

Voice4Change England

Consultation Response

Capacitybuilders' Single Equality Scheme

Submitted to Capacitybuilders

October 2009

Voice4Change England Partnership Members:

BECON (North East BME Network), Black Development Agency, Black South West Network, Black Training and Enterprise Group, Community Development Exchange, Confederation of Indian Organisations, Connections for Development, MENTER (East of England BME Network), MiNET (London BME Network), One North West (North West BME Network), UNI (South East BME Network) and the West Midlands Race Equality Advisory Board.



Building a Thriving Black and Minority Ethnic Third Sector

Voice4Change England response to Capacitybuilders' Single Equality Scheme: A discussion document

1. About Voice4Change England

- 1.1. Voice4Change England (V4CE) is a national body dedicated to strengthening the Black and Minority Ethnic (BME) Third Sector as a positive force for change and which aims to provide a coordinated policy voice for BME groups and organisations. V4CE is a partnership of national BME organisations and BME regional networks. We have successfully acquired a place where our responses to government policies objectively represent the concerns of the BME Third Sector. We aim to continue developing this mutual understanding between the BME-led third sector and government to ensure policies are responsive to BME communities' needs and aspirations.
- 1.2. Voice4Change England is a partner of the National Equality Partnership (NEP). Capacitybuilders has asked the NEP to run the consultation on its Equality Scheme. Voice4Change England has been directly involved in this consultation through the secondment of a member of staff to work with the NEP staff team on this project.

2. Methodology for the Response

- 2.1. Our response is informed by our partnership of national BME organisations and BME regional networks which has a reach of over 6000 BME organisations. To develop our response Voice4Change England took a lead role in organising and attending two consultation events with the BME third sector: the BME Economic Summit in Leicester attended by sub regional and local infrastructure organisations from the East Midlands; and the Regional Race Equality Council Partnership meeting in Bedford.

3. Structure of the response

- 3.1. We have structured our response around the questions asked in the consultation document. We have not answered all the questions and at times have answered several at once. We have made recommendations by directly annotating the proposed Action Plan. Where we have made recommendations we have listed Capacitybuilders' original outcome and action and then added our comments in the right hand column. Where we have recommended additional actions we have labelled them 'new action' and numbered them to fit the existing Action Plan. Please note that we have only included the outcomes and actions where we have made specific comments.

4. Overall comments on Capacitybuilders' Single Equality Scheme

- 4.1. Capacitybuilders' consultation on their proposed Single Equality Scheme is a key opportunity to help strengthen the BME third sector to better meet the needs of communities. The BME sector is recognised as starting from a lower

base in terms of capacity and infrastructure compared to the mainstream Third Sector. At the same time BME third sector organisations continue to feel excluded from traditional third sector structures including those providing capacity building services. Through its Single Equality Scheme, Capacitybuilders' has the opportunity to become a leading funder in equality and diversity, and to support BME third sector organisations to work more effectively in the current challenging environment that includes factors such as: reduction in grant funding; recession; and a shift towards single equalities to the exclusion of the needs of separate equalities strands. **We hope that as identified in action 14.4 Capacitybuilders' will continue to work with strategic partners to maintain engagement with the sector and equality issues and would welcome the opportunity to be involved in this.**

4.2. Single Equalities Approach

Different equality strands have distinctive needs and infrastructure arrangements that cannot be adequately identified or addressed by a single equalities approach. Our research found that amongst BME third sector organisations race is 'perceived to be being diluted by the wider frame of reference emerging with a single equalities agenda'¹. Consultation on the BME Compact Code revealed concern that under a Single Equalities framework equalities are treated homogenously, without recognition of the specific issues and concerns facing different equalities strands. This was reflected at one of the Single Equality Scheme consultation events focused on the BME third sector, where there was a general consensus that a move towards a single equality approach would result in a 'one size fits all' approach.

Recommendation: In planning and implementing its Single Equality Strategy, Capacitybuilders should ensure all equality groups are engaged. Capacitybuilders should ensure that actions allow the distinctive needs of different equality groups to be identified and met.

