

**Voluntary Sector Forum,  
Third Sector Alliance  
and  
London Voluntary  
Service Council**



response to

**Communities and Local Government's draft  
cohesion guidance for funders**

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## **Executive summary**

This response was based on workshop consultations held at an event organised by London Voluntary Service Council (LVSC) to coordinate a response to Communities and Local Government's draft "Cohesion guidance for funders". 83 people attended the event.

To summarise the event suggested that London's Voluntary and Community Sector organisations felt that this draft guidance:

- should not be a national directive, as community cohesion is mainly dictated by local circumstances;
- is open to misinterpretation and the loss of funding to "single groups" providing specialist services to the most disadvantaged;
- does not link with any other government cohesion policy;
- concentrates too much on ethnic, cultural and religious groups;
- is not based on the current evidence available;
- ignores the effect of poverty and inequality on cohesion;
- is inconsistent with other Government policy on the third sector;
- could be interpreted as a cost-cutting exercise that will discriminate against those most in need;
- lacks any clear definitions of what is being discussed;
- makes no mention of the positive impacts of funding community development work on community cohesion;
- is not accompanied by an equalities impact assessment
- breaches the Compact.

Adoption of the draft guidance would have the effect of causing:

- a cut in funding, and therefore a reduction in the number of specialist services provided by single groups,
- an increase in people unable to access services, particularly amongst the most disadvantaged
- increasing inequalities
- reduced community cohesion

The draft guidance may also cause funders to neglect their legal equality duties, by over emphasising the cohesion agenda.

It is, therefore, recommended that Communities and Local Government:

- withdraw the draft guidance linking single group funding to community cohesion;
- review whether guidance around community cohesion is needed at a national level or would be better developed locally;
- work to link community cohesion with policies on equality, regeneration (or tackling disadvantage) and community development.

## **INTRODUCTION**

### **1. London Voluntary Service Council**

London Voluntary Service Council (LVSC) brings London's Voluntary and Community Sector (VCS) organisations together to learn and share best practice and to create a co-ordinated voice to influence policy makers. We provide up-to-date information on management and funding, advice and support for voluntary and community groups, an information service, practical publications and short courses and qualifications for those working in the sector. LVSC also hosts and services networks including Third Sector Alliance, Voluntary Sector Forum, the Second Tier Advisors Network (STAN) and an information workers network (CASCADE) ([www.lvsc.org.uk](http://www.lvsc.org.uk))

### **2. Voluntary Sector Forum**

Voluntary Sector Forum (VSF) is the independent network of all the voluntary and community organisations funded by London Councils.

The Forum is hosted and co-ordinated by LVSC and managed by an elected steering group of members and the Policy and Networks Development Officer at LVSC.

VSF:

- provides policy and voice for funded organisations to London Councils
- builds relationships between funded organisations and London Councils
- monitors London Councils policies and procedures relating to social policy and commissioning
- keeps funded organisations informed about London Councils policy and commissioning with regular enews bulletins and occasional briefings

### **3. Third Sector Alliance**

The Third Sector Alliance (3SA) is the regional 'network of networks' set up to channel the views of voluntary and community groups from the grassroots to policy and decision makers in London.

The network draws its membership from groups and networks that have a pan London remit and want to influence regional agendas. Currently, there are over 200 'second-tier' (those that provide support to other organisations) members.

3SA is funded through the Government Office for London and aims to promote and support the effective engagement, contribution and influence of the VCS as partners in regional policy.

#### **4. Development of the response**

In March 2008, LVSC prepared a policy briefing on the draft "Cohesion Guidance for Funders", which was sent to 1 911 members of the VCS. The briefing included details of how VCS organisations could contribute to LVSC's response. In addition, on 13<sup>th</sup> May LVSC hosted an event for individuals from the VCS to explain the new draft guidance, discuss its implications for the VCS in London and, through workshop discussion, contribute to this response. 83 people attended this event.

This response was drawn from both written submissions and the workshop discussions at the event on May 13<sup>th</sup>. It was circulated to LVSC staff, members of the VSF and 3SA Steering Group and all those who attended the 13<sup>th</sup> May event for additional comments and amendments. A list of participating organisations is provided at the end of this response.

In order to make it easier to respond to the consultation we have used the terminology "single group" to describe groups who work with a single community, as it has been used in the draft guidance. However, we do not feel this term is easily definable and does not reflect the work that these groups do or their often diverse membership. The guidance takes no account of the fact that a woman may wish to join a women's group; at the same time be an Asian woman and wish to celebrate that aspect of her culture, and be disabled and wish to support or join a disability group – and may wish to do this in different ways and at different times. The complexity and reality of how human beings operate as individuals and with others is absent from the guidance.

It is also unclear from the draft guidance whether Communities and Local Government is referring to single groups as those that work with a single identity such as an ethnic, religious or cultural community (as defined by the Commission on Integration or Cohesion) or whether it has a wider definition that would include, for example, disabled people's or older people's organisations.

#### **5. General comments**

LVSC welcomes the opportunity to respond to Communities and Local Government's draft "Cohesion guidance for funders". There are concerns that, if such guidance is adopted, it will have a severely negative impact on the VCS in London and consequently on those who use their services, particularly those already at most risk of discrimination and social exclusion.

## 5.1 London is different: national guidance is not appropriate

The guidance will have a greater impact on London, which is the most diverse region in England. For example 30.7% of London's population belong to non-white ethnic groups<sup>1</sup> and Londoners follow more than 14 faiths while there are also significant numbers of atheists and agnostics<sup>2</sup>. Of the 18 059 civil partnerships in the UK between December 2005 and December 2006, almost one in four took place in London<sup>3</sup>. This greater diversity is reflected in the London VCS, where there are higher numbers of "single groups" working with minority communities.

