

HEAR's response to the CLG's consultation on 'Community Cohesion Guidance for Funders'

May 2008

1. Introduction

1.1 About HEAR

HEAR is a network of equality organisations that represent people who experience discrimination including Black, Asian and minority ethnic (BAME) people, children and young people, disabled people, lesbian, gay, bisexual and transgender (LGBT) people, older people, people of particular religion or belief, refugees and migrants, and women. It also includes organisations interested in using human rights to address inequality and mainstream support organisations. It is underpinned by the belief that people who have direct experience of inequality and discrimination are best placed to develop strategies to achieve equality. HEAR is concerned with the support available to, and issues affecting, equality organisations in the third sector. The members' of HEAR's steering group¹ represent a very broad range of experience relating to the very issues CLG is proposing to offer guidance on.

1.2 HEAR's response to the guidance

HEAR welcomes the opportunity to comment on the draft of the cohesion guidance for funders, and was very pleased with CLG's positive response to a number of requests in January for a full Compact compliant consultation on this important issue. We were also very pleased to see that comments by third sector colleagues on earlier drafts had been included in the version of the guidance that has been consulted on.

We are glad that the guidance acknowledges the valuable work of organisations supporting particular excluded communities, which we shall term as equality organisations¹ for the purposes of this response. We share CLG's concern about community tension and fully acknowledge that when people have more contact with people from other backgrounds, understanding increases and hostility reduces. We agree there is a need to think about how to bring different communities together where there is segregation and tension. We also believe that inequality and disadvantage are major contributors to tension (as found in Laurence and Heath's analysis of the 2005 Citizenship Survey², but not included in this consultation document) and feel strongly that 'bridging' activities should not be at the expense of equality of opportunity. Since equality organisations play a key role, as this response will demonstrate, in addressing inequality, undermining them, as this guidance will, could inadvertently

¹ Equality organisations' for organisations led by, and for specific communities and people who experience discrimination including BAME people, children and young people, disabled people, lesbian, gay, bisexual and transgender (LGBT) people, older people, people of particular religion or belief, refugees and migrants, and women.

² Laurence, J & Heath, A. (February 2008) *Predictors of community cohesion: multi-level modelling of the 2005 Citizenship Survey*. Communities and Local Government.

exacerbate inequality and tension, where it exists. Equality organisations also play a key role in engaging otherwise isolated communities in wider public life, and acting as bridges to other communities, and therefore in strengthening cohesion.

We are particularly concerned about the style of writing used in the guidance, which mistakenly gives the impression, that the author's assumption is that most of these groups are divisive. As we are sure you realise, and as HEAR's extensive experience shows, equality organisations very rarely become insular or divisive. Most equality organisations welcome the opportunity to engage in partnership working and community cohesion is strengthened where this happens. HEAR itself is an excellent example of equality organisations working together to address shared issues of concern for the benefit of entire communities and wider society while building relationships between communities and addressing inequality.

We also feel that a single national guidance for funders is inappropriate given the diversity between localities and regions in terms the nature of inequality, the diversity of the third sector and the causes and patterns of community cohesion and tension. We provide further information on London as a region later in this response but would like to say that overall British Society is becoming more mixed, not more segregated as is sometimes purported³ and as the draft guidance appears to believe. A recent study by the University of Manchester, for example, found that it is becoming more mixed with the number of inter-ethnic couples and children of mixed ethnic parentage having risen 20% in 10 years, and there being four times more children than adults of mixed ethnicity.⁴ The statistics for London are even higher. Diversity is also often recognised as an asset - in 2005, for example, Londoners ranked London's diversity as the second best thing about it.⁵ We would suggest that as tension is not a problem in most areas it seems strange to produce national cohesion guidance.

We feel strongly that this guidance is not the solution to community tension and should not be published. We in fact believe it will have a detrimental impact on equality of opportunity and community cohesion. We recommend that CLG continue to think about solutions to community tension, where it exists, focusing on the links between it and inequality, disadvantage and deprivation, and in dialogue with:

- Second-tier and frontline equality organisations in the third sector, with their expert perspective of and ability to generate innovative solutions to inequality and tension
- The Equality and Human Rights Commission (EHRC).

