



## **Cohesion Guidance for Funders:**

# **A question of Single Group Funding**

**April 2008**

**The National Equality Partnership Policy Briefing**

### **Summary**

This Policy Briefing presents some reflections<sup>1</sup> and early concerns for BME and other equality groups on the draft Cohesion Guidance for Funders whilst explaining its basic arguments and principles. It has been produced by Voice4Change England.

During May 2008, Voice4Change England, on behalf of the National Equality Partnership<sup>2</sup>, is organising a series of consultation events to take place in the North, Midlands and Southern regions. The aim of the consultation events is to engage third sector groups – in particular equality groups – to discuss the proposals of the draft guidance and to understand its implications for the third sector. Based on the discussions, the National Equality Partnership will submit a comprehensive response to the CLG. Details about the events and suggestions for what your group can do are found at the end of this briefing.



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## **Who is this briefing for?**

This policy briefing is developed for primarily, BME and other equality groups, third sector groups, local authorities and external funders to help them respond to the consultation on Cohesion Guidance for Funders.

Third sector infrastructure support organisations can also use this briefing to inform their members and other stakeholders on the guidance.

## **Introduction**

Communities and Local Government (CLG) is currently consulting on the draft Cohesion Guidance for Funders<sup>3</sup>. Issued in Feb 2008, the draft guidance forms an important part of the Government's response<sup>4</sup> to the Commission on Integration and Cohesion on its report 'Our Shared Future'<sup>5</sup>. Other documents issued as part of the Government's response include Predictors of Community Cohesion and Community Cohesion Impact Assessment and Community Conflict Prevention Tool<sup>6</sup>. The deadline for responses is 26th May 2008.

**The guidance sets out the government's intention to advise funders on 'practical ways in which local authorities could help to build strong communities by promoting cohesion and integration locally.'** The draft Guidance proposes 'practical ways' to local authorities in awarding funding to single issue or identity groups to help them deliver cohesion objectives.

Single community groups are defined by the guidance as third sector groups providing targeted support for single issue/identity based community activity. These groups include Black and Minority Ethnic (BME) groups and other equality groups including women's groups, gay and lesbian support groups, age and/or disability advocacy groups and service providers. Single group funding may also refer to mainstream third sector groups that provide specific support or service to single identity community or community of interest.

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Despite recognising the good work of the third sector in approaching excluded communities, the guidance places additional conditions on funding for these groups. The proposed conditions may adversely impact the organisation and association of third sector groups in response to specific needs. The conditions may also lead local authorities to disregard the public duties placed on them by the equality legislation to race, gender and disability.

These and other concerns compelled the National Equality Partnership to raise awareness of third sector organisations about the guidance and encourage them to respond to the CLG.

## Background

In June 2007, the Commission on Integration and Cohesion published 'Our Shared Future'. Annex D of the report discussed the issue of funding for single community groups and how, according to the Commission's findings, it impacts on cohesion and integration within diverse communities. The Commission interchangeably uses the terms 'single community organisation' and 'single group'. Single Group Funding is defined as that 'awarded on the basis of particular identity, such as ethnic, religious or cultural.'

Annex D argued that 'single group funding should be the exception rather than the rule for both Government and external funders' and in making decisions on awarding funding to single community groups, the funders should:

- [1] publicise the reasons behind the award, and
- [2] require groups receiving renewed or additional resources to demonstrate their progress in becoming more outward-facing, especially by evidence of twinning.

The third and final recommendation addressed to the CLG was to develop guidance to assist grant-making bodies in deciding the 'appropriateness of Single Group Funding.' The draft Cohesion Guidance for Funders is issued in response to this recommendation and also encompasses the other two recommendations of the Annex D.

## Consultation document overview

The draft Cohesion Guidance for Funders is divided in three main sections:-

1. Sets out the 'context' – a rationale behind the proposed guidance.
2. Lists a series of 'key principles' that serve as a statement of policy intent.
3. Presents practical steps that funders can undertake to help ensure that the work they fund promotes cohesion.

