undertook on a draft outline of the benchmark across December 2022 and into January 2023. Their specific input has been important in shaping a number of the aspects in this proposal document.

More broadly, gratitude also goes to everyone else who provided us with evidence over the three years of this project. That includes:

- The participants of the two expert roundtables we held in the summer and autumn of 2021.
- The key stakeholder interviews from late 2020 and early 2021, when we spoke to a wide range of organisations about their take on the issue of in-work poverty and the benchmark landscape.
- The 24 interviewees we spoke to as part of the two qualitative research exercises into the impact of in-work poverty on workers in London, the findings from which are at the centre of the 2022 report *Working Lives* and the 2023 report *A Duty of Care*.
- The 500 London businesses we surveyed in 2021 about in-work poverty in the capital, the results of which informed the 2022 *Capital Concerns* report.

Finally, we would like to acknowledge the Living Wage Foundation's (LWF) role, not only by engaging with us at various stages of the project's life and offering their expert thoughts, but in the upcoming stages of the project. With ongoing sponsorship from Trust for London, LWF will be leading on a new phase of the benchmark development process (with continued SMF involvement). Drawing on its expertise in employment standards and its extensive network of employers and links to workers and communities with lived experience of poverty, LWF will explore how we might transform the benchmark into a practical business tool. We expect this next stage to commence in late 2024.

SOCIAL MARKET FOUNDATION FOREWORD

People who work should not be in poverty and yet more than half of households in poverty in the UK have at least one adult in work. Worse still, the proportion of working families in poverty is growing and is particularly acute in London. Addressing this challenge is the goal of the new employment benchmark and the comprehensive framework to address in-work poverty, which is set out on the following pages. It is the culmination of a three-year project sponsored by Trust for London, and builds upon a considerable programme of research exploring the capital's in-work poverty problem.

The document outlines the key elements of the proposed benchmark, including its purpose and development, design, and strategies for operationalisation. Ultimately, it emphasises the need to transform this proposal into reality through active promotion and adoption. The suggestions we present here are the result of wide-ranging and lengthy consultation with a range of stakeholders and are offered up for consideration, with the aims of prompting discussion and inspiring new approaches to addressing in-work poverty.

As we have highlighted in previous research, in-work poverty is a growing issue in London. We have also shown that businesses are concerned about the issue of poverty, and that they want to take actions to tackle it. The problem is that employers don't always know what to do to help.

The purpose of this benchmark is to:

- Improve awareness of in-work poverty among London's business community.
- Enable them to recognise what steps they can take to support workers.
- Encourage firms to implement measures which will have material impacts on in-work poverty among their own workforce and in those of their suppliers.
- Provide a tool for investors and entities such as public sector bodies which outsource to and procure from the private sector to incentivise businesses to prioritise issues of in-work poverty.

To help deliver those behavioural changes, the benchmark is designed with three key drivers of in-work poverty in mind: pay and conditions, the cost of living, and financial resilience. Within each of these 'domains of action' the benchmark outlines a set of measures that businesses can take to help alleviate the degree to which a worker experiences poverty.

While the benchmark has been developed with Londoners and London employers in mind, in practice many of the businesses in London have a regional or national footprint. Where there is an appetite to take action across the country, the benchmark is also relevant for and applicable to the other parts of the UK.

We also set out the components of how the benchmark can be operationalised, offering proposals to any organisation which decides to manage the initiative in the long-term. This includes information on monitoring and accrediting employers, ways to provide them with education and advice, and avenues for scaling up the initiative.

Taken together, this proposal document offers a comprehensive framework for business participation in addressing in-work poverty. However, we recognise this project is far from complete. The next vital phase involves the active implementation of the benchmark, making it a living, breathing entity that employers use in the business world.

Extensive research has informed the development of this framework, intended to serve as a guiding structure rather than a set of rigid instructions. We acknowledge that poverty and attempts to eliminate it are inherently complex, and we refrain from prescribing a singular strategy. Instead, we set out a number of principles and criteria that can advise potential stakeholders, supporting them to develop their own approaches.

We hope this research acts as a catalyst for further exploration and development, equipping prospective funders and operators with the necessary tools to launch a new benchmark for addressing in-work poverty.

Theo Bertram

Director, Social Market Foundation

LIVING WAGE FOUNDATION FOREWORD

The Living Wage campaign was started over 20 years ago by communities in East London working with Citizens UK. Since then, we have grown one of the largest movements of employers in the UK, with more than 15,000 committed to always paying a wage that covers the cost of living. The success of our campaign demonstrates the appetite among employers to play their part in tackling poverty. We welcome the publication of this anti-poverty benchmark which sets out how employers can go even further.

Today, the Living Wage is as important as ever. Rates of in-work poverty in our capital city are sobering, with nearly a million adults living in poverty despite someone in their household being in work. London's high cost of living means that for too many people, work doesn't allow them to live with dignity. The rapid rise in the cost of essentials like energy and food in recent years means that inflation has had an outsized impact on lower income households. Today, one in eight jobs in London is paid less than the real Living Wage.

At the Living Wage Foundation, we know that many employers want to do more to address in-work poverty. There are over 150 employers across the UK who have accredited as Living Hours employers to tackle insecure work, while nearly 50 have accredited as Living Pension employers to help low-paid workers avoid poverty in later life. In London, there is great energy among employers to go further. Our campaign to make London a Living Wage city has seen more than 1,800 employers in the capital accredit in under three years, leading to nearly 60,000 workers getting a pay rise.

Our vision is for London to become a city where all workers can thrive. We are delighted to see the Living Wage, Living Hours and Living Pension highlighted in this new benchmark as key steps employers can take to provide people with the financial security they need to do so.

Trailblazing employers know that poverty has multiple causes. The new benchmark outlined in this report is a welcome step towards enabling employers to not only improve pay and conditions, but also to support workers with the cost of living and to help them to build economic resilience. It offers a holistic framework for employers to use to identify actions that they can take to improve the living standards of their workforce and their community.

We are glad to have the opportunity to build on the foundations laid by this report to explore how we might bring this benchmark to life in the capital. In a new project, we will work with employers and workers to explore how to translate the benchmark outlined here into something that will work in practice. Starting with a focus in London, we hope to develop an accreditation for responsible employers everywhere, helping us to change the face of poverty in the UK. We look forward to working with the Social Market Foundation and Trust for London to make this happen.