Our response includes comments, which highlight how detrimental this guidance could be to equality and cohesion and which we hope will contribute to CLG's thinking on these issues.

³ Mulgan, G. & Bacon, N. (May 2008) *Promoting wellbeing and neighbourliness*, Public Supplement, 'How equality shapes place: diversity and localism.

⁴ Mulgan, G. & Bacon, N. (May 2008) *Promoting wellbeing and neighbourliness*, Public Supplement, 'How equality shapes place: diversity and localism.

⁵ London Equalities Commission (January 2007) *The State of Equality in London*. Greater London Authority.

As we are recommending that the guidance is not published, we have chosen not to use the pro forma response, but to highlight our principal areas of concern. We have also included information on the particular situation within London that we believe differs from other regions and needs to be taken into consideration.

2. Key areas of concern

2.1 The tone of the guidance

As noted in the introduction, the guidance is written in such a way that appears its underlying assumption is that activities focused on particular communities are divisive. This could be seen to show a lack of understanding in particular of their key role in addressing inequality and strengthening cohesion. (see 'Nea, B. & Cox, D (May 2008) *Gaps and Solutions: Supporting London's equality sectors*. HEAR' for details of sources of evidence). It could also be perceived as demonstrating a limited understanding of the nature of inequality, and its inextricable links to community cohesion.

Point 17, bullet two, for example ['(funders should) 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'], depicts a rare situation, yet is likely to establish or perpetuate suspicion and misconceptions about equality organisations.

Similarly, the 'key questions for funders' are unnecessarily negative and unhelpful. The tone of the first question [is there a clear case for this activity to be funded even though it will only involve one group or community? Or can we harness this funding to contribute to wider goals on integration and cohesion?] may well serve to discourage funders from thinking about equality in terms of access to appropriate services and their statutory equality duties.

We are also concerned that the guidance appears to discriminate against equality organisations by making negative assumptions about them, while omitting questions that need to be raised of mainstream services claiming to be open-to-all, to ensure they have the expertise and reach to back up such claims.

From HEAR's experience, and as is well evidenced, most equality organisations play a key role in addressing inequality and strengthening cohesion Their impact on their service users is significant because they are led by, those who have shared similar experiences of inequality and discrimination. They are critical to achieving equality of opportunity, which depends on more than meeting needs, and crucially, on the opportunity to take action and have a collective voice.

They deliver a range of activities and often life-saving services including crises and longer-term accommodation, counselling, advice and representation. They work in all fields such as sustainable development, health, culture, criminal justice, employment, education and transport. They play a key role and have invaluable experience in responding to inequality by:

- Meeting specialist need: in providing services to meet specific needs that mainstream service providers are either unaware of, or find difficult to understand and often do not address. An evaluation by the Disability Law Service (DLS) found, because of its specialist understanding and greater responsiveness, respondents were more likely to take up and be satisfied with DLS than mainstream law services;⁶
- Providing representation: with their expert community knowledge and information, equality organisations are best placed to represent their communities, for example, on neighbourhood panels and local Strategic Partnerships, and to inform and monitor public service providers; For example, refugees face multiple barriers that constantly change and without official data about them, knowledge of their disadvantages and achievements rests largely on what they report and, therefore, on strong refugee representation and voice.⁷
- Campaigning: it is BAME women's organisations, for example, that are mainly responsible for bringing the plight of women and girls who are subject to forced marriage, female genital mutilation, 'honour' killings, and other abuse to the attention of government, the wider third sector and the general public;⁸
- Strengthening community cohesion: by building the confidence of people who have been victims of inequality and discrimination, frontline equalities groups enable them to feel strong enough to share public spaces with people from other communities.⁹ A 2005 report, for example, provided evidence that local faith-based organisations strengthen community cohesion by strengthening relationships between their communities and those of other faiths;¹⁰
- Implementing Government policies: For example, the government's latest refugee integration strategy recognises the key role refugee community organisations can play in integration: *'The enormously valuable work of RCOs in helping refugees to acclimatise to life in the UK has already been emphasised. Based on the self-help principle, and usually run on slender resources, they build links between refugees and the wider community and provide English-language training and employment support. They also offer expert advice to local, regional and national government on the problems faced by refugees in accessing services, achieving their full potential, and contributing to communities. We want to boost the capacity of RCOs to undertake this, particularly through the*

⁶ Goodall, C. (2006) *DLS Service User Consultation Final report*. Unpublished.

