

Response to the Department for Communities and Local Government (DCLG) Consultation on its Third Sector Strategy

Voice4Change England

September 2007

Voice4Change England Partnership Members:

BME Compact Sub-group, Social Business Company, Ethnic Business Development Corporation, The Pillar Consortium, BTEG, Black Development Agency, CAZMAC, Confederation of Indian Organisations, Connections for Development, CEMVO, NAVCA, Community Development Exchange, MENTER, Voice East Midlands, MiNET, York and Humber BME Regional Panel, Black South West Network (BSWM), Black and Ethnic Community Organisations' Network (BECON), One North West and Fatima Women's Network.



A national partnership for the Black and Minority Ethnic Third Sector

Overview of the Response

Voice4Change England (V4CE) welcomes this opportunity to respond to the Department for Communities and Local Government (DCLG) on its consultation for the Third Sector Strategy. V4CE is a partnership of 20 national and regional Black and Minority Ethnic (BME) Third Sector organisations, which aims to provide a co-ordinated policy voice for the BME third sector in England.

We welcome the DCLG's approach to work with third sector organisations as key stakeholders in delivering its strategy for better outcomes for local people. However the experience of our Partners suggest that often BME third sector organisations are overlooked in shaping Government's policy agenda on central, regional and local policy platforms. This has also been evidenced through several research studies and acknowledged by the Government itself on various occasions. Thus in our response to the Strategy, we raise our concerns on the 'composition' of the proposed structures and on ways through which the DCLG seeks to reach to the 'hard to reach' groups.

The following is a summary of the key recommendations to the consultation from the V4CE Partnership:

1. We would like to see the proposed Third Sector Partnership Board and Strategic Partners programme to be inclusive and representative of the diversity of the third sector especially those concerned with equalities. The Department should ensure that the selected organisations have demonstrated that they embrace principles of equalities and that they have a track record to both involve and engage BME groups in their respective domains of work;
2. In taking forward its 'place shaping agenda' and selecting 'community anchors', the DCLG should value the expertise of BME sub-regional and regional networks and other infrastructure support organisations to better involve local BME third sector organisations in influencing policies;
3. The Department should review 'community anchors' as there are very few BME-led third sector organisations that would fall within the definition. We would urge the Department to consider the complexity and diversity of the third sector in developing its strategy to ensure all parts benefit equally; and
4. In developing strategic partnerships, the Department should consider the growing dynamic nature of the BME third sector; rich with BME organisations working on specific themes such as education, regeneration and employment as well as those that work on generic issues such as policy, research, campaigns and infrastructure support.

A detailed response is submitted under each section of the consultation document.

Methodology

Voice4Change England's response is informed by its Partnership of 20 national and regional BME third sector organisations, who provide a co-ordinated voice of the BME Third Sector in their respective regional and national domains. V4CE's origin is based on its Partnership forged from the BME sub-group on Compact. This response is therefore informed by the practitioner understanding of the Compact Principles and its Codes of Good Practice in relation to the BME Third Sector as well as by the wealth of experience and representational strength of the Partners who between them represent over 5700 BME third sector organisations across England.

In addition, the response is informed by background research and informal discussions with BME Third Sector professionals, mainly from the frontline local service delivery organisations, on their experience of engaging in local government agenda in their respective local areas.

Voice4Change England's Response to the proposed Third Sector Strategy for Communities and Local Government

The consultation document divides its proposals in four sections. The fifth section outlines indicators for the DCLG to measure success against the proposals. This response deals with each section separately and puts forward comments and recommendations to inform the proposed Strategy to be representative and inclusive of needs and aspirations of the BME third sector.

Section I – Ways of Working

Specific Comments - *Inclusive representation*

- 1.1 V4CE commends Department's intention to establish a Third Sector Partnership Board. However to 'recognise the role of the sector' in its entirety, it is vital that the membership of the proposed Third Sector Partnership Board is inclusive of the diversity of the third sector with a balance of geographical and thematic specialism of third sector organisations – representing local or regional area perspectives as well as those that represent minority ethnic communities or voices of women or disabled people. We recognise that it is a challenging task, nevertheless essential. *We recommend that the composition of the proposed Board should have representation from both the mainstream and BME specialist and generic third sector organisations, and in so doing, the diversity of the sector should be reflected.*
- 1.2 The principle of 'mainstreaming equalities' should be the guiding principle in selecting members to the proposed Board. *We recommend that all selected organisations should be able to demonstrate that they embrace principles of equalities and that they have a track record to both involve and engage BME groups in their respective domains of work.*
- 1.3 A good example to learn from is the composition of the Infrastructure National Partnership (INP). As an advisory body to Capacity Builders, the INP has over 20 organisations as its partners representing national, regional and sub-regional third sector organisations. The INP also brings together the diversity of the third sector; partner organisations represent BME, young people and faith based third sector organisations.