Coupled with this greater diversity, comes the problem of collecting population data on London. The recent Treasury committee's report on counting the population, criticised the Office of National Statistics' population data as 'not fit for purpose'. This follows changes to the way the Office for National Statistics calculates population statistics that led to London's population projection being cut by over 100 000. This was in direct contradiction to work undertaken by a number of London boroughs to estimate their local population. London Councils has warned that London's public services have already missed out on at least £130million of public funding<sup>4</sup>. This has put a great strain on council services in London, including social care and housing support leading to cuts in specialist services for particular communities already. In this climate, if the draft guidance was adopted, specialist services for some of those at most risk of discrimination, who would never use mainstream services, could be decimated.

National guidance cannot possibly reflect, or be applicable to, the unique situation of a region such as London.

## 5.2 The guidance is open to misinterpretation by funders

It is welcome that the guidance states that there should be no loss of services that target particular groups and that single groups should not have their funding stopped.

However, other statements from the guidance could be misinterpreted and used by funders **to justify decisions to stop funding single groups**. In fact, although the guidance is still only at the consultation stage, several VCS groups in London have suggested that it has already had an impact on decisions to stop or

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<sup>1</sup> "Labour Market data for Local Areas by ethnicity", Office for National Statistics (ONS), 2004

<sup>2</sup> "ChangeUp in London report 2004 – 8."

<sup>3</sup> "National statistics press release: more than 18 000 civil partnerships formed" 28<sup>th</sup> June 2007

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<http://www.londoncouncils.gov.uk/media/pressreleases/2008Jantodate/PressreleaseLondonCouncilsrevealsthecapitalhaslost130millionduetopopulationstatisti.htm>

change their funding arrangements, including Southall Black Sisters and Imkaan<sup>5</sup>.

Statements from the draft guidance that could be misinterpreted:

- “ [funders] can ensure they are not undercutting cohesion objectives, by avoiding funding projects for particular groups which do not meet evidenced needs particular to those groups, building resentment amongst others; or which allow users to develop insularity and a ‘comfort zone’ without a wider justification in terms of meeting evidenced needs”;
- “whether the single group work proposed for funding by the grant is **genuinely the only way** (our emphasis) to offer the right skills and knowledge for the delivery of services”;
- “Is there a clear case for this activity to be funded **even though** (our emphasis) it will only involve one group or community?”

### **5.3 There is no link to any other government policy on cohesion**

Looking at the draft guidance as a whole, it is unclear to which government policy or legislation it is linked. At the moment the main government documents relating to community cohesion policy are the Home Office’s “Improving Opportunity, Strengthening Society”<sup>6</sup> and the PSA Delivery Agreement 21<sup>7</sup>. The former is a strategy to increase race equality and community cohesion, which acknowledges the importance of reducing inequality in improving community cohesion. The latter specifically emphasises the importance of a “thriving third sector” in promoting community cohesion. Neither provide a clear policy direction on single group funding. In fact their emphasis on reducing inequalities and promoting the third sector are policies that the draft guidance could undermine.

### **5.4 The guidance concentrates too much on ethnic, cultural and religious groups**

At the consultation event, many attendees expressed concern that the draft guidance had been written to address Muslim extremism rather than to improve community cohesion.

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<sup>5</sup> <http://dotm1.net/cr.asp?i=345776&t=t&CID=366376#1>

<sup>6</sup> “Improving Opportunity, Strengthening Society”, Home Office, 2005

<sup>7</sup> “PSA Delivery Agreement 21: Build more cohesive, empowered and active communities”, HM Government, 2007

“Communities and Local Government is struggling with issues such as how Mohammad Sidique Khan (one of the 7<sup>th</sup> July bombers) did what he did when his mother is a community leader. What seems to be forgotten is that he grew up in Dewsbury and was a child of school age at the time when the local publican set up a separate school for white children whose parents withdrew from the local (predominantly Asian) school. Was it this early experience of racist self-segregation by the local white community, and their lack of cohesion that helped shape his views and actions?”

Attendee at LVSC consultation workshop, 13<sup>th</sup> May 2008

### **5.5 The guidance is not based on evidence and does not mention addressing poverty and inequality**

This opinion would seem justified by the fact that there is little evidence that the recommendations in the draft guidance would actually increase community cohesion. For example:

- There is no definitive evidence that “single groups” are divisive or reduce community cohesion. In fact, there are many instances where “single groups” have been shown to promote community cohesion and provide the opportunity for “hard to reach” and newly arrived communities to integrate into local society: examples are provided throughout this response. The guidance suggests that a lack of community cohesion is the fault of these “single groups” and is caused because they do not want to build relationships. Again, there is no evidence of this.
- Communities and Local Government’s own research, is quoted in the guidance as showing that “having friends from different backgrounds is a very strong predictor of community cohesion”, suggesting the need for the draft guidance to emphasise the funding of “bridging” activities. However, this research also found that “irrespective of the level of ethnic diversity in a community, disadvantage consistently undermines perceptions of cohesion and operates in a similar fashion for all communities”. Despite this, there is no mention in the guidance of using funding to reduce levels of deprivation to increase community cohesion.
- The Commission on Integration and Cohesion’s report<sup>8</sup> to Communities and Local Government emphasised the importance of equality in increasing community cohesion. However, the draft guidance makes no mention of funding

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<sup>8</sup> “Our Shared Future”, Commission on Integration and Cohesion, 2007

being used to reduce discrimination or promote equality and the positive effect this would have on community cohesion.

- Recent surveys have shown that very few local areas feel there are problems with community cohesion. In April – September 2007 82% of people agreed that their local area is a place where people from different backgrounds get on well together. This is an increase from 2005 and did not vary with ethnic group, apart from Indian people who were actually more likely to think that their local area is cohesive<sup>9</sup>.