⁷ Mayor of London (July 2007) *London Enriched: The Mayor's Draft Strategy for Refugee Integration in London*. Greater London Authority.

⁸ Corry, D., Dhimi, K. Hudson, I. Moore, K. & Pouwhare, P. (2007) *Why women-only. The value and benefits of by women, for women services*. Women's Resource Centre.

⁹ Temple, B. & Moran, R. (February 2005) *Learning to live together: Developing communities with dispersed refugee people seeking asylum*. Joseph Rowntree Foundation.

¹⁰ Cradock, F., Oley, N., Reith, T., & Wallis, Z. (February 2005) *Building the Capacity of London's Faith Groups*. Faithworks.

carefully targeted use of the government funding available for refugee integration work.’¹¹

- Providing employment and volunteering opportunities: the Learning and Skills Council has reported that the third sector employs higher proportions of BAME people, women, disabled people and people with long-term illness and graduates. Employment and volunteering opportunities provided by equalities groups help people from the most marginalised communities move into the formal economy or from voluntary to paid employment.

The role of these organisations in the economy is also significant. Through improving the health and employment prospects of their communities they save the state significant sums. A recent economic impact study found that women’s organisations, for example, are value for money, and represent a return on funding of 385%.¹²

We have included the following examples to illustrate the role of equality organisations in addressing inequality and engaging marginalised communities in wider public and civic life.

- Enfield Saheli¹³ is an Asian Women’s organisations, which runs a range of services, including a group counselling and yoga classes. In order to continue to engage the most vulnerable it is important that the group counselling services remain exclusively for Asian women who would be less likely to use them if they were open to all. The yoga classes, on the other hand, are open to all women and are having a positive impact on community cohesion in the locality. The organisation engages the most marginalised Asian women, building their self esteem and then enables them to mix with other women, for example, through the yoga classes.
- Little Oak’s Children Centre¹⁴ delivers a range of services in the Spitalfields and surrounding areas of Tower hamlets to under fives and their families. Services delivered include Early Education and Childcare, Healthcare, Play and Learning opportunities, and Training and Education for Parents. The Centre strives to ensure that services are sensitive to need, culturally accessible and provided in a range of settings, by commissioning specialist services targeting different elements of the ethnically and otherwise diverse local community, and by employing multi-lingual specialist workers. A number of services, such as hungry to read, targeting all communities provide opportunities for interaction between a range of communities.
- The role of refugee/migrant and other BME organisations play in providing advice, information and advocacy services for their communities to enable them to access mainstream services. For example, Newham Disabled Tamils made services provided by Disability Law Service (DLS) accessible to disabled Tamils in Newham, by

¹¹ Home Office (2005) *Integration Matters: National Strategy for Refugee Integration*.

¹² Matrix Research and Consultancy (2006) *The economic and social impact of the women’s voluntary and community sector - a pilot study*. The Women’s Resource Centre.

¹³ www.enfieldsaheli.org

¹⁴ www.childcarelink.gov.uk/whitebox/board.asp?content=results&cid=51034&showAll=true#60

translated information about DLS services into Tamil and disseminating it. Without the support of this Newham Disabled Tamils, Disability Law Service would have been unable to access this community, leaving their needs unmet.