Katherine Chapman

Director, Living Wage Foundation

CHAPTER ONE – INTRODUCTION

This proposal document is the culmination of a three-year project, supported by Trust for London, which:

- Examined perceptions of in-work poverty among London’s business community.
- Highlighted the experiences of those in London who are facing in-work poverty, in both the private and the public sector.
- Aimed to develop interventions that would contribute to easing London’s poverty problem by helping businesses to take effective action against in-work poverty.
- Seeks to support investors and organisations, such as public bodies, with substantial procurement “footprints” to push for more efforts by the businesses they invest in or procure products and services from to tackle in-work poverty.

Understanding the problem of in-work poverty in London and businesses’ appetite for change

The first stage of the project looked to provide research to help improve understanding of in-work poverty in the capital. To do this, it examined the extent of the awareness and understanding of in-work poverty among London employers and identified the scale of any appetite for helping tackle it.

The findings of our first report, *Capital Concerns*,¹ provided a number of answers. In that report we:

- Drew attention to the scale of the in-work poverty problem in London, what drives it, and the impact it has on workers, their families, and wider society.
- Used survey evidence from London employers, which showed that there is a significant amount of concern about in-work poverty among businesses and an appetite among many to contribute to tackling it.
 - 79% of London employers agree that “poverty is an issue that impacts the people in the capital”.
 - 39% estimate that half or more of their workforce are “directly affected” by poverty.
 - 84% say that “in-work poverty (among their own workers) should be a concern to London businesses”.
 - 70% say they are motivated to help tackle in-work poverty in the capital by taking voluntary measures above and beyond legal minimums – such as paying the National Living Wage.
- Showed that there are potentially considerable benefits that can accrue to employers, if they do take explicit steps to tackle issues like in-work poverty among their own workforces and being experienced by those working for their suppliers.

Our second report, *Working Lives*,² highlighted the human costs of living on low income. Interviewing people working in the private sector and living below the

poverty line, we aimed to present new insight into the experience of in-work poverty in London. This was followed by a counterpart report, *A Duty of Care*,³ which provided insights from those in in-work poverty with jobs in the public sector. We revealed:

- Some common problems and drivers. These included low earnings, insufficient hours, high and rising living costs, and caring responsibilities.
- A belief that business could be more understanding, caring, and proactive, particularly towards employees that earn less and are in greater need of support.
- Participants cited the need for better provisions for sick pay, flexibility, in-work progression and upskilling, sufficient hours and subsidies to cover the high cost of living in the capital.

The key takeaway from our research – three years in the making – is that employees want and need their employers to do more to help tackle London’s in-work poverty problem.

Making the case for an in-work poverty benchmark

Capital Concerns looked at examples of existing “good work” and supply chain benchmarks. It also asked London employers who adhere to such accreditations about their experiences with such standards.

The evidence suggested that the right kind of benchmark focused on in-work poverty might have considerable potential for helping incentivise greater efforts by London employers to take steps to tackle in-work poverty among their own employees, and (potentially) among those working for their suppliers, too.

Box 1: What a well-designed in-work poverty benchmark could help to achieve

We think a new benchmark focused on the challenge of in-work poverty has the potential to:

- Help drive positive change for workers in London.
- Contribute to enhanced competitiveness among firms that take it up.
- Boost fairness across the capital and the prosperity of London more broadly.

A well-designed benchmark can contribute to these ultimately beneficial outcomes because such a tool can:

- Help improve awareness and understanding of in-work poverty across the capital’s business community and public sector organisations based in London, including the potential commercial and social benefits of taking action.
- Enable businesses to recognise what specific steps they can take to help alleviate in-work poverty (whether that is among a firm’s own workforce or those working for their suppliers).

- Contribute to creating better incentives for businesses to act on in-work poverty.

Incentives include:

- Enabling businesses to advertise their anti in-work poverty efforts to consumers, investors and suppliers.
- Providing a signalling mechanism that will mean investors can monitor corporate behaviour more easily and make investment decisions with greater knowledge about which companies are making efforts to improve conditions for their workers and those in their supply chains and which are not.
- Offering organisations, such as public sector bodies, a standard to include in their procurement policies, which they can require their suppliers to meet.

Making the in-work poverty benchmark different to other standards

This proposal paper sets out an idea for such a benchmark. It focuses on specific steps that employers can take which are widely understood to help reduce in-work poverty. Some are measures which will make bigger impacts on individual circumstances in the short-term, while others are smaller and may have long-term benefits. Cumulatively the measures have the potential to make a significant difference to individuals working in firms that adopt the benchmark.

Encouraging firms to aspire to do more over time

To propel that cumulative positive effect on individual workers, the benchmark is designed to incentivise employers to progressively increase the amount they do to tackle in-work poverty. Initially, the standard is likely to most usefully focus upon an accredited firm's own workforce, but as employers look to achieve higher levels of accreditation, action to help tackle in-work poverty among the supplies of goods and services to an accredited businesses will be required. In other words, the intention is that the scope of responsibility (and in turn the scale of the concomitant business benefits) grows.

Solely focused on in-work poverty

While there are other schemes that focus on “good work” (for example, the Mayor of London's Good Work Standard) or specific causes of the in-work poverty (Living Wage accreditation) there are none that tread the middle-ground by:ⁱ

- Specifically focusing upon in-work poverty and the factors that drive it, in a comprehensive way.
- Utilising measurable outcomes to ensure there is accountability, achievements are clear, and progress is visible to users, aspiring adherents, and external audiences alike.

ⁱ For a more comprehensive outline of some of the existing standards touching on employment issues and supply chains, please see SMF's report *Capital Concerns*.

- Avoiding trying to cover too many different factors related to other aspects of work and employment that can obscure the in-work poverty issue.

Therefore, the proposal in this paper is for a benchmark that:

- Brings together relevant parts of the “good work” agenda as well as other employment, cost of living, and individual and financial resilience factors with a direct bearing on in-work poverty. These are not always reflected sufficiently in existing standards.
- Builds on existing standards where appropriate.
- Requires measurable actions to be taken.
- Offers considerable opportunities for employers to expand their in-work poverty efforts over time, in a measured and cumulative way.

A powerful incentive to change commercial behaviour

The resulting benchmark will be a clear incentive tool that, along with appropriate support and other complementary activities, could help drive business behaviour change in a way which results in material improvements for many of the worst-off employees in the firms that become accredited.

