

Mayor's Equality Framework – Equal Life Chances for All

ROTA is a registered charity and a company limited by guarantee set up in 1997 to take over from GLARE (Greater London Action on Race Equality) originally set up in 1984. ROTA is a social policy think-tank focusing on issues that affect Black, Asian and minority ethnic (BAME) communities. ROTA aims to increase the capacity of BAME organisations and strengthen the voice of BAME communities through increased civic engagement and participation in society. ROTA is the host and the accountable body for two regional networks:

- MiNet: the London focused BAME network, which joined ROTA in 2002 to strengthen the voice for London's BAME voluntary and community sector (VCS) in the development of regional policy;
- HEAR: London's only pan-equalities and human rights network, which joined ROTA in January 2005. Its focus is on issues affecting London's equality and human rights VCS organisations.

ROTA provides policy infrastructure support to BAME and equality organisations and other stakeholders, and influences social policy at regional and national level by:

- Providing voice and representation of issues identified by the BAME and equality VCS through memberships at key policy boards and decision making body, by supporting members of MiNet and HEAR to sit on policy boards, brokering relationships between policy bodies and equality representatives and by speaking at events and the media.
- Carrying out and publishing in-depth research that creates an evidence base for policy.
- Holding regular networking and policy events bringing together the VCS and key regional and national stakeholders to discuss current priorities, disseminate best practice and find solutions.
- Producing free and accessible publications such as Agenda, Supplement and policy e-newsletters
- Working in partnership with BAME and equality VCS organisations, the other London regional networks and with regional networks in the rest of England.
- Providing training on policy areas such as hate crime, equalities and regional governance.

1. What do you consider are the priority areas for ensuring there are equal life chances for all Londoners?

According to GLA 2008 statistics, with over 7.5 million residents, London has the second largest population of any British region - only exceeded by the South East - and accounts for 12.4 per cent of the UK population. In addition:

- London is home to over 40 per cent of the national ethnic minority population
- It is also home to 40 per cent of the national migrant population (the population born outside the UK).
- London's ethnic minority population is expected to increase from 33 per cent (2006) to 39 per cent by 2026.
- All ethnic groups are projected to increase over the next twenty years except the White ethnic group which has a projected small decline of 0.1 per cent.
- Over the next 20 years, six London boroughs will join Brent and Newham as authorities with at least half of their resident population from a BAME group.

The Mayor's Equality Framework needs to pay attention to the needs associated with the demographics of London and the forecasted trends. Further consideration will need to happen in relation to policies, practices and structures that need to be put in place to tackle local issues relating to all London's communities. This is particularly acute given the recession and current economic downturn. It is also expected that the recession will create new social problems and discontentment in communities and meeting these emerging needs also needs to be a high priority for the GLA in moving forward.

In order that all Londoners are ensured equal life chances the Mayor should ensure that current barriers to equality are addressed, and acknowledge how inequality, and discrimination, compounded at a number of levels leads to unequal life chances. The inequality faced by BAME individuals and communities in London should be a key priority for the Mayor as they currently experience unequal treatment and outcomes in key social policy areas such as **education, criminal justice, health, housing and employment**.

All of the above areas are inextricably linked, and when individuals or communities experience unequal access or treatment to any of the above it impacts on their ability to have equal life chances. Numerous pieces of research, including work undertaken by ROTA, have evidenced gaps in both policy and practice, which compound these unequal life chances.

Education

Government and academic evidence bases demonstrate multiple examples of unequal treatment for BAME communities in London. At present, Black Caribbean, Mixed White and Black Caribbean, Traveller Irish and Roma Gypsy children have, on average, attainment rates below the national average. Furthermore, Black Caribbean, Mixed Black Caribbean and White, and Black African children are all more likely to be permanently excluded from mainstream education, and for reasons that their white peers may not be excluded for (DFES). Black Caribbean and Black African children are more likely to be placed in lower tiered classes and

be entered into lower-tiered examination papers. The state of competition in the education system has produced schools considered to be 'failing' allowing for wealthier parents to move into areas with schools at the top of league tables, and others left with schools that could not compete (for more on this see Tomlinson). The success or failure of schools has also determined their funding and compounded disadvantage. The difficulties that many BAME families have in navigating and understanding the British education system, the impact that poverty had on their ability to travel outside of the borough, means that they often struggle to compete with other families. This is particularly acute for refugee families or newer/emerging communities who lack even community/local support/awareness to guide their decisions.

