

London Councils consultation on service specifications for the London Borough Grants Scheme, 2013 – 2015

July 2012

Through the consultation, London Councils sought views about service specifications for the London Borough Grants Scheme, 2013 - 2015. The services to be commissioned are: homelessness services; services to prevent violence against women and girls; services to tackle poverty by promoting access to employment and training; and services that provide support to London's voluntary and community sector. This response focuses on services to prevent violence against women and girls and services that provide support to London's voluntary and community sector.

This document includes responses to the questions asked by London Councils about draft service specifications which are available on the grants pages of London councils website at www.londoncouncils.gov.uk.

To find out more about the work ROTA has been doing over the last few years to help ensure this grant fund is continued and benefits London's most marginalised BAME communities, please visit the consultation pages of our website, www.rota.org.uk, or contact Barbara Nea, Senior Policy Officer on 020 7842 8530.

Priority 2: Violence against women and girls

Are there aspects of this specification which could be improved?

2a: Prevention of Violence Against Women and Girls

It is very positive that London Councils is recognising gang association as a violence against women and girls issue that needs to be addressed through this service.

Violence that women and girls face as a result of gang-association is a distinctive form of violence against women and girls (VAWG), with extreme risks associated, which leaves those affected with very specific support needs. ROTA's Female Voice and Violence project has highlighted how, if these risks are not properly addressed, girls and women can be left in more danger of harm than prior to any disclosure about victimisation.

The specifications need to be further developed to ensure the services commissioned have the appropriate level of expertise to deal with this complex and high risk form of VAWG. It would be very dangerous if the service in anyway encouraged young women and girls impacted by gang-association to disclose to staff who were not sufficiently trained to deal with disclosures and associated safeguarding procedures. This specification should include specialist training for staff delivering the service around gang-related VAWG. This should enable staff to identify young women and girls at risk, assess their needs, respond appropriately within a safeguarding framework and refer to specialist support providers.

In June 2012 ROTA launched phase three of the *Female Voice and Violence* project, which aims to look at the training and support needs of a range of professionals that work with young women and girls at risk of gang-related VAWG. Initial findings indicate that many experienced practitioners in a range of fields including education, youth work, the criminal justice sector and health still do not feel competent in responding to disclosure in this area and subsequent care, highlighting an urgent need for specialist support in this area. There is a need for a tool to enable those who work with children and young people to effectively identify, assess, treat and refer young women and girls who have been affected by this form of violence. Currently no such tool is available. While some work has been done towards producing such a tool, there is a need for further work in this area, as well as piloting and rolling out; this should be included within the specification for this service.

The preventative service described through the specification currently only responds to low risks associated with gang-related VAWG. It needs to be further developed to respond to medium and high risks. Appropriate preventative strategies are detailed in the latest report from ROTA's Female Voice and Violence project (Firmin, C (2011) *This is it. This is my life*. ROTA). ROTA would be happy to meet with London Councils as specifications for this service are being finalised and provide further support in developing and guidance. Please contact Rahana Mohammed on 020 7842 8531 to arrange.

Preventative work should also be targeted at parents who have a key role to play in enabling young women and girls to be aware of the risks of gang-association and in identifying if their daughters have been affected and how to subsequently support them. The outputs and outcomes detailed in the specification should be developed to reflect the important roles of parents in preventative work in relation to gang-associated VAWG.

2a: Violence against women and girls - Emergency accommodation and advice and support for people and organisations

Are there aspects of this specification which could be improved?

Strand 2 B 1: Helpline and coordinated access to refuge provision for women and girls affected by violence.

ROTA's Female Voice in Violence project has highlighted that significant numbers of women and girls in London are affected by gang-related VAWG. Many of those that are affected do not receive support because of concerns about potential police involvement following disclosure due to links

with criminal activity. Where young women and girls do receive support they are often at increased risk due to gang-association, for example potential reprisal by multiple gang-associates. Young women and girls affected by gang-related VAWG have significant unmet health and related needs and there is a need for relevant services to be trained up to effectively deal with them and also for services to be made more accessible by victims.

As such, we recommend that, in addition to addressing domestic violence this service specification be developed to increase appropriate support available to those affected by gang-related VAWG. Gang-related VAWG was, until very recently, a form of violence that was under-researched and unknown about. As such, it is particularly important that, while practice on supporting those affected develops, gang-related VAWG is explicitly considered within this service. The risks associated with this form of violence, where there is wide-spread interest in non-disclosure due to links to organised criminal activity, by multiple gang associates and even multiple gangs, make this even more important.

