

Voice4Change England

Consultation Response

Cohesion Guidance for Funders

Submitted to the Communities and Local Government (CLG)

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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, Council for Ethnic Minority Voluntary Organisations, FATIMA Women's Network, MENTER (East of England BME Network), MINET (London BME Network), One North West (North West BME Network), National Association for Voluntary and Community Action, The Social Business Company, Voice East Midlands, and Yorkshire and Humber BME Regional Panel, UNI, South East BME Network and the West Midlands Race Equality Advisory Board.



Building a Thriving Black and Minority Ethnic Third Sector

Voice4Change England's Response on the Cohesion Guidance for Funders – a Consultation Document by the Communities and Local Government

1 Introduction

1.1 Voice4Change England welcomes the opportunity to comment on the proposed Cohesion Guidance for Funders by the Communities and Local Government (CLG). In making this response, we would like to acknowledge the level of engagement that the CLG has had with Voice4Change England and other third sector organisations over the period of the last six months in producing the draft Cohesion Guidance for Funders and for carrying out Compact compliant consultation on the document. We hope that this spirit of engagement will continue and that the CLG will give serious consideration to the comments and recommendations set out in our response.

1.2 Voice4Change England is a partnership of national and regional Black and Minority Ethnic (BME) third sector organisations (TSOs) providing an informed policy voice for the BME third sector. We aim to promote understanding of the issues facing the BME third sector and better inform Government policies that may have an impact on BME communities.

1.3 We therefore have a keen interest in responding to the consultation on the Cohesion Guidance for Funders (the Guidance). **We fundamentally oppose the rationale for the Guidance, which is based on the premise that funders award single group funds as 'the exception rather than the rule'.¹** Although the consultation document recognises 'the many facets of identity according to which people may be grouped or choose to group themselves' (p8), it still proposes a flawed policy framework which is insensitive to the positive contribution made by the 'single groups' in mainstreaming equality and meeting the unmet needs of diverse communities. Single groups are being defined in current policy debates as that organised on the basis of ethnicity, faith, culture, gender, race, age, sexual orientation or any other single identity. The focus on groups organised on the basis of ethnicity, faith and culture encompasses the whole of the BME third sector.

1.4 In opposing the rationale for the Guidance, this response provides both a critique of the Guidance and comments on its tone, structure and analysis and also aims to re-open a debate on the value and contribution of the BME and other single groups in the social and economic development of local communities that are immensely diverse. The response also looks at the 'integration' and 'cohesion' policy frameworks in the context of equality of opportunity and rights. It argues that the Guidance is developed on a narrow understanding of integration and cohesion that undermines multiculturalism and liberal democratic values of equality and freedom of association. The response also discusses the likely impact of the Guidance on the BME third sector and consequently on Britain's diverse communities. Finally, it presents recommendations for CLG to abandon the Guidance and instead open a dialogue with BME third sector organisations and funders how they can together promote equality and social justice which would lead to a cohesive society.

¹ The Commission on Integration and Cohesion recommended Annex D on Funding to Single Groups and argued that the single group funding should not be the exception and not the rule. The Cohesion Guidance for Funders 'follows the recommendations the Commission made about what it termed "single group funding"'. See page 5 of the Cohesion Guidance for Funders, CLG, Feb 2008 available at www.communities.gov.uk/documents/communities/pdf/681891 . For Commission's report 'Our Shared Future', see www.integrationandcohesion.org.uk .

2 Developing the response – Methodology

2.1 This response is informed by Voice4Change England's national and regional partner organisations across the nine English regions. Our Partners have a reach to over 5,700 BME third sector organisations. A consultation event was organised in the North West region in March 2008 with participants from local and regional BME third sector organisations. A representative from the CLG presented an overview of the Guidance and workshops were held to discuss the principles and questions of the Guidance. Participants' views are given throughout this response to illustrate the arguments made and to capture a frontline perspective.

2.2 The response also reflects the views of a Working Group of 16 organisations that Voice4Change England brought together in February 2008 to discuss and share the early reflections and concerns on the Guidance. In addition the response captures the concerns of frontline local organisations who completed the electronic survey conducted by Black South West Network (a BME regional network in the South West region – partner organisation to Voice4Change England).

2.3 Voice4Change England also took the lead role in organising three consultation events on behalf of the National Equality Partnership (NEP) to generate debate and response to the Guidance. The events took place in Leicester, Bristol and Leeds and a separate comprehensive response is submitted to the CLG by the National Equality Partnership. A policy briefing produced by Voice4Change England on behalf of NEP was circulated prior to the consultation events and also to Voice4Change England's Partnership. These consultation events also informed this response.