Attendees at the consultation event argued that it was a lack of transparency and openness about who the council chose to fund and why, combined with discriminatory press and media coverage that caused the problems between different ethnic communities in Oldham, Bradford and Burnley in 2001, rather than decisions to fund single groups. This seems to be confirmed by a detailed reading of the Cantle report<sup>10</sup>.

“Problems in Oldham were the result of racism and a lack of transparency or openness about who the council decided to fund.”

Attendee at LVSC consultation workshop, May 13<sup>th</sup> 2008

It is much more likely that it was wider government policy decisions that resulted in different communities living in different areas and going to different schools, which built up problems. The small amount of funding for “single groups” in the VCS is unlikely to have an impact set against these broader social and economic factors.

## **5.6 The guidance is not consistent with other Government policy**

The guidance also contradicts other government policy. For example, the Treasury is quoted as saying as part of the Third Sector Review:

“The government wants to ensure that the third sector is at the heart of reforms to improve public services as contractors delivering services, as campaigners for change, as advisers influencing the design of services and as innovators from which the public sector can learn. This will require a new approach to commissioning and procurement, embracing the sector’s multiple roles in shaping and

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<sup>9</sup> “Race, Cohesion and Faiths. Statistical Release 2. Citizenship survey April – September 2007: England & Wales”, Communities & Local Government, 2008

<sup>10</sup> “Building Cohesive Communities: A Report of the Ministerial Group on Public Order and Community Cohesion, Home Office 2001.

delivering services, and particularly in working with users to ensure that services meet their needs.”<sup>11</sup>

It is often “single groups” that provide the advocacy (campaigning or advisory) role for their communities and deliver services that meet specific communities’ needs.

Similarly the Department of Work and Pensions states that it is “committed to ensuring excellent sub-contractual relationships between the top-tier and high performing third sector and other organisations”<sup>12</sup>. Sub-contracting arrangements are usually most appropriate for those providing specialist services, such as third sector organisations working with a single community.

The draft cohesion guidance may, therefore, contradict policy aims for work with the third sector from both the Department of Work and Pensions and HM Treasury.

### **5.7 The guidance appears to be a cost-cutting exercise that will discriminate against those most in need**

Other attendees at LVSC’s May 13<sup>th</sup> event put a broader cost-cutting agenda at the root of the draft guidance.

“It [the draft guidance] may be the result of there being less money for funding the VCS and this is how the government is addressing it”

Attendee at LVSC consultation workshop, May 13<sup>th</sup> 2008

With the efficiency savings demanded of local authorities in the Comprehensive Spending Review 2007, there is certainly a move at present to commission more mainstream services, that are theoretically used “by all”, with the related savings in management and administration produced by a single contract. There is already evidence<sup>13</sup> that this results in greater inequality (and so would imply reduced community cohesion) with those whose needs were previously met by specialist services, including those provided by “single groups”, not using any services at all, rather than beginning to use mainstream services.

Recent research about the women’s third sector found that many women service users would not access mixed gender / generic services. In a poll of 1000 women, 97% thought it was important for women who have been sexually assaulted to have the choice of women-only support services.

“Why women-only? The value and benefit of by women, for women services”, Womens Resource Centre, 2007

## **5.8 Definitions in the guidance are either absent or confusing**

The draft guidance had the potential to create huge confusion because the terms it uses are not well defined.

“There is also an assumption that communities are homogenous – what does “community” mean – in the BAME “community” – there are many different people, rich, poor, educated, uneducated, unskilled, gay, christian, disabled etc. etc. – so many and such diversity but all lumped together as the BAME sector or community – it is a false assumption.”  
Attendee at LVSC consultation workshop, May 13<sup>th</sup> 2008

There is no definition of “community cohesion” within the document and the terms “bridging” and “bonding” were thought particularly confusing. Many examples were given of where these terms could not be clearly defined, including that of a refugee group that works with refugees of different nationalities. Were their group offering “bonding” activities because they only work with refugees or “bridging” activities because they brought together refugees from a variety of different countries and ethnicities?

One attendee noted the use of the words “integration” and “cohesion” as though they were synonymous. The guidance acknowledges that the ways all these terms are defined will depend on the local context. It does not, therefore, seem appropriate to include them in national guidance where their use could be misinterpreted.

## **5.9 The guidance does not mention community development**

A huge omission in the community cohesion debate, and the role the third sector or VCS can play within it, was felt to be the lack of any mention of community development. There is considerable evidence that community development activities promote community cohesion<sup>14</sup>. Rather than looking to review funding to “single groups”, a more evidence-based policy would see the government investing in and supporting more community development initiatives.

“There is good evidence that community development works in increasing community cohesion. This is a slow process but brings forward good things and doesn’t do any damage.”  
Attendee at LVSC consultation workshop, May 13<sup>th</sup> 2008

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<sup>14</sup> “Firm Foundations”, Home Office, 2004

Attendees at the consultation event thought the activities identified in the guidance as “linking” were the most important for community cohesion and suggested that it is community development workers (based in the local community and working with different community groups) who can provide that linking work.

“Linking work is the key to successful cohesion”  
“There are people who do ‘linking’ work well – community development workers and some community leaders – some focus could be on those key people who do ‘linking’ work well and who are trusted”  
“Trust and understanding are key”  
“A solution is to capacity build community development workers and invest in community development work”.  
Attendees at the LVSC consultation workshops, May 13<sup>th</sup> 2008

LVSC is aware of substantial gaps in the understanding and funding of community development work across London and the shortage of training programmes for those who wish to take a community development approach<sup>15</sup>. This is something that cohesion guidance for funders should address.

#### **5.10 The equality impact assessment of the draft cohesion guidance is not currently available**

If adopted, the guidance is likely to have a huge impact on “single groups”. Those that gain the majority of their income from public funds may well have to alter their aims and objectives to include communities they haven’t previously worked with or risk closing down.