Initial findings of V4CE's Mapping Research on the scale and scope of the BME third sector and audit of the representational roles of V4CE Partners suggest that BME groups have little presence in various policy development and influencing platforms such as LSPs at local levels and RDAs and Regional Assemblies at regional levels. The same is also true at national level with very few BME organisations taking part in policy matters.¹

Recommendation 1- COMPOSITION: The composition of the proposed Third Sector Partnership Board should have representation from both the mainstream and BME specialist third sector organisations, and in so doing, the diversity within the specialist sector should be reflected.

Recommendation 2 – TRACK RECORD: The Department should ensure that selected organisations have demonstrated their commitment to equalities in all their activities and have a track-record to involve and engage BME groups in their respective domains of work.

General Comments

- 1.4 Voice4Change England welcomes DCLG's plan to build the capacity of its staff to work with the third sector and for holding a third sector month within the Department in June 2007. *We would consider it helpful in building partnership working with the Department, if the outcomes of the month's activities (e.g. a summary report) are shared with the sector.*

¹ Mapping the BME Third Sector in England, Voice4Change England (findings to be publicly available in October 2007)

- 1.5 We also welcome DCLG's commitment to work with the Commission for Compact. *We offer our full support to the DCLG for effective implementation of the Compact principles in local governance, in particular to build positive and equal relationships between local statutory agencies with BME third sector organisations.*
- 1.6 It is not clear from the proposed strategy how the membership for the Third Sector Partnership Board would be drawn. We assume that either the membership of this Board for third sector representatives would be drawn from the Strategic Partners (once they are selected), or the two bodies will have entirely different set of people/ organisations as members. *The Department should clarify the functions and forms between the Third Sector Partnership Board and the Strategic Partners.*
- 1.7 Provided the clarity between the forms and functions of the Board and Strategic Partners is made clear, *Voice4Change England as a generic umbrella body representing a voice for the BME third sector to raise issues that are important for BME third sector organisations would be well placed to contribute to the work of the Board.*

Section 2 – Local Partnerships in Place-Shaping

Specific Comments – Ways to reach 'hard to reach'

- 2.1 Whilst Departmental recognition that all local authorities and their partners should work more closely together with the third sector and in this regard its proposal to provide 'statutory guidance' on how to involve third sector organisations at local level is commendable, the practical manifestation of such intentions is not without challenges. There has not been effective reach to BME groups by generic third sector support structures to advocate on behalf of BME communities. V4CE's mapping research suggests that significantly low number of BME third sector organisations take up advocacy and campaigning as their key activities for two main reasons: first, due to lack of funding available for these tasks at local, sub-regional and even at regional levels, and secondly, due to the perceived and real fear of damaging their relationship with the statutory agencies.²
- 2.2 To address these issues, the proposed strategy does not go far enough with its plans on 'how else' this desired involvement can be achieved. For example, the Strategy does not appreciate the important role that sub-regional and regional third sector organisations play in cascading support to local groups and in raising the profile of local action at national policy levels. This is particularly important for the BME third sector where local frontline organisations are still on the margins of third sector activity. The Compact Code on BME VCS acknowledges the important role BME organisations play at regional and national levels to provide BME perspective on key policy matters (Code 3.3, p5). *V4CE would recommend that the Department should involve BME regional and sub-regional networks and BME generic infrastructure support organisations to improve the effectiveness in engagement with BME third sector organisations at local level.* This is imperative in developing an inclusive place-shaping agenda and for the BME third sector to take up an increasing role in policy advocacy and campaigning.
- 2.3 We welcome the Department's commitment to three year grant funding, which will be set out in the statutory guidance to all public bodies.³ We also welcome DCLG's approach to work with the Office of the Third Sector (OTS) in delivering the £80million fund for small grants for local community organisations. *Once again we would advise both DCLG and OTS to be responsive to the specific needs and challenges of 'reach' to BME groups in this initiative.* The BME Third Sector has not received its fair share from public bodies, lottery funds and charitable sources. A research study carried out by our regional partner - MENTER in East of England found that most local authorities in their region were unable to provide information on how much funding they distributed to local BME groups. They did not have any frameworks through which they could track and monitor their practices and failed to demonstrate their duty on race equality. We believe that the disbursement

² Ibid.