2.4 We also reflected and took on board the responses made by other third sector organisations including Imkaan, HEAR, One North West (Regional BME Network), LVSC, WRC, bassac, and the Commission for Compact. In addition, Voice4Change England's Director presented a BME third sector's perspective on the Guidance at consultation events organised by Confederation of Indian Organisations (CIO), LVCS, and the Camden BME Alliance in London.

2.5 In setting out this response, we deliberately chose not to follow the questions suggested by the Guidance document. We have strong reservations on the structure and analysis of the Guidance which makes the suggested questions irrelevant. We therefore present our critique on the Guidance as informed by our Partners and participants at the consultation events for CLG to consider in assessing the responses and reviewing its policy framework.

2.6 This response is divided into four sections. Section A opens a debate on the role and contribution of the BME third sector in meeting the unmet needs of BME communities who still face discrimination and disadvantage in the UK. Section B develops a critique on the Guidance and argues that promoting equality would lead to integration and cohesion. To underpin the analysis and framework set by Sections A and B, a case study on the impact of the Guidance on the BME third sector is narrated in Section C. Finally Section D concludes the response and presents recommendations to inform the formulation of public policy on cohesion.

Section A: Valuing BME third sector organisations as ‘single groups’ in meeting the unmet needs, fighting discrimination and promoting equality

3 Valuing BME third sector organisations as single groups

3.1 In 2007, Voice4Change England’s national mapping study on the scope and size of the BME third sector found a much larger BME third sector operating in England.² These organisations deliver services that include:

- ◆ Cultural, social and economic support programmes for young, older and disabled people
- ◆ Advocacy and advice on legal, 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.

This is not an exhaustive list and in the absence of updated and credible quantitative data, the extent of these services cannot be measured.

3.2 **BME third sector groups in providing a range of services to BME communities, address the needs of people with significant social and economic need.** According to a research conducted for 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.**³

3.3 The role of the BME third sector has also been acknowledged by the government. For example the Home Office report, *Strengthening the Black and Minority Ethnic Voluntary Sector Infrastructure* (1999) notes that BME organisations promote social inclusion, race equality and social justice in addition to providing tailored services and cultural activities, including employment, training and education opportunities, individual and community advocacy and representation, and campaigning.⁴ Generic third sector organisations value the role of the BME third sector. **The National Council for Voluntary Organisations (NCVO) sees BME third sector organisations offering vital expertise on the needs of BME communities, essential ‘mainstream’ public services, development and support services of especial relevance to young people, and leadership development within BME communities.**⁵

3.4 In promoting civic engagement **within** and **across** Britain’s diverse communities, BME third sector organisations have a ‘strong tradition of trying to ensure that minority communities can enjoy full citizenship rights and have equal opportunity to participate in

² ‘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.

³ 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.

⁴ Home Office, “Strengthening the Black and Minority Ethnic Voluntary Sector Infrastructure” (Home Office Active Community Unit 1999).

⁵ NCVO, “Compact BME” (2000)

British Society'.⁶ **BME organisations form a 'distinct sector within the wider voluntary and community sector because of their origins and their propensity to deal with issues of social exclusion with a racial discrimination'.**⁷

3.5 **The above narratives provide an acknowledgment for the BME third sector on its role in the regeneration, recognition and positive development of BME communities. The proposed policy set out in the Guidance is surprisingly moving away from [earlier] recognition of the BME third sector and the role it plays in cohesive communities and active citizenship.**

3.6 In 2001, an Independent Review Team reported to the Home Office recommended that **"programmes must be devised, as part of the Community Cohesion Strategy with support at a national level, to promote contact and understanding within and ethnic minorities, and the white community and faiths....."**⁸ This emphasis has continued to shape government's thinking about the role and contribution of the BME third sector until recently as 2006. The Compact framework also emphasised **".....the (BME) sector bring distinctive value to society. In particular it enables BME individuals to contribute to public life and supports the development of active thriving communities by providing opportunities for voluntary and community actionAn active partnership with Government is an essential part of ensuring that the BME voluntary and community sector is able to develop its full potential as an important contributor to society and a strategic agent of those it seeks to represent."**⁹

3.7 However, **we are now witnessing government policy narratives with reservations and doubts on the role and contribution of the BME third sector that was previously acknowledged and seemingly cherished (albeit under-resourced).** The Cohesion Guidance for Funders seems to assume that BME organisations, alongside other equality third sector groups (defined as single groups) contribute in segregated communities. In doing so, the Guidance advises funders to **"ensure that 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'"** (p14). (emphasis added).