In so doing, the guidance suggests key questions for funders (local authorities and other funders) when funding community-level activities.

# Key issues and concerns in the draft guidance

## 1. Concerns about the Compact compliance

In setting out the context, the guidance outlines a new framework developed by the Commission on Integration and Cohesion for local cohesion work and aims to 'show clearly how cohesion can be successfully embedded in wider policy areas to ensure greater impact.' The guidance mentions that it 'will not replace' other guidance covering work with the third sector in particular the Compact,<sup>7</sup> the Treasury and National Audit Office guidance for funders.

However the guidance does pose some serious concerns on whether it meets the requirements of the Compact and its Codes. The proposals of the draft guidance appear to push third sector organisations to compromise their independence and autonomy. According to the proposed conditions on funding, third sector groups will be required to build activities that promote interaction between diverse communities which may or may not be the primary concern of the group seeking funding. In other words, the independence of third sector groups, in particular BME and other equality groups, and their ability to represent the groups they serve, may in practice be compromised by the guidance.

## **The independence of third sector groups, in particular BME and other equality groups, and their ability to represent the groups they serve, may in practice be compromised by the guidance.**

The guidance also appears ambiguous **as it is not clear whether the CLG has already agreed their policy on cohesion and integration, which is being followed by the proposed guidance.** If this is the case and the CLG is working on an agreed policy line, then both the public policy and proposed guidance are subject to consideration under equality legislation which would require an Equality Impact Assessment to be undertaken alongside the proposed policy. The draft guidance states that there are 'plans' to carry out such an assessment following the consultation period. The guidance therefore presents partial information and this falls foul of the Compact Code on Consultation.

## 2. Concerns about strengthening negative stereotypes

The language in the draft guidance may be offensive to certain equality groups as it strengthens the stereotypes against associated communities of identity or interest. For example the foreword reads:

*" ....this guidance does not aim to cancel projects working specifically with **young black men to tackle gun crime**..... Nor does it preclude work with **Muslim communities to prevent violent extremism**....." (Emphasis added).*

The negative examples of single issue/community groups and associated communities highlighted in the document further labels certain groups as problems and the cause of certain social ills. This approach does not recognise the hard work achieved by these groups and communities in addressing the barriers of prejudice and inequality and struggle for social justice.

### 3. Concerns about the key principles

The draft Cohesion Guidance sets out five key principles that serve as a statement of policy intent. The principles discuss:

- establishing a clear link between equality and cohesion
- promotion of cohesion as well as meeting the diverse needs of the community
- evidence that building relationships between people promotes cohesion
- funders to seek appropriate balance between bridging activities and activities which support particular ethnic groups alone
- awarding funding to single issue groups to be driven by the local context.

**The guidance omits any mention of equality duties, even though it could potentially come into direct conflict with the general duties to promote race, gender and disability equality.** Yet it refers to the CLG carrying out a 'full equalities and cohesion impact assessment'. This would appear to suggest that assessing impact in terms of the equality duties has the same importance as assessing the impact in terms of cohesion. However, there is no duty on public bodies to assess cohesion, but there is a statutory duty to assess the impact of a policy in terms of race, gender and disability equality. These two areas should not be combined, nor given equal weight.

Funding agencies are being asked to 'seek appropriate balance between bridging activities and activities which support particular ethnic groups alone'. The fourth principle guides funders to decide on the appropriateness of funding wherever there is an 'evidenced need within the community concerned...'. **The concern is who can best identify local needs, including provision for bridging activities with evidence for funding? Third sector organisations and groups should be involved in determining the local context and local needs. Local government and external funders alone will fail to adequately identify communities' needs.**

The CLG recommends that all funding should be 'awarded in a way that maximises the opportunity for interaction across different groups'. In saying this, the guidance sends out mixed messages to funders. There is a risk that such an aim could be interpreted by the funders as justification for not funding single groups.<sup>8</sup>

### 4. Concerns on questions for funders

The draft Cohesion Guidance suggests five key questions to local authorities and other funders 'to consider when funding community-level activities'.

