Voice4Change England

Consultation Response

<u>CLG Tackling Race Inequalities</u>

Submitted to the Communities and Local Government (CLG)

May 2009

Building a Thriving Black and Minority Ethnic Third Sector

Voice4Change England response to CLG Tackling Race Inequalities: A discussion document

1.   About Voice4Change England

Voice4Change England 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 which has a reach of over 6000 BME organisations. 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.

2.   Tackling Race Inequalities consultation

Voice4Change England welcomes the opportunity to influence CLG's Race Equality Strategy both through our response and through attendance at CLG's consultation events. Against a backdrop of the Single Equalities agenda and a move towards mainstreaming, the Race Equality strategy is now more than ever essential in overcoming the continuing racism and structural inequalities that prevent BME communities achieving equal outcomes.

National government is the right place for a Race Equality Strategy to set the framework and establish the importance of tackling race inequalities. However a successful strategy will need flexibility to respond to local and regional needs. It will engage with BME communities and the third sector organisations that represent and support them, ensuring that they are involved from policy development to frontline delivery.

> *'The strategy will be helpful in bringing in activities across all aspects of government. This is important because we don't want it to sit alone and be ignored/sidelined.'* V4CE consultation event participant

2.1. Methodology for the response

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: attended the Cambridge and London CLG listening events; held our own consultation event with partners and a delegation of sub regional and local infrastructure organisations from the East Midlands; and launched an online questionnaire. We also prepared a briefing on the consultation to better inform the BME third sector, and many of our partners will be submitting their own responses to CLG.

2.2. The consultation process

Voice4Change England welcomes CLG's consultation on the Race Equality Strategy. However, **we were concerned at the relatively low BME third sector representation at the events we attended and difficulties with engaging in CLG's consultation process were raised at our consultation event largely around capacity issues**. As recognised in the BME Compact Code (section 5) many BME third sector organisations are small and under resourced. CLG should recognise that extra support may be needed to ensure the engagement particularly of frontline groups. This is particularly the case where local or regional infrastructure is absent or under resourced.

In moving forward CLG should provide clarity over the scope of the Race Equality Strategy. What will it inform? How does it link to other strategies? And what influence will it have over Local Authorities. Several organisations felt that the consultation document was too broad to effectively respond. **CLG should ensure it continues to engage with the BME third sector as it develops the Race Equality Strategy, and that where necessary it consults further on the detail.**

We note that the **Tackling Race Inequalities Fund** has been launched and welcome continued support for Strategic Partners grantees such as Black Training Enterprise Group [BTEG] who have an important national role to play on BME employment, education, training and social enterprise. **We would like clarity over how the consultation will influence the fund and assurance that our views will be taken into account throughout policy development and not just in its implementation.**

A successful race equality strategy must build on lessons from the past. So whilst it is right to celebrate successes under *Improving Opportunity, Strengthening Society*, this must not be at the expense of recognising the inequalities that persist. It was unclear from the consultation document whether an evaluation had been undertaken on the existing **Race Equality Strategy** and how the lessons learnt from this have been used. We feel this is essential to getting the new Race Equality Strategy correct.

2.3. About our response

In our response (below) we have first presented our **18 key recommendations** under 5 headings :**The continuing need for a Race Equality Strategy; Inclusivity; Building on existing legislation; Key role of the BME Third Sector and Implementing the Race Equality Strategy,** before moving on to detailed discussion. We have also submitted our recent publication **Eliminating Racism: Are we there yet?** as part of our evidence base. We have not followed the question format as set out in CLG's discussion document but to ease analysis have drawn out the key related questions where appropriate.

3. Voice4Change England Recommendations

3.1. The continuing need for a Race Equality Strategy

- **Recommendation 1:** Government must have a distinct Race Equality Strategy to identify, prioritise and tackle the continuing inequalities and disadvantage experienced by BME communities. This should be driven by CLG with Grade 3 Race Champions to drive progress in each Department (similar to Compact Champions).

- **Recommendation 2:** Race equality should maintain a distinct profile rather than being merged into a wider programme on disadvantage. Although there are blurred boundaries between the effects of race inequality and other drivers of disadvantage the concept of the 'ethnic penalty' demonstrates that race inequality does have a separate effect. In addition Government should recognise that racism and the effects of inequality cut across social class.

- **Recommendation 3:** Government should move away from a discourse that positions tackling race inequality and overcoming class inequalities as opposing or exclusionary. This discourse sets BME communities and White working class communities against each other and avoids tackling the real issues faced by working class communities such as unemployment and poor housing.

- **Recommendation 4**: The priority areas for the Race Equality Strategy should remain as they are unless further research identifies additional benefits of the 10 freedoms approach. Regardless of the priorities identified it is essential that Race Equality is integral to all areas of public service delivery and embedded in all public authorities.

3.2. Inclusivity

- **Recommendation 5:** The Race Equality Strategy should be inclusive not exclusive. The current terminology of 'visible' ethnic groups is divisive and risks marginalising some BME communities.