The opportunities for use of the benchmark by investors and procurers of services (such as the public sector) to encourage employers to implement anti-in-work poverty measures could be significant. If such organisations took it up and used it to inform their investment decisions or procurement choices, it would magnify the incentive effects of the benchmark.

Helping to simplify the standards landscape

In addition, currently a large patchwork of different schemes presents a complicated and hard to navigate standards landscape for businesses, especially SMEs. This complexity likely inhibits the full potential for standards to drive corporate behaviour change. Therefore, the benchmark proposed in this paper deliberately looks to build upon existing accreditations where possible and consequently provides an opportunity for simplifying some of the confusion for firms, which is inherent in a standards environment where there are many varying accreditation options. In that vein, and with the right backing, the benchmark described in this paper could, ultimately, fold into or form the basis of a national scheme, at a later date.

As with individual enterprises, investors and organisations engaged in procurement, whether public or private sector, can also find the current patchwork of accreditations a hinderance to using such tools as effectively as they might. Therefore, a simplification such as the kind that the proposed benchmark could help contribute to is also likely to aid investors and procurers who want the firms they invest in or procure products and services from to be good employers that, for example, take steps to tackle instances of in-work poverty among their workforces.

The benchmark development process

To arrive at the benchmark that is being outlined in this proposal document, a 12-month long multi-stage development process was undertaken. It involved a number of elements:

- Extensive bilateral stakeholder engagement with academics, charities, interest groups, politicians, and business and investor groups. This includes two SMF-convened expert roundtables.
- A survey of London's business community and in-depth qualitative research with Londoners working in the private and public sectors, who were experiencing in-work poverty.
- Oversight and advice from an expert advisory panel which contained experienced academics and researchers, businesses, representatives of London government, public sector employers and relevant professional bodies.
- A written consultation exercise on an advanced design of the benchmark, which was circulated among relevant experts, charities and interest groups for their feedback. These included business bodies and anti-poverty campaign organisations.

This document

We intend for this to be the final output from the three-year Trust for London funded project to develop an in-work poverty focused benchmark for London's business community. Utilising the evidence we gathered over that period, this proposal document presents the contours of what we believe a credible and effective benchmark tool could look like.

Also in this paper, we set out some ideas for a set of complementary measures that we consider important to make the benchmark workable and ultimately successful at scale in changing business perceptions and behaviour and in turn helping reduce in-work poverty levels in the capital.

It is crucial to note that we intend for this document to function as a guiding paper, rather than an instructive one. We recognise that its contents are not definitive and, while considerable research has informed its development, laying the groundwork of what we consider to be an applicable and robust benchmark, we acknowledge that we do not possess all the answers. This document aspires to establish the foundations of future endeavours, which we envision as flexible and adaptable, rather than representing a final product.

If you have any questions about this proposal paper, please send any thoughts to the Social Market Foundation via director@smf.co.uk.

If you would like to discuss any aspect of the benchmark's design, please don't hesitate to get in touch with either Richard Hyde (Senior Researcher) or Jake Shepherd (Senior Researcher) at the following email addresses: richard@smf.co.uk or jake@smf.co.uk.

CHAPTER TWO – THE OVERALL FRAMEWORK AND OPERATIONALISATION

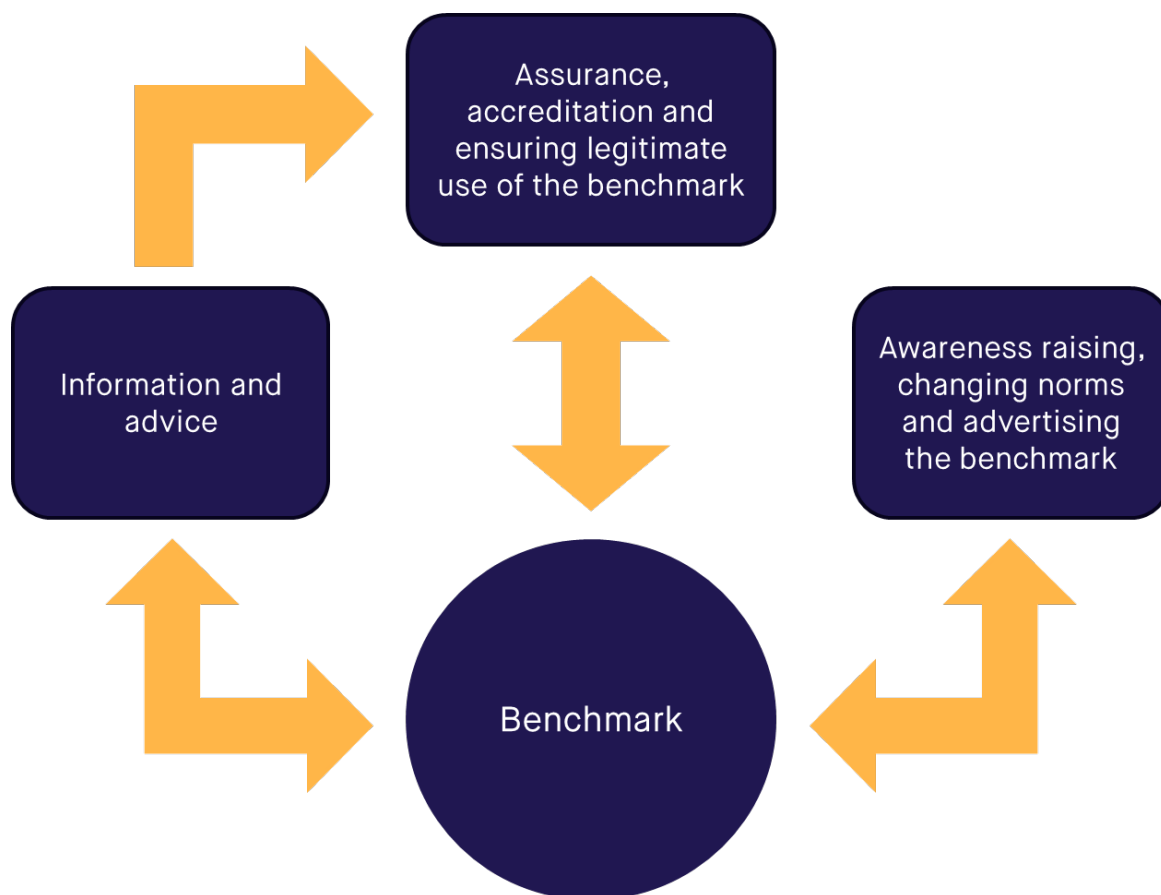
The benchmark can only work effectively in the context of a wider framework

The in-work poverty benchmark will only be effective if it is part of a wider framework of complementary activities, which includes:

- Raising awareness about the issue of in-work poverty.
- Providing information about the benchmark and its benefits for potential accreditees.
- Offering a range of support services to aid compliance.
- Conducting robust checks that ensure rigorous implementation and adherence by those who sign-up to it.