As most of these single groups are working with communities at a high risk of discrimination, the first thing that should have been done on producing this draft guidance was an equalities impact assessment. This is currently unavailable and makes it more difficult to respond to the consultation.

#### **5.11 The draft guidance breaches the Compact**

There are several instances where the guidance breaches the Compact, the partnership agreement between government and the VCS on how they will work together. These have been logged by Carl Allen, Chair of Local Compact Voice, but include:

- The information supplied is not in keeping with consultation standards
- The proposals could affect the independence of charities to determine their objectives and policies

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<sup>15</sup> “ChangeUp London Infrastructure Development Plan 2008”, Capacitybuilders 2008

- It breaches the BME Compact code which states that “the main strength and value of the BME sector lies in its support and delivery of services to BME communities.”

LVSC supports this analysis that the draft guidance breaches the Compact.

## **6. Consultation question 1: Are these principles the right basis for this guidance?**

These principles are not the right basis for this guidance.

### **Principle 1**

It is welcome that principle 1 acknowledges the clear link between equality and cohesion. However, London VCS organisations are concerned that this principle does not seem to be consistent with the rest of the draft guidance.

The Public Law Project, which was invited to present their view of the guidance at the consultation event on 13<sup>th</sup> May, specifically noted that there was no mention of anti-discrimination legislation, or more specifically the equality duties of public bodies, throughout the draft guidance. Public body funders have a statutory duty to have due regard to the need to:

- eliminate race, gender and disability discrimination;
- promote equality of opportunity;
- promote good race relation;

and specific duties including the development of equality schemes and equality impact assessments of new policies covering race, gender and disability. They raised the concern that there could be a potential breach of these if, as is suggested in the guidance, cohesion is given undue prominence and equalities legislation ignored.

In fact this situation currently appears to be happening in London, where Southall Black Sisters users have been given permission to proceed with legal action against Ealing Council, in a bid to maintain their specialist services and funding.

### **Case study: Southall Black sisters**

Southall Black Sisters provides a range of services particularly for Black, Asian and Minority Ethnic (BAME) women. This year it has been told that Ealing Council no longer wants to fund a domestic violence service dedicated solely to the needs of the female BAME community. Gregory Stafford, an Ealing councillor has been quoted as saying: "this year.....the council wants to find a provider that will serve the entire borough, all people regardless of their ethnic origin and both men and women." As Pragna Patel, the Chair of Southall Black Sisters writes in her letter requesting support, this "fails to take account of the unequal social, economic and cultural context, which makes it difficult, if not impossible for black and minority women to access outside help or seek information about their rights"

Southall Black Sisters began working with the Public Law Project because they were concerned that their users would lose a service and that no race or gender equality impact assessments had been done. Under the law, if a local authority introduces a new policy that is likely to have an adverse impact on disabled people, one gender or a particular ethnic group or groups, the council must do an equality impact assessment.

As far as Southall Black Sisters were concerned none had been done and the Public Law Project advised that the Council's failure might be unlawful and could be challenged using the judicial review process.

A high court judge has now ruled that the council should be taken to judicial review for its failure to have proper regard to its duties under the Race Relations Act. The council was felt to have failed to consider the adverse impact that its decision to stop funding Southall Black Sisters would have on BAME women.

If the draft guidance is adopted more such cases where equality duties have been ignored in the quest to "promote community cohesion" are likely to be taken forward.

In addition, principle 1 places a clear onus on funders to only fund single groups where there is "evidenced need". This guidance produces problems as there is no definition of what can be cited as

evidence. Many peoples' needs are concluded to be "unevidenced" by public sector bodies, because they are not included in census categories. Examples include lesbian, gay and bisexual people, certain ethnicities that are lumped together under the "White other" category, refugees, humanists and the transgender community. This is compounded by the fact that census data is only taken every 10 years and is quickly outdated.

The requirement for evidenced need cited in the draft guidance should only be retained if needs analyses include the input of VCS groups working with these types of communities. The type of work required to identify these needs should be fully resourced.

### **Principle 2**

The second principle of the draft guidance suggests that "all groups need to consider how they can promote cohesion and integration". This is a direct breach of the Compact (the agreement between government and the VCS on how they would work together), which has a specific clause on the independence of the VCS which states that the government agrees:

"To recognise and support the independence of the sector, including its right within the law, to campaign, to comment on Government policy, and to challenge that policy, irrespective of any funding relationship that might exist, and to determine and manage its own affairs."

VCS organisations have a variety of governance arrangements which may range from a written constitution to charitable aims and objectives. These often determine who that organisation can work with, particularly in the case of "single groups". The current draft cohesion guidance, if adopted, could mean that groups would have to change their underlying purpose in order to fit in with public body funding requirements. There is concern that public body funders could put conditions on VCS organisations to change their constitution to fit in with cohesion guidance, in direct breach of the the Compact promise to allow organisations to determine and manage their own affairs.

### **Principle 3**

The third principle states that there is evidence that building relationships between people promotes cohesion. "Building relationships between people" could, in fact, be a definition of cohesion. As there is no definition of cohesion in the draft guidance, this statement is useful, but is not an underlying principle.

There was also concern amongst attendees at LVSC's consultation workshop that this principle implied that community cohesion could be imposed in a "top down" process.

"The VCS has a primary role to play in promoting cohesion but the guidance needs to promote meaningful social cohesion. This is like asking someone to build a house but not giving them bricks."  
"Communities are being pushed to assimilate or integrate – cohesion cannot be imposed."  
Attendees at LVSC consultation workshops, May 13<sup>th</sup> 2008

This principle again ignores the role inequality and deprivation play in reducing community cohesion. Projects that support joint work with disadvantaged people are a way of addressing cohesion and working across communities, but only "single groups" will be able to provide the initial access.