3.8 **It is important to note that this 'visible' shift in understanding the role of single community or identity groups including the BME and other equality groups is very recent.** This shift is mainly being linked to the government's response to community tensions and disturbances in Bradford, Burnley and Oldham in 2001 and the subsequent Cantle Report (2001). The Commission on Integration and Cohesion's report Our Shared Future (2007), in recommending Annex D, has raised doubts on the role of the BME and other single community groups in promoting a cohesive society.¹⁰

⁶ Karen Chouhan and Clarence Lusane, "Black voluntary and community sector funding: Its impact on civic engagement and capacity building" (2004), Joseph Rowntree Foundation.

⁷ 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.

⁸ Independent Review Team, "Community Cohesion: A Report of the Independent Review Team: 29", Home Office, 2001.

⁹ The Compact Code of Good Practice on the Black and Minority Ethnic Voluntary and Community Organisations, (2006).

¹⁰ Annex D recommended that 'Single Group Funding' should be the exception rather than the rule for both Government and external funders. See Our Shared Future, p160, a report by Commission on Integration and Cohesion. www.integrationandcohesion.org.uk.

3.9 Furthermore, the Guidance uses language which strengthens the stereotypes associated to minority ethnic communities. 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)

3.10 This association of BME third sector organisations and communities as responsible for certain social and political problems does not recognise the contribution of the BME third sector in social, cultural, political and economic development of the British society and in promoting equality and fairness for all.

“The BME sector has found itself a political pawn in an effort to lambaste specialist services and placate the general public that we are not making a special effort with these minorities. This is about the terrorism agenda and the BME population taking the burnt of it. The document has a sinister nature where if it wasn't labelled as a labour party paper then people could easily assume it was written by the BNP. It does not say what its clearly wants to say. I am very concerned about this document and the future it points to.”
Participant at NEP consultation event, Leeds, May 2008

3.11 The Guidance appears to assume that BME third sector organisations (as single groups) contribute to segregated communities. The Guidance advises funders 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 the evidenced needs**” (p14). We strongly maintain that there is **insufficient evidence in the Guidance to support the policy shift that BME third sector organisations set communities apart. The Guidance is therefore open to challenges of discrimination and institutional racism on its unfair impact on BME third sector organisations.**

3.12 **Voice4Change England's Partners and many frontline BME third sector organisations on the other hand, still 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.** The participants at the consultation on the Guidance were asked to defend why the services provided by BME third sector groups are still needed. A couple of statements below illustrate participants' views.

“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!”
“In our view, the current service provision is not diverse enough in terms of staff. There is not much in-depth interaction with service users, thus the help/service being offered has lost its relevance”.
Participants at V4CE consultation event, Manchester, March 08

4 Meeting the unmet needs as a precondition to an integrated and cohesive society

4.1 **Promoting cohesion is imperative for a multicultural British society.** Culturally diverse societies are for many countries a modern fact of life in which they have to find ways of accommodating diverse demands without losing their cohesiveness and unity.¹¹

4.2 Various factors contribute to this cultural diversity including different ethnic, religious, cultural communities and communities of interest and different schools of thought, intergenerational differences in social and moral value systems, immigration (both economic and political), globalisation with people moving from one country to another constantly shaping and reshaping the identity of nation states. **What we also have in Britain however is our long fought war for the respect of democratic liberal values of 'equality of status and rights' whereas "minority communities demand equal treatment including absence of discrimination, equality of opportunity, and equal right to participate in and shape the collective life of society."**¹²

4.3 It is imperative to note here some recent facts on the levels of deprivation and discrimination that BME communities are still facing in modern Britain. **These facts show how far we are in mainstreaming equality of status and rights whereas discrimination is [still] rampant and opportunities to participate in and shape the collective life of society are far from reality for most people who belong to minority communities in England.**

4.4 In a recent research study on 'Poverty and Ethnicity in the UK' (April 2007), JRF found that:

- ◆ "There are stark differences in poverty rates according to ethnic group. Risks for poverty are higher for Bangladeshis, Pakistanis and Black Africans, but are also above average for Caribbean, Indian and Chinese people. Muslims face much higher poverty risks than other religious groups
- ◆ Educational qualifications, employment sector, labour market experience, discrimination, location, disability, ill health and family form and structure all play a role in different poverty rates
- ◆ 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. This 'ethnic penalty' includes the effects of discrimination
- ◆ There are also appear to be 'ethnic penalties' in access to social security benefits and other financial support".¹³

4.5 The report concluded that "where there are many policy agendas that are relevant to tackling poverty among minority ethnic groups – for example around employment and job searching, childcare, area initiatives and discrimination – **it is important that policy is followed through with procedures and practices on the ground that can meet the needs of the target population.**"¹⁴(emphasis added)

4.6 **Thus a well defined public policy framework that meets the needs of a target population is fundamental to put an end to discrimination and disadvantage of minority**

¹¹ Bhikhu Parekh (March 2005), "Unity and Diversity in Multicultural Societies", Geneva.