Without these additional elements, the benchmark will fail to deliver on the goals for which it is being created. Figure 1 shows how the benchmark and these supporting mechanisms fit together into a single framework that:

- Highlights the problem of in-work poverty in London and the benefits that can accrue to those firms that take steps to help tackle it.
- Provides a range of support for businesses that want to obtain the benchmark and for investors or public sector bodies that want to utilise it as part of their decision-making over investment choices and procurement activities.
- Guarantees the rigour of the benchmark through quality design and ensuring that those who are accredited are fulfilling their undertakings, through a system for monitoring and assurance.

Figure 1: Framework for the benchmark and supporting tools

Source: SMF

Each component of the framework, set out in Figure 1, will be described in more detail in the rest of this proposal document.

Ongoing until in-work poverty is reduced significantly

The benchmark should not be a “one-off” exercise. It is a long-term measure which aims to help shift behaviour among businesses, through the incentive effects that the benchmark creates. The benchmark is intended to continue indefinitely, until and if the in-work poverty challenge in the capital dramatically improves.

Operationalising the benchmark

To operationalise the benchmark, an organisation with an experienced standards development and accrediting team will be needed to set it up and run it. Further, funding to help get efforts off the ground and see it through the early years will be essential.ⁱⁱ In time, if the benchmark proves successful, there may be opportunities for it to become financially self-sustaining.

ⁱⁱ It is notable that the London Mayor’s “Good Work Standard” is operated by several full-time staff.

The preparatory work required before the benchmark can be fully operationalised will remain substantial, even if the benchmark proposed in this paper were taken up wholesale by the organisation that took on or was created for this purpose.

It is likely that further adaptations will be needed, perhaps in light of beta-testing of the benchmark. Therefore, some flexibility about the final form of the benchmark is expected. That said, at the point of launch, its design and wider framework of complementary factors (see Figure 1) may need to be fixed, to offer prospective adherents a credible standard that aspiring businesses can have confidence in.

Operationalising the benchmark will likely require the team responsible to undertake a number of specific tasks. We believe this ought to include the following:

- Designing, launching and running a website for the benchmark.
- Marketing the benchmark, putting pressure on businesses to prioritise the challenge of in-work poverty and undertake extensive stakeholder engagement to engineer interest and enthusiasm for it.
- Developing the materials about the benchmark and offer support to potential accreditees about becoming compliant.
- Undertaking or contracting with others, to set up and operate the assurance and accreditation process.
- Carrying out ongoing oversight of the marketing, engagement, support, assurance and accreditation activities.
- Protecting the benchmark's intellectual property (IP) from those who might try to use and benefit from it without permission.

Necessary refreshment of the benchmark from time to time

It is inevitable that the benchmark will need refreshing from time to time. Factors that may necessitate evolution include growing levels of awareness of it and increasing uptake from an ever-wider range of organisations wanting to be accredited, as well as new drivers of in-work poverty that may emerge.

Therefore, the organisation that operationalises the benchmark may want to consider building in a process for reviewing and updating the benchmark. This would help to formalise learning and adapting in light of experiences and conditions.

CHAPTER THREE – THE DESIGN OF THE BENCHMARK

The credibility of the benchmark ultimately lies in its ability to deliver behavioural changes among businesses. The benchmark aims to do this in three ways:

- Having relatively low barriers to initial adoption.
- Encouraging enterprises to focus their efforts on the three most salient drivers of in-work poverty.
- Providing a “road map” for enterprises to do more and more to help reduce the incidence of in-work poverty over time.

The design of the benchmark

The structure of the benchmark itself is modelled on a matrix (see Figure 2 for a visual representation) with three “domains of action”ⁱⁱⁱ for employers based around key drivers of in-work poverty. We have identified the following as key drivers that require attention from employers:^{iv}

- **Pay and conditions** is the greatest priority for addressing in-work poverty, and can refer to ameliorating measures such as wages, number of hours worked, pensions, flexible working, and progression opportunities.
- **Cost of living** can make London a difficult place to live. Measures for easing that pressure include staff discounts or expenses policies, subsidised travel or food, or assistance with childcare costs.
- **Resilience** helps to enhance financial wellbeing during times of stress or hardship. Measures for improvement cover better sickness benefits, training and upskilling, and financial advice.

Table 1: Drivers of in-work poverty in London

Drivers of in-work poverty	
Pay and conditions	Employment does not always guarantee an adequate standard of living. ⁴ Poor pay is a key driver of in-work poverty. ⁵ Other contributors include inadequate hours and precarious work, as well as an absence of or insufficient workplace benefits, opportunities for training, improving skills and progression.

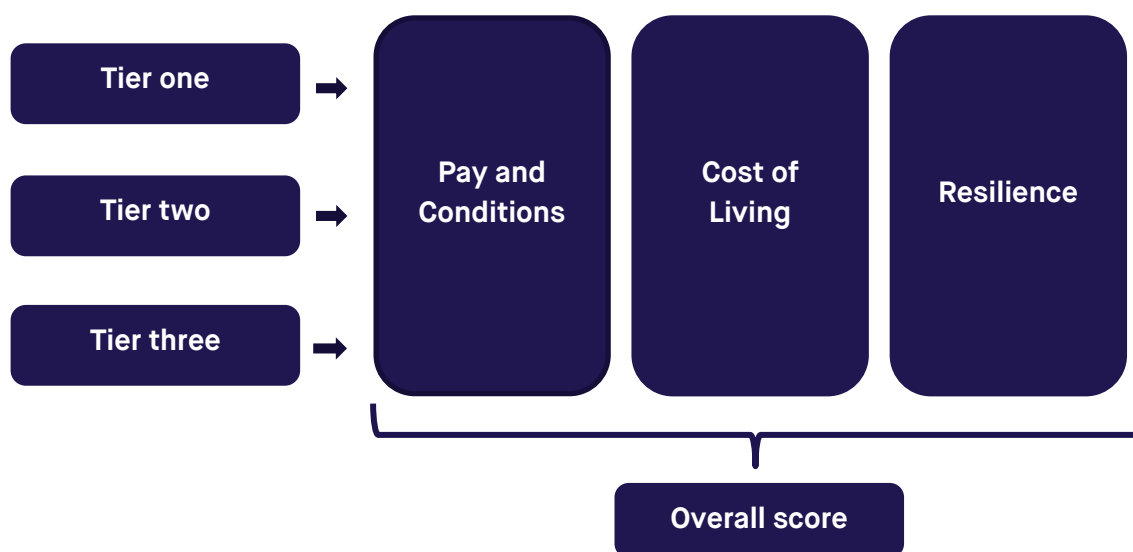
ⁱⁱⁱ The terms “domains of action” and “domains” will be used interchangeably in this document.