"This is about poverty and class and that is not being addressed."  
"Equality of rights would create the ability to exercise cohesion."  
Attendees at LVSC consultation workshops, May 13<sup>th</sup> 2008

#### **Principle 4**

The fourth principle is the one most open to misinterpretation by funders as it specifically talks about the "balance" between "bridging" activities and activities which "support particular groups alone". This principle suggests a complete misunderstanding of the work that single groups do. In many cases it is the secure environment created by single groups that allows people to build confidence and skills, supports them to use more mainstream services and in time to become involved with wider issues. There is much evidence that in this way "single groups" meet needs, address inequality and, so, promote community cohesion.

#### **Case study: Latin American Women's Rights Service**

"One interviewee described her organisation's area of work as integration because it is helping Latin American women to integrate better into British society and to access equality. [Clients] feedback is that they have been able to understand how things work in this country better, and therefore function better in this country and they become more integrated. Sometimes they have been able to overcome situations of violence and to access safety for themselves and for their children. Sometimes they have been able to sort out practical difficulties which created a lot of distress and anguish in their lives." Latin American Women's Rights Service interview<sup>8</sup>

One attendee at the LVSC consultation workshops specifically stated that “bonding is needed to develop community cohesion”.

### **Case study: a refugee women fleeing domestic violence**

A young refugee woman first accessed the services of a VCS organisation working with refugees and asylum seekers, when she was in crisis. The young refugee woman was in a difficult and abusive domestic situation but didn't want to leave the area where she was based, to gain temporary accommodation in a nearby borough. The organisation encouraged her to come back and see what they could offer her.

The young woman came back to their offices a few weeks after her first visit. The reason why she returned was because her benefit had mysteriously stopped. The organisation was able to give her practical advice and help to resolve the problem, as well as provide emergency food. The worker who dealt with the young woman's issue encouraged her to come back and maybe join the ESOL class. She came back a few times and it became obvious that she was in a delicate emotional state and suffering from trauma; she had regular panic attacks. She began, after time, to interact with other volunteers at the organisation and over a period of several months she changed from a person unable to socially interact to a volunteer who learned to type, improve her English, do other office tasks and be more confident and outgoing. She had become empowered by the VCS organisation's intervention to resolve her difficult situation.

### **Principle 5**

The final principle in the draft guidance suggests that cohesion guidance should be driven by the local context and specific local needs. This was welcomed, but this principle raised the question of why Communities and Local Government was not leaving it to local areas to decide how they should tackle cohesion.

This is a particular issue in London where there is huge diversity, both within the region and compared with other regions. In an area such as Barking & Dagenham, where BNP councillors have been elected, the 1.1% of the population from a BAME background may find it more difficult to tackle the issues of discrimination than if they had a larger BAME community around them. Tensions between different ethnic groups are high in this area. In Camden by contrast

30% of the population is from the BAME community but over 90% of residents say that they enjoy living in such a culturally diverse place.

The situation in each local area is probably unique as it depends so much on characteristics of the local population and even local geography. By trying to establish guidance at a national level, the government cannot take account of differences between areas. Not all areas are expected to include the national indicators included in PSA21 in their Local Area Agreements. In a similar vein, Communities and Local Government should leave it to local areas to address cohesion issues, if there are any, within a local context and abandon their national guidance.

### **7. Consultation question 2: Are these the right questions for funders to consider to help make them promote cohesion through the funding decisions they make?**

These are not the right questions for funders to consider.

Many of the answers to the following consultation questions return to points already made in sections 5 and 6. Please refer to these sections for more detailed answers and case studies.

The questions for funders were subject to many of the same criticisms as the five main principles. The first question seems to imply that single groups are themselves socially divisive and decrease community cohesion. They also suggest that a "single group", for example decided on the basis of ethnicity, is a homogeneous community, when they obviously contain a diversity of members. For example, it is possible to be Asian and gay but still have an interest in playing for a local club.

Question 2 again undermines the independence of the sector, suggesting that funders should influence VCS organisations' activities. This is a breach of Compact principles.

Question 3 addresses the issue of whether there should be a communications plan to announce the reasons for funding decisions to the local community. It is worrying that this question is included in the draft cohesion guidance, rather than in more general guidance to funders. It is obviously important that all funding decisions should be open and transparent, not simply to improve community cohesion, but as a matter of principle in ensuring public money is well spent.

Question 4 asks whether the funding is aligned with the area's wider community cohesion strategy, suggesting, as before, that funding for community cohesion is a matter that should be addressed within the local context rather than be subject to over-arching national guidance. It is also important to note that even at a local level, many small community groups do not have the capacity to get involved in local strategic partnerships and may be unaware of local strategies, so putting them at a disadvantage in competition for funds.

Question 5 raises more questions about the independence of the VCS, as many organisations will not have a remit to promote integration or cohesion between, for example, different ethnic communities but will have been specifically set up to work with a "single group".

It is interesting that the draft guidance only suggests asking these questions when funding VCS groups. There is no such cohesion criteria or questions to be asked when spending public money on securing the services of private sector companies.

Indeed, if taken to its logical conclusion, the guidance also implies that all Church of England, Roman Catholic, Muslim or Jewish schools should be closed down with immediate effect.

**7. Consultation question 3: How could the process of organisations setting out, in their project plans, plans for future interaction across groups, be developed, refined or extended? How should it be implemented to ensure it is proportionate and does not present barriers for organisations with differing levels of capacity?**

This question also raises questions about the VCS' independence and encourages funders to break Compact principles by trying to influence the type of activities that VCS organisations carry out. In many services, particularly for vulnerable groups, future integration of the service is not appropriate.

For example, groups that provide support for victims of hate crime, such as Galop which works with lesbian, gay and bisexual people who have been targeted because of their sexuality, should not have to detail plans of how they will interact with other groups in the future. It is wholly appropriate to have a service specifically for one single community, on an issue such as homophobic hate crime.