All of the above has been confirmed by research conducted by ROTA over the past two decades. Our seminal book, *Inclusive Schools, Inclusive Society* (ROTA 1999) highlighted all of the concerns noted the above as barriers to an inclusive education system, which offered equal chances to all BAME groups. It is concerning that 10 years on from its publication, both a recent ROTA consultation of London's BAME sector, and a ROTA workshop held at the sixth London Schools and the Black Child Conference, raised persistent concerns regarding unequal access, experience and outcomes for some BAME communities in London.

Education is a key determining factor in individual's life chances, and such persistent inequality, to date, has also meant unequal life chances for some BAME groups. The relationship that educational success bears to other social areas such as criminal justice and health is well documented, and recently noted in the Mayor's Time for Action document (GLA 2008). Given these links unequal experience of education for BAME groups should be a priority for the framework.

Criminal Justice

BAME groups are significantly disadvantaged by their experiences of both crime and the criminal justice system in London specifically and in the UK more generally. A recent partnership publication and campaign produced with ROTA, *Race for Justice*, highlighted the increasing over-representation of BAME individuals in the criminal justice system. The report states that 'the most recent figures show that BME groups account for 26% of the prison population, even though they constitute only 9% of the overall population in England and Wales' (Race for Justice 2008). This disproportionality cannot be explained with reference to rates of offending, as evidence has shown that the unequal experiences that occur at every stage of the criminal justice system, simply serve to compound and sustain inequality. As such, both the policies and procedures within the criminal justice system remain institutionally racist at varying points. While changes may have been made internally, the statistics show that the impact has not seen a reduction in how they are realised on the ground.

The issue is even more acute in London. The Home Affairs Select Committee report on Young Black People and the Criminal Justice System (2007) stated that although young black Londoners under 18 constitute 15% of the population they 'represent 37% of those stopped and searched, 31% of those accused of committing a crime, 26% of pre-court decisions, 49% of remand decisions, 43% of

custodial decisions and 30% of those dealt with by Youth Offending Teams'. This disproportionately negative impact of policy and practice needs to be addressed, given the direct impact it will have in producing unequal life chances at present. London policies being developed to tackle gang, gun and knife violence, such as Operation Blunt, threaten to continue and exacerbate these trends. ROTA's award winning, youth-led investigation into gangs and weapon use in London, Building Bridges, not only noted continuing perceived and real discrimination in the criminal justice system, it also identified negative outcomes for responses such as Operation Blunt. It was claimed by some BAME young women that operations that focused on a particular weapon not only increased the use of stop and search on young black people, but they also felt at increased risk of sexual assault being used on them as an alternative weapon. The lack of the resources and capacity in the women's BAME sector to support these young girls and their negative perceptions of the criminal justice system compounds their unequal life chances. If young people feel a lack of faith in the criminal justice system, then their victimisation will not be addressed sufficiently.

The issue of victimisation extends beyond gang and weapon violence. This alone is a concern, given the huge disproportionality in both victim and offender rates with regards to this type of offence. However, even those who are offenders have often been victims prior to their offence and failed to seek support through criminal justice institutions in such cases. Rather the weapon or the gang has become their means of protection, and this stems back to a lack of faith, and crucially trust, in the systems put in place to protect them; especially as children. ROTA's research study into hate crime and restorative justice identified that in 2006/7, 'the most commonly reported hate crime in London was racist crime (9,976), followed by homophobic crime (1,184 incidents) and faith crimes (696 incidents). While it is encouraging that such incidents are being reported to the police, this level of victimisation remains a concern. With the enforcement approach that is being taken in response to youth violence, and policy responses to terrorism, ROTA is concerned that faith in the criminal justice system will be questioned by BAME communities, and they will continue to be victimised without the support of state institutions.

Health

The life chances of BAME communities are also being impacted by the health inequalities that currently exist for ethnic minority communities. The disproportionate representation of black men referred to mental health services has been well documented. These also bear links to black men who are processed through the criminal justice system. Aside from this there is also disproportionate impact of sexually transmitted infections to some BAME communities, as well as in addition to alcohol and heroin. Given the level of poverty for BAME communities they also have lower life expectancy rates.