^{iv} For those who want to know more, additional detail about some of the main causes of in-work poverty are explored in more detail in our report *Capital Concerns*. Source: ‘Capital Concerns’.

<p>Cost of living</p>	<p>Long-standing differences in the cost of living between the capital and the rest of the country have made it much more expensive to live and work in London. Estimates of the Minimum Income Standard (MIS) for London (i.e. the minimum needed to have a decent standard of living) is between 14% and 56% higher than other parts of the country.⁶ Households in the most precarious economic positions bear the brunt of this.</p>
<p>Resilience</p>	<p>Those on the lowest incomes and in precarious employment conditions are the least resilient to challenges such as “life shocks” because they do not have assets such as savings to help them through the tougher times.⁷ Many are in debt, and this further inhibits their resilience. Cycles of insecure work, low income and debts to make up for those deficiencies in earnings see future wages in turn swallowed up by servicing debts.^{8 9}</p>

Source: SMF (2021) Within each domain of action, the benchmark sets out a list of measures that businesses can take that, if implemented, will help ameliorate the degree to which that particular factor (whether it be “pay and conditions”, the “cost of living” or financial “resilience”) is contributing to an individual worker’s experience of in-work poverty.

Figure 2: The basic structure of the benchmark



Source: SMF

Within each domain, the types of measures businesses will be expected to implement are organised into three tiers. The rationale behind the three-tiered structure is described in the next section. The kinds of detailed steps that employers are likely to be required to take at each tier – across each “domain of action” – are listed in the Annex.

An employer’s accreditation will be determined by their overall score

We propose that a firm’s accreditation should be based around an overall score. The latter should be determined by the sum of the individual “domain scores” the

applicant business has achieved across each domain at the relevant tier (see more below).

Tiering: A “step ladder” of in-work poverty countermeasures

Our proposed tiering structure creates a system:

- Of relatively low barriers to entry, to enable as many employers as possible^v that are taking some steps to reduce in-work poverty among their workers to gain the basic benchmark accreditation.
- That provides opportunities for employers to build on their initial efforts to tackle in-work poverty over time, through the provision of a clear “pathway” for firms to follow, which is reflected through the opportunity to move up the tiering system and achieve a higher level of accreditation.

Table 2 describes in more detail the three-tier aspect of the benchmark’s structure.

Table 2: The tiering element of the benchmark

Tier	Meaning of achieving the relevant tier
Tier one: entry-level standard	Meeting a set of minimum specified standards. One point will be awarded to a firm's overall score for each domain where a business meets the tier one “measures implemented” threshold.
Tier two: improving performance	On the journey to reaching the “frontier”. An employer at this level will achieve more than the basic minimum. Two points will be awarded towards a firm's overall score for each domain of action a business meets the tier two “measures implemented” threshold.
Tier three: at the frontier of best practice	Achieves and maintains strong performance across most areas. Three points will be awarded towards a firm's overall score for each domain a business meets the tier three “measures implemented” threshold.

Source: SMF

Determining a firm’s overall score and consequent level of accreditation

It is proposed that, to achieve accreditation at one of the three levels, the applicant or renewing firm will have to demonstrate that they have achieved the requirements across all three domains at the relevant tier. Table 3 sets out how we think the scoring system might work.

^v A key rationale is that the low barriers to entry will encourage smaller enterprises in particular, to sign-up to the benchmark.

Table 3: Proposed scoring system for applicant and renewing firms

Tier	“Domains of action”			Overall score: Accreditation awarded
	Pay and conditions	Cost of living	Resilience	
Tier one: entry-level standard	Criteria met: 1 point	Criteria met: 1 point	Criteria met: 1 point	3 points accumulated: Level 1 award
Tier two: improving performance	All tier one criteria met + most of tier two = 3 points	All tier one criteria met + most of tier two = 3	All tier one criteria met + most of tier two = 3	9 points accumulated: Level 2 award
Tier three: at the frontier of best practice	All tier one criteria met + most of tier two + most of tier three = 6 points	All tier one criteria met + most of tier two + most of tier three = 6 points	All tier one criteria met + most of tier two + most of tier three = 6 points	12 points accumulated: Level 3 award

Source: SMF

At tiers two and three it is suggested that not every single measure needs to be achieved to obtain the relevant point award. We therefore propose that the threshold be the achievement of “most” measures. This may be just over half, three-quarters or more. Any organisation operationalising the benchmark may want to decide what is appropriate after trials with businesses. We believe this could be a useful built-in flexibility for aspirant or re-accrediting businesses, as not every single requirement at the high tiers will necessarily be appropriate to a particular firm’s circumstances.

However, the approach set out in Table 3 should not be seen as set in stone. If an organisation takes on the benchmark or one is set-up to take it forward, they may – in light of beta-testing with businesses for example – see benefit in reviewing and adjusting what is described here.

Possible future developments in the benchmark scoring system

The above is just one possible approach. Any organisation that might take on the benchmark or be set-up to operationalise it may want to consider developing a more sophisticated “mix and match” approach to the scoring. This might allow firms, for example, to achieve a particular overall accreditation based upon accumulating a total number of points resulting from meeting the requirements of different tiers in each of the “domains of action”. A business might achieve a level 2 accreditation overall though meeting an alternate “mix” of tiering scores, not by meeting tier two scores across all three domains. Such a mix could be, for instance, meeting tier three standards in one domain but only tier one in another and tier two in the third. With a reformulation of the scoring system, to reflect mix and match possibilities, a business in the kind of situation described could aggregate enough points to get that overall level 2 accreditation.