2.2 Bonding and bridging

As mentioned, we appreciate that meaningful interaction between people of different backgrounds can directly build cohesion, and understand the importance of 'bridging' activities. However, we feel the guidance creates a false dichotomy between 'bonding' and 'bridging' and misunderstands that bonding is often a prerequisite to bridging. We question the statement that 'those who have bonding social capital are more likely to bridge BUT when this is broken down by ethnicity this only holds for White and Chinese people'. This is contrary to much existing research. A JRF study¹⁵, for example, found this to be true of a wider range of ethnic groups. This researchers of this report suggested that 'bridging' activities should not be at the expense of ensuring all communities have the resources to stand on an equal footing and that the need for externally strengthening communities was seen as a necessary first step towards building bridges to other communities. The former Mayor of London's draft refugee integration strategy¹⁶, similarly, emphasizes the need for refugee communities to 'bond' to enable them to fully participate in wider public and social life. The statement also contradicts the extensive experience of HEAR members, which indicates this is true of most ethnic groups, as well as other communities of interest. We feel that CLG needs to further explore the relationship between 'bonding' and 'bridging' social capital.

2.3 Evidence of need

We agree that evidence of need can be very important that when making funding decisions. However, in the case of marginalised communities, one of the issues is the lack of evidence about need. This is because, as a result of being de-prioritised, needs assessment and data collection on marginalised communities is often not undertaken. The Census, for example, has not collected data about immigration status, sexual orientation, transgender status, disability, and collects limited data on ethnicity. Surely, a key task for local authorities and other statutory service providers in creating a more equal and cohesive society is to understand who they serve. Where evidence and data on marginalised communities is limited, the onus should be on authorities, with resourced support from equality organisations, to ensure needs assessments have been undertaken and data is collected.

2.4 Statutory equality duties

The guidance almost ignores statutory equality duties and risks discouraging funders from thinking about equality in access to appropriate services. For example, one of the key questions for funders asks 'is this funding aligned with the area's wider community cohesion strategy?' Surely one of the key questions

¹⁵ Temple, B. & Moran, R. (2005) *Learning to live together: Developing communities with dispersed refugee people seeking asylum*. JRF

¹⁶ Mayor of London (2007) *London Enriched: The Mayor's Draft Strategy for Refugee Integration in London*. Greater London Authority.

funders should ask themselves instead is, 'Is this funding aligned with equality duties and local equality context/strategy?'

The 'Equalities impact: Plan for full assessment', should be given higher priority, both in terms of where it is referenced in this document (it is in an annex at the end, rather than in the introduction) and in terms of when the full assessment is done. The annex claims the guidance is in line with the duty to promote good relations between people of different ethnic groups set out in the Race Relations (Amendment) Act. We feel strongly, however, that this is probably not the case. We also believe it may be contrary to duties to promote equality of opportunity (particularly in access to appropriate services provision, to inform service provision and democratic structures, which is a key role of equality organisations, and to promote positive relations). We also believe the negative and discriminatory tone that underlies the guidance towards organisations supporting specific communities, is contrary to statutory duties to promote positive attitudes.

2.5 Any expectation on groups to undertake additional cohesion activities should be sensitively applied

We are very concerned about taking a blanket approach to applying additional pressure on all equality organisations to promote cohesion and integration, in addition to their core activities. As demonstrated, most groups play an important role in strengthening cohesion by engaging, often otherwise isolated communities, in wider public and social life. There are many practical issues, for example relating to resources, which need to be considered if expecting groups to undertake additional cohesion activities. We noted that the impact assessment of the guidance felt that 'the proposals should not lead to significant costs'. This concerned us because it may imply that such additional activities will be at the expense of equality of opportunity by diverting resources away from services to meet identified needs. Cohesion activities should not be delivered/expected at the expense of equality of access to suitable service provision.

Additionally, any such expectation should also be sensitively applied. Organisations supporting vulnerable and marginalised communities often deal with urgent and pressing community needs. It would be entirely inappropriate, for example, to expect under-resourced refugee and BAME women's organisations to divert attention and resources away from supporting destitute community members with no recourse to public funds..