- The guidance is positive as it acknowledges that funders may on some occasions find that there 'is a clear business or equalities case for the funding to (single community groups) proceed.' But the suggested approach also advises funders that they should not fund a single group/community project if it 'builds resentment in others'. **The guidance states that it is for local authorities and external funders to determine 'evidenced need' and levels of resentment in the communities that may arise if funding was to be awarded to a particular project.** The guidance does not encourage funders to have a dialogue with the single issue group applicant on the reasons for the provision of specialist services.
- The guidance advises funders to consider the local area cohesion strategy in deciding to award funding. Unless special needs of local communities are reflected in such strategy, it is unlikely that equality groups will secure funding.

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- The understanding of 'bridging' in the context of diverse communities needs broadening. **To consider BME communities as homogenous groups of people would be wrong and misleading in making public policy.** Bridging can and does take place within and across BME communities that are immensely diverse.
- In most cases, charitable objects bind BME and other equality groups to provide services to an identified section of the community. The guidance makes no reference to this limitation yet poses a question for funders to consider this situation. **It is not clear if the guidance is asking charities to change their objectives and/or include a cohesion policy in their governing documents.**

## ***Implications for BME and other equality groups***

BME and other equality groups have played a vital role in helping to ensure that communities that are often socially and economically marginalised are not excluded. Whilst some associations are organised to deliver or help deliver public services to BME communities and communities of interest, others are formed to voice the concerns of the communities and advocate on their behalf to reform government policies. Grant funding to these groups from local authorities and other funders is often the only financial support available to these groups. The draft guidance if implemented will potentially have considerable implications for the availability, accessibility, sustainability and diversity of provision for BME and equality groups with special and unmet needs by mainstream service providers.