4.3. Funding of Regional BME Networks

Our regional networks policy position paper² sets out the recent achievements and impact of the BME Regional Networks in terms of provision of: voice; representation; engagement; policy development; evidence collection and research; information and advice provision; networking and partnership development; and capacity building support. Despite the impact the BME regional networks have, significant gaps remain with regards to voice, capacity and infrastructure. Continued investment in the BME networks is required to complete the job which the Government started with the Regional Infrastructure Programme. Currently the West Midlands, East Midlands, North West, and Yorkshire and Humber continue to be the most fragile regional networks, and it is notable that outside of London these areas have the highest BME populations. Several of our regional partners will be

¹ Bridge the Gap: What is known about the BME Third Sector in England', 2007, Voice4Change England, unpublished work. Findings of the full report can be found at www.voice4change-england.co.uk.

² Voice4Change England, 2008, The Continuing Need for Government Support for the Black and Minority Ethnic Regional Voluntary and Community Sector Networks in England, A Voice4Change England position paper.

responding to the Capacitybuilders Single Equality Scheme consultation from a regional perspective and it is essential that their views are heard.

5. Response to consultation questions

5.1. Section 1: People

5.1.1. Do you have any comments on Capacitybuilders' plans to improve its employment practice or anything else in the People section?

We welcome Capacitybuilders' commitment to creating a representative workforce and the proposed steps to collect monitoring data. It is however important that monitoring leads to action where required.

Recommendation

Outcome	Actions	V4CE recommendations
2) Our employees (based in Birmingham) are broadly representative of the West Midlands	2.2) Collate and analyse existing monitoring data collected on staff. Map this analysis to the demographic profile of the West Midlands to gauge representativeness.	This should include an analysis of seniority of staff in relation to diversity.
		2.4) Following data analysis consider what, if any, steps need to be taken to increase workforce diversity including at senior management level.
		2.5) When recruiting staff experience of working in or with the BME third sector should be included in the person specification.
4) All employees to be supported in their development		New action: 4.3) Equality training will be included in annual appraisals and embedded into training and development.

5.2. Section 2: Business

5.2.1. Do you think targeted funding is needed for marginalised groups?

We strongly believe that targeted funding is needed for BME third sector organisations. Targeted capacity building support and the funding to facilitate this is essential to the future of the BME third sector. We have found that capacity building is not a generic skill that can be rolled out to meet the needs of all groups. We have found that specific challenges and capacity

building needs exist for BME third sector organisations and that challenges facing other small organisations may have specific impacts for BME groups. For instance, research by Shared Intelligence³ into procurement and commissioning found that BME third sector organisations shared many challenges with other small organisations. However it also found distinct concerns including: limited understanding of the BME third sector and the communities it works with; institutional racism; perceived lack of trust amongst commissioners of BME TSOs; and lack of engagement with the early stages of the commissioning process.

It is also important to recognise that mainstream support providers continue to fail BME third sector organisations. Our consultation events on the Compact found that that BME third sector organisations continue to feel excluded from traditional third sector structures including those providing capacity building services. Our regional BME networks paper⁴ outlined that the generic third sector networks and infrastructure organisations still do not have the skills, understanding, time, resources or reach to act as an effective or trusted voice for the BME third sector.

5.2.2. If you are an equalities organisation or support equalities groups, what are the key issues for your sector?

Key issues facing the BME third sector include:

- **Tackling racism, inequality and exclusion:** Although outcomes for some ethnic minorities in areas such as housing, education and employment have seen improvements others have seen limited progress and BME communities still face high levels of deprivation and discrimination.
- **Single equalities agenda:** our research found that BME third sector organisations are concerned that there has been a lack of progress on issues of 'race' equality and that race was 'perceived to be being diluted by the wider frame of reference emerging with a single equalities agenda'.
- **Demonstrating value:** the BME third sector is currently undervalued and although Government have withdrawn their draft Cohesion Guidance for Funders which set out 'single group funding as the exception' questions have been raised over the value of the contribution of so called 'single groups' including BME groups.
- **Lack of engagement in decision making processes:** The BME third sector can offer expertise throughout the policy and consultation process but faces several barriers to effective engagement including limited capacity in terms of income, staffing and time and are often excluded from the traditional structures of the voluntary and community sector.

