

The National Equality Partnership Response

On the Cohesion Guidance for Funders: A Consultation Document by the Communities and Local Government

May 2008

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Response to Communities and Local Government's draft Cohesion Guidance for Funders

May 2008

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Executive summary

“ Small independent organisations that help specific communities are at risk. If these organisations go down then we are facing a retrograde situation of increasing social and financial exclusion and segregation.” Participant in Leeds consultation event

“ Hazel Blears says the intention is not for organisations to lose their funding..... She needs to know this is happening” . Participant in Leicester consultation event

This is a unique response in that it speaks from an Equality Sector’s perspective and includes voices of equality groups that are immensely diverse in both *form* and *function*. These groups include voluntary and community groups as well as social enterprises, working for and led by Black and Minority Ethnic and refugee communities, women, disabled and older people as well as lesbian, gay, bisexual and transgender communities.

Over 80 participants from across the equality strands participated in consultation events held in Leicester, Bristol and Leeds. Workshops were held to generate more focused debate on proposals of the Guidance. Participants were provided question sheets to feed into the response in their own words.

It was strongly felt and expressed by the participants that the government is failing to recognise the importance of equality groups as agents of social change. Equality groups have demonstrated an enormous potential not only to help marginalised communities overcome barriers of exclusion but also to challenge the mainstream communities to recognise and respect the difference and positive contribution of all communities living side-by-side.

These groups are vital in challenging the prejudice and in reforming the provision of services that historically have been developed on the basis of uniform understanding of communities’ needs. Above all, such groups are generally user led thereby understand better the direct impact of discrimination and disadvantage faced by the communities they represent.

The Guidance if implemented in its current form will have considerable implications for the availability, accessibility, sustainability and diversity of provision for equality groups. The immediate implications for the equality groups will be funding cuts and in some areas complete closures of support groups.

“Community cohesion is important but it is vital that ALL equalities groups contribute to this. BME and other equality groups provide a voice to their community’s empowerment and self determination. They contribute to community cohesion and not the opposite. Discrimination is still rife in society and needs to be tackled in equal measure. Marginalising communities by cutting funding to special interest groups will NOT help” Participant in Bristol

“I work for a generic infrastructure organisation. Without partner agencies from single community groups the reach of our services would be significantly reduced.” Participant in Leeds

Recommendations

1 The government should abandon the Guidance to repair the damage already caused. With the help of Local Government Association (LGA), CLG should investigate how local authorities across the country have already implemented the proposals, resulting in a negative impact on equalities groups.

2 The government should work with equality groups to guide funders on how to:

- ◆ Include marginalised people and identify need with the help of voluntary and community groups;
- ◆ Meet the equality duties;
- ◆ Use procurement to promote equality;
- ◆ Develop appropriate funding mix – grants, commissioning and investment; and
- ◆ Empower disadvantaged people to develop their own solutions to inequality and discrimination.

3 We recommend that CLG, in partnership with Office of the Third Sector, produces an ‘equality and cohesion guidance for funders’, explaining the clear evidenced links between ‘inequality and segregation’ to help them develop funding practices that target inequality in ways that reduce segregation and promote cohesion. The guidance on ‘equality and cohesion for funders’ should be developed in consultation with equality organisations and the Equality and Human Rights Commission (EHRC).

The Equality Impact Assessment being carried out on the Guidance proposals should include results of the investigation into the impact they have already had. The Equality Impact Assessment should be carried out transparently and with the involvement of equality groups affected by the guidance.

“Good guidance is essential – don’t rush this through until it is right. The cohesion guidance can ONLY work if it matched by separate guidance on equalities funding. The two issues are inter-dependent but not the same.” Participant in Leeds

1. Introduction

1.1 The National Equality Partnership welcomes this opportunity to respond to the Communities and Local Government (CLG) on its consultation on the Cohesion Guidance for Funders, issued in February 2008.

1.2 The National Equality Partnership (NEP) 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).¹

1.3 **This is a unique response in that it speaks from an Equality Sector's perspective and includes voices of Equality groups that are immensely diverse in both form and function.** These groups include voluntary and community groups as well as social enterprises, working for and led by Black and Minority Ethnic and refugee communities, women, disabled and older people as well as lesbian, gay, bisexual and transgender communities.

1.4 The Cohesion Guidance for Funders (the Guidance) poses serious threats to the survival and quality of valuable services that Equality groups offer to people and communities often on the margins of society. We strongly believe that the way 'single group funding' has been defined by the government, equality groups will be the prime target for funders to withdraw funding. For this reason, NEP agreed to undertake a thorough consultation with the Equality Sector in England as one of its first programme of activities.

1.5 The consultation with equality groups not only informed our response to the Guidance, the dialogue has also informed us about the current issues that equality groups are facing especially around ever increasing limitations to project and core funding. The problem is intensified by the increased use of procurement and tendering rather than grants which favours large generalist providers. **The most disturbing finding however was a general sense of unease among the equality groups that 'equality is off the government's agenda' and that 'meeting needs of diverse communities is no longer government's priority'**.² NEP will give serious consideration to these concerns in its future programme of action.

¹ For more information on NEP, please visit www.improvingsupport.org.uk/equality. Short profiles of the four partner organisations are attached as **Annex A**.

² Views expressed in participants' own words.

1.6 **Terminology** – In this response we use the term ‘equality groups’ to refer to organisations run by and for people who face discrimination or abuse. In many cases these are focused on specific groups of people, such as older Irish people, Muslim women, or Bangladeshi disabled people. As such they will bear the brunt of this Guidance and ‘single group funding’ policy. We do not use the term ‘single groups’ because it does not accurately describe people involved in and helped by equality groups – while they may share a particular identity and experience of discrimination, they also have differences in the way any group of individuals is different.