¹² Ibid., p4.

¹³ 'Poverty and Ethnicity in the UK', JRF findings April 2007 – Ref 2059. www.jrf.org.uk.

¹⁴ Ibid.

communities in England. Logical links have been made in both public and academic institutions between approaches to integration and improving equality of opportunity and universal participation.¹⁵ It is also agreed in both government and academic sectors that integration among diverse communities leads to cohesion. The experience of V4CE Partners and BME frontline organisations endorses this approach. The proposed Guidance is out of step with the sector’s thinking on this and we further assert that this is because the Guidance is based on a flawed premise that BME communities are solely responsible for segregation. This assertion is strongly refuted by the BME organisations we have spoken to regarding the Guidance.

4.7 We are in agreement with the Guidance that meeting evidenced needs should be the priority for both funders and voluntary and community organisations. However, we do not agree with the Guidance where it gives prominence to local authorities in identifying local needs. Funders are advised to consider when funding community level activities “...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). **We believe that communities and voluntary 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.**

4.8 Furthermore, the Compact Code on Community Groups gives priority to the sector in determining local priorities and decisions about the local delivery of services and support to communities at local level. **Local authorities and other public bodies as well as independent funders would be unable to determine local needs without the involvement and help of the local community and voluntary sector.** Once again, in prioritising local authorities and other funders over community and voluntary groups in identifying local needs, the Guidance undermines the role of the third sector in general and BME third sector in particular.

“It is important not to lose the experiences, knowledge and skills of BME third sector agencies who are able to reach communities”.

Participant at NEP consultation event, Leicester, May 2008

“This would be disastrous for BME groups. BME groups already working with those at greatest disadvantage. We are excluded from decision making and represented by groups such as CVS’s that don’t understand our needs and help funding to be channelled to themselves (example through LAAs). There needs to be more focus on mainstream provision to identify why it doesn’t meet the needs of BME communities. It is this provision that should have funding conditions attached to ensure it meets basic equality regulations.”

Participant at NEP consultation event, Leeds, May 2008

4.9 Section A: Summary Points

- a) Absence of discrimination, equality of opportunity and equal right to participate in and shape the collective life of society is a fundamental precondition for a unified yet multicultural society;

¹⁵ Ibid.

- b) Britain has yet to travel a long way to ensure that BME communities do not face discrimination, disadvantage and have equal opportunities and rights to contribute as active citizens in a collective life of the society;
- c) A well defined policy framework that meets the needs of BME communities is needed;
- d) The BME third sector has long been recognised as a 'distinct sector' because of its propensity to deal with issues of social exclusion with racial discrimination and can better identify and meet the needs of BME communities to a much greater extent than the voluntary sector as a whole;
- e) There is a direct causal link between equality of opportunity and universal participation with that of integration;
- f) Integration among diverse communities leads to cohesion; thus
- g) Meeting the needs of minority communities in Britain and elimination of discrimination, disadvantage would lead to integration and cohesion.

4.10 Building on the points outlined above, Section B argues that the Guidance does not account to a public policy framework that meets the needs of BME communities facing discrimination and disadvantage. The Guidance undervalues the role of the BME third sector in meeting the unmet needs. This lack of recognition of persistent inequalities, discrimination and undervaluing of BME third sector organisations has resulted in a flawed framework by CLG in aiming to promote cohesion. **We would advocate that meeting the needs, 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 a progress towards a cohesive multicultural society.**

Section B: Rethinking cohesion in light of equality – a critique on the Cohesion Guidance for funders

5. Equality as the prerequisite to cohesion

5.1 The Guidance recognises that “Equal life chances is an important part of cohesion – building equality is part of building cohesion as well as vital in its own right” (p11). The second principle states that “Where relevant, organisations – both mainstream and those serving particular groups – should be encouraged to be more open, accessible and to build bridges with others” (p11). In the context of BME third sector groups, the implementation of both these principles can be in contradiction with each another. **Building equality by meeting the unmet needs of target communities often requires a sensitive approach to service users whereas cultural, social, religious and lingual bonding is often a precondition.** Meeting the needs of diverse disadvantaged groups of people demands different approaches whereas a centralised method of operation and standard conditions would be undesirable and consequently unsuccessful.

“(Funding) is not a level playing field, discrimination exists.”

“(The BME third sector) looks at creating ways of breaking barriers to achieve positive sustainability.”

Participants at V4CE consultation event, Manchester, March 2008

5.2 Although the first principle seeks to establish a ‘clear link’ between equality and cohesion, the principle is not reflected in the key questions for funders in the Guidance. This weakens the basis of the policy shift and undermines the overriding aims of the Guidance.