³ Shared Intelligence, 2008, Evaluation of the National Programme for Third Sector Commissioning: Consultation with BME Third Sector Organisations, <http://www.idea.gov.uk/idk/aio/8458905> Accessed: 12/10/09.

⁴ Voice4Change England, 2008, The Continuing Need for Government Support for the Black and Minority Ethnic Regional Voluntary and Community Sector Networks in England, A Voice4Change England position paper.

- **Funding and other support:** The BME third sector is historically underfunded and faces a series of funding challenges including a gradual reduction in government grant funding and marginalisation in the commissioning and procurement agenda. There is also a risk that BME Third Sector organisations will be further marginalised during the current recession.
- **Meeting different needs:** BME communities are not homogenous: race cuts across all identities. Therefore different BME third sector organisations have different expertise and needs.

It is important that the current limited capacity of the BME third sector is recognised and that investment is made in BME third sector infrastructure at all levels. Key areas for support and capacity building identified by the BME third sector include:

- Access to information including robust data and research.
- Partnership working.
- Networking.
- Training of leaders.
- Finance.
- Fundraising and sustainability.
- Governance.
- Performance management including monitoring and evaluation.
- HR and volunteer management.
- Training and investment in collaborative working.
- Management.

BME third sector organisations also play an important role in helping frontline BME organisations to access mainstream services. This has been evidenced through larger mainstream providers seeking the help of small organisations in effectively identifying and meeting the needs of specific communities. Voice4Change England plays this role for several of the National Support Service workstreams.

Recommendations

We strongly support Outcome 5, that ‘Capacitybuilders provides targeted investment to support marginalised communities where appropriate’ but agree with NEP’s analysis that Action 5.1 is currently inadequate to achieve this. We suggest the following changes and additions:

Outcome	Actions	V4CE recommendations
5) Capacitybuilders provides targeted investment to support marginalised communities where appropriate.	5.1) Capacitybuilders ensures that the independent evaluation (2008-11) looks at the impact and outcomes of our investment in the Improving Reach programme and the Equality NSS workstream. These findings will be	Add: the evaluation will be informed by regional and national BME support organisations.

	published and freely available.	
		New action: 5.2) Capacitybuilders provides targeted ring-fenced funding for the BME third sector to ensure specific capacity building needs are met. This should include working with BME infrastructure to ensure they are better resourced and skilled to meet the needs of frontline organisations.
		New action: 5.3) Capacitybuilders supports BME infrastructure organisations to improve access to generic capacity building opportunities for BME third sector organisations.
		New action: 5.4) Capacitybuilders will ensure that application and assessment processes clearly enable BME third sector organisations to bid for mainstream funding programmes in addition to ring fenced funding set aside for specific identified needs.

5.2.3. How do you think Capacitybuilders can promote equality and tackle discrimination through all its funding programmes?

As well as providing targeted funding it is also essential that Capacitybuilders ensure mainstream funding programmes are both delivered by and reach BME third sector organisations. We support outcome 6: mainstream grant programmes deliver benefits to all parts of the sector, including equality groups, but make the following recommendations to ensure this can be achieved.

Outcome	Actions	V4CE recommendations
6) Mainstream grant programmes deliver benefits to all parts of the sector, including equality groups.	6.1) Establish the profile of new applicants for funding. From this we will assess the extent to which equality groups are: a) bidding for funding and; b) successful in their applications.	We support NEP's recommendation that these findings will be published and made freely available.
		New action: 6.3) Capacitybuilders' will require all funded organisations

		to have equality and diversity policies.
		New action: 6.4) Capacitybuilders' will support mainstream grant holders to better understand equality and diversity. For instance through race equality training.
		New action: 6.5) Capacitybuilders' will require grant holders to monitor the engagement they have with BME third sector organisations.
		New action: 6.6) Capacitybuilders' will promote grant holder good practice in equality and diversity.
		New action: 6.7) Capacitybuilders will ensure that application and assessment processes clearly enable BME third sector organisations to bid for mainstream funding programmes in addition to ring fenced funding set aside for specific identified needs.
7) The design process for all future investment programmes will fully consider the potential impacts on equality groups	7.1) An equality impact assessment will be conducted prior to the introduction of new funding programmes. All assessments will be published and made freely available.	We support NEP's recommendation that Capacitybuilders' should follow best practice on involvement and consultation on its equality impact assessments.