A development along these lines may be desirable as the benchmark becomes more widely known and used. The benefits of such an evolution would allow the benchmark to become a more sophisticated standard as it would allow more tailoring to the circumstances of a wide variety of applicant and accredited firms. This could make it even more attractive to more of the business community. However, such changes are very much for the longer-term and beyond the scope of this paper to explore beyond floating as one possible future direction the standard might be taken in. We would argue that, in these early years, as the standard “finds its feet”, keeping the scoring system as simple as possible is likely to prove the best way forward.

CHAPTER FOUR – ASSURANCE, ACCREDITATION, AND OPERATIONALISATION

Components of a credible assessment and accreditation system

The benchmark will need to have a system in place for ensuring compliance with its requirements in order to ensure that all businesses who get it can be confident that each one of them is making a difference to in-work poverty. Assurance is equally important for the reputation of the accreditation amongst third party organisations. The latter may want to rely on it as a trusted sign about a business’ values and actions as, for example, they make decisions about where to make an investment or which company or companies they might procure products or services from. Certainly, a key ambition behind the standard outlined in this paper is that it becomes widely recognised as a credible signalling mechanism that influences commercial decision-making.

Therefore, robust assessment processes to ensure the standard can be trusted by both those accredited with it and those using the accreditation to make decisions about firms are a necessary ingredient. Reflecting this, Table 4 broadly outlines what we believe could be the contours of a rigorous assessment and accreditation regime that will ensure employers are adhering to the requirements of the benchmark and therefore that the standard is a credible one that can be trusted. The organisation that takes on or is set-up to run the benchmark in its initial years may wish to adopt some variation of this proposed approach.

Table 4: Methods for assessing and accrediting businesses applying for the benchmark

	Assessment		Accreditation	
	Online submission of compliance evidence	Detailed assessment process – likely by an assessor	Remote-automatic certification	Verified awarding of accreditation by an assessor
<i>“Domains of action”: Pay and Conditions, Cost of Living and Resilience</i>				
Tier one	Y	N	Y	N
Tier two	Y	Y	N	Y
Tier three	Y	Y	N	Y

Source: SMF

Proof of compliance

In keeping with the intention to have relatively modest barriers to initial uptake so that firms of different sizes and in a variety of sectors can obtain the benchmark at least at the lowest tiers, tier one assessment and awarding of accreditation will likely

have to be relatively unobtrusive to minimise the financial and administrative burdens on applicants. In contrast, compliance with tiers two and three should almost certainly involve a more difficult process and be extensively monitored.

In order to achieve compliance, applicants will no doubt expect to be provided with details of what kinds of evidence they will need to provide for achieving compliance. How this might be done best can be decided by those undertaking the assurance and accreditation process.

Confidentiality is important to businesses. Therefore, all information provided as part of the application or re-assurance process will have to be treated in confidence and stored in ways compliant with relevant laws.

Third party assurers

Initially, in the early life of the benchmark the organisation that develops the benchmark (see Chapter Two) and owns the IP for it should undertake the compliance assessments and awarding of the accreditation, and reassurance around applications for renewal.

However, as the benchmark becomes more established, a network of accredited third-party assessors could carry out assessments and undertake assurance checks on firms looking to take up the benchmark or re-certify their compliance.

Over time, we anticipate the original organisation that oversees the benchmark's initial launch and growth will step back from directly accrediting firms and instead shift towards accrediting third-party advisors and assessors, who will in turn carry out the assurance and accreditation process and more generally become the oversight body for the benchmark, including ensuring the benchmark's IP is protected.

We suggest that reassurance and reaccreditation take place periodically, perhaps every three years, for those firms who want to continue to adhere to the benchmark's requirements. Where there is a dispute over the decision of an accreditation, there should be a (time-limited) opportunity for a firm to appeal to the benchmark oversight body, for a second opinion. In addition, firms will be free to make public any disagreements they have about their accreditation award after the final decision is made and the details are published.

Working with other standards providers

The benchmark looks to utilise the existence of other well-respected standards relevant to work and poverty. This is central to the credibility of the benchmark being proposed in this document and if it is to help streamline the benchmark landscape and possibly contribute to the emergence of a national scheme.

Therefore, as part of the assessment and re-assurance process, those carrying out the assessment process will liaise with other standards providers, such as the Living Wage Foundation. This will verify that an applicant employer is an accredited business under those other standards, where compliance with the latter is required or offered up as evidence of their adherence to one of the criteria of the in-work

poverty benchmark. If an employer claims to be a Living Wage accredited employer, then the assessor would be expected to verify that with the Living Wage Foundation.

CHAPTER FIVE – INFORMATION AND ADVICE

The availability of information about the benchmark and written guidance and advice about compliance are essential to ensuring that the benchmark is a success. The absence of such a range of support would almost certainly hinder interest and curtail take up levels.

The delivery of information and guidance

Table 5 sets out the range of possible information about the benchmark that could be made available and the guidance that shall be provided to firms interested in or striving to meet the benchmark’s conditions, especially in the early years of its existence.

Table 5: Information for businesses, investors and public organisations outsourcing the supply of goods or services, about the benchmark

	Information on key elements of compliance provided in written/ visual form	Case studies of currently compliant businesses and the benefits of adherence	Sign-posting to other schemes relevant to the metric, e.g. LWF, etc.	Information offer for investors to understand the metric	Information offer for procurers of outsourced services
<i>“Domains of action”: Pay and Conditions, Cost of Living and Resilience</i>					
Tier one	Y	Y	Y	Y	Y
Tier two	Y	Y	Y	Y	Y
Tier three	Y	Y	Y	Y	Y

Source: SMF

Investors and public agencies involved in outsourcing are also important audiences for the benchmark. Consequently, appropriately tailored information that will help investors and outsourcing organisations utilise the benchmark as part of their investing activities and procurement processes would need to be a central part of the information offer.

The delivery of advice

We believe advice about how to comply will be essential for applicant or reaccrediting businesses. It should also be accessible by investors and public sector entities involved in outsourcing and looking to understand and use the benchmark. In the first instance, the organisation that initially operationalises the benchmark will be best placed to deliver advice services. Table 6 highlights some of the potential routes through which advice could be accessed.