1.7 We note that the Guidance uses the term ‘single groups’ less than Annex D of the Commission on Integration and Cohesion’s report, but that the CLG continues to use the term in its discussions on community cohesion, for example in Hazel Blear’s letter to the Guardian on 16th February, and in a CLG press release on 12th May.

2. Developing a response – Methodology

2.1 As its first programme activity, NEP members agreed to hold consultation events with equality groups across the country on the Guidance. Voice4Change England (V4CE) took the lead responsibility to organise the consultation events on behalf of the Partnership.

2.2 A policy briefing was produced to assist participants in better understanding of the Guidance. It was circulated prior to the events to the participants and to NEP’s network via partners’ websites and email bulletins. The policy briefing not only provided a critical summary of the Guidance, it also reflected the concerns of voluntary and community organisations towards the Guidance to help equality groups better understand its possible implications.³

2.3 During May 2008, consultation events were held in Leicester, Bristol and Leeds to cover the super regions of the Midlands, the South and the Northern parts of England. Jointly held by V4CE and its partner regional BME networks, the events secured participation of equality groups both with a remit to deliver services to local communities and infrastructure support providers.

2.4 Over 80 participants from across the equality strands participated at the events, including membership based representative organisations extending the reach to equality groups regionally and locally. Representatives from the CLG and regional government offices were invited to present the proposals of the Guidance. Participants were encouraged to submit individual responses to the CLG.

³ ‘Cohesion Guidance for Funders: A question of Single Group Funding’, NEP Policy Briefing, April 2008. Available at www.voice4change-england.co.uk.

2.5 Workshops were held to generate more focused debate on proposals of the Guidance. Participants were provided question sheets to feed into the response in 'their own words'. The quotations included in this response are taken from participants' written contribution at the events, unless otherwise stated. Feed back forms were distributed to evaluate the quality of consultation events in content and organisation.

2.6 Informed by the events, a draft response was developed by Voice4Change England. It was then distributed among NEP Partners for final comments. This is a final response and has full support of the four organisations that form the National Equality Partnership.

3. Structure of the Response

3.1 This response focuses on participants' views and sentiments expressed at the consultation events. We have deliberately focused on themes that emerged from the dialogue and discussions among the equality groups. This response aims to relay the participants' concerns and *voice* where appropriate in the first person so as not to lose the integrity of the comments.

3.2 Furthermore, it does not directly answer the questions raised by the Guidance. It was strongly felt at the consultation events that the Guidance is a manifestation of a top-down approach which was felt to be 'patronising' to the voluntary and community sector. Questions in the Guidance were therefore regarded as 'narrowly focusing on government's understanding of community cohesion and negative perception of single groups.' This response highlights concerns, sentiments and feelings of equality groups on the proposals of the Guidance.

3.3 Workshops were designed to generate written responses from frontline equality groups on the likely impacts of the Guidance on their organisations. **Annex B** to this response lists the workshop questions.

3.4 We are aware that many other voluntary and community organisations and social enterprises are making their responses to the CLG. We acknowledge responses made by HEAR and LVSC from London and bassac, Imkaan and WRC as national organisations and in particular their referencing to evidence where appropriate.

3.5 There is a separate section in the response to highlight the possible impacts of the Guidance on equality groups.

4. Implications for the Equality Groups: General Comments

4.1 Equality groups have played a vital role in helping to ensure that communities that are often socially and economically marginalised do not remain 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 Guidance if implemented in its current form will potentially have considerable implications for the availability, accessibility, sustainability and diversity of provision for equality groups.**

4.2 **The immediate implications for the equality groups will be funding cuts and in some areas complete closures of support groups.** They may have to compromise on their ethos and identity to continue to deliver services to an identified section of community. For most small and medium equality groups, infrastructure support services will be affected as funding for specific infrastructure support to equality groups may also be made limited.

4.3 The procurement and tendering processes already favour large generalist providers, because small, specialist **equality groups are often unable to invest resources in the tendering process, or compete for big contracts to deliver high volume of services.** Equality groups are also at a disadvantage because they often work on issues that have not yet been identified as priorities by the government. A more flexible nature of grants allows them to put forward the case for their service in a way that prescriptive commissioning processes often do not.

4.4 Currently Southall Black Sisters (SBS) – a BME women’s rights group providing support to survivors 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 Guidance.

5. Implications for the Equality Groups: Specific Issues

Disabled and Deaf people

5.1 The Deaf community is likely to suffer from the cohesion guidance and under-valuing of diversity. The Deaf community is an important part of the richness of Britain’s diversity but the trend towards mainstreaming and ‘integration’ would risk undermining Deaf culture and language. Strong Deaf community organisations are needed both to provide space to develop Deaf culture and language but also to enable better interaction between Deaf and hearing people, and tackle discrimination and social exclusion of Deaf

people. **The 'progression' principle is nonsensical in the case of Deaf people, as Deaf organisations will always be needed to maintain and develop Deaf culture and language.**

5.2 Organisations run by and for disabled people are essential to ensure that disabled people are respected, can access their rights, and that difference is valued and discrimination and human rights abuses are tackled. Disabled people need spaces in which they can develop their own solutions to disability discrimination rather than large charities or public services run by non-disabled people defining what disabled people need. **The self-determination and empowerment that is at the heart of the disabled people's movement is under threat in a climate of mainstreaming and 'one size fits all'.** Participants in the consultation events described disability organisations as 'disenfranchised' by the cohesion agenda. The cohesion guidance contributes to an under-valuing of small, specialist, 'by and for' organisations that are essential to disabled people's empowerment.