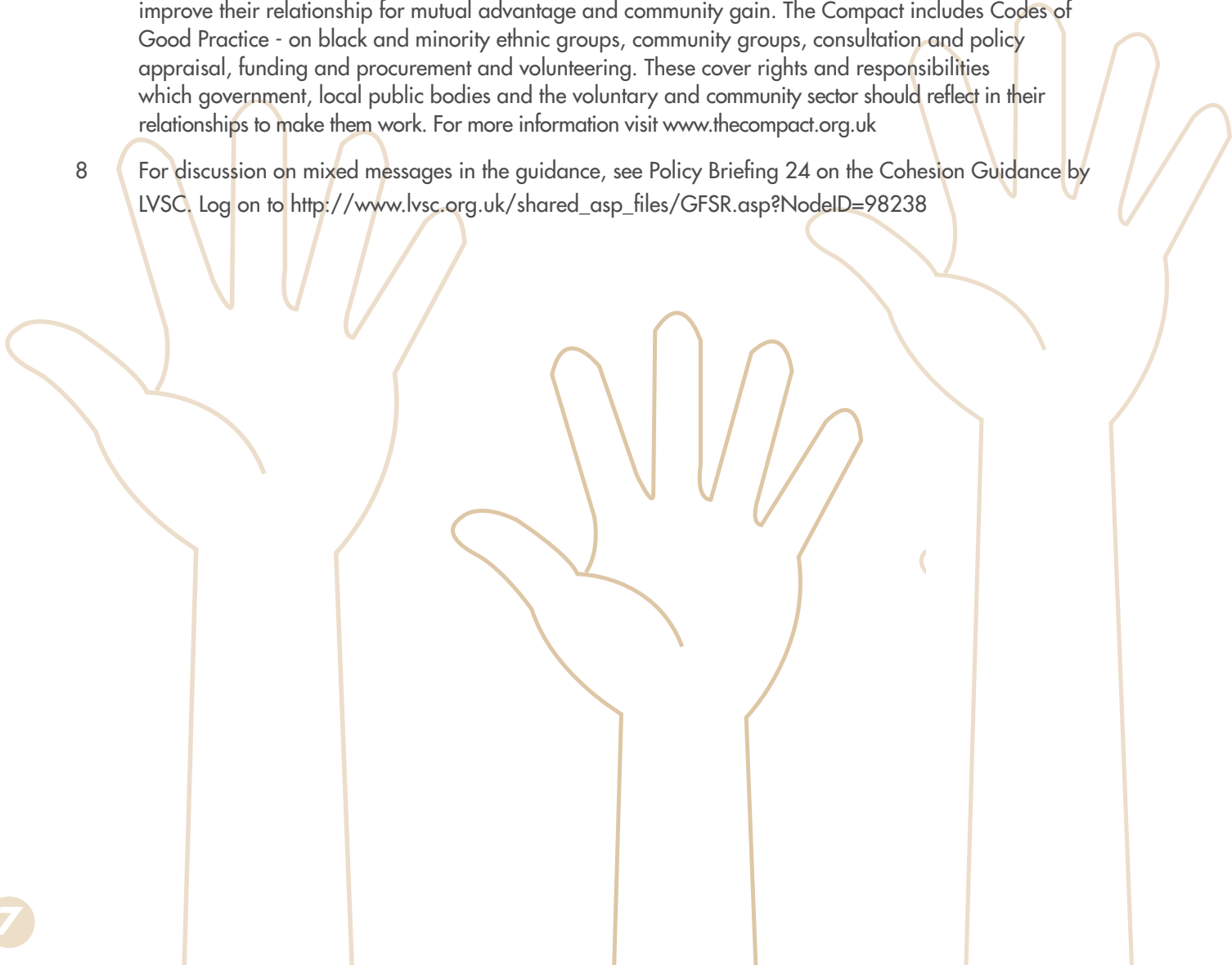
Currently Southall Black Sisters (SBS), a BME women's rights group providing support to victims of domestic violence primarily of South Asian communities based in the Ealing Borough of London, is facing funding cuts because the local council wants domestic violence support services to be provided to all service users by a single organisation. **The value of specialist service provision, even when there is evidenced need risks being ignored.** SBS is also an exemplary organisation whose work bridges communities and promotes cohesion within South Asian and other communities of various ethnic, religious and cultural backgrounds. The organisation has been instrumental to bring law reforms and change the lives of all women facing domestic violence in England. The last twenty years of its achievements are being undermined by the policy proposals set out in the draft guidance.

The draft guidance may have similar impacts on other BME and equality groups in receiving funding. There will be additional conditions placed upon these groups to justify the needs of the communities they work for.

**The guidance should propose funders work with BME and other equality organisations in partnership to determine ways that tackle inequality of all kinds and promote cohesive communities in specified local area.**