3.3. Building on existing legislation

- **Recommendation 6:** Government should ensure we do not lose the gains made in legislation for tackling race inequality. Race Equality Impact Assessments should not be levelled down through the Single Equality Duty and it should be recognised that institutional racism persists through continuing racism and structural discrimination.

3.4. Key role of the BME third sector

- To ensure the Race Equality Strategy is successful it is essential that Government and other public authorities work with BME third sector organisations.

- **Recommendation 7**: CLG should invest in sustainable funding for the BME third sector including infrastructure organisations at national, regional, sub regional and local levels, to promote race equality.

- **Recommendation 8**: CLG should work in partnership with the Office of the Third Sector on how to promote equality in the use of procurement in ways that support and strengthen small BME and generalist voluntary and community organisations.

- **Recommendation 9**: CLG should ensure BME third sector engagement in developing and implementing the Race Equality Strategy. The approach to consultation should be Compact compliant, recognising the particular challenges that BME groups face as identified in section 5 of the BME Compact Code.

- **Recommendation 10**: 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'. The Race Equality Strategy should clearly recognise the value of specialist services for targeted need and make provisions for their continued funding. It should make clear that equality law not only provides opportunities to deliver specialist services but sometimes requires them.

- **Recommendation 11:** Government should take a two-pronged approach to meeting the needs of BME communities through public service delivery by mainstreaming race equality but also by recognising the value and continuing need for BME community specific services.

- **Recommendation 12:** CLG should revisit its policy position on cohesion to make better links with equality and to recognise the essential role of the BME third sector in promoting equality.

3.5. Implementing the Race Equality Strategy

- **Recommendation 13:** Government's race equality strategy should provide a national framework but allow flexibility for needs to be identified at a local and regional level in consultation with BME third sector organisations and communities. This will allow local needs and the needs of different BME communities to be met.

- **Recommendation 14**: A National Indicator specifically on Race is needed to ensure the Race Equality Strategy is implemented at a local level.

- **Recommendation 15**: Data should be disaggregated for all relevant National Indicators to effectively measure race equality across a range of social and economic indicators and to design and develop appropriate policies and services.

- **Recommendation 16**: Government should ensure all public sector bodies fully understand their obligations under the Single Equality Duty and Race Equality Strategy.

> Where bodies are not reaching the requirements of the Race Equality Strategy appropriate enforcement action needs to be taken. There need to be clearer lines for redress for BME third sector organisations experiencing difficulties. This needs to take into account the limited resources many BME third sector organisations have.
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> - **Recommendation 17**: The Race Equality Strategy should include measures to ensure that the public service workforce reflects the communities they serve.
>
> - **Recommendation 18**: CLG should ensure that public authorities do not contract out of their race equality duties.

4. Is a race equality strategy still needed?

A race equality strategy remains essential. Voice4Change England's new booklet *Eliminating Racism: Are we there yet?* analysing the state of the BME Third Sector ten years on from the Stephen Lawrence Inquiry (attached) identifies that even with the Stephen Lawrence Inquiry, subsequent legislation and BME third sector activity, progress towards race equality in British society has been mixed. 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 compared to their 'White British' counterparts.

Despite ongoing disadvantage 'a new narrative about race and ethnicity in Britain is forming that makes for an uncertain future for BME groups and organisations'[1]. **Participants at the Voice4Change England consultation event commented that race equality had been diluted by the Single Equalities agenda and that there is now an even greater need for a Race Equality Strategy.**

Government should ensure that we do not lose the gains made in legislation for tackling race inequality. Race Equality Impact Assessments play an important role in prioritising race equality and should not be levelled down through the Single Equality Duty (see section 7.2). **We are concerned that institutional racism is disappearing from the policy agenda.** 'Institutional racism' still poses a present and constant danger to the life chance of BME communities in the UK (Rupert Daniel, Black South West Network) and it is recognised that 'sustained leadership from the top and repeatedly acknowledging 'institutional racism' can make a huge impact both for organisations and BME communities' (Richard Stone, Advisor to the Stephen Lawrence Inquiry).[2]

The demographic need for a Race Equality Strategy was highlighted at the Voice4Change England consultation event. With increasing BME communities in Europe it was seen as a disservice to all communities not to think of the needs of BME communities. Research commissioned by MENTER found that in the East of England 'the growth in the BME population is significant in comparison to the White British population…largely due to a younger age profile and higher birth rates'. The report highlights that 'this sustained

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[1] Voice4Change England, 2009, Eliminating racism: are we there yet?
[2] Voice4Change England, 2009, Eliminating racism: are we there yet?

demographic change will require significant policy adaptations in order to ensure the inclusion, and economic contribution of the growing BME population'[3].