5.3 For the reasons cited in Section A and the existing research referenced, the CLG should review the existing evidence on segregation and its links with inequality. This would support in formulating a public policy that is more grounded and that recognises that inequality of opportunity and rights can result in segregated communities.

5.4 A significant omission in the Guidance is that it does not mention existing Equalities legislation and yet suggests a framework for funders on how to fund activities of third sector organisations aiding better community relations. The Guidance would 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 possible contradictions with Equalities legislation, the Guidance presents conflicting messages to local authorities and other public bodies as well as independent funders.**

5.5 The concept of bridging as discussed in the Guidance also appears to be confusing. BME third sector organisations represent and provide services to people from BME communities that are immensely diverse on ethnic, lingual, cultural, religious and on grounds of country of origin. They are not a homogenous group of people and **bridging in this context does take place within and across BME communities.** BME third sector organisations play a significant role in bringing various communities together on a single identified issue. For example a domestic violence support organisation for women from BME background may already provide services to women from more than three or four different BME communities. But although the organisation focuses on a single issue, it is still difficult for it to expand its specialist targeted services to more communities, especially if the organisation is small and with limited capacity. **The expansion of services to more communities for bridging activities would require resources to ensure that each community is supported to receive specialist services sensitive to its language, culture, religion and any other specific needs. In meeting unmet needs provision of specialist services must take a priority over bridging activities.**

5.6 **For many BME third sector organisations, progression from bonding to bridging might not be a desirable proposition.** For example, it will not be desirable for a community centre offering a weekly luncheon club for older women from Pakistani origin to also include older women from Polish community. It would not make sense as older women from both communities [naturally] need culturally sensitive services to help them break the barriers of exclusion and isolation to become better integrated to the society. In this context 'bonding' is the only focus. The Guidance appears insensitive to this context in which most BME third sector organisations operate. Government needs to recognise that bridging activities however desirable cannot be forced and that BME organisations are already helping to bridge *within* diverse communities.

5.7 **The Guidance is part of 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. As a result of this, 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.** Government funding, and in particular grant funding, is often the only financial support available to BME organisations. In the absence of small and local BME organisations, the needs of BME communities will go unrecognised. This has also been evidenced as larger mainstream providers often seek help of small

organisations to identify the needs of local communities and deliver 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. Discrimination against minority ethnic communities is still rampant where mainstream providers are failing to respond to a diverse population.**

"This (Guidance) presents a further attack on BME VCS in addition to the contracting agenda which favours large voluntary organisations The mainstream services are actually having quite a good time of it!"

Participant at NEP consultation event, Leeds, May 2008

5.8 BME third sector organisations do not only meet the unmet needs of diverse communities, they also help communities to access the mainstream services. With their contribution in producing user-led research, BME third sector organisations inform policies and activities of mainstream providers to better develop their programmes in a responsive and cost effective manner.

5.9 This contribution of the BME third sector has long been accepted both by voluntary and public sectors who often struggle to reach 'hard to reach' communities. CLG is encouraged to research further the existing literature and research on the role and contribution of the BME third Sector in service delivery and building cohesive communities.

6. Other relevant concerns on the analysis of the Guidance

6.1 BME third sector organisations demand Equality of opportunity to have a fair and equitable access to various funding streams. The Compact Code on BME third sector in paragraph 3.2 requires the government and its agencies to "ensure that BME voluntary and community organisations have fair and equal access to Government funding programmes, particularly those that impact significantly on BME communities."¹⁶ It further pledges a commitment on behalf of the government that where funding is removed or reduced from one BME organisation, it should be redistributed to other BME organisations which can provide the same or similar services. However, the Guidance is not sensitive to these undertakings in advising funders to award funding to BME third sector organisations.

6.2 The Guidance does not advise funders to be transparent in their funding practices to BME organisations by providing a clear policy on what 'cohesion' would mean in the context of a particular funding stream. In the absence of this transparency and clarity, many BME organisations may find it difficult to satisfy funders' demands and risk rejection or withdrawal of funding.

6.3 Question five in the Guidance asks "how can funders best work to promote cohesion with organisations with constitutions and charitable objects, if those objects do not include specific reference to cohesion or integration activities?" (p19). This approach lacks an understanding of how charitable activity and organisations come into being. They form as a result of a need that is not being met by statutory or other provision. It is not the role of government to dictate what voluntary groups should or should not do. There is sufficient body of literature that establishes the role, ethos and value of BME third sector organisations many of whom emerge to deliver services to a targeted BME community on the basis of identified need. Their objects reflect this targeted focus and the condition, if proposed by funders, would **result in BME third sector organisations to change their objects**

¹⁶ 'Black and Minority Ethnic Voluntary and Community Organisations: Compact Code of Good Practice', Government Undertakings 3.2, p4, www.thecompact.org.uk.

and compromise their ethos and identity. The national Compact contains an undertaking to respect and support the independence of the third sector. Funders must not influence the independent action of third sector organisations without appropriate and transparent dialogue with organisations receiving funding.