The need for exclusive services in certain situations must also be acknowledged - services for victims of hate crime, for example, may need to be exclusively for particular communities. A recent study by the Women's Resource Centre, for example, demonstrated vulnerable women are far more inclined to take up services exclusively for women and led by women who have shared similar experiences, than mainstream services.¹⁷

¹⁷ Women's Resource Centre (April 2007) *The need for specialist equalities infrastructure; briefing by the Women's Resource Centre (WRC)*.

2.5 The local context

We agree with the statement, 'it will be important for local funders to have a sensitive appreciation of the local cohesion situation in order to make informed judgements'. As noted earlier one issue associated with marginalisation, is lack of evidence about need. Equality organisations are often the only organisations that hold any information about particular communities, because communities are transient and there is little official data on many groups. Local funders will need to meaningfully engage with all parts of their communities, particularly through equality organisations, when certain communities are 'hard to reach'. While some authorities are very good at engaging marginalised organisations, many are not. A recent survey, for example, revealed of the 198 London CEN representatives only 4% (8) were from women's organisations, 10.1% from youth organisations, 9.6% from disabled people's organisations and 8.6% from older people's organisations.¹⁸ Another report revealed LGBT organisations are rarely included in planning processes.¹⁹ Some funding for equalities and cohesion will need to be available and decided on at the sub-regional and regional level in order to tackle the fact that equalities communities may be too small to make an impact at the local level, but can form a critical mass across larger areas.

2.6 The examples used in the guidance

We are concerned about the examples used in the guidance, which we feel misrepresent equality groups:

- The example of the generic women's centre is potentially a good example to illustrate an ideal scenario where confident and sustainable specialist organisations are resourced to support the mainstream organisations, to meet the needs of all communities, while various communities simultaneously have the opportunity to interact. In its current form, however, this example betrays a lack of understanding about inequality in service provision. The project description is too simplistic and risks exacerbating the health inequalities specific to particular communities, contrary to statutory equality duties. A fuller description, detailing why there is a need for specialist expertise in such services should be given: particular communities often have particular nutritional needs, for example, diabetes in certain Asian communities, and heart disease in the Irish community. Provision may also need to take account of language and cultural issues. Any generic service seeking to deliver to a range of communities would need specialist input from equality organisations or specialist workers from target communities and this would need to be resourced to ensure an inclusive, responsive and engaging service.
- Northern Ireland: This example is also misleading. It illustrates an approach to a type of community tension which is true of few, if any other areas in the UK. Two relatively similar communities, with an historical, deep seated and extremely tense relationship. In most other areas in the UK where there is tension, the situation is very different, with a greater

¹⁸ Women's Resource Centre (September 2006) *The Women's Voluntary and Community Sector. Briefing by the Women's Resource Centre.*

¹⁹ Kairos in Soho (October 2006) *Pip: Phase One LGBT Infrastructure Project, Final Draft for Consultation.* Kairos in Soho.

number of more distinct communities, with a far greater range of languages, cultures, needs, types of inequality and so on.

2.7 Is there a communications plan for this funding?

While we agree that clear and accessible information about the situation of different communities can facilitate understanding, as found in ICAR's Understanding the Stranger report²⁰, we feel that provision of information in the way the guidance proposes, could have the adverse effective of perpetuating tension and giving ammunition to right wing groups to incite misguided feelings of resentment.

We question the statement, or else the sample used to generate the statement, that 56 per cent of people surveyed believed that other groups were getting preferential treatment or a better deal than them on resource allocation, particularly housing. Our experience of peoples' opinions on such matters is quite different and as such we would be interested in further clarification either through an exact source or including further information with this text. We also feel that even if this was the case, CLG should be taking steps to address such a misperception, rather than producing guidance such as this, which would reinforce it.

We feel that any communications about grants should be within the context of equality of access to appropriate services and should present services targeting specific communities as part of a more generic services. Any such communications should be used as an opportunity to educate about the concept of equality and the nature, existence and impact of inequality.