4.6. Who does the race equality strategy include?

In the discussion document CLG refer to Black, Asian and minority ethnic groups as 'people from 'visible' ethnic groups such as Black, South Asian and Chinese people and also Gypsies and Irish Travellers'. It is unclear what CLG mean by 'visible' ethnic groups or whether the race equality strategy is intended to cover 'racial groups' as defined in the Race Relations Act 1976 as a 'group of persons defined by reference to colour, race, nationality or ethnic or national origins, and references to a person's racial group refer to any racial group into which he falls'.

Participants at our consultation event discussed whether CLG used visible to refer only to colour. Delegates were concerned that this could be used to exclude some BME communities, for instance, one delegate described how many Eastern European communities which their organisation worked with said they feel invisible until language barriers made them visible. Another questioned how Irish or Traveller could be identified as visible unless we are including aural in visible.

5.   Importance and distinctiveness of race equality

- How can we make sure that race equality maintains a distinct profile within a wider programme of work to address multiple disadvantage?
- How should a race equality strategy focus on addressing disadvantage linked with race and ethnicity, as opposed to mainstream programmes?
- Can we disentangle the role that race and ethnicity plays in driving disadvantage from other factors, e.g. socio-economic status?
- How can government strategies to address social mobility for all also address the effects of historic and residual racism?

5.1. Public policy is moving away from a focus on individual equality strands to an all encompassing approach to equality. Voice4Change England's research[4] 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'. Consultation on the BME Compact Code[5] revealed concern that under a Single Equalities framework equalities are treated homogenously, without recognition of the specific issues and concerns facing different equalities strands. Furthermore 'there was a strong consensus that the notion of equality had often been used (whether intentionally or not) by organisations to marginalise

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[3] Centre for Social Inclusion, 2007, BME access to skills, employment and enterprise services in the East of England.

[4] 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.

[5] Voice4Change England, 2008, Response to the Compact Debate.

the BME third sector'.[6] Participants at our consultation event also identified a risk of losing clarity of evidence in a move towards single equalities, limiting the ability of policy makers and practitioners to respond to identified needs. **Given these concerns we are pleased to see Government's continuing commitment to a Race Equality Strategy. It is important that CLG takes this opportunity to put Race firmly on Government's agenda.**

5.2. Race and multiple disadvantage

Race remains linked to indicators of disadvantage. As CLG's latest progress report shows[7] 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. Research by the Joseph Rowntree Foundation found that 'all identified minority ethnic groups had higher rates of poverty than the average for the population'[8].

The focus on disadvantage in CLG's consultation document is welcome: 'the Race Equality Strategy must address and meet the needs of the most disadvantaged sections of BME communities who are constrained by their race and class in society' (participant at V4CE consultation event). However it should also be recognised that racism and the effects of inequality cut across social class.

5.3. The 'ethnic penalty'

Blurred boundaries exist between the impact of racial inequality and other factors such as socio-economic status especially given the higher likelihood of ethnic minorities experiencing disadvantage. However **evidence of the 'ethnic penalty' can help us to recognise disadvantage driven by racial inequality.** The 'ethnic penalty' is where despite allowing for other characteristics, BME individuals achieve poorer outcomes than their White counterparts. For example, the Joseph Rowntree Foundation found that 'when the contribution of individual characteristics (such as fewer qualifications) to employment disadvantage is analysed, there are some unexplained outcomes. For example, Black Africans have very high rates of higher education qualifications, but also suffer from high rates of unemployment and poor occupational outcomes.'[9] In a report commissioned by MENTER, discrimination is described as a significant part of the ethnic penalty and a major barrier preventing BME groups from gaining positive outcomes in skills, employment and enterprise. They quantify discrimination as complex and multifaceted; perceived and real; direct and indirect (see their report for more information on ethnic penalty)[10].

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[6] Commission for the Compact, 2009, BME and equalities issues in the Compact: a report of events held in November 2008 and January 2009.

[7] CLG, 2009, Improving Opportunity, Strengthening Society.

[8] Platt, L., 2007, Poverty and Ethnicity in the UK, Joseph Rowntree Foundation.

[9] Platt, L., 2007, Poverty and Ethnicity in the UK, Joseph Rowntree Foundation.

[10] Centre for Social Inclusion, 2007, BME access to skills, employment and enterprise services in the East of England.

5.4. The White Working Class

> *'All the most disadvantaged groups must be helped to improve their joint lot. Competition between them, real or imagined, is just a distraction.'* Gavron, K in Sveinsson (ed) 2009, Who cares about the White Working Class, Runnymede Trust.

The consultation document talks about the challenges facing disadvantaged White communities. It sets out the Government's commitment both to challenge racial prejudice and ensure that colour or ethnicity is not a barrier to opportunity and to focus on alleviating poverty and improving social mobility for all in Britain. **We support these aims but are concerned that recent discourses have positioned them as opposing or exclusionary, setting BME communities and White working class communities against each other.**

A recent collection of essays by the Runnymede Trust[11] explores these issues in detail. It explains that 'the interests of the white working class are habitually pitched against those of minority ethnic groups and immigrants, while larger social and economic structures are left out of the debate altogether'. It argues that in order to address white working class disadvantage it needs to be understood as a class rather than an ethnic disadvantage: 'by stressing the *whiteness* of the white working class, the class inequality of other ethnic groups also slips from view. This sidesteps the real issue of class inequality, focusing on how disadvantaged groups compete for scarce resources, rather than exploring how that scarcity is shaped in the first place'[12].