Lesbian, gay bisexual and transgender (LGBT) people

5.3 **Many of the participants in the consultation events reported hearing explicitly or implicitly from the public sector that equality is 'off the agenda',** and one participant in particular recounted hearing a community grants committee saying 'proudly' that they had turned down an application from a lesbian organisation 'on the grounds that it was not open to everyone and was therefore exclusive'. LGBT organisations are important not just to provide services to people who cannot or do not access or trust mainstream services and to support victims of hate crime, but also to nurture lesbian and gay culture and community. There are still few positive role models in the media of gay and transgender people and LGBT organisations are needed both to provide alternative positive images within the community and also to educate the general public about the reality of LGBT people's lives.

5.4 Transgender people are particularly marginalised both in wider society and within the LGBT sector. **The cohesion guidance contributes to a culture of under-valuing specialist organisations for relatively small sections of the community,** and will hit LGBT organisations hard at a time when demand for their services is increasing.

Black and Minority Ethnic (BME) People

5.5 It is an evident fact that people from minority ethnic backgrounds face institutional racism and discrimination to access public services and to gain opportunities to participate in and shape the collective life of society. Poverty contributes to this disadvantage as "risks for poverty are higher for Bangladeshis, Pakistanis and Black Africans, but are also above average for Caribbean, Indian and Chinese people."⁴

⁴ 'Poverty and Ethnicity in the UK', JRF Findings April 2007 – Ref 2059. Available at www.jrf.org.uk.

5.6 BME groups deliver targeted support services to BME communities that include cultural, social and economic support programmes for young, older and disabled people from BME communities; advocacy and advice on legal, immigration, race equality and equal opportunity in employment issues; health services and help communities accessing mainstream health provision; supplementary schools education and training; day care community centres and language support etc. BME groups meet the needs of BME communities 'to a much greater extent than the voluntary sector as a whole.'⁵

5.7 **The Guidance in advising funders to prioritise 'bridging' and 'mainstreaming' would result in overlooking specific needs of BME communities arising from entrenched disadvantage, discrimination and inequality** they still face on the basis of their ethnicity, culture, colour, class and/or country of origin.

Religion/Belief

5.8 The current climate of Islamophobia and mistrust of Muslim organisations and communities is demonstrated in the draft guidance in the selection of the example of 'Muslim community to tackle violent extremism' as a legitimate use of 'single group' funding. In fact funding is needed to support Muslim communities in many ways, as Muslims are much more likely to live in poverty than their non-Muslim counterparts, and face discrimination, social exclusion and hate crime because of their religious background. Many Muslims feel targeted by the police and mistrusted by the public. Muslim community organisations help provide space for dialogue and essential services to tackle social exclusion, discrimination and poverty. **Within Muslim communities there are many different voices and specific groups that also need investment and support but are likely to bear the worst brunt of the cohesion funding cuts, risking leaving fewer, less diverse organisations to represent and support Muslim communities.**

5.9 Other minority religious groups will also of course struggle to access support if the cohesion guidance is formally issued. A participant from a Hindu community organisation at a consultation event pointed out the inconsistency between the cohesion guidance and the policy of the Heritage Lottery fund that minority cultures should be valued and developed, such as through the community celebration of religious festivals.

Older People

5.10 We received feedback from a community development worker supporting older Irish people's organisations that the cohesion guidance was particularly worrying for their sector because the older Irish population has a

⁵ Mcleod M, Owne D & Khamis C., "Black and Minority Ethnic Voluntary and Community Organisations: their role and future development in England and Wales" (2001), Policy Study Institute for Joseph Rowntree Foundation.

clear need for specific services to address years of poverty, discrimination and social exclusion. The view was strongly expressed that it is not possible to 'mainstream' services for older Irish people, nor would it be efficient to try.

5.11 The 'progression principle' whereby people begin with 'bonding' with a view to 'bridging' does not make sense for very elderly people who may not be able to learn a new language, for example. Organisations to support older people from minority ethnic backgrounds are needed to help act as a gateway to mainstream services and integrate older people into wider society. Society has a duty of care to older people of all backgrounds, and it is not possible for many older people from minority ethnic backgrounds to access services without the support of minority ethnic older people's organisations.

Refugees and asylum seekers

5.12 Despite the fact that for refugees and new migrant communities there should be least argument of the need for specific services and organisations, the refugee community sector is already facing cuts to small specialist services because of the introduction of a commissioning process that favours large generalist providers. In this context the Guidance will make an already bad situation worse.

5.13 Gypsy and Traveller communities are another example of a sector in particular need of long-term investment and support. These communities are extremely marginalised and organisations to support and represent their needs are vital to help Gypsies and Travellers access services and rights.

Women

5.14 **Women's organisations are already facing acute funding problems due to the 'equality myth'** (the misperception that men and women are now equal) and the trend towards mainstreaming and cutting women only spaces. Black and minority ethnic women's organisations are particularly badly affected by these funding cuts and many BME women's organisations are already facing closure (A Right to Exist, Imkaan, 2008).

Multiple Discrimination: the most marginalised are the first to go

5.15 **In all these sectors, minority groups within each sector face particular difficulties, eg BME women's organisations, or disabled refugee organisations, supporting people facing 'multiple discrimination'**. These groups are often marginalised within equality sectors as well as in the wider third sector and community. They are particularly vulnerable and likely to be the first casualties in funding cuts under the cohesion agenda, partly because they may work with such a small part of the community that they are seen as too specific or insignificant. There are also fewer people who will challenge a decision on funding to a small minority group so it is easier for funders to make cuts in these areas. We are already seeing this in the BME women's sector with organisations like Southall Black Sisters facing funding cuts defended using the

cohesion policy. Yet these organisations are just the groups that are needed to promote integration – they support the most marginalised people and they also often create a bridge between different groups as they straddle different communities and can address complexities of identity, exclusion and community.