2.8 London is different

With a population of 7.52 million²¹, London is one of the largest cities in the world. It is also one of the world's most diverse cities, with:²²

- 50.5% of Londoners are women or girls. There are no figures for London's trans community
- An estimated 10% are lesbian, gay or bisexual (LGB), giving London a higher proportion of LBG people than in most other UK cities
- An estimated 19% are disabled²³
- At least 30% were born abroad; nearly 40% of the working age population were born abroad.²⁴ An estimated 6 – 7% are refugees or asylum seekers²⁵

²⁰ D'Onofrio, L & Munk, K. (2004) *Understanding the stranger: Final report*. The Information Centre about Asylum and Refugees in the UK.

²¹ Office for National Statistics (2005) *Mid-year estimates*.

²² All statistics included in section 2.1 and table 1 come from 'London Equalities Commission (January 2007) *The State of Equality in London*. Greater London Authority' except where referenced separately.

²³ Kiely, C. (12 July 2006) *Report to Grants Committee: Second Tier Services for Disability Sector – evidence of need, item no: 23*. ALG

²⁴ Mayor of London (July 2007) *London Enriched: The Mayor's Draft Strategy for Refugee Integration in London*. Greater London Authority.

- 22% are under the age of 18, giving London the highest proportion of children and young people among UK cities
- 16% are aged 60 or over
- 42% are BAME, with non-White groups making at least 30%. About 300 languages are spoken with Londoners coming from 150 countries²⁶
- 14 faiths are practiced, more than in any other region in the country²⁷

London is without doubt a prosperous and thriving city. Despite this success, sadly, equality of opportunity is still not a reality for many of our communities, as the figures included below demonstrate. In 2005²⁸, for example:

- 53% of pupils achieved 5 GCSEs between the grades of A and C compared with 7% of special educational needs children; 12% of Gypsy; 23% of Traveller; 28% of Black Caribbean male, and 48% of male children
- On average 35% of London's public buildings were physically accessible - Lewisham had the lowest rating at only 1.4% accessibility, Southwark had the highest at 87%
- There was limited data about religion/belief, LGB(T) and language as service providers are not required to monitor this information
- 74% of working age Londoners were economically active compared with 46% of Bangladeshi people; < 11% of women of age 65 and over, and 32% of 16-17 year old young men
- London's poverty rate was 27% compared to 52% of children in inner London, and 69% for Pakistani and Bangladeshi children
- 63,656 domestic violence offences were recorded each year
- 11,895 racist hate crimes, 1,377 homophobic crimes and 785 faith hate crimes were reported

London has possibly the most diverse third sector in the world, reflecting and providing invaluable support to its population:

- The number of registered charities has grown by 42%, to 26,634, since 2002²⁹
- There are at least 40,000 voluntary and community organisations and over 3,300 social enterprises (almost 22% of the UK total)³⁰
- Over 300,000 people (6% of London's working population) are employed in the third sector
- The value of volunteering in London is estimated at £932 million annually
- London's third sector has an income of almost £4 billion annually and contributes £3 billion (3.4%) to the UK's GDP³¹

²⁵ Mayor of London (July 2007) *London Enriched: The Mayor's Draft Strategy for Refugee Integration in London*. Greater London Authority.

²⁶ *Country of Birth Profiles, DMAG Briefings 2005/02*, Greater London Authority (2005).

²⁷ *Religious Diversity Indices, DMAG Briefings 2005/26*. Greater London Authority (2004)

²⁸ London Equalities Commission (January 2007) *The State of Equality in London*. Greater London Authority.

²⁹ Capacitybuilders, London Councils, LVSC (2007) *ChangeUp in London 2004 – 2008*.

³⁰ LVSC (April 2006) *ChangeUp London Infrastructure Development Plan*

³¹ LVSC (April 2006) *ChangeUp London Infrastructure Development Plan*.