Attendees at the May 13<sup>th</sup> event thought that "linking" work through trusted community development workers working with communities

and different community groups was the best way to address the community cohesion agenda, rather than by not funding "single groups". Such work could easily be included in project plans and would not require an organisation to change its aims or objectives, if it were working with a single group. However, it would obviously have to be appropriately resourced and use trusted community development workers.

#### **8. Consultation question 4: Do funders have the right information and resources to make these considerations part of their decision-making processes in an effective way?**

As previously stated in section 5, there are some communities which are not routinely categorised, such as lesbian, gay or bisexual people and people of particular "white other" ethnicities. Work with such communities by the local VCS is often unacknowledged. Because of this, statutory sector funders do not have the right information to make decisions in an effective way and they often use this lack of evidence as a sign of a lack of need.

It is, therefore important that small VCS organisations working with such communities are given sufficient resources to explore the users' needs and develop services that will meet these. Funders, especially statutory sector commissioners, need to have a better understanding of using the VCS to analyse needs and to develop a knowledge of the local VCS "market" in their area.

#### **Case study: Centre for Armenian Information and Advice**

The Centre for Armenian Information and Advice (CAIA) was established in 1986 to provide advice and support to disadvantaged Armenians. The Armenians are a relatively "hidden" community in London, and the Centre's funding is threatened by both the drive to "mainstreaming" services and the issue of "single group funding" although their work promotes cohesion.

Armenians are one of Britain's oldest refugee communities having sought asylum in Britain since 1915. Present day Armenian asylum seekers are fleeing from the former Soviet Union, the Middle East and Turkey and it is estimated there are 20 000 in London. Additional problems faced by Armenians are that they are not identified as an ethnic group under census information - so there is little research on their needs. There are also issues of cohesion within their own community because they have arrived in the UK from different parts of the world, having been forced to live under different regimes in different countries.

**Case study: Centre for Armenian Information and Advice  
(continued)**

CAIA meets the needs of this extremely isolated group, whose language is rarely catered for by statutory agencies, and ensures their users grow in confidence and feel more able to take up opportunities and **integrate into mainstream society** in the UK. At their Hayashan community centre they work to create cohesion amongst their community and in partnership with social services, GPs, Job Centre Plus and local councillors, who explain how the Armenian community can access mainstream services with the support of the Centre.

The CAIA also works with other refugee organisations, for example through the Ealing Refugee forum. This co-operation is based on the common issues faced by all refugees and ensures better understanding amongst these different communities.

Despite this, CAIA's funding is currently under threat as they were unsuccessful in the recent London Councils commissioning process, where a 35% budget cut in their partnership bid meant that some BAME, refugee and migrant groups' funding was excluded from the partnership bid. The excluded partners all provided specialist services for communities for which there was less mainstream evidence of need, because they were not included in separate census categories.

Where funders get this right, there can be huge benefits for the VCS and the people they work with. London Councils works very closely with Voluntary Sector Forum on developing and reviewing their funding arrangements. Their recent change to a commissioning process was only taken after full consultation with the VCS. All subsequent service specifications were open for consultation so that VCS organisations could feed in their expert knowledge about their communities' needs in that area.

**9. Consultation question 5: How can funders best work to promote cohesion with organisations with constitutions or charitable objectives which may define the work the organisation is there to do, if these objects do not include specific reference to cohesion or integration activities?**

Any guidance to funders should be clear that they cannot influence the constitutions or charitable objectives of VCS organisations. VCS organisations are independent of government and cannot be told to

make particular issues, including community cohesion, a priority. For many organisations community cohesion will be an issue that they are already working on as part of their constitution or charitable objectives. These are the groups funders should initially be looking to work with around this issue. Other groups can be linked in through community development work. More strategic work across the borough would be best managed through liaison between funders and local VCS infrastructure organisations, both specialist and generic.

“It is the integrity of an organisation that builds people’s trust so that they will engage with other activities.”

Attendee at LVSC consultation workshop, May 13<sup>th</sup> 2008

Attendees at the 13<sup>th</sup> May suggested that issuing this guidance to promote cohesion was “using a sledgehammer to smash a nut”. Funders should simply ask to see and monitor the effectiveness of VCS organisations’ equal opportunities policies to ensure that they promote cohesion.

**10. Consultation question 6: Can you tell us about examples of projects which have found innovative ways to balance “bridging” activity and work meeting the needs of particular groups to promote cohesion, locally?**

**Case study: Interlink Foundation**

Interlink Foundation is based in the north of the London Borough of Hackney, supporting the needs of Charedi (Orthodox Jewish) organisations. This part of Hackney has the highest concentration of Charedi Jews anywhere in Europe and also houses a sizeable religious Muslim community.

The two faith groups have developed an excellent relationship over the years, even in times of political tension in the Middle East and have worked together at a local level on common issues such as ritual slaughter, faith schools, funding and health.

Interlink started to develop its working relationship with the North London Muslim Housing Association and North London Muslim Community Centre in 2001 when leading a Sure Start partnership in Stamford Hill, Hackney. The Muslim community, in the words of one of their leaders “were encouraged by Interlink to take the leap and build our capacity”. Interlink gave them the opportunity to engage in the local Sure Start programme and they have now moved on to configure their own highly successful Children’s Centre to meet the needs of specific groups who otherwise would have been left out.

All this has led to good partnership working at the organisational level and warm community relations at the community and individual levels.

### **Case study: Amba Bongo (working with Education Action)**

Amba came to the UK in 1991 from the Democratic Republic of Congo (DRC) where she had worked in the Ministry of Education. Amba left her home country after denouncing her corrupt seniors and then suffering from subsequent persecution. It was a very traumatic time. 'I was really sad. I remember I was crying because I didn't get to see my daughter or my brothers and sisters before I left. We were a very united family'.