The experiences that BAME individuals have of health services has highlighted a failure by health agencies to offer culturally appropriate services. The low uptake of translation services also hinders their ability to seek medical advice on illnesses, as well as documented evidence of discriminatory practices has seen health inequalities worsen in some cases. The health needs of the variety of BAME groups are not currently being met and for differing reasons. The risks currently

faced by many specialist services who attempt to fill this gap, with pressed capacity and resources, due to funding cuts threatens to see gap widen. This limited capacity and increased need was reflected in the results of a recent consultation of the BAME sector run by ROTA. For the majority of the organisations surveyed, health appeared in their top three social policy concerns with access to appropriate services and mental health being the reason for this response. The links that there are between poor health and educational performance and experiences of crime, as well as the two-way relationship that exists between them, means that addressing health inequalities is crucial to redress unequal life chances currently faced by BAME communities in London.

Housing

Historically BAME communities have faced unequal experiences of housing in London. According to the English Housing Conditions Survey, between 1996 and 2006 the proportion of minority ethnic households living in non-decent homes fell from 51% to 29%, which whilst being good progress, is still a higher than the for the wider population. Given the impact that housing has on young people's educational attainment and ability to concentrate, the health of individuals and their general well-being, it therefore impacts substantially on their life chances. The low stock of social housing, with more than three bedrooms, increases the likelihood of over-crowding for some BAME groups. Many BAME families pull together and pool resources, including accommodation, and one root of overcrowding is the lack of available housing stock to meet needs.

Homelessness also impacts disproportionately on BAME communities. According to data published by Communities and Local Government, in 2007 20% of households accepted as homeless in England were from a BAME group even though they only made up 8% of the national population. And as for other social policy areas, the problems become more acute when one considers London. Data collected in 2004 by local authorities showed that over 50% of London's homeless were non-white. A study conducted by ROTA into BAME Homelessness in London also identified differing housing issues for different BAME groups and for those suffering multiple-disadvantage such as refugee communities of BAME women. There were also specific needs and unequal outcomes for Gypsy and Traveller communities, who had facility needs and required assistance with affordable utility and caravan repairs, compared to high numbers of older Irish hostel residents individuals who have become institutionalised. Needs will also differ across boroughs depending on which BAME populations reside in those areas, and lack of sensitivity to these issues locally compound unequal experiences of housing, and therefore life chances of BAME communities.

Employment

Given the unequal outcomes faced by BAME communities in health, housing, education and criminal justice, stated above, it follows that the impact of this would be unequal outcomes in employment. However, unequal outcomes in employment cannot only be explained via reference to discrimination and/or wanting services in other areas. Research demonstrates that even with further education qualifications BAME individuals often find entering certain employment fields more challenging than their white counterparts.

Unemployment is a concern for BAME communities and impacts them disproportionately. For instance, although the overall Black, Asian and minority ethnic employment rate has increased in recent years, the gaps for some groups remain high. For example, Pakistani and Bangladeshi women have the lowest employment rates (25 per cent and 31 per cent) and the highest economic inactivity rates (69 per cent and 63 per cent). Black, Asian and minority ethnic men and women continue to have higher unemployment rates – for instance 18 per cent of Black Caribbean men are unemployed compared to five per cent of White men. Also many Black, Asian and minority ethnic groups are under-represented in senior management.

Furthermore, the specific issues are different for specific BAME groups, and further complicated when one considers legislation regarding working rights of refugees and/or asylum seekers, as well as concerns regarding transferable skills and qualification. Even for those organisations who have successful recruitment statistics for BAME representation, their records on retention demonstrate an inability to offer appropriate support for BAME staff.

While levels of unemployment for some BAME communities remain unacceptably high, BAME groups are also massively under-represented in higher level or managerial positions across the sectors. While recruitment of BAME individuals in a specific concern for statutory service providers such as criminal justice agencies, schools and healthcare providers, the concern is more than one of representation; It is also one of influence. The lack of BAME political representation and BAME individuals in posts of decision-makers is crucial to seeing the necessary cultural shifts in institutionally discriminatory agencies.