A significant proportion of London's third sector organisations are equality organisations with, for example, modest estimates of 2,000 women's organisations³², 4,500 Black, Asian and Minority Ethnic (BAME) organisations³³ and 110 – 500 organisations per borough working with children and young people.³⁴

In terms of funding, single equality groups, for example, the LGBT, religion and belief, BAME and women's sectors, are disproportionately under-funded by some funders. The following figures by the Register of Charities for England and Wales reveal low investment:³⁵

- Organisations that list LGBT people as a 'beneficiary group' make up 0.08% of all registered charities yet have an income of 0.016% of all voluntary sector income in London. LGBT organisations tend to receive their funding from the same limited range of sources.³⁶
- Organisations that list 'people from an ethnic minority' as a 'beneficiary group' make up 12.3% of registered charities, yet have an income of 7.3% of all voluntary sector income in London.
- Organisations that list 'religious activities' as a main activity make up 15.5% of registered charities yet have an income of 9.3% of all voluntary sector income in London. In the past, religion and belief communities have been excluded from access to public funding with only 18% in receipt of any kind of public funding.³⁷
- Women's organisations receive only 1.2% of central government funding and 2.8% of charitable trust funding despite making up 7% of registered charities.³⁸ While this is a national figure it is likely that the figure for London's women's sector would also demonstrate chronically low investment.

London needs a third sector that reflects and represents its diversity to deliver a more equal society for all of us. We feel that national guidance is inappropriate for London given its uniqueness, which these statistics have demonstrated.

³² Hutton, C. & Nea, B., Equalities and Human Rights Sub-group of the ChangeUp London Regional Consortium (July 2007) *Priority Sub-sectors for Infrastructure Support, London Region: Report prepared for Capacitybuilders by LVSC on behalf of the London Regional Consortium*.

³³ ROTA (January 2008) *Statistics about BAME organisations in London*. Unpublished.

³⁴ Samuels, M., Plus People Ltd (September 2006) *VCS Engagement in Every Child Matters infrastructure to support the voluntary and community sector's engagement in the Every Child Matters agenda across London*. LVSC, Third sector Alliance.

³⁵ Data produced from information taken from the Register of Charities for England and Wales, December 2007.

³⁶ Harker, A and Burkeman, S. (2007) *Building Blocks: Developing second-tier support for frontline groups*. City Parochial Foundation.

³⁷ Cradock, F., Oley, N., Reith, T., & Wallis, Z. (February 2005) *Building the Capacity of London's Faith Groups*. Faithworks.

³⁸ Corry, D., Dhani, K. Hudson, I. Moore, K. & Pouwhare, P. (2007) *Why women-only. The value and benefits of by women, for women services*. Women's Resource Centre.

3. Conclusion

We feel strongly that this guidance is not the solution to community tension and should not be published. Equality must be at the heart of the community cohesion agenda, because of the links between inequality, disadvantage and tension, considered in the analysis of the 2005 Citizenship Survey³⁹ and elsewhere. New thinking and developments on equalities and local government provide an unprecedented opportunity, which we must take advantage of, to develop new solutions to old and persistent inequalities and new patterns of tension. We would welcome the opportunity to think further about solutions, in collaboration with CLG ,to these important issues.

ⁱ Current members of HEAR are Dinah Cox (Chair), ROTA; Mark Reedman (Vice-Chair), Consortium of LGBT Voluntary and Community Organisations; Vivienne Hayes (Vice-Chair), Women's Resource Centre ; Beth Crosland, Migrant and Refugee Communities Forum; Ceri Goddard, British Institute of Human Rights; Chaya Spitz, The Interlink Foundation; Dr Christine Goodall, Disability Law Service; Dagmar Kattler, Citizen's Advice – London Region; Helen Hibbert, Partnership for Young London; Julia Hausermann, UK Association of Rights and Humanity; Lorraine Dongo, London Civic Forum ; Lynn Strother, Greater London Forum for Older People; Neera Lakhmana, Enfield Saheli; Rafiu Williams, MiNet; Sahdia Warraich, Black and Ethnic Minority Community Care Forum; Sam Mauger, Age Concern London Sanusie Sesay, Disability Hackney; Sharon Long, VCS Engage; Stefanie Borkum, Evelyn Oldfield Unit; and Tim Brogden, London Voluntary Service Council.

³⁹ Laurence, J & Heath, A. (February 2008) *Predictors of community cohesion: multi-level modelling of the 2005 Citizenship Survey*. Communities and Local Government.