5.2.4. Do you feel you have had a positive experience when engaging with Capacitybuilders?

Outcome	Actions	V4CE recommendations
8) All stakeholders engaging with Capacitybuilders have a positive experience	8.1) Conduct an impact assessment on our external communication strategy.	We support NEP's amendment that this should read 'Conduct an <i>equality</i> impact assessment on our external communication strategy <i>and mechanisms (e.g. website)</i> '.
		New action: 8.3) Capacitybuilders will clearly communicate information about their different funding programmes in a range of

		accessible formats.
		New action: 8.4) Capacitybuilders will ensure application processes are clear and that the expectations of application questions are clearly explained.

5.2.5. How do you think Capacitybuilders should use its 'purchasing power' to promote equality and tackle discrimination?

We support Capacitybuilders' aim to use its purchasing power to promote equality and tackle discrimination. As well as requiring its suppliers to meet equality and diversity standards, Capacitybuilders' should make sure that BME groups themselves can compete for tenders.

Outcome	Actions	V4CE recommendations
9) Capacitybuilders' commissioning and procurement practices are fair and equitable to all applicants who fit the required criteria		New action: 9.3) Capacitybuilders will ensure that the size and scope of commissioning does not exclude BME and other equality organisations from bidding. It will achieve this by targeting appropriate sectors according to the desired outcomes.

5.3. Section 3: Governance

5.3.1. We support Capacitybuilders' intended outcomes under Governance and are pleased that it sees the importance of embedding the Single Equality Scheme throughout the organisation. We have made several recommendations to ensure that the actions are better able to achieve the outcomes

5.3.2. The consultation also specifically asks about our experience of the equality impact assessment on the new funding programme 'Real Help for Communities'. We were concerned that this programme did not follow good practice by not publishing the equality impact assessment alongside the consultation. We highlighted this in our response to the consultation and followed this up with the then Minister Kevin Brennan MP. When the assessment was published we were concerned that a key source of data used was the National Survey for Third Sector Organisations (NSTSO). The dataset for the NSTSO is based on details supplied by Guidestar and only includes incorporated or registered third sector organisations. This excludes many BME third sector organisations who are unregistered community groups

and as such 'below the radar'. This is exacerbated by the fact that data on the BME third sector is currently inadequate

Outcome	Actions	V4CE recommendations
10) Capacitybuilders Board comprises members from diverse backgrounds		New action: 10.2) When recruiting new Board members Capacitybuilders will advertise board membership opportunities widely and targeted to the BME and equality sector. Where necessary positive action measures will be taken to recruit board members from diverse backgrounds.
12) The principles of the Single Equality Scheme become embedded throughout the organisation	12.2) All staff and Board members will undergo equality training.	We support NEP's recommendation that training should include not only training on equality and human rights issues and legislation, but also on equality groups in the third sector.
13) Capacitybuilders decisions are informed by the best possible data	13.2) Equality impact assessments will be conducted prior to the introduction of all new policies or programmes.	We support NEP's amendment to 13.2 that 'Capacitybuilders will follow best practice on involvement and consultation on its equality impact assessments. All assessments will be published and made freely available'
14) Capacitybuilders will communicate progress in implementing the Single Equality Scheme	14.2) Progress reviews will be overseen by the Single Equality Scheme Internal Working.	14.2 ADD: An important part of the review should include external feedback including from BME and equality organisations.

6. Comments on the response

We would be happy to discuss our response further with Capacitybuilders.

Please contact Jemma Grieve, Policy and Research Officer, Voice4Change England at jemma@voice4change-england.co.uk or on 0207 843 6128 to discuss the response in detail.

For more information about Voice4Change England's activities, please visit www.voice4change-england.co.uk.

Our postal address is Voice4Change-England, c/o BTEG, 2nd Floor Lancaster House, 31-33 Islington High Street, London, N1 9LH.