Community Cohesion

A recent consultation of London's BAME third sector conducted by ROTA identified the potentially negative impact that the community cohesion agenda could have on both BAME third sector services and BAME communities. Of all organisations surveyed, concern regarding the community cohesion agenda featured as a social policy priority for this needs to be filled in- how much?? of organisations, and therefore it should also be a priority for the Mayor's framework.

The reasons for this concern need to be understood if it is to be addressed appropriately. Firstly, there was a concern by those surveyed that the responsibility for 'community cohesion' was being placed on ethnic minority communities rather than being a generic social responsibility. To elucidate: a lack of cohesion within communities was assumed to be a) the result of ethnic/racial divides and b) a result of the failings of ethnic minority communities. Both of these are inaccurate and unacceptable, and if they are to be the starting point for policy they could in fact contribute to unequal outcomes for ethnic minority communities. Not only could the above misunderstandings contribute to policy development that would damage the life chances of BAME communities, but they would also influence policy and strategy in all social policy areas outlined above.

Secondly, the community cohesion agenda seriously threatens the existence of specialist BAME services currently being provided by third sector organisations in London. The Single Group Funding recommendation originally made in the

Cohesion Guidance by the Department for Communities and Local Government has already had an impact on decisions being made locally to fund specialist services. Race Equality Councils have reported to ROTA threats to their funding, and even given Southall Black Sisters recent successful appeal against their funding withdrawal, other small third sector BAME services are gradually facing closure. The sector was already extremely under-resourced. If the community cohesion agenda seeks to mainstream services, where specialist third sector services would be more appropriate, policymakers and funders risk creating a more exclusive rather than inclusive society, running against the cohesion agenda. The two concerns raised above demonstrate that if the community cohesion agenda is used to hold BAME communities responsible for a lack of cohesion and to insist on mainstream services fulfilling the roles of specialist organisations, then the impact on unequal life chances for BAME groups in all social policy areas will be negative and widespread.

Cross-Equalities and Multiple-Disadvantage

With the closure of the Commission for Racial Equality, the creation of the Equality and Human Rights Commission and the development of the Single Equality Bill, an environment has been created in which an acknowledgement of racial inequality can be threatened, as well as one where cross equality concerns and multiple-disadvantage are not recognised.

Much of the work that ROTA has produced, such as the BAME Homelessness study and the Building Bridges project, has focused on social policy concerns whose impact is intensified due to multiple-disadvantage. For example BAME women who also had refugee status had needs that were multiplied due to their cross equality identities. ROTA's consultation of the BAME third sector also identified a concern by organisations that there was a need to work out how to offer services that met cross equality need. There is a need to break from individual silo working and develop mechanisms to tackle multiple disadvantage if we can make the most of single equality legislation and the EHRC.

It is concerning that at present the above is not happening and therefore threatening to compound unequal life chances of BAME communities. Race Equality Councils are losing resources and expected to offer cross equalities services and other specialist local groups such as BAME women's services or Refugee services are also losing funding and therefore the complex needs of those service users are not being met. As with the issues surrounding the community cohesion agenda, without specialist services in place to bridge the gap between mainstream services and excluded communities, we create a climate where life chances for many BAME communities are even more unequal.

Third Sector and Specialist Services

As all of the above priority areas have demonstrated, unequal life chances for BAME communities will not be addressed simply through mainstream services across the sectors. There is a duty, both legal and moral, for statutory agents to improve both their services and policies to meet needs of BAME communities. More importantly, and before they can get to such a point, statutory services such as education and criminal justice need to address policies which actually directly

increase unequal life chances for some BAME communities. However besides from the work that statutory agencies deliver directly, there is also a need to support the work of BAME third sector organisations who both offer services to meet local need, and who offer policy and infrastructure support to the sector, bridging the gap between them and policy.

Without this third sector provision and expertise, the needs of BAME communities will not be met. It is not possible for mainstream services to meet the needs of everybody, especially those which are very specialist or met for the most isolated communities. The sector acts as a bridge between communities and mainstream services to get them to a point where the state can meet need both in practice and policy. The Mayor must recognise this role and how it relates to all of the above policy priorities in reducing inequality currently faced by BAME communities in London.