> *It is important to remember that the working class are not disadvantaged because they are white and that class and race are separate identifiers. To propose, that if it was not for the fact of their whiteness; the working class would some how have their conditions reversed is misleading. It undermines and distracts from the real issues that working class people face, for example, unemployment, poor housing, poverty and a lack of access to assets and capital, which is the root cause of that class disadvantage. And also makes it harder to address the issue of racial discrimination.* Voice4Change England partner.

5.5. Multiple discrimination

Race is a cross cutting issue cutting across all other equality strands. One of the opportunities of the Single Equality agenda is to tackle intersectional or multiple forms of discrimination. The legal review of the BME Compact code cites that in the U.K. Pakistani and Bangladeshi women are at very high risk of disadvantage in the work place experiencing a more significant pay gap than other women and higher levels of unemployment, placing them in a different position to other women[13]. Current equality law is difficult for those suffering

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[11] Sveinsson (ed) 2009, Who cares about the White Working Class, Runnymede Trust.

[12] Bottero, W. in Sveinsson (ed) 2009, Who cares about the White Working Class, Runnymede Trust.

[13] Monaghan, K, 2008, An Independent Legal Analysis of the Compact Code of Good Practice on Relations with 'BME' Voluntary and Community Organisations, for the Commision for the Compact.

intersectional discrimination to negotiate. The Single Equalities Act will go some way to addressing this but it should also be recognised in Government's Race Equality Strategy.

6. What should the Race Equality Strategy tackle?

- Is there a need for a separate strategy to tackle race inequality? If so, what should the priorities be?
- What practical measures should we be taking to address disadvantages experienced by different Black, Asian and minority ethnic groups?
- Should we expand our policy areas? If we do, do we risk diluting the focus on the five public service areas mentioned above?
- Which are the priority areas for Government action on race equality? What responsibilities are there for people from all communities in modern Britain, to others and themselves?

6.1. What policy areas should be included in Race Equality Strategy?

Amongst BME third sector organisations it was generally felt that the existing Race Equality Strategy priority areas: education; the labour market; the criminal justice system; housing; and health were adequate. If CLG does move towards using the 10 Freedoms identified by the Equalities Review, further research is needed to identify the added benefits this brings and whether the current priority areas will limit the success of a future Race Equality Strategy.

BME third sector organisations often develop in response to need and gaps in mainstream provision. They therefore provide a good starting point in identifying key areas the Race Equality Strategy should support. Voice4Change England's national mapping study on the scope and size of the BME third sector found organisations delivering services including:

- Cultural, social and economic support programmes for younger, older and disabled people;
- Advocacy and advice on legal issues, immigration, race equality and equal opportunity in employment issues;
- Health services including support programmes on mental health issues and to help communities accessing mainstream health provision;
- Welfare and economic support services;
- Supplementary schools education and training;
- Opportunities to learn and practice ethnic arts and cultural education;
- Day care community centres;
- Language support and adult literacy skills etc.

Regardless of the priorities identified it is essential that race equality is integral to all areas of public service delivery and embedded in all public authorities. There also needs to be flexibility for needs to be identified at a local level in consultation with BME third sector organisations and communities.

6.2. Experiences of different BME communities

A successful race equality strategy needs to move away from a 'one size fits all' approach to targeted help addressing the different needs of particular groups. In particular Voice4Change England consultation participants highlighted the importance of identifying different needs of recently arrived and settled communities.

> 'Well established communities such as the Black and Asian communities in Luton, have very different characteristics to newly established communities e.g. White migrants from Poland and Eastern Europe – many of whom are based in rural areas. This difference can extend to the respective communities' needs, for example, in seeking help in starting or growing a business, or in taking a language course'. Centre for Social Inclusion, 2007, BME access to skills, employment and enterprise services in the East of England.

It is also important to recognise that race is broad and cuts across all identities. This may lead to different needs for different members of the same BME community (see 5.6 on multiple discrimination).

We welcome CLG's recognition that BME communities are not homogenous and that not all communities are in the same position. However we are concerned that whilst the devolution of local decision making and personalisation agenda provide a good opportunity to identify and meet the needs of different BME communities, at the same time commissioning and procurement and the single equalities agenda are resulting in a 'one size fits all approach' (see section 7.1.1 for details).

6.3. Responsibilities of communities

Communities have a key role to play in implementing the strategy. Participants at the Voice4Change England consultation event suggested that although the demographic map is in constant flux Government can future proof its strategy by ensuring that communities are the catalyst for change. This requires resources and buy-in from BME communities. There are still inequalities in the ways communities are engaged and represented. (See section 8.1 on the BME third sector).