The outputs and outcomes should be developed to include gang-related VAWG. The services commissioned should have expertise in identifying, assessing, treating and referring those who have been affected by gang-related VAWG. The monitoring of these services should capture explicit data on beneficiaries who have been affected by gang-association.

Girls and women affected by gang association escaping domestic violence will need to be assessed by the danger of them staying in the same area and the potential threat to their family and friends. The risk to the girl or women may not only be from the perpetrator but from other gang associates. Any risk assessment and safety planning needs to reflect this. The specification for this service needs to be developed to reflect this.

Strand 2 B 2: Advice, counselling, outreach, drop-in and support for access to services

The same points made in relation to other aspects of service 2 are also relevant to Strand 2 b 2 and we will not reiterate them here.

Strand 2 B 3: Emergency refuge accommodation that offers services including those that meet the needs of specific groups of women

The same points made in relation to other aspects of service 2 are also relevant to Strand 2 b 3 and we will not reiterate them here. Additionally this service and its specifications need to be developed to respond to the need for provision for girls under the age of 18.

Strand 2 B 4: Support services to the VAWG voluntary sector organisations to assist them to deliver better services

The same points made in relation to other aspects of service 2 are also relevant to Strand 2 b 4 and we will not reiterate them here.

Priority 4: Providing support to London's voluntary and community organisations enabling those organisations gain access to funds, skills and resources to provide effective services to communities

Are there aspects of this specification that you feel could be improved?

We will consider each activity in turn:

Activity 1: Voluntary organisations provided with support to improve their capacity to deliver effective and sustainable services to London's communities

Equality in delivery is an essential part of effective and quality services. There is sufficient evidence (some is summarised below), including from London Borough Grants Scheme (LBGS) monitoring returns*, that the voluntary sector needs more support in conceptualising, developing, delivering and monitoring more inclusive services. As such, under Activity 1, specific support aimed at enabling voluntary organisations to develop more inclusive services, that are compliant with the Equality Act 2010, should be specified. [Evidence: *In 2009 London Councils commissioned HEAR to deliver equalities awareness raising events to all LBGS commissioned services due to concerns about equality and inclusion. Participants' feedback pointed to their need for further support on the Equality Act 2010.]

ROTA's Equality Act 2010 programme of work (from preparation for the Equality 2006 – present) has found that many frontline organisations don't understand the implications of the Act for their work and are at risk as their equal opportunities policies and procedures are non-compliant with legislation. This has an impact, not only on service accessibility, but also on the strength of funding applications and sustainability. [Evidence: In late 2011 ROTA delivered Equality Act 2010 training in Hounslow, Barking and Dagenham, Brent, Lewisham and Croydon and found that 80% of participants were using old equality legislation as the basis of their equality and inclusion policies.]

Lack of awareness of the Equality Act 2010 also has an impact on organisations ability to use it as a framework to promote their work to public bodies and support them in addressing issues impacting on their service users.

Given the above, we recommend the following output indicators should be added to Activity 1:

- No. of organisations that have taken part in an inclusion capacity building programme (e.g. training, use of web-resources and telephone advice line), which: 1. enables organisations to develop more inclusive services, which are compliant with the Equality Act 2010; and 2. enables organisations to use the Equality Act 2010 (and linked policy and legislative tools such as the Child Poverty Act, Health and Well Being Boards, Policy and Crime Commissioners) as a framework to promote their work to public bodies and negotiate with them on issues impacting on their service users.
- No. of organisations that have taken concrete actions to improve equality and inclusion in their service delivery.
- No. of organisations that have developed their equality and inclusion policies and procedures.

We recommend the following outcome indicators be added:

- No. of organisations who have taken action to develop more inclusive and accessible services, which are compliant with the requirements of the Equality Act 2010.
- No. of organisations reporting improved local and regional voice and influence as a result of using the Equality Act 2010 (and linked policy and legislative tools such as the Child Poverty Act) as a framework to promote their work to public bodies and negotiate with them on issues impacting on their service users.

Activity 2: Engagement of London's voluntary and community sector in London wide, regional and central government bodies, non-departmental public bodies and associated partnerships to promote understanding of new policies and opportunities and dissemination of information

In order to ensure tangible policy impact Activity 2 could be more clearly defined to focus on:

1. Groups that have least influence on policy development (i.e. those that are associated with characteristics that are protected under the Equality Act 2010); and
2. Particular policy areas. ROTA's bi-annual consultation with London's BAME sector identifies children and young people, health and social care, and crime and public protection as the top policy areas of concern. We recommend they be the policy areas focused on through Activity 2 in addition to LGBSs new priorities (i.e. violence against women and girls, poverty and homelessness).