6.4 Section B: Summary Points

- a) The Guidance offers weak links between equality and cohesion;
- b) It omits any mention of Equalities legislation and is not supported by an Equality Impact Assessment to assess the likely impacts of the Guidance on the BME third sector and on BME communities;
- c) The independence of action of BME and other third sector organisations is threatened if the Guidance is implemented unchecked.

6.5 The following section presents a short qualitative case study to highlight the likely impact of the Guidance on BME third sector organisations. The case study on Southall Black Sister – a BME third sector organisation based in London – encapsulates all the concerns expressed above in Sections A and B. It proves that concerns being raised on the Guidance by us and other third sector organisations are legitimate and well-founded and that the CLG should take serious notice of these concerns.

Section C: Likely Impacts of the Guidance on BME third sector organisations – a case study of Southall Black Sisters

7 Southall Black Sisters and the commissioning of domestic violence support services in the London Borough of Ealing

Southall Black Sisters (SBS) has been in existence since 1979 and from 1983 they have operated an advisory, casework advocacy and counselling service to address issues of violence against women. Their focus is predominantly on the needs of BME women however they do not turn away any woman who needs advice or emergency assistance. The group does the majority of their work in the London borough of Ealing although a number of their cases have gone on to have national significance.

The majority of the women they have worked with are from South Asian backgrounds, however they have supported significant numbers from Caribbean, Somali and other African and Middle Eastern backgrounds. These women represent a range of major religions such as Hindu, Sikh, Christian and Muslim. Many do not speak English and almost all cases require intense counselling, advocacy and support.

SBS are confident in their belief for the absolute need for specialist services for black and minority women in the area of domestic violence. These women can be one of the most vulnerable and invisible groups of our society and are affected not only by domestic violence but also other forms of abuse such as forced marriage, honour killings and immigration difficulties. Also due to strong cultural, religious and linguistic reasons, many black and minority women cannot access or do not wish to access the advice services that are available to all women. For many, discrimination and racism in the outside society also present considerable barriers to accessing services. Recognition of these issues is becoming recognised through recent reports such as that produced by the Fawcett Society (2005) which

“ ..We have no problem with commissioning per se, but we do not want to become a generic provider, it would affect our whole identity as an organisation.

Pragna Patel, Chair SBS

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concluded that as a whole black and minority women face discrimination on the grounds of both their gender and their ethnicity, these conclusions are echoed in the more recent report 'Map the Gaps' (2007) published by the End Violence Against Women campaign in partnership with the Equality and human Rights commission.

For many years SBS has received core funding of £100,000 per annum from Ealing Council. The council decided last year that they wanted to move to a more formal tendering process for domestic violence services in the Borough and that the commissioning process would request the provision of support services for all people experiencing domestic violence. Whilst moving to a commissioning environment per se did not concern SBS, the move to providing services for the whole of the community did. They felt very strongly that the quality of the service they provide to BME women is vital. Providing a service to the whole of the community for the same budget (£100,000) is firstly not possible and secondly is not something that they as an organisation want to do.

The problems were not just limited to issues about money and resources – it also affects the whole identity and rationale behind SBS. They were set up specifically to provide support to BME women, they strongly believe that this is what they are good at and they do not want to change to become a mainstream service provider. The move to providing mainstream services would necessitate a change in their constitution and may affect how local BME women view them. They also point out that there is considerable need for this specialist support for minority women and that if there is one service provider addressing all women's needs, this will work against the interest of BME women in Ealing. They would say that the new proposals for domestic violence services fail to take account of the unequal social, economic and cultural context which makes it difficult if not impossible for BME women to access outside help or seek information about their rights.

This view would seem to be echoed by users of SBS. *'SBS should not close down because where would women like me go?'* says Taiya, a woman supported by SBS. She goes on to say that after contacting other agencies for help such as the Police she came to SBS and *'I realised that SBS understood my language (Urdu and Punjabi)... and because of their unrelenting help and support I now have my identity back, no other could have done this.'*

“ ..If this agency did not exist where would I have gone? ”

Taiya Shah, SBS Client

Part of the move to commissioning services for all women is the perceived benefit of promoting community cohesion with the additional 'bridging' activities that a generic service can bring. SBS would argue that they already provide strong 'bonding' and 'bridging' activities through the work they do. Black and minority women from varied religious and ethnic backgrounds use their centre without fear or mistrust and build friendship networks that cut across differences. Much of their project work supports community cohesion and they have just applied for funding for a major project through a council grant scheme for Activities that Increase Integration and Community Cohesion.