7.   Key themes for race equality

7.1. Public service delivery and mainstreaming

7.1.1. Inadequacy of mainstream services

Devolution of local decision making and the personalisation agenda provide a good opportunity to identify and meet the needs of different BME communities. Despite this recent years have seen a general trend to 'mainstream' equality and move away from self-determination and empowerment of BME third sector organisations where marginalised communities come together and develop their own solutions to the discrimination they face.

Instead preference is being given to large generic service providers as they are assumed to meet the needs of all communities with a standard provision of services. This has been particularly seen through commissioning and procurement which has marginalised BME third sector organisations in favour of large generic service providers.

7.1.2. Role of specialist services

BME specific services have developed in response to the failure of mainstream services to meet the needs of BME communities. They provide services sensitive to cultural, religious and linguistic needs that mainstream services often overlook and reach communities that other providers label 'hard to reach'. Voice4Change England's consultation participants particularly felt that those from disadvantaged ethnic minorities would go to their own communities for help and support. Voice4Change England's case study report[14] on BME specialist services demonstrates their value in terms of: meeting local needs; empowering users; creating bridging social capital; and a wider contribution to social cohesion.

> *'The cultural sensitivity, understanding and flexibility is not always available through other agencies. Because the organisation is needs-led, the client/customer always feels their needs come before the running of the service i.e. we fit in with them wherever possible!'* Participant at V4CE Cohesion Guidance for Funders consultation event, Manchester, March 08.

The legal review of the BME Compact Code[15] identifies that not only do opportunities exist in equality law to create and deliver community (BME) specific services but that sometimes a requirement arises in equality law to create and deliver community (BME) specific services. Although proposals in the Cohesion Guidance for Funders on 'single group funding as the exception' have been withdrawn we are concerned that these proposals have confused both the third sector and funders over what can and should be funded and does not explain the value and legal requirement for BME specific services to meet targeted needs. **The Race Equality Strategy should clearly recognise the value of and legal opportunity to deliver BME specific services and support their continued role.**

7.1.3. Mainstreaming

As well as meeting the unmet needs of diverse communities, BME third sector organisations play an important role in helping communities to access mainstream services. By producing user-led research, BME third sector organisations can inform the policies and activities of mainstream providers to better develop their programmes in a responsive and cost effective manner. This has been evidenced through larger mainstream providers seeking the help of small organisations in effectively identifying and meeting the needs of local communities.

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[14] Voice4Change England, 2008, Discussion Paper 3: Evidencing the value of the BME Third Sector.
[15] Monaghan, K, 2008, An Independent Legal Analysis of the Compact Code of Good Practice on Relations with 'BME' Voluntary and Community Organisations, for the Commision for the Compact.

To meet the needs of BME communities **Government needs to take a two-pronged approach to meeting the needs of BME communities through public service delivery by mainstreaming race equality but also by recognising and supporting the value and continuing need for BME community specific services.** In an ideal world, mainstreaming equality in the provision of public services would be the goal. However, we do not live in an ideal world and discrimination against minority ethnic communities still exists where mainstream providers are failing to respond to a diverse population.

7.2. Community empowerment

- How can we encourage more people from Black, Asian and minority ethnic backgrounds to get involved in public life and in volunteering?
- What are the main barriers to civic participation and representation that need to be addressed?

Volunteering underpins the BME third sector and many organisations can only exist due to the support of volunteers. However, whilst 'BME organisations have access to a wide range of communities and individuals who are passionate about changing the BME experience for the better. More support is needed to nurture this motivation for self help which exists' (V4CE Online questionnaire respondent). **Volunteering is not fully recognised and support is underdeveloped within the BME Third Sector. It is also important to recognise that as identified in the BME Compact Code (section 9) there is a different experience of volunteering in the BME sector compared to that of the mainstream voluntary sector and Government support for volunteering needs to meet these differing needs.**

7.3. Cohesion

- What more can the Government do to help communities recognise and celebrate the strengths that come from diversity and the values we have in common?

V4CE responded strongly to CLG's draft Cohesion Guidance for Funders stating that 'we fundamentally opposed the rationale for the guidance, which is based on the premise that funders award single group funds as 'the exception rather than the rule''. **We are pleased that CLG have followed our call to withdraw the guidance but remain concerned by Government's cohesion policy as demonstrated in the Cohesion Delivery Framework which we feel:**

- **Makes weak links between equality and cohesion;**
- **Creates confusion by presenting the Community Cohesion Impact Assessment and Community Conflict Prevention Tool with no reference to the legal requirement to conduct Race Equality Impact Assessments;**
- **Risks the onus falling more heavily on specialist groups to justify themselves and prove they are not having a negative impact on cohesion.**

Voice4Change England's Partners and many frontline BME third sector organisations view the role of the BME third sector as fundamental in promoting a cohesive and equal British society with a great respect to the diversity of British people. We advocate that meeting the needs and fighting against discrimination and disadvantage disproportionately faced by BME communities is the only way to promote integration and cohesion. Progress towards equality of opportunity and rights for all communities is progress towards a cohesive multicultural society.