A more defined specification is particularly important given the reduction in funds being allocated to policy and voice in London through LBGS and other sources.

BAME and other equality groups should be targeted through this activity due to the considerable evidence of their lack of influence. For example, EHRC's 2010 Triennial Review reported that: only 1 in 10 black African men and black Caribbean men are employed in managerial jobs; this is half the rate for all men; 30 per cent of BAME communities aren't registered to vote compared with six per cent of the white British community; BAME groups are under-represented in Parliament with just 27 BAME MPs (four per cent of MPs); there has only ever been one MP (in the 1970s) from either a Gypsy, Traveller or Roma community; less than one per cent of all councillors in England were BAME women in 2008, yet BAME women make up six per cent of the population; and political activity (e.g. contacting representatives, attending public meetings, demonstrations or signing petitions) is higher among white British people than among BAME people. ROTA's work confirms and provides a qualitative account of such facts.

Most recently, for example, one of the key findings from our *Shaping the Future: Race and racism in 21st century Britain* seminar series related to the reduced influence of BAME communities in policy-making amidst a climate of cuts, austerity and national policy reforms (contact barbara@rota.org.uk for the report). This London Councils funded seminar series, which brought together 300 statutory and voluntary sector representatives, gave many examples of under-representation of BAME communities from school governing bodies to local health and well being boards. It highlighted the continued need for specialist support to ensure the voice of London's BAME communities in policy-making.

Activity 2's description should be rewritten as: "Engagement of London's equality voluntary and community sector in London wide, regional and central government bodies, non-department public bodies and associated partnerships to promote understanding of new policies and opportunities and dissemination of information in relation to children and young people, health and social care, crime and public protection, violence against women and girls, poverty and homelessness)."

In addition to the commissioned organisations having policy impact, this activity should include a focus on enabling frontline organisations to work more constructively with public authorities and influence policy and service development themselves. To support this and the above suggestions, we recommend the following changes to the output indicators for Activity 2:

- Change bullet 2 to 'no. of equalities-led voluntary and community sector representatives on relevant key committees'.
- Add 'no. of local, regional and national policies and services influenced in response to needs identified by LBGS funded equalities-led organisations'.
- Add 'no. of frontline equality organisations participating in support programmes to enable them to influence policy and service development more effectively'.

We recommend the following changes to the 'outcome indicators':

- Add 'No. of equalities organisations using services provided through this activity'.
- Add 'No. of equalities organisations reporting increased voice and influence on policy and service development'.

Activity 3: Enhanced support provided to equalities led and generic services providers to focus on the needs of equalities target groups

We commend London Council's recognition, through this Activity, of the specific support needs many equalities-led organisations have and the subsequent need for targeted support (some evidence for which has been referenced throughout this response).

We do not have any specific suggestions other than to note that the amendments we have suggested in relation to Activity 1 would complement and are also relevant to Activity 3.

Does the specification (priority 4) create any positive and/or negative impacts on people with the protected characteristics in the 2010 Equalities Act?

We feel, in its current format, the specification may lead to disproportionately reduced policy and voice capacity among equality groups.

As considered earlier, it is particularly important at the current time to target funding at groups that are under-represented in policy-making with specialist expertise in priority policy areas (children and young people, health and social care, crime and public protection, violence against women and girls, poverty and homelessness).

Does the equalities section (priority 4) provide sufficient information on the protected characteristics?

The information provided in the equalities section on the protected characteristics is quite limited.

While we agree with the premise of the 'promoting equality' sub-section, greater consideration needs to be given to BAME communities and the disadvantages and inequalities they continue to face as outlined in our responses to London Councils various consultations on the future of LBGS over the last three years (ROTA's responses to London Councils Jan 2010, Nov 2011 and Mar 2012 consultations are available from the consultation pages of our website at www.rota.org.uk).

The purpose and logic of including this information on the different protected characteristics within the service specification is unclear. We recommend either that this information is taken out or that a fuller range of information on key inequalities facing London's BAME communities is included instead.

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What is ROTA?

ROTA is an action research and social policy organisation focused on issues impacting on Black, Asian and minority ethnic (BAME) communities.

As a BAME-led organisation, all ROTA's work is based on the principle that those with direct experience of inequality should be central to solutions to address it. Our work is actively informed by the lived experiences of BAME communities and their organisations.

How do I join?

Membership is free and the online membership form only takes a few minutes to complete.

Members automatically receive our services including invitations to events, policy briefings, our monthly policy e-bulletin and more. The membership form is available on the 'about us' section of our website at www.rota.org.uk.

You can find out more at www.rota.org.uk.

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