SBS decided to participate in the commissioning process for domestic violence services in Ealing however their tender for the provision was concentrated exclusively on their existing level of service – i.e. providing a specialist service to BME women experiencing domestic violence which would not turn away women from any background who requires advice or emergency support. They are firm in their belief that they are providing a service that is firmly rooted in what the local needs are and that they are providing specialist services that promote social cohesion by ensuring equality of provision and also working within and

between communities. SBS are awaiting Ealing Council's decision on the award of funding for domestic violence support in the Borough.

7.1 Southall Black Sisters (SBS) case study provides a snapshot on the impacts of the Guidance, if implemented in its current form, on the BME third sector. **The Guidance will have considerable implications on the availability, accessibility, sustainability and diversity of provision for BME communities who struggle to acquire fair and equal access to provision of public services.** Even though the CLG cannot dictate or direct what happens at local level, they have a responsibility for setting out an overarching framework where local funding decisions do not discriminate against BME third sector organisations.

7.2 **An overwhelming feeling by participants at the consultation events and views of Voice4Change England Partners is that the proposed Guidance is an attack on BME third sector organisations, specialist third sector service providers and that it will be used to rationalise withdrawal of funding for 'single groups'.**

7.3 **Participants at the consultation event strongly criticised the government for making the specialist sector an 'escape goat' for local authorities' failure to address cohesion and integration.** The BME third sector already struggles with lack of funding as a result of discrimination and institutional racism. The Register of Charities for England and Wales (December 2007) found that organisations that list 'people from an ethnic minority; as a 'beneficiary group' make up 12.3% of registered charities yet have an income of 7.3% of all voluntary income.

7.4 By withdrawing funding from BME third sector organisations in favour of mainstream providers it is the experience of our Partners and others within the BME third sector that the needs of BME communities will be further marginalised and that BME third sector organisations will continue to operate on shoe string budgets.

"The guidance will not help small/medium BME community groups to sustain themselves and develop the needs for their communities. There is no forward thinking in cohesion and it seems to me that our communities don't matter. Discrimination and disrespect will become legitimised (as a result of this guidance)".

Participant at NEP consultation event, Bristol, May 2008

"This is about the government trying to shed its responsibilities to support the BME sector in the UK. This has been coming for a while, with mainstreaming, single equalities agenda and now cohesion. All this is eroding the focus from BME organisations and the vital services they provide often on a shoestring budget. When will our contribution be recognised?"

Participant at V4CE consultation event, Manchester, March 2008

Section D: Conclusion and Recommendations

8. Conclusion

8.1 This response offers a critique on the Guidance by highlighting that the absence of discrimination, equality of opportunity and equal rights to participate in and shape the collective life of society is a fundamental precondition for a unified yet multicultural society. In this, Britain has to travel a long way to ensure that BME communities do not face discrimination or disadvantage to have equal opportunities and rights. Given this

context a well defined policy framework informed by grounded research and that meets the needs of BME communities is urgently needed.

8.2 The role and ethos of the BME third sector has long been recognised, both by the government and the generalist voluntary sector, as a 'distinct sector' because of its propensity to deal with issues of social exclusion with racial discrimination. The BME third sector can better identify and meet the needs of BME communities to a much greater extent than the voluntary sector as a whole.

8.3 There is a direct causal link between equality of opportunity and universal participation with that of integration. Integration among diverse communities leads to cohesion.

8.4 Contrary to this analysis the Guidance presents weak links between equality and cohesion. It omits any mention of Equalities legislation and is not supported by an Equality Impact Assessment to assess the likely impacts of the Guidance on the BME third sector and on BME communities.

8.5 The Southall Black Sisters case study helps to encapsulate the key concerns raised by the Guidance from Voice4Change England's Partners, BME frontline organisations and other third sector organisations. It sets out our legitimate and well-founded fears that the CLG introduction of the Guidance is a dangerous attack on the independence of the BME third sector and its role in building cohesive communities.

8.6 On the basis of this conclusion, Voice4Change England proposes the following recommendations.

9. Recommendations

Overarching Policy Recommendations

9.1 Voice4Change England recommends that the Communities and Local Government **should abandon the Guidance and put in place a programme of work that includes a constructive, equal and transparent dialogue with the BME third sector on how both can work in partnership to promote equality and social justice by addressing the wider causes of inequality in the society.** Informed by the existing research, the CLG should review the existing evidence on segregation and its links with inequality. This would assist in formulating a public policy that is more grounded and that recognises that inequality of opportunity and rights can result in segregated communities.