7.4. Global economic downturn

- What should the Government be doing to ensure that the gains in Black, Asian and minority ethnic employment, and the narrowing of the employment gap are not reversed during a recession?
- How do we ensure that people from Black, Asian and minority ethnic communities have the skills to fully participate in the post downturn economy?

A lack of resources already hinders the capacity of BME Third Sector organisations to meet the full range of needs of BME communities. Any further adverse impact on this position as a result of the recession is likely to lead to the loss of vitally needed support to people often marginalised and discriminated against in our society. Government should recognise that the impact of the recession on race equality will be felt in areas other than employment for example around advice and counselling services.

The Government needs to help the sector by creating an environment where we can maximise the opportunities that might arise in the recession. For example, if skilled workers are wanting to improve their re-employment options by volunteering for BME Third Sector organisations then the Government should acknowledge that this is a positive social activity and ensure that welfare polices support rather than prevent this from happening.

However volunteering should not be seen as an alternative to narrowing the paid employment gap and work is still needed to ensure that the employment gap for BME communities is not widened. In particular we would like to see specific measures introduced to support BME women to gain training to support them in getting jobs. This support must recognise their needs around childcare and their role in the family. The training opportunities should look beyond traditional employment and provide advice on home working and starting social enterprises.

For a more detailed response to the impact of the recession please see Voice4Change England's response to the Government's Action Plan for Third Sector organisations. Voice4Change England will be holding a conference in partnership with BTEG in October to explore the impact of the recession on BME third sector organisations and welcomes CLG's engagement in this. In addition it is important that public policy is responsive to the research being carried out by the Equalities and Human Rights Commission and the Department for Work and Pensions on the impact of the recession on ethnic minorities.

8. Partners in achieving race equality

8.1. The role of the BME Third Sector

> • What role does the voluntary and community sector have to play in prioritising race equality at the local level?

The BME third sector plays a key role in tackling race inequalities through a range of activities as discussed in section 6.1. According to research conducted for the Joseph Rowntree Foundation (JRF) in 2001, BME organisations meet the needs of BME communities 'to a much greater extent than the voluntary sector as a whole.' They also play an active role in advocating changes in the policy and practice on the part of mainstream service providers.[16]

> *'BME third sector organisations bring a history of experience and practical evidence of the impact of racism which needs to put them at the heart of race equality interventions'.* V4CE online questionnaire respondent.

We believe that third sector organisations are best placed to identify local needs as they are located locally at neighbourhood levels. Organised and led by local residents, they often enjoy the trust and confidence of communities in sharing distinct needs and demanding appropriate services. Furthermore, the Community Groups Compact Code gives priority to the sector in determining local priorities and decisions about delivery of services and support to communities at a local level.

It is important to recognise that the BME third sector is not homogenous and that different BME third sector organisations have different expertise. Whilst some focus on BME communities others work across both mainstream and BME communities.

To ensure that the Race Equality Strategy is successful it is essential that Government and other public authorities work with BME third sector organisations. However the sector faces several barriers particularly around:

• **Funding and other support**: The BME third sector has been historically under-funded compared to the mainstream third sector and is facing a series of funding challenges including a gradual reduction in government grant funding for its services and activities and marginalisation in the commissioning and procurement agenda.

> *'Due to lack of funding there has over a period of five years been a decline of BAME organisations whose knowledge and understanding of cultural issues have been eroded or totally diminished preventing sustained growth within the ethnic community.'* Voice4Change England online questionnaire respondent.

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[16] 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.

- **Consultation and engagement**: 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. In addition 'many BME voluntary and community organisations continue to be excluded from the traditional structures of the voluntary and community sector. This often results in exclusion from engagement with Government'[17]. See also section 8.4.

> *'I believe that third sector organisations make a great contribution to the issues of race inequalities but have found their voice to be silenced or ignored.'* Voice4Change England online questionnaire respondent

- **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.

8.2. The role of the public sector

- How can we help and encourage the public sector, such as local councils, criminal justice agencies and NHS Trusts to prioritise their work on race equality?

In section 8.1 we discuss how the BME third sector can offer expertise throughout the policy and consultation process but faces several barriers to effective engagement. One way to help the public sector to prioritise their work on race equality is to ensure BME representation on local partnership bodies such as Local Strategic Partnerships (LSPs). This is limited at the moment, for example engagement of the BME third sector in LSPs can best be described as 'patchy', based on research conducted by BTEG (2006) which found that only one third (32%) of the Neighbourhood Renewal Fund LSPs had a place on their board for one or more BME representatives. See also section 9.1.1 on developing a National Indicator on Race Equality.

8.3. The role of the private sector

- How best can we work with the private sector to address ethnic minority employment issues?