6. Comments on the quality, tone and analysis cited in the consultation document

Ambiguity

6.1 The Guidance appears ambiguous as it is not clear whether the CLG has already an agreed overarching policy on ‘cohesion’ of which the Guidance is one element. *Improving Opportunity, Strengthening Society: the Government’s Strategy to increase race equality and community cohesion* recognises the role of voluntary and community sector in promoting good race relations.⁶ The Strategy also aimed at improving opportunities for people from all backgrounds to participate in civic life for people at most risk of social exclusion including BME groups and those who live in deprived areas.⁷ **The Guidance appears to take a divergent position from the Government’s strategy and this makes it all confusing.**

6.2 The Guidance proposes to undertake ‘cohesion impact assessment’ alongside equalities impact assessments. Whilst impact assessment of public policies in relation to gender, race and disability equality is a statutory duty for public bodies, **the status of ‘cohesion impact assessment’ is unclear** and is being introduced for the first time. The respective assessments should not be combined nor given equal weight.

“The CLG do not seem confident with this document so why should we? It feels like it is on shaky ground and its worrying that this is already having an impact. We may not realistically be able to monitor its impact on the Sector until years to come. This is a very scary document with veiled threats for the end of the community sector”. Participant in Leicester

6.3 We welcome the Compact compliant consultation on the Guidance. But there are other areas of Compact good practice that this Guidance does not meet. **Equalities impact assessments have not been completed thus no information was made available to the public on likely impacts of the Guidance on local communities.** This equates to presenting partial information to the public and a non-compliance with the Compact Code on Consultation.⁸

⁶ *Improving Opportunity, Strengthening Society*” Home Office, 2005:p53

⁷ *Ibid.*,p12

⁸ The Compact Code on Consultation and Policy Appraisal states in 6.1, p7 that the consultation documents will ideally contain “where appropriate, an explanation of who is likely to be affected, and how, including an assessment of impact statement covering the

6.4 **There is also a disparity between questions asked for funders and key principles presented by the Guidance.** Some of the key questions for funders do not reflect the key principles outlined in the document as policy intent. For example the first principles on the link between equality and cohesion is not reflected at all in the key questions. The consultation document does not provide the reader with all the information on which to base an informed view.

Omissions

6.5 There is insufficient evidence in the Guidance to propose the policy change outlined. **The Guidance omits any mention of Equalities legislation.** It is a significant omission as the Guidance focuses on community relations. The Guidance will be given serious consideration from public bodies as they would have to 'conscientiously' take it into account in making public funding decisions and would only be able to depart from it with 'good reasons'. However, any such guidance cannot contradict the law. With its omissions and possibly contradictions with Equalities legislation, the Guidance presents conflicting messages to local authorities and other public bodies as well as independent funders exposing them to fail in their statutory duties and obligations.

"We want to see copies of the impact assessments done on this document".
Participant in Leeds

Insensitivity

6.6 The language in the Guidance is offensive to certain equality groups as it strengthens the stereotypes against communities of identity or interest. For example the foreword of the Guidance 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).

6.7 Such negative examples of 'single' groups and associated communities highlighted in the document further label certain equality groups as problems and the cause of social ills. This approach does not recognise the achievements by equality groups and communities in addressing the barriers of prejudice and inequality.

likely effect of the proposals on voluntary and community organisations (for example, any implementation role or increased costs envisaged)". The Code is available at www.compact.org.uk.

“The emphasis of the guidance is unbalanced – it implies that the effort to become a cohesive society is on BME communities. True cohesion would state that mainstream British communities also need to be more ‘open’, ‘willing’ and make the same effort that is being asked of the BME sector. The guidance demonstrates a lack of understanding of the BME VCS”. Participant in Leeds

Lack of understanding of the role and value of equality groups and an attack on independent action

6.8 In most cases, charitable objects bind BME and other equality groups to provide services to identified section of community. The Guidance in setting key principles requires voluntary groups to consider how they can promote cohesion and integration as well as meeting the diverse needs (Second Principle). It further poses a question to funders how they can promote cohesion with organisations whose objects do not include specific reference to cohesion or integration activities (Question 5).

6.9 This approach undermines the role and value of equality groups, many of which work with a so-called ‘single’ group of people. **The ethos of equality groups, such as women’s and disability groups, is primarily to provide targeted support to people most in need of their services and are otherwise unable to find help and support.** Furthermore, most equality groups are smaller in size and often local in approach which may, by capacity, limit them from going beyond responding to the needs of their target groups. Besides, cohesion and integration might not be the priority over other identified needs in every local area.

“Any faith/cultural group particularly smaller ones will be disadvantaged especially those working with newly emerging communities. This guidance means that our organisation will find it extremely difficult to secure funding unless we change our mission statement which we are not prepared to do.” Participant in Bristol

Value of specialist equality groups:

“User led organisations; addressing institutional racism and discrimination; valuing the experience and track record of BME voluntary sector; (addressing) language barriers.” Participant in Leicester

“Need for groups to demonstrate cohesion but SGF (single group funding) develop as part of wider cohesion spectrum for example women’s groups doing ESOL classes will enable women to take part in society but this is an earlier step in the process”. Participant in Leeds

"Would this apply to women's refugees? If so how would they ensure that women feel safe?" Participant in Leeds

6.10 In advising funders to consider how they work with organisations without specific reference to cohesion and integration, the Guidance is insensitive to the specialist nature of equality groups. **This can potentially lead to a situation in which equality groups find themselves having to change their objects and ethos.** This is unacceptable as it can undermine the independence of charitable, voluntary and community sector and risks undermining the value of civil society activism.