Amba applied for asylum immediately on reaching the UK, but the response was slow. 'I didn't hear anything for 8 years – no letters, meetings or anything. I didn't just want to sit around though, so I found a job as bi-lingual secretary'. Then in 1995 she began translating for a solicitors firm dealing in immigration and asylum cases. After learning the complexities of asylum cases Amba set-up her own project, 'Active Women', in 1998 to help French-speaking, African women asylum seekers.

In the same year Amba wrote her first novel, *Une Femme En Exil*. 'When I started writing, everything just started flowing' she explains – and so have her works. Amba has already finished her second novel, *Cécilia*, and is writing a third book which explores her own feelings as she returned to visit the DRC in 2003.

After receiving a flyer from Education Action about the human rights training course, Amba knew it was for her immediately. 'I always felt I was a human rights activist. In my own community I've always tried to understand people and defend the persecuted. The course is brilliant – more than I was expecting. I like the theory of it, but also the practical issues: how to contact the media, lobby and other techniques important for human rights activism'.

Amba continues to act as Project Director and Immigration Case Worker for 'Active Women' and hopes to expand the organisation and its work with her new knowledge. She understands the important opportunity British citizenship has afforded her and is making the most of it. As she simply states 'the UK has given me the chance to be what I am'.

**11. Consultation question 7: Can you tell us about other examples of funders who work well with the organisations they fund in applying considerations like those set out in the questions above to promote cohesion locally?**

Independent charitable trusts, that are one of the few VCS funders not subject to any funders guidance from government, often have a better understanding of the ethos of the VCS than publicly funded bodies.

Funders need to provide support to help VCS organisations deliver outcomes that both fit with their constitution or charitable objectives and the funders' own objectives, without breaching Compact principles. This could include capacity building support to help organisations improve their governance and financial procedures, monitoring requirements that are appropriate to the level of funding and support to help the organisation meet their core costs.

All these defining features are outlined in the government's own PSA Delivery Agreement 21<sup>2</sup> under the "thriving third sector" national indicator.

**Case study: City Parochial Foundation and the John Lyons Charity**

City Parochial Foundation and the John Lyons charity are both independent grant-making charities. They wanted to find new ways of working with marginalised and disaffected young men in London. Their independence from government meant they did not have to espouse government-sanctioned and approved policies, but could respond directly to local needs.

They gave a three-year grant to the Surma Centre of the Bengali Workers Association in south Camden to work with young Bangladeshi men.

All of the young men shared a concern about drug use and dealing within their own community and expressed fears for the 12 – 15 year old boys who were getting into trouble. Work expectations were extremely limited. Most had left school with few qualifications and had worked in a succession of part-time retail and service sector jobs interspersed with prolonged periods of unemployment.

The grants funded programme aimed to:

- encourage young men to have higher expectations of themselves
- provide them with a significant role in the Bangladeshi

community through their efforts to mentor and support young men

- ensure access to advice and information about sexual health and drugs
- encourage a more flexible attitude towards being a man.

There was also help with debt, support for social and recreational needs and the project worker also got involved in local gang rivalries when they impacted on the work of the project.

96 British Bangladeshis have so far taken part in the project and 60% have succeeded in obtaining employment with another 29 in apprenticeships, training or university courses. Parents and centre workers also noticed changes in the young men's behaviour describing them as being more confident, more caring and considerate of others and more caring and responsible.

The independent-funding of this innovative approach demonstrated a number of lessons to policy makers:

- the importance of providing a service specifically for these marginalised and disaffected Bangladeshi young men
- growing up male is complex and unless this is acknowledged simplistic policy ideas will fail
- mainstream services are often too tightly age-restricted and unable to adapt to the social changes that impact on young people's lives
- mainstream services need to learn to target specific groups effectively
- development takes time; the project had a difficult first year but, by year two, workers had experimented with the project design and become more confident and trusted.

**12. Consultation question 8: Access to funding, leadership skills and misconceptions may be issues which may limit the ability of organisations to bridge and link. Are there other barriers in your community or local area which need to be overcome? Who needs to take action, and what do they need to do?**

The main barriers limiting the ability of VCS organisations to bridge and link are:

- misinterpretation of guidance by funders, who then do not fund "single groups". This will ensure that bonding activities within the most disadvantaged, excluded or vulnerable

- groups do not occur, or linking activities between them, with resulting increases in social exclusion and inequalities;
- use of the guidance by extremist groups to prevent or to challenge the funding of equalities (or single) groups that they discriminate against.

### **Case study**

On 4<sup>th</sup> March 2008 Charity News published the story that the Charity Commission were looking into allegations made in a report on the British National Party's website that donations by the Phillip Green Memorial Trust to various other charities did not meet the Trust's charitable purposes. A Commission spokeswoman said it had received no formal complaint from the BNP about the charity but had been alerted to the report and was now "looking into it to see whether we have a regulatory role to play".

The report, headlined "Children's Charity Investigated", starts by stating that the BNP has for some time been carrying out a major investigation into the regulation and conduct of certain registered charities in the UK. It then goes on to examine the charitable purposes of the Trust which include helping sick and disabled children and advancing the religious and general education of Jewish youth in London.

However, according to the BNP report, the Trust has been making some regular donations to organisations whose purposes do not match the Trust's publicly-stated objects. It singles out a Jewish charity Community Security Trust (CST); anti-racism charity Searchlight and EACH, Educational Action Against Homophobia.

Sandra Nagioff, an administrator at the Trust was reported as saying that the BNP had pinpointed the wrong EACH charity – the one the Trust supports is East Anglia Children's Hospice. She also said that CST and Searchlight do work with children and so fall within the Trust's remit. "They are both anti-fascist organisations that are thorns in the BNP's side," she said. "The BNP is obviously going round looking for organisations that have given them money and is having a pop at them."