Voice4Change England has joined ROTA to set up the Winning the Race coalition to influence the final stages of the Single Equality Bill. In our letter to Harriet Harman QC MP[18] we recommended that the Act places an explicit legal duty to make equality part of procurement and to ensure that public authorities are not able to contract out of their

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[17] 2001 BME Voluntary and Community Compact Code of Practice.
[18] 2009, ROTA and Voice4Change England, Single Equality Bill, Winning the Race Coalition, letter to Harriet Harman QC MP .

equality duties. We argued that it is important to ensure that employees in the private and third sector do not receive less protection than those in the public sector. Our letter states that: 'the current equality legislative framework has not provided consistency and a clear picture on the consideration and implementation of equality standards by private and Third sector contractors who have been procured to deliver public services. We have evidence to suggest that despite the existing guidance, there is inconsistency in its implementation. This is not only seen across different public bodies, but also within a single body. We also have evidence to suggest that some public authorities are ignoring equality throughout the procurement process including management, planning, performance and monitoring'.

CLG should work in partnership with the Office of the Third Sector on how to promote equality in the use of procurement in ways that support and strengthen small BME and generalist voluntary and community organisations.

8.4. Meeting regional needs

- How can we ensure that our approach meets the needs of the different regions, and Scotland and Wales?
- How can we best work with organisations such as Regional Development Agencies, Government Offices and local authorities to deliver on race equality?

Whilst it is important that CLG set out a national framework on Race Equality and set it as a priority, there needs to be flexibility to meet regional and local needs. There was concern by our consultation event participants that the Strategy was 'London centric'. A key way to meet regional and local needs is by involving BME Third Sector infrastructure at a regional, sub-regional and local level. BME regional infrastructure for 8 of the 9 regions form part of the Voice4Change England partnership. Our regional networks policy position paper sets out some of their recent achievements and the impact they are having 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.[19]

Despite the impact which 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. Several of our regional partners will be responding to the Tackling Race Inequalities consultation from a regional perspective and it is essential that their views are heard.

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[19] 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.

9.   Implementation and monitoring

- Do you agree with the approach of a long-term vision and a short-term action plan?
- What does 'success' look like? And how do we measure that success?

9.1. Implementation

By far the largest concern at Voice4Change England's consultation event was not with the changes needed to the content of the current Race Equality Strategy but with its implementation.

'*We don't need to set up anything new. We need to enact legislation*'
'*'The Race equality strategy exists – but programmes don't always reflect it. It needs to be reflected in programmes and policies*'. V4CE consultation event participant

Research commissioned by MENTER in the East of England found similar concerns: 'there were reports of a considerable degree of 'paper commitment' but little commitment in practice. For example, a number of race equality strategies were designed in Local Councils and regional bodies, but there was a lack of evidence to support that change was occurring'[20].

To be effective the Race Equality Strategy must include an effective implementation strategy that filters down to the ground including enforcement measures where necessary. It needs to be embedded in all policy and clear guidelines, targets and timeframes need to be set to monitor its implementation.

9.1.1. National Indicators

One way to ensure that the Race Equality Strategy is implemented at a local level is to work with existing local targets. PSA 15 already sets national Government's commitment to 'address the disadvantage that individuals experience because of their gender, race, age, sexual orientation, religion or belief'. However, the related National Indicators[21] lose the focus on race. **Although 3 National Indicators refer to ethnicity in relation to a specific public service area[22] we believe an indicator specifically on Race is needed to ensure the Race Equality strategy is implemented at a local level.**

9.1.2. Workforce

A diverse workforce that reflects the make up of local communities was seen by our consultation respondents as a key way to ensure that the Race Equality Strategy is

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[20] Centre for Social Inclusion, 2007, BME access to skills, employment and enterprise services in the East of England.
[21] NI 3 Civic participation in the local area and NI 140 Fair treatment by local services
[22] NI 44 Ethnic composition of offenders on Youth Justice System disposals. NI 107 Key Stage 2 attainment for BME pupils, NI 108 Key Stage 4 attainment for BME pupils

implemented. A need was also identified to provide training in race equality for mainstream officers and to drive race equality by setting up a team of champions and mentors.

> *'The work to tackle race inequalities requires educating professionals as well as central and local government ministers and recognise that ethnic minorities are disadvantaged due to what they believe to be complex issues within our culture.'* Voice4Change England online questionnaire respondent.

9.2. Enforcement

Where bodies are not reaching the requirements of the Race Equality Strategy appropriate enforcement action needs to be taken. Voice4Change England's consultation participants asked for 'better enforcement and accountability' and 'enforcement backed by penalties'. Several called for public naming and shaming of bad practice alongside rewarding good practice.

One route of enforcement is through using race equality legislation. Voice4Change England as part of the Winning the Race coalition has been lobbying to ensure that under the new single equality duty proposed in the Equality Bill Race, equality is considered in a way that best suits its needs taking into account its long history and rich case law, and that existing protection is not levelled down but streamlined and strengthened.