6.11 Furthermore the national Compact good practice codes require funders not to influence the independence of action of voluntary projects in any ways they fund or work with them. Government policy encourages the independence of the sector and the role it plays in campaigning and advocacy. The potential of this may be comprised if the guidance is implemented in its current form.

"Many groups could find themselves operating illegally if the Charity Commission does not engage in the debate on the role of charitable aims and objects and implications around cohesion work". Participant in Leeds

"We seem to think we have reached equality? Where is the evidence for this? This document is a breach of the BME code (Compact Code) in several ways and will be challenged if this guidance comes into being". Participant in Bristol

Assumption that equality groups contribute to segregated communities

6.12 The Guidance seems to assume that equality groups contribute to segregated communities. The assumption is made without any definitive evidence that equality groups set communities apart. In making this assumption the funders are being asked in the Guidance to "ensure they are not undercutting cohesion objectives, by avoiding funding projects for particular groups which do not meet evidenced needs particular to those groups, *building resentment amongst others*; or which *allow users to develop insularity and a 'comfort zone'* without a wider justification in terms of meeting evidenced needs" (p14). (emphasis added)

6.13 **This amounts to discrimination in funding practices against equality groups by making negative assumptions about the purpose of these groups which is to voice, represent, advocate and campaign for marginalised sections of society and provide services to meet the unmet needs.**

"It is an insult to say we need to think about cohesion, we are already thinking and doing things about it". Participant in Leicester

“Single groups receiving funding by definition work to increase participation, awareness or take up of services: all these activities increase cohesion”.
Participant in Leicester

“Small independent organisations that help specific communities are at risk. If these organisations go down then we are facing a retrograde situation of increasing social and financial exclusion and segregation.” Participant in Leeds

Narrow understanding of bridging -undervaluing bonding

6.14 The concept of ‘bridging’ is contested and it puzzled many participants at the consultation events. Participants appreciated that bridging can be understood by “building relationships with people different to themselves” (Cohesion Guidance p11). However, its narrow interpretation may lead funders to consider, for example, people from BME communities by a homogenous group of people. The reality is that BME communities are immensely diverse. **Most BME groups, where appropriate to their services and local context, are already providing opportunities for more than one BME community to come together and interact.** To consider BME communities as homogenous group of people would be wrong and misleading in formulating public policy and in providing guidance to public funding bodies.

6.15 The concept of bridging and bonding gets further complicated for equality groups that represent and provide services to communities of interest. A community group providing services to older people from Polish backgrounds may not choose to be ‘outward’ looking to expand their services to older people from Turkish or Indian origin. Their primary purpose is to develop bonding capital in providing culturally sensitive environment to older Polish people who would otherwise be completely socially excluded with no where to go to and interact in their language. **Being a group of older people, how does the ‘progression principle’ apply on this group?**

Participants at the consultation events welcomed greater clarity on this to inform their understanding.

6.16 The same argument applies to groups of people who are yet to be recognised in mainstream service provision and who because of long entrenched prejudice against them would not prefer to bridge with wider communities. They need bonding with people sensitive to their needs and existence. **Lesbian, gay, bisexual and transgender people unfortunately face serious prejudice against them from mainstream society and as a natural response form associations led by and for them to meet the unmet needs.** This is a clear case of ‘bonding’ with unforeseeable progression to ‘bridging’ due to prejudice and the nature of special need.

"I worked with the community grants panel whose remit included funding projects which would promote social inclusion. They told me (proudly) that they had rejected an application from a lesbian group on the grounds that it was not open to everyone and therefore was exclusive. There was no recognition of the need disadvantaged groups have to organise separately in order to move towards equality. If this guidance is adopted I would expect to see more cases like this". Participant in Leeds

6.17 A women's group providing specialist domestic violence services in a local area is another example where progression from bonding to bridging appears flawed. To say that women's groups should also provide services to men is a complete negation of the ethos of these groups. These groups are set up to provide a safe and friendly environment and services to women fleeing from their abusive husbands or another male family member and traumatised by cruel behaviour against them. Although the draft the Guidance states that "..... it [Guidance] should not be taken to place any barriers in the way of support for particular groups where cohesion is not a relevant issue: for example, single group work with victims of domestic violence would not be an area where there should be an expectation of or preference for bridging activities" (p9), a recent research study by Women's Resource Centre on Rape Crisis centres has found that 43% of centres had been challenged about why they are unable to support male survivors.⁹

"This guidance for my organisation – Shama Women's Centre Leicester – spells the writing on the wall. And the writing is CLOSEDOWN. As an organisation which is a frontline grassroots organisation working with women from minority ethnic communities, this guidance will and can be used by funders to withdraw continuation funding..... In the last 2 years the city council has already cut down its support to our organisation by arguing that they do not see the need for 'women's only' centres. This is a clear cut ignorance of the ground reality. Through this guidance I feel the national government is trying to act like a watchdog on voluntary sector organisations without understanding the ground realities." Participant in Leicester

"Hazel Blears says the intention is not for organisations to lose their funding..... She needs to know this is happening". Participant in Leicester

Evidence of need: who can best identify local needs?

6.18 Meeting evidenced needs should be the priority both for voluntary and community organisations and for public and independent funders. Thus far we are in agreement with the Guidance. However, there are other related factors to this principle which makes its implementation impossible.