Table 6: To support adoption and use of the benchmark, advice for businesses, investors and organisations undertaking outsourcing

	Remote (and limited) access to an advisor to facilitate initial and on-going compliance by a business	Remote (and limited) access to an advisor to support use of the benchmark by investors or organisations that outsource	In-person, on-going support from an advisor about how to become and remain compliant	Renewal and/or upgrade support package
<i>“Domains of action”: Pay and Conditions, Cost of Living and Resilience</i>				
Tier one	Y	Y	N	Y
Tier two	Y	Y	N	Y
Tier three	N	Y	Y	Y

Source: SMF

Those delivering advice will no doubt want to tailor their services to the tiering that a business is aspiring to obtain or re-accredit at. For example, those aiming to achieve the highest tiers of the benchmark in any particular domain of action are likely to need to access more extensive and intensive advice to support their application and compliance than those looking to meet tier one requirements.

Over the three-year life cycle of a benchmark accreditation held by a firm, assessors will likely want to proactively maintain contact with the firms to ensure that all possible support is provided on an ongoing basis. Further, the best assessors will probably want to remain open to approaches from compliant firms, to help troubleshoot problems with compliance that might arise in between assessment periods. The costs of such services may need to be reflected in any fees or charges, if and when the benchmark becomes a widely respected accreditation.

The delivery of advice

It is most ideal for both the information and advice offer envisaged in this chapter to be provided by the organisation that establishes the benchmark and operates it in its early years. In the initial period there will inevitably be a process of testing the information and advice provided, learning in light of experience, and adapting what is provided.

Over time, if and when the benchmark uptake expands sufficiently, it is envisaged that the original organisation that operationalised it will take up more of an oversight role (see Chapter Four). In such circumstances, it may want to consider developing standards for third-party information and advice delivery, which will have to be met in order to be considered “official”.

CHAPTER SIX – AWARENESS RAISING, CHANGING NORMS AND ADVERTISING THE BENCHMARK

A compelling argument about the benchmark’s usefulness to all parties is required, if it is:

- To be taken up and used at scale by London businesses.
- To become a routine part of the criteria by which investors make their investment decisions.
- Used frequently as a requirement in the outsourcing policies of public organisations.

The argument will only be convincing if potential accreditees and other parties that might want to utilise it are aware of its existence and there is an encouraging climate which makes tackling in-work poverty a societal priority.

A strategy for raising awareness of in-work poverty, building pressure to change business norms and advertise the benchmark

In order to raise awareness of in-work poverty, foster an environment that encourages changes in business norms and advertise the existence of the benchmark, a public facing strategy with actions that could deliver on such ends should be considered by any organisation that takes up or that is set up to run the accreditation proposed in this document. In broad terms, Table 7 outlines a possible three-pronged strategy that, with sufficient commitment and resourcing, could be developed and deployed by whoever operationalises the benchmark.

Table 7: Outline of an awareness raising, pressure building and norm changing strategy

Category of action	Actions to be taken
Building pressure	<ul style="list-style-type: none"> • Work with interest groups such as the investor community, trade unions and business groups to build understanding of the issue of in-work poverty and the benefits of ameliorating it. • Engage with businesses directly to encourage interest in in-work poverty and the role of standards and benchmarks in helping tackle the problem. • Work with local and central government and in particular their procurement teams to build understanding of in-work poverty and their possible role in the benchmark. • Public focused messaging to build interest and understanding of the scheme. • Engage with the media to help highlight the challenge of in-work poverty.

	<ul style="list-style-type: none"> • Publish survey evidence and public data that shows the progress (or not) made towards helping tackle in-work poverty across London.
<p>Communicating the benefits</p>	<ul style="list-style-type: none"> • Provide written/visual/oral information (including case studies demonstrating impact where possible) on the business benefits of taking-up the benchmark. • Tailor material to different audiences, e.g. investors, trade unions, business groups, public sector bodies, etc. • Build connections with and gain the endorsement of key interest groups e.g. investment bodies, investors, trade unions, business representatives, consumer bodies, representative entities of the public sector involved in outsourcing, as well as the public organisations themselves. • Investors in particular will be targeted as potential accreditees. • Use social media to advertise the existence of the benchmark, its benefits, as well who is accredited.
<p>Badging and publicising</p>	<ul style="list-style-type: none"> • Provide a “badge” (i.e. some form of visual recognition) for compliant firms. • Publish the names of compliant businesses and (any) investors and public bodies using the benchmark on a dedicated website and highlight this use through digital channels and in other bespoke literature. • Where desired by accredited firms, they will be able to publish details of what tiers they have achieved, in which domains of action and what specific measures they have complied with. The same information will also be published on the benchmark website, with appropriate permissions from the accreditees. • Partner with a business group to help demonstrate the benchmark’s utility and encourage members of the business group to become compliant and get accredited.

Source: SMF

CHAPTER SEVEN – CONCLUSIONS AND NEXT STEPS

This proposal document outlines the possible design of a new employment benchmark focused on in-work poverty in London. It is the result of a three-year project supported by Trust for London, which aims to address in-work poverty by involving businesses, investors, and public sector organisations.

The document covers various aspects of the proposed benchmark, including:

- **Purpose and development**, highlighting the project's aims and presenting the case of a poverty benchmark. It outlines the extensive development and research process that led to its creation.
- **Benchmark design**, structuring the benchmark around three domains of action: pay and conditions, cost of living, and resilience. Each domain has tiers with specific criteria used to assess and score businesses.
- **Assurance and accreditation**, to ensure credibility and compliance, a robust system for accrediting needs to be in place for businesses applying for the benchmark. Compliance with different criteria is monitored, and third-party assessors may take on this role as the benchmark matures.
- **Information, guidance, and advice**, information about the benchmark and guidance about compliance are crucial to its uptake. Different tiers of advice need to be available to businesses and investors, tailored to their specific needs.
- **Pressure building and awareness**, outlining a strategy for raising awareness of the benchmark but also of in-work poverty. It includes building pressure on businesses to do more to help their employees, communicating the benefits of a benchmark, and publicly recognising compliant firms through badges and a dedicated website.