Voice4Change England is concerned by several cases where BME third sector organisations have identified that Equality Impact Assessments have not been carried out appropriately resulting in an adverse impact on BME communities. It is essential that all public sector bodies fully understand their obligations under the Single Equality Duty and that there are clearer lines for redress for BME third sector organisations experiencing difficulties. This needs to take into account the limited resources many BME third sector organisations have.

9.3. Monitoring

The Race Equality Strategy must contain measures both to monitor and publish data. One way to do this would be to work with the existing National Indicators. Current guidance for Local Authorities[23] identifies a disaggregating of data by equalities strand as a way to 'identify groups of people within an area who are disadvantaged in relation to the outcome being measured by the indicator, and to enable local authorities and their partners to set targets aimed specifically at delivering improvement for those groups in the LAA'. Local Authorities are encouraged but not required to collect this data for indicators defined at the universal population level. LSPs can 'agree designated targets in their LAA for a particular sub-group or groups of a national indicator defined at the universal population level...on the basis that they will voluntarily report the performance against that group in addition to the national indicator requirements'. We recognise that CLG wants to avoid creating additional burdens for Local Authorities in terms of data collection. However the disaggregating of data for all relevant indicators is the key way to measure race equality providing evidence across

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[23] CLG, 2008, National Indicators for Local Authorities and Local Authority Partnerships: Handbook of Definitions.

a range of social and economic indicators and to design and develop appropriate policies and services.

Our online questionnaire also identified the British Sikh Federation's concern that 'Government's work does not capture racial discrimination against Sikhs, because it does not monitor Sikhs as an ethnic group' (online questionnaire respondent).

10. Success

We asked our consultation participants 'how will the BME third sector know that the Government's Race Equality Strategy has been successful?' [See Annex 1 for a Summary of responses].

Annex 1: How will the BME third sector know that the Government's Race Equality Strategy has been successful?

Education

- Ensuring that the BME young population is appropriately skilled to beat the competitive edge economically.

Engagement

- Public bodies having better engagement with Third Sector organisations and BME communities.
- New and emerging communities having an active engagement with existing BME communities.
- There will be clear and noticeable engagement from the BME Third Sector in terms of their 'buy in' and 'response' to the strategy.

Implementation

- Race specific performance indicators.
- When national indicators filter down to Local Area Agreements covered under Comprehensive Area Agreements.
- When success is measured by Equality Impact Assessment.
- Set up a national framework delivered through a regional approach, supported at local level through 'fit for purpose' frontline organisations – with clear targets, deadlines and sanctions.
- Set up a team of 'champions' and 'mentors'.
- The Race Equality Strategy needs to be reflected in all Government programmes and policies – it needs to be embedded otherwise it will be terribly 'aspirational' and not deliver.
- There will be shared examples of 'sanctions' put into place to ensure we have the opportunity to learn from this strategy and clear good practice guidance and examples of why we need to adhere to the strategy.
- The Public Sector will have clear guidelines and benchmarks to measure against to ensure that they are not only accountable but responsible for challenging wider accountability.

Enforcement

- Better enforcement and accountability.
- Has enforcement at its heart.
- Enforcement backed by penalties.
- Public naming and shaming.
- Public 'name and shame' on race equality auditing.
- Name good practice areas and reward good practice to 'mentor'.

Indicators of success
- When there are or is a reduced level of negative impact indicators on communities and individuals measured by their physical characteristics.
- BME communities will have a better standard of living in urban and rural areas with a greater understanding of their legislative rights, being more equal in terms of Race.

Mainstreaming
- When demand for their (BME third sector organisations) services – if particularly targeting BME groups – reduces or becomes redundant; due to their groups either experiencing less discrimination and/or mainstream providers being able to offer appropriate support.

Monitoring
- Effective monitoring and evaluation conducted by external bodies.
- Diversity audit of all government organisations – central, regional and local, should be made compulsory and put in public domain.
- More critical assessment/improvements being shared publicly on mainstream service provision through independent bodies (Traffic lights system).
- Enforced with regular review/reports.
- First of all the Government has to be more self-critical/ honest of its current strategy and identify areas where progress was not made.

Representation
- Increase of BME representation at strategic and local level.

Resources
- Increase in resources.

Services
- Service design and delivery incorporates the key concerns of diverse BME communities.

Single equalities agenda
- Regional and local statutory agencies will take race seriously and seek to advance work on tackling Race inequalities and not hide behind the diversity agenda which benefits none of the equality strands in a substantial way.

Social class and race

- The Race Equality Strategy must address and meet the needs of the most disadvantaged sections of BME communities who are constrained by their Race and class in society.

Sustainability

- When we have a sustainable BME Third Sector which is not reliant on grants but is able to generate income by successfully selling services to Public Sector agencies.
- Unlocking of sustainable investment that enables sub-regional networks and infrastructure organisations better support for their stakeholders to deliver.

Updates

- The Government must have regular refreshes on the strategy so that it is a LIVING DOCUMENT.

Workforce

- Representative workforce.