⁹ Women's Resource Centre (2007) The Crisis in Rape Crisis, (London: Women's Resource Centre)

6.19 Firstly, the Guidance gives prominence to local authorities and other public funders to consider when funding community level activities a “clear case for ... activity to be funded even though it will only involve one group or community?” (p15). Funders should draw out:

- ◆ “whether the group or community in question is being supported by mainstream provision....
- ◆ whether the single group work proposed for funding is genuinely the only way to offer the right skills and knowledge for the delivery of services.....” (p15).

In considering the above, local authorities and other public funders would not be able to identify needs of local communities and needs for services until and unless they work in partnership with small voluntary and community groups. A local authority official participant at the Bristol consultation event, pointed to the fact that **in the face of dramatic change in the demographics of local communities and no updated official data on changing demographics it is nearly impossible for grants officers in local authorities to make these judgements fairly and accurately.**

“We need small local voluntary and community groups to know and assess how communities have changed in local areas and what their needs are. Without these groups, it is impossible for us to identify needs and base any judgments upon them”.

Official of Bristol City Council, participant in Bristol

“The only sensible way of establishing local needs is for local voluntary groups/councils/VCS groups/faith groups to define them and produce local ways of satisfying them. Top down is inappropriate.” Participant in Leeds

“As a user led organisation we have experience, knowledge and contacts on disability”. Participant in Leicester

“User led organisations bring a value that mainstream organisations cannot give”. Participant in Leicester

6.20 Secondly, even though the voluntary and community sector is well placed to evidence needs of local communities, it is not always possible for small equality groups with limited research capacity and infrastructure support. **Government has long been de-prioritising the needs assessment of diverse communities and communities of interest resulting in lack of updated and reliable information and assessments to develop targeted measures.** As HEAR quoted in their response to the Guidance “The Census, for example, to date, has not collected data about refugee status, sexual orientation, transgender status, disability, and collects limited data on ethnicity. Similarly many service providers collect limited data about equality groups”.¹⁰

¹⁰ See Response to the Draft Cohesion Guidance for Funders by ‘HEAR – a Network of equality organisations in London’. To receive a copy, email Barbra@rota.org.uk.

6.21 Thirdly, on the principle of transparency and respect to voluntary and community groups, as supported by the national Compact and its Codes, funders should provide groups with a clear outline of what they consider as 'evidenced need' appropriate to the local context. **Each funding programme should clearly state what would be considered as 'evidenced need' in ways that directs applicant organisations to phrase it accordingly in funding applications.**

6.22 Lastly on this point, **there are fears among voluntary and community organisations of biases and racism on part of funders in considering 'evidenced need'**. Participants at the consultation events strongly felt that partnership working with local authorities and other public funders on the basis of equality and mutual respect is still a distant dream. They argued that it is often lack of transparency, personal favours to few and racism in public funding awards which is a reason behind the abuse of public funds.

6.23 As part of the workshop questions at the three consultation events, participants were asked to prioritise who could best identify needs of the local communities. Among the list of small local voluntary and community groups; large voluntary groups; local councillors; local authorities and private sector, **many respondents chose the local voluntary and community groups as best placed to identify local needs followed by large voluntary groups.**

"Racist officers in public bodies will use this negatively to apply a discriminating policy – they need to be monitored." Participant in Leicester

"We do not trust funders to make balanced judgements around cohesion and issues that they have no specialism in." Participant in Leeds

"What happens when funders ignore the guidance? What about when it is applied unfairly? What is the redress? What are the penalties?" Participant in Bristol

Cohesion Guidance: yet another hit on the voluntary and community sector

6.24 Participants at the three consultation events unanimously felt that the Guidance and the proposed policy on single group funding will have a negative and devastating impact on already struggling equality groups in their pursuit to secure funding from public bodies. **It is a well researched fact that equality groups struggle for funding more than the mainstream groups.** As noted and referenced in HEAR's response to the Guidance, ".....equality groups, for example the LGBT, religion and belief, BAME and women's sectors, are disproportionately under-funded by some funders."¹¹ For example "Women's organisations receive only 1.2% of central government funding

¹¹ Ibid.

and 2.8% of charitable trust funding despite making up 7% of registered charities".¹²

6.25 The following sentiments expressed by individuals representing the equalities' sector validate the researched evidence.

"We are already affected by the guidance. In terms of other external funders Refugee Integration and Employment Service recently went out to tender which Refugee Action lost in the East Midlands – a decision we felt was made on price and not quality. Only specialist services can support our clients because of the specific needs of new arrivals with language, culture, faith etc. we want to ensure mainstream services are accessible and we should build the confidence of our clients to access the mainstream provision, but we are not there yet. If we do not exist cohesion will be negatively affected and there will be increased tensions." Participant in Leicester

"It's another hit on the voluntary sector (including and specifically BME communities). In relation to education:

- ◆ Local council withdrew funding for the voluntary sector a few years ago, resulting in voluntary organisations closing down – especially BME groups
- ◆ The LSC decided not to fund first level and introductory courses. This meant community education being hit and another funding stream for the voluntary sector being hit, as their provision was no longer fundable
- ◆ LSC decided to focus funding on 14-19year olds and reducing funding for adult provision. Much of community delivery was provided to adults, meaning another hit. Adult provision no longer fundable – cannot offer as much provision out in the community
- ◆ Fees being bought in for ESOL course – not everyone can afford these fees = not able to learn English = not able to develop themselves and not being able to progress their lives = remaining on the poverty line

This community guidance will be another hit and affect the voluntary BME sector. This will not help community cohesion but the opposite." Participant in Leicester

"In a climate of insecurity for the third sector, further restrictions in funding (dictates from funders) will have very negative impact. This guidance breaches the compact principles of the independence of the sector and targeted and specific work to be carried out with equalities groups (capacity building with single groups is a staged process. All of the support work we do e.g. with gypsy traveller community could be undone if forced down certain government led paths)". Participant in Leeds

¹² Ibid, quoted Corry, D. Dhami, K. Hudson, I. Moore, K. & Pouwhare, P. (2007) 'Why women-only: the value and benefits of by women, for women services', Women's Resource Centre.