³ Third Sector Strategy for Communities and Local Government, Discussion Paper, June 2007, p15.

of the small grants programme is a good opportunity for establishing good practice to support BME groups that are often at margins of third sector activity.

- 2.4 The BME third sector is striving to bridge gaps that exist between its under-resourced capacity and a continuously transforming policy environment. Most of our Partner organisations have achieved significant success in linking local BME groups with regional and national policy spheres. Black Training and Enterprise Group undertook great deal of work to better engage the BME third sector in LSPs and to identify priorities for LAAs and MENTER (regional BME network for East of England) progressed on mainstreaming equalities in East of England. *The DCLG should improve the individual and collective efforts of BME groups to further expand their influence to develop local civic action in minority communities.*

Recommendation 3 - ENGAGEMENT: In setting out its strategies to engage local BME groups, the DCLG should involve BME regional and sub-regional and networks and BME generic infrastructure support organisations to improve the effectiveness in engagement. This is imperative in developing an inclusive place-shaping agenda and for the BME third sector to take up an increasing role in policy advocacy and campaigning.

Recommendation 4 – LEVEL-PLAYING-FIELD: V4CE recommends that in delivering £80million fund for small grants for local community organisations the DCLG and OTS should be responsive to the specific needs and challenges of ‘reach’ to BME groups. We believe that the disbursement of the small grants programme is a good opportunity for establishing good practice to support the BME groups that are often at margins of third sector activity.

Recommendation 5 - INFLUENCE: The DCLG should improve the individual and collective efforts of BME groups to further expand their influence to develop local civic action in minority communities.

General Comments

- 2.5 The Department’s proposal to develop a national improvement strategy for local authorities to best coordinate third sector capacity building is a timely intervention. Third sector organisations are expected to play a significant role in delivering public services and therefore need strengthening of resources and capacity. To influence this at local level, local authorities should be seen as one of the key partners to coordinate with other capacity building initiatives.
- 2.6 The DCLG’s commitment to work with the Audit Commission to develop proposals for Comprehensive Area Assessments to assess the effectiveness of local partnership working is an important step towards the direction of a thriving third sector.
- 2.7 We applaud the Department’s proposal to work with the OTS in developing its delivery plans for CSR07 on how best to support the third sector. We endorse joined up working and this approach should be extended to all Government departments, who have direct implications for their activities on third sector organisations.

Section 3 – Strategic Partners

- 3.1 DCLG is responsible for all issues in which the third sector is a key stakeholder, especially on developing national policy frameworks on local government, equalities and social justice. V4CE’s Partnership of 20 regional and national BME third sector infrastructure organisations makes it a desired strategic partner – to provide a national link to issues that are important to the BME third sector and to ensure that regional, sub-regional and local perspectives on BME issues are heard and the gaps in effective involvement are bridged.

- 3.2 Often the BME third sector is seen as a single entity. This is misleading. Although the driving force for all equalities groups is to mainstream equality, they all have different expertise and areas of interest, just as the generic third sector is multi dimensional in its scope. *We would therefore recommend that in its Strategic Partners programme, the DCLG should value the various expertise BME groups have to offer and select on the basis of their respective merit to deliver against the Department's priorities.*
- 3.3 Experience has shown that there are unrealistic expectations placed on BME organisations (at whatever level they operate). This is particularly the case for national organisations. V4CE is a new generic voice for the BME Third Sector. We sit alongside our national partners who have developed specialist expertise in health, education, economic development and regeneration, social enterprise and communities of interest. *We strongly recommend that the Department consider the diversity of the BME Third Sector in developing the Strategic Partners Programme.*

Recommendation 6 – PLURALITY of VOICES: In developing strategic partnerships with third sector organisations, the DCLG should consider the growing dynamic nature of the BME third sector; rich with BME organisations working on specific themes as well as those that work on generic issues such as policy, research, campaigns and infrastructure support. The Department should value the various expertise BME groups have to offer and select on the basis of their respective merit to deliver against the Department's priorities.