### **13. Conclusion and recommendations**

To summarise the LVSC consultation event suggested that London's VCS organisations felt that adoption of this draft guidance would cause:

- a cut in funding, and therefore a reduction in the number of specialist services provided by single groups;
- an increase in people unable to access services, particularly amongst the most disadvantaged;
- increasing inequalities;
- reduced community cohesion.

The draft guidance may also cause funders to neglect their legal equality duties, by over emphasising the cohesion agenda.

It is, therefore, recommended that Communities and Local Government:

- withdraw the draft guidance linking single group funding to community cohesion;
- review whether guidance around community cohesion is needed at a national level or would be better developed locally;
- work to link community cohesion with policies on equality, regeneration and community development

## 14. Event participants and additional advice

Those attending the 13<sup>th</sup> May event were:

<b>NAME</b>	<b>ORGANISATION</b>
Clare Knights	London Voluntary Service Council (LVSC)
Bee Burgess	Community Transport Association
Chaya Spitz	The Interlink Foundation
Wendy McGuire	Community Action Southwark
Sue Sanders	Schools OUT & LGBT History Month
Pepper Harow	British Humanist Association
Louise Ivison	Richmond CVS
Pilgrim Tucker	Age Concern Islington
Rachael McGill	Community Action Southwark
Anna Herrmann	Clean Break
John Anderson	London Youth
Sanchita Hosali	Greater London Domestic Violence Project (GLDVP)
Suzan D. A. Malaquias	The Lilith Project, Eaves Housing for Women
Angela Spence	Black Training & Enterprise Group (BTEG)
Deborah Hart	Women in London
Essi Lindstedt	Citizenship Foundation
Amanda Little	London Development Agency (LDA)
Karen Hart	North London CVS Partnership
Phil Storey	Hammersmith & Fulham Citizens Advice Bureau
Gerry Mahaffey	Help the Aged
Luisa Messina	Red Ochre
Ryan Davey	Mind
Valerie Brown	Race Equality in Newham (REIN)
Claire Helman	Capital Volunteering
Aloyse Raptopoulos	Gate 69
Rebecca Townsend	Interchange Legal Advisory Service
Roger Bronkhurst	Interchange Legal Advisory Service
Marian Larragy	London Civic Forum
Marjorie Francis	Healing Waters
Jessica Sims	Runnymede Trust
Wai-Fong Pang	London Advice Services Alliance (LASA)
Maxine Quintyne-Kolaru	London Councils
Marsha Smith	London Councils
Bally Dhaliwal	London Councils
Francisco Ghaly	Volunteer Centre Southwark
Poornima Karunacadacharan	Refugees in Effective and Active Partnership (REAP)
Olesya Khromeychuk	Refugees in Effective and Active Partnership (REAP)
Tracy-Ann Smith	Natural History Museum
Nicole Beckford	Croydon Voluntary Action
Karin Podschun	London Voluntary Service Council (LVSC)
Sumanta Roy	Imkaan
Zainab Waliullah	London Refugee Voice
Sharon Anderson	Sankofa African Caribbean Org
Anna Bainbridge	Latin American Women's Aid
Viviana Rosenkranz	Latin American Women's Aid
Jacky Moran	Universal House
Angela Cairns	Relate
Noelle Gilbert	The Refugee Council

Candice Wallman	Royal Mencap
Alison Licorish	London Borough of Lewisham
Beatrice Piloya	PATIKO
Zafreen Mahfooz	Praxis
Manjeet Johal	Youth Service
Hyacinth Parsons	Government Office for London (GOL)
Seán Hutton	Federation of Irish Societies
Tim Kahn	Pre-School Learning Alliance
Carl Allen	Black Workers' Group
Laura Bennett	Greater London Volunteering (GLV)
Ceri Goddard	British Institute of Human Rights (BIHR)
Macarena Vergara	Women's Resource Centre
Mazin Zeki	National Secular Society
Sharon Stainsby	London Voluntary Service Council (LVSC)
Gemma Cossins	London Voluntary Service Council (LVSC)
Alison Blackwood	London Voluntary Service Council (LVSC)
Tim Brogden	London Voluntary Service Council (LVSC)
Sandra van der Feen	London Voluntary Service Council (LVSC)
Kevin McInerney	London Voluntary Service Council (LVSC)
Gethyn Williams	London Voluntary Service Council (LVSC)
Corinne Welsh	London Voluntary Service Council (LVSC)
Roisin Cavanagh	British Institute of Human Rights (BIHR)
Sarah Veale	Trades Union Congress (TUC)
Catherine Casserley	Discrimination Law Association
James Kingston	Communities & Local Government (CLG)
Isabel Hudson	Women's Resource Centre
Vandna Gohil	Voice4Change England
Clare Collier	Public Law Project
Pam Grant	National Association for Voluntary and Community Action (NAVCA)
Barbara Nea	Humanity, Equality & Rights (HEAR)
Mônica M Britto Vidal	Wandsworth Voluntary Sector Development Agency
Guri Hummelsund	London Voluntary Service Council (LVSC)
Nicole Waters	Inclusion in Leaders
Siddo Deva	UNI Network
Arjumand Kazmi	Voice4Change England

Many thanks for additional advice and comments on the response document which was provided by:

<b>NAME</b>	<b>ORGANISATION</b>
Andy Gregg	London Advice Services Alliance
Tim Brogden	LVSC
Sandra van der Feen	LVSC
Barbara Nea	HEAR
Carl Allen	Local Compact Voice
Karen Hart	North London CVS Partnership
Sumanta Roy	Imkaan
Isabel Hudson	National Equality Partnership
Arjumand Kazmi	Voice4Change England
Gordon Deuchars	Age Concern England

This response was prepared by Alison Blackwood (LVSC).