"This policy has started to be implemented NOW. It is marginalising BME groups. The equality agenda needs to come back; we are surprised by this guidance as it is already being underhandedly implemented. " Participant in Leicester

"In the longer term we can now see a situation where the community sector and the equality groups in particular no longer exist in the numbers they are currently present in. This does mark the end of the sector as we know it." Participant in Bristol

Equality groups as solution to a problem

6.26 It was strongly felt and expressed by the participants that the government is failing to recognise the importance of equality groups as agents of social change. **Equality groups have demonstrated an enormous potential not only to help marginalised communities overcome barriers of exclusion but also to challenge the mainstream communities to recognise and respect the difference and positive contribution of all communities living side-by-side.** These groups are vital in challenging the prejudice and in reforming the provision of services that historically have been developed on the basis of uniform understanding of communities' needs.

6.27 Participants stressed that often equality groups are local in nature and closer to the communities they work for. Above all, such groups are generally user led thereby understand better the direct impact of discrimination and disadvantage faced by the communities they represent.

6.28 Because of this intimate understanding of local communities, equality groups are by definition best placed to open dialogue with local communities on social and political issues such as cohesion. Their reach and cultural understanding of communities should be seen as an asset to promote positive civic engagement and not the other way around.

6.29 A participant in Leicester stated that the current economic recession will result in further marginalisation of poor communities. Access to services will be even harder and it is likely that the situation will result in communities feeling stretched and desperate. **In the absence of equality and community groups providing creative opportunities to marginalised groups and meaningful interaction with wider society, threats to cohesion may get serious, much more than the government fears at present.** It is therefore imperative for the government to work closely with equality groups in combating reasons behind the current and forthcoming economic disadvantage leading to social inequalities and segregation among communities.

6.30 The following account further illustrates this argument.

"Community cohesion is important but it is vital that ALL equalities groups contribute to this. BME and other equality groups provide a voice to their community's empowerment and self determination. They contribute to community cohesion and not the opposite. Discrimination is still rife in society and needs to be tackled in equal measure. Marginalising communities by cutting funding to special interest groups will NOT help" Participant in Bristol

"In general, local organisations are best placed to meeting specified needs of people in their area. They also take a holistic approach which is different from the 'one size fits all approach'. Participant in Bristol

"We want small groups to be funded to maintain diverse number of voices essential for community cohesion – do not want there to be more separation and more inequality." Participant in Leicester

"Single organisations are filling niches – stopping funding will expose this". Participant in Leeds

"Why not look at some of the positive work of organisations and their successes and consider how they could be used as models for the future instead of bringing in policy that is likely to destroy them". Participants in Leeds

Mainstreaming services: we are not there yet

6.31 The value, reach, user led experience, empathy, sensitivity to culture and language and beliefs that equality groups offer in the provision of public services to identified sections of communities cannot be replaced by one mainstream often large centrally located organisation. This has long been accepted by mainstream voluntary organisations themselves who often struggle to access to 'hard to reach' communities and in meeting diverse needs with limited specialism. In recognising the government's effort to mainstream equality, Dr Indrajit Singh OBE once said that "despite all this effort, the sad fact is that need continues to outstrip action".¹³

6.32 Participants were also sceptical of government's policy on cohesion as it appears to target small specialist voluntary and community organisations without any mention to large public, private associations and companies that have been winning contracts against voluntary groups in delivering public services. This they believed equals to institutional racism and lack of recognition of the full value of small specialist groups in meeting unmet needs of local communities.

¹³ 'Community Cohesion: The Role of Diversity', NCVO Hinton Lecture 2002 by Dr Indrajit Singh OBE, available at <http://www.ncvo-vol.org.uk/press/speeches.asp?id=2468>.

"Why are big mainstream organisations not being asked to demonstrate what they do towards cohesion – would this not be more cost effective and have greater impact?"

"Why are we not asking large public corporations like the BBC, National Opera House etc what they are doing towards cohesion? We do not seem to be saying this to them as they are not part of the moral panic on terrorism, rising food prices, floods of migration..... it is a very underhanded way of promoting an implicit agenda."

Participants in Leicester

"We are a domestic violence support project that supports 32 women per year. So far 300 women have been supported. Nationally on the multi agency risk assessment conferences (MARAC's), which were introduced 3 years ago, Asian women make up a third of all women who are at high risk. With this guidance projects such as ours will face closure as we have similar projects working with generic communities but in reality only reach a few Asian women. So with this guidance Asian women facing violence in their lives will be isolated, have no understanding of rights and responsibilities, be disempowered and will increasingly miss out on social justice. If mainstreaming is the answer, where is the good practice?" Participant in Leeds

"We are not yet in a place where we can see mainstreaming as an effective alternative to specialist provision.....The specialist sector set up to meet unmet need. Only when a substantial contribution to meeting that has happened will the specialist start making way for mainstreaming initiatives, until then it needs to be on top of it to ensure vulnerable communities do not get left behind." Participant in Leeds

Equality as a principle cannot be blurred with the concept of cohesion

6.33 The Guidance in its tone, language and analysis fails to recognise the principles of equality and diversity. It makes no reference to equalities legislation and makes weak links between the concepts of 'equality' and 'cohesion'. Although the first principle in the Guidance states that "equal life changes is an important part of cohesion – building equality is part of building cohesion as well as vital in its own right" (p11), yet this statement has not been considered in proposing key questions for funders that advise funders to consider when funding community level activities, a need for "... a clear case for this activity to be funded even though it will only involve one group or community?..."(p15). The principle presented here is clearly outwith the question proposed to funders.