Section 4 – Sustainable Investment

Specific Comments – Community anchors

- 4.1 In its role to implement the Quirk review's proposals, the DCLG is proposing to support and develop 'community anchors' – community organisations that are independent, community led with multi purpose foundations that provide a focal point for community organisations and services. The focus would be on "third sector organisations of sufficient scale and capability". Whilst the proposed strategy seems appropriate to cascade support to frontline local service delivery organisations, there is a danger that this condition may prevent the involvement of grass-roots community groups and BME third sector organisations, simply because they lack capacity. Here we reiterate the arguments set out in our response to the Community Assets Fund.⁴ *The Department should ensure that the principles of equalities are adhered to in selecting organisations to become 'community anchors'. Furthermore, in selecting community-led organisations on their merit of delivering successful capacity building projects, assessment should be made on their track record of involving grass-root organisations in key decisions related to local communities.*
- 4.2 But having to select BME organisations as 'community anchors' alone would not be enough. In the spirit of positive action, the DCLG should extend its support to the selected organisations to develop and sustain their capacity in delivering against the set objectives. *We would recommend that the scope of BME groups' reach to local communities should not be undermined by their size and limited capability as this should be considered by the Department as an area of strategic investment.*
- 4.3 The focus on 'community anchors' does not explain how the Department would address the underlying diversity within third sector organisations; would it consider community-led organisations as those that are providing services to a particular 'community of interest' or those that are 'area based' and therefore cover all communities inhabitant of that area? Without this clarity, the inclusiveness of this approach is potentially flawed. *V4CE recommends that the Department*

⁴ V4CE response to Community Assets Fund recommended the following:

- The CAFund should include provision for potential small scale projects that will create diverse partnerships, community benefit and sustainability.
- Large scale projects should state as a requirement how the BME sector and communities will benefit in a way which supports their sustainability

See V4CE response to Community Asset Fund consultation, p2, (June 2007)

<http://www.bteq.co.uk/Downloads/V4CE/web%20version%20of%20Com%20Asset%20Fun%20response%20June07.pdf>

should review the provision of supporting and developing ‘community anchors’ as it may underplay the complexity of diverse communities that make the map of a diverse third sector provision.

- 4.4 In selecting ‘community anchors’, the expertise of national, regional and sub-regional infrastructure organisations should be drawn to identify community-led organisations that have been successfully delivering support projects to local grass-root initiatives. Within the BME third sector, whilst regional networks and infrastructure organisations have geographical leadership for a vast majority of BME third sector organisations, the national umbrella bodies can offer a thematic specialist insight and leadership.

Recommendation 7 - EQUALITY: the DCLG should ensure that the principles of equalities are adhered to in selecting organisations to become ‘community anchors’. Furthermore, in selecting community-led organisations on their merit of delivering successful capacity building projects, assessment should be made on their track record of involving grass-root organisations in key decisions related to local communities.

Recommendation 8 – POSITIVE ACTION: In the spirit of positive action, the DCLG should extend its support to the selected organisations to develop and sustain its capacity in delivering against the set objectives. The scope of BME groups’ reach to local communities should not be undermined by their size and limited capability and this should be considered by the Department as an area of strategic investment.

Recommendation 9 – DIVERSITY of the THIRD SECTOR: the DCLG should review the provision of ‘community anchors’ as it may underplay the complexity of diverse communities that make the map of a diverse third sector provision.

Recommendation 10 - LEADERSHIP: the DCLG should also utilise expertise of regional and national BME third sector leadership to identify community-led organisations that have been successfully delivering support projects to local grass-root initiatives.

Section 5 – Measuring Progress

Voice4Change England strongly urges the DCLG to positively consider the representation of BME third sector organisations in ‘place shaping’ agenda and in identifying ‘community anchors’ to take forward the Department’s commitment to community asset transfer. We welcome the Department’s commitment to measure its progress towards better partnership working between the statutory agencies and third sector organisations by minimising breaches of the Compact.

Comments on the response

We would be happy to discuss our response further with the DCLG.

Please contact Vandna Gohil, Director V4CE at vandna@voice4change-england.co.uk or on 0207 843 6132 to discuss the response in detail.

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