2. What are the strengths of the draft documents?

ROTA welcomes the development of the Mayor's Equality Framework. The vision set by the Mayor which show the Equality Policy Statement filtering through organisational strategy, the work of the GLA, the rest of the GLA group and non-GLA organisations, where possible, holds many service providers and policy makers to account.

ROTA believes that the following are strengths of the documents:

Draft Equal Life Chances for All Policy Statement

- a) Aim to deliver services which are *inclusive* and that workforces should reflect the communities that they service – this reflects concerns raised above regarding representative workforces in the police, education services and health care providers.
- b) Supporting the development across London of diverse markets, workforces and suppliers. With shifts to procurement services it is crucial that such support extend to BAME third sector organisations.
- c) Identify and share learning about communities' lived experience of London and promote what works best to improve a better quality of life. ROTA would expect this to promote the work of BAME organisations who currently work with communities and also work with service users directly, as ROTA aims to do with its research, in order to get authentic accounts of experiences.
- d) Commitment to the elimination of 'institutional racism'.
- e) Develop and support a GLA workforce that reflects, *at all levels*, the resident community of London. This is crucial given the concerns raised in the employment section above, that there is an issue with representation in decision making jobs and managerial positions.
- f) Equality impact assessment carried out on all strategies and policies.
- g) Develop strategies and policies in consultation with communities.
- h) Help businesses, particularly small ones, get fit to compete with and win contracts with the GLA.

Draft Indicators for Measuring Success

- a) By the end of the Mayoral term the GLA will have no employees earning less than the London living wage.
- b) From working with partners workforces, including in the GLA group, will be more diverse and at all levels.
- c) More affordable housing, more family size housing, more Lifetime homes and more authorised Gypsy and Traveller sites.
- d) Life expectancy gap reduced between boroughs.
- e) Learning and development opportunities for disadvantaged groups.
- f) Less people will experience health inequalities.
- g) Recognition of current below average attainment for Gypsy and Traveller children and black Caribbean boys.
- h) Pay gap decreased, with the hourly rate targeted, especially for Bangladeshi and Pakistani people.
- i) More businesses run by disadvantage groups and BAME businesses are priority groups.
- j) Difference between the extent to which white and BAME victims are satisfied with Metropolitan Police Services overall service will have dropped.

3. What are any gaps or weaknesses in the draft documents?

The fundamental weakness of the documents is found in the tools identified for measuring success of the Equal life chances policy. While there are positives outlined above, these are undermined by the gaps that currently exist in the document.

- a) **Community Cohesion**
Vision 6 of the measuring success document aims to 'encourage London's communities to work together to foster community cohesion.' The initial concern with this aim is the lack of definition given to community cohesion. The means by which this will be measured confirms that the definition that the GLA are working with is not one that ROTA would endorse.

Firstly the main means for measuring success are via serious youth violence statistics. Given ROTA's evidence base on criminal justice, noted above, violence occurs are a consequence of a lack of cohesion and not as a cause. Therefore, we will not see the trends aimed for unless more fundamental inequalities are addressed. The responsibility for this lies with service providers and not necessarily the communities identified in the document.

The measurements regarding gun and knife crime are riddled with difficulties. They are already low reporting rate of knife and gun crime incidents. Therefore, if confidence and trust in the police were to have increased in order to support community cohesion and inclusiveness, then in all likelihood statistics will increase before they decrease. Overall improvement in relations with the police is what is important here.

The priority groups identified under the community cohesion banner and Black Caribbean boys, young people and BAME communities in general. This

reflects the above concerns of the BAME sector, identified by ROTA, that the community cohesion agenda will place the onus on excluded and marginalised groups to make society more cohesive. Furthermore, the issues are focused on relationships between different ethnic groups and religious communities rather than all groups of people. Community Cohesion extends far beyond racial boundaries and this document fails to even acknowledge this.

Furthermore, there are no links made the community cohesion section of this document to other social policy areas such as employment, education, health or housing. It is clear from the evidence displayed above, that the unequal life chances that harm any sense of cohesion are created by wider social policy concerns than crime, and much of the responsibility need to be held by service providers and not necessarily the communities who are being excluded.