Cohesion is "promoting positive dialogue with local groups"

Participant at V4CE consultation event, Manchester, March 2008

9.2 **The CLG, in partnership with the Office of the Third Sector¹⁷ and in a dialogue with the third sector should produce an 'equality and cohesion guidance for funders', explaining the clear evidenced links between inequality, discrimination and disadvantage with that**

¹⁷ 'As part of the Cabinet Office, the Office of the Third Sector leads work across government to support the environment for a thriving third sector (voluntary and community groups, social enterprises, charities, cooperatives and mutuals), enabling the sector to campaign for change, deliver public services, promote social enterprise and strengthen communities.'
www.cabinetoffice.gov.uk/third_sector.

of segregation to help them develop funding practices that target inequality in ways that reduce segregation and promote cohesion. The proposed guidance should be developed in consultation with the Equality and Human Rights Commission and equality organisations with a record on producing user-led research studies on the nature and scope of persistent inequalities in the British society.

Specific Policy Recommendations

9.3 We strongly maintain that there is insufficient evidence in the Guidance to support the policy shift which concludes that BME third sector organisations set communities apart. The Guidance is therefore open to challenges of exercising discrimination and institutional racism against the BME third sector. **CLG should revisit its approach in formulating a public policy on cohesion, whereby the role of the BME third sector in promoting equality is given due recognition.** Policies on promoting cohesion and, in doing so, assessing the role of the BME third sector must be grounded in existing research on the rampant inequalities, discrimination and disadvantage that BME communities face in the society and on the role of the BME third sector in challenging the causes behind these entrenched inequalities. The Guidance as it currently stands fails to acknowledge the existing government policies to support the BME third sector and thereby presents inherent contradictions. References to the Compact Codes on the BME VCS and Community Groups are weak in the Cohesion Guidance for Funders. **It is important that the policy on cohesion is followed through the procedures and practices on the ground that gives priority to equality in meeting the unmet needs of the target population.**

9.3 We strongly urge the CLG to abandon the Guidance and instead propose an 'Equality and Cohesion Guidance for Funders'. In following this recommendation, **Voice4Change England further recommends that the Equality Impact Assessment must be carried out to investigate the likely impacts of the proposed guidance on BME communities and BME third sector organisations.** This should include an assessment of the impacts that the Cohesion Guidance for Funders already had (as illustrated in the case study on Southall Black Sisters). Furthermore **the Equalities Impact Assessment must be carried out transparently and with the involvement of BME third sector organisations.**

9.4 **In meeting the unmet needs of BME communities, the role of the BME third sector in bonding social capital must be fully recognised.** It should be acknowledged in formulating public policy on cohesion, meeting the unmet needs and promoting equality is a priority over bridging activities. 'Bridging' might or might not be desirable depending on the context of services being delivered and the target group being served. Furthermore, where 'bridging' is possible and desirable, BME third sector organisations should be given additional resources to ensure that each community in receipt of service provision is primarily supported on the basis of its needs (language, culture, religion, etc) followed by a focus on bridging. Government needs to recognise that bridging activities however desirable cannot be forced and that BME organisations, where ever possible, are already helping to bridge *within* diverse communities.

9.5 **Keeping to the spirit of the Compact and its good practice Codes for BME VCS and Community Groups, CLG must recognise and support the value of small BME third sector organisations in promoting equality and reaching communities that mainstream and often large organisations fail to reach.** Any guidance to funders should advise how small voluntary and community organisations can be supported, both in grants and procurement processes, where they are not overburdened by the requirements to demonstrate cohesion goals. **The 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.

9.6 The national Compact contains an undertaking to respect and support the independence of the third sector. **Any guidance to funders advising on funding to third sector organisations, should state that funders must not influence the independent action of third sector organisations without appropriate and transparent dialogue with organisations receiving funding.**

9.7 Last but not least, the proposed 'Equality and Cohesion Guidance for Funders' must require **funders to be transparent in their funding practices to BME third sector organisations by providing clear policy guidelines on what 'equality' and 'cohesion' would mean in the context of a particular funding stream.** In the absence of this transparency and clarity, many BME organisations may find it difficult to satisfy funders' demands and risk rejection or withdrawal of funding.

9.8 Voice4Change England welcomes the opportunity to continue a dialogue with the CLG to ensure that the role of the BME third sector is recognised, empowered and valued in meeting the needs of BME communities, mainstreaming equality and promoting cohesion.

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 the Cohesion Guidance for Funders.

Please contact Arjumand Kazmi, Head of Policy, V4CE at arjumand@voice4change-england.co.uk or on 0207 843 6129 to discuss the response in detail.

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

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