6.34 Furthermore, it can also be argued that just as equality leads to cohesion, inequality leads to segregation. Segregation in communities is a result of

entrenched inequalities of opportunities, life chances, sexual orientation, ethnic origin and class differences. This proves that 'cohesion' is a wrong focus of addressing problems of 'segregation'. Inequality appears to be the main reason, yet equality groups challenging inequalities in all facets of life are being targeted by the Guidance in its aim to promote cohesion and integration.

"Equality is a crucial principle which cannot be blurred with the concept of cohesion. If cohesion is privileged over equality, equality will suffer, because it often depends on separate organisations (look at the women's movement, movements around ethnicity and sexuality)" Participant in Leeds

"Just because we stop funding for groups that are meeting needs... it doesn't make the need go away...just makes it more difficult to address." Participant in Leeds

"I do not believe there should be cohesion guidance to funders. This will create confusion among funders and applicants alike. Current equality legislation deals with these issues, to ensure that groups get access to funding on an equal basis. This guidance can also be used in a manner to justify not funding equality groups which will mean the end of certain organisations including my organisation who works with African/African Caribbean people". Participant in Leicester

"I work for a generic infrastructure organisation. Without partner agencies from single community groups the reach of our services would be significantly reduced." Participant in Leeds

"New arrival communities/small groups are not really in the system, there are serious questions about the ability of the larger voluntary sector to effectively advocate and meet their needs. In fact it's the larger voluntary organisations that stand to benefit as they can continue their mainstream work without any regard for minority issues be they around ethnicity, disability sexuality etc. We know that migration is a growing issue in every city and rural area and yet these issues are not addressed in the guidance. We need to get joined up on national policy. We know they have a massive need, we know they are not easily accessible but we don't really know who and where they are. This suggests a great need for specialist provision. Mainstream will not proactively seek to meet these emerging needs and so they will get lost in the system as the problem intensifies. At a time when needs are greater than before the resources targeted at meeting these are in jeopardy". Participant in Leeds

Cohesion Guidance may aggravate segregation

6.35 The characteristics of equality groups include the following features:

- ◆ Representation and voice of marginalised communities,
- ◆ campaigning and political lobbying,

- ◆ user-led research and
- ◆ reach to communities of places, identity and interests

Communities have bonding and trust on some of the long standing and, in case of emerging communities, emerging specialist community groups. The absence of such groups will quite arguably result in exclusion of specific communities whereas needs will remain unmet and poverty, stereotyping of communities by other communities and prejudice may increase.

6.36 The role of equality groups in producing and helping to produce user-led research is important to inform the development of public policy and in delivering accessible and responsive public services. This contribution may be lost in the absence of equality groups.

“In Plymouth there is a massive gap, BME groups already lack voice. BME women need appropriate specialist services and funding which is difficult. Refugee’s communities lack services and have no organisations to meet their needs or advocate on their behalf. A BME worker is being proposed as the solution but this is disproportionate to the need. A new disability group has been disenfranchised by the guidance, where do they go now? These and many other groups exist in Plymouth because of a lack of services. The playing field is not equal making integration impossible. Where are and who are the mainstream service providers that will replace single group provision. What if you have never had a string history of single group funding? Is it business as usual?” Participant in Bristol

“This is a very simplistic measure to address a very complex issue and it will be divisive and not address or meet community cohesion needs or ease community tensions where they exist. Specialist groups/organisations need to be funded to support the excluded or disadvantaged. It’s a knee jerk reaction to terrorism and one size does not fit all. What’s important is a range of good services need to be funded that serve the whole community not just the majority. ” Participant in Leicester

7. Recommendations

Given the feedback from the consultation and also taking into account responses from others within the sector the NEP recommends the following:

7.1 The government should abandon the Guidance to repair the damage already caused. With the help of Local Government Association (LGA), CLG should investigate how local authorities across the country have already implemented the proposals, resulting in a negative impact on equalities groups.

7.2 The government should work with equality groups to guide funders on how to:

- ◆ Include marginalised people and identify need with the help of voluntary and community groups;
- ◆ Meet the equality duties;
- ◆ Use procurement to promote equality;
- ◆ Develop appropriate funding mix – grants, commissioning and investment; and
- ◆ Empower disadvantaged people to develop their own solutions to inequality and discrimination.

7.3 We recommend that CLG, in partnership with Office of the Third Sector, produces an ‘equality and cohesion guidance for funders’, explaining the clear evidenced links between ‘inequality and segregation’ to help them develop funding practices that target inequality in ways that reduce segregation and promote cohesion. The guidance on ‘equality and cohesion for funders’ should be developed in consultation with equality organisations and the Equality and Human Rights Commission (EHRC).

7.4 The Equality Impact Assessment being carried out on the Guidance proposals should include results of the investigation into the impact they have already had. The Equality Impact Assessment should be carried out transparently and with the involvement of equality groups affected by the guidance.

7.5 The following recommendations from the participants further support the above proposed recommendations.

“Good guidance is essential – don’t rush this through until it is right. The cohesion guidance can ONLY work if it matched by separate guidance on equalities funding. The two issues are inter-dependent but not the same.”
Participant in Leeds

“There needs to be a mixed economy of specialist and mainstream provision funded according to the need.” Participant in Leicester

Comments on the response

We would be happy to discuss our response further with the Communities and Local Government and its team responsible to produce this Guidance.

Please contact Isabel Hudson, Head of National Equality Partnership at isabel@wrc.org.uk or on 020 7324 3037 to discuss the response in detail.