Overall, this document sets out suggestions for what a comprehensive framework for a new benchmark which addresses in-work poverty might look like. If the right organisation was willing to take it on or an appropriate entity was established that could operationalise it, it offers some principles and criteria to help others turn the proposal into reality.

Next steps

We do not want to be overly prescriptive of what the course of action for promoting the benchmark should look like, nor do we wish to provide a detailed plan of how, exactly, such a scheme should be operationalised. Ultimately, how the benchmark is implemented is for the funders of the project and those who manage it for decide.

That said, we believe there are some important near-term next steps to help get the benchmark off the ground. This includes engaging with potential applicant businesses to encourage participation in the scheme and – crucially – identifying an operator to manage it. Before that, however, the benchmark must be tested with employers and employees. While this project's research phase has involved the business community, we have not yet workshopped the scheme with those who will benefit most from it. From this process, there might be revisions and refinements made to the design outline presented here.

To this end, the Living Wage Foundation will be leading on this work, while SMF continues to stay involved in an advisory capacity. With ongoing sponsorship from Trust for London, the Foundation's extensive experience in developing and operating employment benchmarks, with our support, will seek to transform the benchmark into a working, practical business tool. We expect this development phase to commence in late 2024.

ANNEX – THE BENCHMARK’S REQUIREMENTS IN EACH “DOMAIN OF ACTION”

Tables 8, 9 and 10 illustrate the kinds of specific measures businesses could be expected to take at each tier, across the three “domains of action”.

Table 8: Actions expected of businesses at each tier within the Pay and Conditions “domain of action”

Measures	
Tier one	<ul style="list-style-type: none"> • Pay the Real Living Wage (LWF), as a minimum, to all staff. • Provide a written contract to all employees. • Offer a minimum of 16 hours of work a week to all employees (unless there is a wish to work fewer) or have a policy in place to compensate workers for cancelled shifts. • Provide pension to all staff that want them e.g. auto-enrolment or equivalent or better alternatives.
Tier two	<ul style="list-style-type: none"> • Achieve all of the tier one measures. • Formal information gathering/assessment of the extent of poverty among a firm’s workforce. • Be a Living Wage accredited business. • Be a Living Hours (LWF) accredited employer. • Provide flexible working opportunities for staff. • Compensate those employees working unsociable hours with supplementary pay. • Show good practice in the use of employment agencies and agency supplied staff and towards all temporary employees e.g. by ensuring equal treatment with permanent employees from day one and by using agencies signed up to the REC Code of Practice.¹⁰ • Have a minimum supply-chain standards policy e.g. requirements for suppliers to be Living Hours employers, have their employees all covered by the auto-enrolment (or an equivalent) pension scheme and provide (above statutory minimum) sick pay. • Publish a summary report (whether as part of an annual report or separately) of the measures taken to tackle in-work poverty among a firm’s own workforce.
Tier three	<ul style="list-style-type: none"> • Achieve all tier one and most tier two measures. • Demonstrate a formal action plan for tackling in-work poverty in a company’s workforce and down the supply chain, including an effort to minimise the use of temporary and agency workers.

	<ul style="list-style-type: none"> • Be a Living Pension (LWF) accredited employer. • Recognise “employee voice” when issues arise that impact staff. This could be through many different kinds of mechanisms.^{vi} • Offer a package of additional support for all employees working unsociable hours. • Have progression opportunities/ladders for the workforce. • Putting in-place extensive and robust supply chain practices e.g. adherence to the SA8000 standard¹¹ (or similar) on workers’ rights in supply chains. • Publish a detailed report (whether as part of an annual report or separately) of the measures taken to tackle in-work poverty among a firm’s own workforce and among the workforces of suppliers.
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Table 9: Actions expected of businesses at each tier within the Cost of Living “domain of action”

Measures	
Tier one	<ul style="list-style-type: none"> • Staff discounts on products, where relevant. • Adequate staff expenses policy. • Sign-post employees to free resources to help with money management e.g. Money and Pension Service’s (MaPS) “MoneyHelper”¹² and benefits calculators.¹³
Tier two	<ul style="list-style-type: none"> • All tier one measures. • Travel season ticket loans. • Cycle-to-work policy. • Subsidised access to food/meals. • Schemes to support financial resilience e.g. salary finance schemes, workplace saving scheme, access to financial advice.
Tier three	<ul style="list-style-type: none"> • All tier one and most tier two measures. • Policy to ensure that rises in the cost of living are consistently reflected in pay rises and other aspects of staff remuneration. • Interest free payroll loans e.g. Tenancy Deposit Loans. • Shares for staff or profit-sharing scheme. • Policy on assisting with childcare costs.

^{vi} The two most often utilised are trade union recognition and employee works councils but alternative approaches could be used. The key is that the employee perspective is taken into account and ultimately has some influence on decision-making.

Table 10: Actions expected of businesses at each tier within the Resilience “domain of action”

Measures	
Tier one	<ul style="list-style-type: none"> • Better than statutory minimum sickness benefits. • Better than statutory redundancy terms. • Better than the statutory minimum parental leave policy and benefits. • Signpost employees to free resources on money, pension and welfare matters e.g. the MaPS website¹⁴ and MoneyHelper’s debt advice locator”¹⁵
Tier two	<ul style="list-style-type: none"> • All tier one measures. • Policies for employee progression. • Bereavement and other family leave. • Comprehensive policy for employee training and upskilling, including flexibility over hours around training and small-scale financial assistance for learning. • Equality of parental leave entitlements. • Schemes to support financial resilience e.g. flexible pay,^{vii} consolidation loans, insurance, (autosave) workplace savings, money coaching, access to financial advice through salary sacrifice schemes (£500 allowance), promotion of the government’s incentivised Help to Save scheme for people on low incomes.
Tier three	<ul style="list-style-type: none"> • All tier one and most tier two measures. • Additional good quality health/employee wellbeing package(s) e.g. PMI, GIP or similar offer for all staff. • Access to individual financial advice services. • Large-scale financial help for training/upskilling e.g. interest free training loans or grants. • Apprenticeship programme.

^{vii} Offered in ways consistent with the FCA’s statement about the risks and benefits of Employer Salary Advance Schemes and what good employer practice should be, when they are offered to staff. Source: FCA, ‘FCA Sets out Views on Employer Salary Advance Schemes’, 30 July 2020, <https://www.fca.org.uk/news/statements/fca-sets-out-views-employer-salary-advance-schemes>.

ENDNOTES

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