Finally the community cohesion section of the document fails to reference the third sector at all. The role played by the BAME third sector is crucial in fostering community cohesion and bridging all of the gaps in the social policy areas highlighted above. It would be more beneficial and productive to monitor support for BAME third sector organisations and those meeting specialist need and providing specialist support to take an overview of the cohesiveness of London. To simply monitor activities of BAME communities, especially young black boys, and link their experiences to the criminal justice system is in itself an example of stereotyping and damaging to any inclusive agenda.

- b) The document seeks to measure homelessness but prioritises Black people, especially Africans. There is no justification for this focus and it fails to take into consideration other BAME communities who face disproportionate homelessness, as evidenced in ROTA's research. Furthermore, it fails to acknowledge individuals who are suffering multiple disadvantage such as BAME women who are homeless and are in need of specialist services.
- c) Within outcomes to measure inclusive services, there is a focus placed on the ability to travel safely across London. The priority group identified in this is women. While this is clearly important, the weight placed on serious youth violence in other parts of the document, and given the number of BAME young people who use public transport, it is concerning that their safety is not also considered. Furthermore, this is a clear example of an inability to think across the equality groups or consider multiple equalities concerns.
- d) Within outcomes that consider educational attainment focus is placed on disabled children, gypsy and traveller children, black Caribbean boys and white working class boys. The problem with this is that while all of these groups currently face below average attainment at GCSE level they do so for different reasons. Asides from low attainment black Caribbean boys, and to a lesser extent gypsy and traveller children, are also affected by the tiering system, exclusions and access to systems which are link directly to the treatment of their communities. This is not the same for White Working class boys, and it is the poverty/class in their case, and not their ethnicity, which links to this outcome. Therefore any intervention put in place to impact their performance would be different to support required for black or gypsy and traveller young

people. At present it is not clear how 'class' is to be measured as an equalities issue, and it is not presently treated the same as gender, ethnicity, disability, faith, age or sexuality. This needs to therefore be distinguished in equalities documents. Furthermore, once we extend concerns to issues around exclusion and tiering, instead of focusing completely on attainment, the role played by service providers is questioned rather than simply what the communities in question do.

- e) While ROTA welcomes the prioritisations of rape, domestic violence and hate crimes, the means by which to monitor success in the document will not reflect need in the best possible way. Rather than purely measure on detection rates in a bid to increase them, there should be a broader aim to increase initially reporting of the incidents. Evidence from the Building Bridges project has highlighted rape associated with serious youth violence and an unwillingness to report such incidents to the police. ROTA's research into hate crime and restorative justice has offered alternative responses to hate crime that don't sit within criminal justice enforcement responses. There is a need to consider ways to address both hate crime and sexual violence that exists with third sector and specialist services. Support from the GLA for those services to continue as partners of this framework would be another area to monitor as a means of progress.

4. Any other comments?

The above issues which have been raised highlight where areas that are mentioned lack clarity or productive direction. The initial priorities identified by ROTA in this response also identify a number of areas of concern regarding unequal outcomes for BAME groups which do not feature at all in the draft documents.

The equality VCS on London is currently faced with a number of challenges for which it needs support. These include but are not limited to the recession¹, the shift from grants to commissioning, Local Area Agreement and the Single Group Funding Recommendation. As newer communities are being established and the shifting population of London continues to experience inequality, the VCS will be a critical friend a partner in addressing social injustices. The proper infrastructure support to equality VCS organisations should continue to be provided by specialist equality VCS organisations and not mainstream providers whether in the VCS or other sectors.

Also, in the main there is a need to shift focus to broader aspects of services that are being provided and for third sector and specialist services to be seen as real partners in meeting these complex needs. Furthermore, it is crucial that this framework doesn't fall into the trap of meeting siloed needs and ignoring cross-equality needs which create multiple disadvantage and compounded

¹ See ROTA research study of the impact on the recession on BAME VCS organisations in London www.rota.org.uk

unequal life chances. The GLA needs to acknowledge this aspect of unequal life chances and where they are unable to meet all such needs they should acknowledge other organisations that are meeting these needs.

For questions regarding this consultation response or information on ROTA publications referenced please contact Carlene Firmin on 020 7729 1310 carlene@rota.org.uk