## Endnotes

- 1 To understand the third sector's response to the draft Cohesion Guidance, Voice4Change England brought together a Working Group of 16 national and regional third sector organisations. This Policy Briefing is informed by the discussion at the Working Group Meeting. For more information on the Working Group, please log on to [www.voice4change-england.co.uk](http://www.voice4change-england.co.uk) and click on Voice4Change England's recent campaigns.
- 2 The National Equality Partnership is a brand new three-year project funded by Capacitybuilders to support the third sector on equality and diversity issues. Its remit is to deliver services to 'sector support providers', i.e. umbrella bodies and infrastructure organisations, to help them with equality, diversity and human rights. The partnership is made up of Women's Resource Centre (WRC), Voice4Change England (V4CE), the Consortium of Lesbian, Gay, Bisexual and Transgender Voluntary and Community Organisations (the Consortium) and the National Association for Voluntary and Community Action (NAVCA). For more information on NEP, please visit [www.improvingsupport.org.uk/equality](http://www.improvingsupport.org.uk/equality).
- 3 The Cohesion Guidance for Funders is available from the CLG's website at [www.communities.gov.uk/documents/communities/pdf/681891](http://www.communities.gov.uk/documents/communities/pdf/681891)
- 4 To download the Government's Response to the Commission on Integration and Cohesion, click on [www.communities.gov.uk/publications/communities/governmentresponsecoic](http://www.communities.gov.uk/publications/communities/governmentresponsecoic)
- 5 To download the 'Our Shared Future' report click on [www.integrationandcohesion.org.uk/~/\\_media/assets/www.integrationandcohesion.org.uk/our\\_shared\\_future%20pdf](http://www.integrationandcohesion.org.uk/~/_media/assets/www.integrationandcohesion.org.uk/our_shared_future%20pdf)
- 6 For the Conflict Prevention Tool, see <http://www.communities.gov.uk/documents/communities/pdf/communitycohesiontool> For the Predictors click on [www.communities.gov.uk/documents/communities/pdf/681539](http://www.communities.gov.uk/documents/communities/pdf/681539)
- 7 The Compact is the agreement between government and the voluntary and community sector to improve their relationship for mutual advantage and community gain. The Compact includes Codes of Good Practice - on black and minority ethnic groups, community groups, consultation and policy appraisal, funding and procurement and volunteering. These cover rights and responsibilities which government, local public bodies and the voluntary and community sector should reflect in their relationships to make them work. For more information visit [www.thecompact.org.uk](http://www.thecompact.org.uk)
- 8 For discussion on mixed messages in the guidance, see Policy Briefing 24 on the Cohesion Guidance by LVSC. Log on to [http://www.lvsc.org.uk/shared\\_asp\\_files/GFSR.asp?NodeID=98238](http://www.lvsc.org.uk/shared_asp_files/GFSR.asp?NodeID=98238)



## What can your group do?

### 1) **Respond to the consultation – shape the debate on single group funding**

CLG is seeking the third sector's response to the draft Cohesion Guidance for Funders. The guidance sets out eight questions and **the deadline for responses is 26th May 2008**. You can respond to the CLG directly by email to [cohesionfunders@communities.gsi.gov.uk](mailto:cohesionfunders@communities.gsi.gov.uk) or by post to Consultation on Cohesion Guidance for Funders, Department for Communities and Local Government, 7th Floor, Zone H10, Eland House, Bressenden Place, London, SW1E 5DU.

### 2) **Lobby government – to recognise the value and BME and other equality groups**

Write to Hazel Blears MP, Secretary of State for Local Government at:  
The Department for Communities and Local Government, Eland House, Bressenden Place, London, SW1 5DU.

Write to Phil Hope MP, Minister for the Third Sector at:  
Office of the Third Sector, 35 Great Smith Street, London, SW1P 3BQ.

You can also write to your local MP and ask them to raise the issues addressed by this briefing with Hazel Blears and Phil Hope.

### 3) **Get your voice heard at the National Equality Partnership consultation events**

You may also like to attend one of our regional consultation events to make your voice heard. Three regional events are being held on the following dates:

- 1st May in Leicester
- 8th May in Bristol
- 15th May in Leeds.

The consultation events will focus on the following questions:

- Should there be guidance on cohesion for funders?
- If the answer is YES, what principles should the guidance be based on?
- If the answer is NO, what are the reasons behind it?
- What impact will the guidance have on your organisation and communities you work for?

For details and a booking form go to [www.voice4change-england.co.uk/partner\\_events.html](http://www.voice4change-england.co.uk/partner_events.html)  
Call **Arjumand Kazmi** on **020 7843 6129** or  
email at [arjumand@voice4change-england.co.uk](mailto:arjumand@voice4change-england.co.uk)

You can download more information on the consultation and third sector activities from Voice4Change England's website at [www.voice4change-england.co.uk](http://www.voice4change-england.co.uk) Please visit our 'Speak to Us' section updated regularly with your comments and views, and join the debate.

## Further Information

If you would like more information and/or discuss your response with policy leads at the National Equality Partnership, please email [arjumand@voice4change-england.co.uk](mailto:arjumand@voice4change-england.co.uk) or [isabel@wrc.org.uk](mailto:isabel@wrc.org.uk) **You can also send us your response and comments, which we will incorporate in our comprehensive response to the CLG. Should you decide to do so, please email us by no later than Friday 16th May 2008.**

