

Response to the DCLG consultation on Cohesion Guidance for Funders

May 2008

Contact: Belinda Pratten
Tel: 020 7520 2558
Email: [belinda.pratten@ncvo-
vol.org.uk](mailto:belinda.pratten@ncvo-vol.org.uk)

NCVO response to DCLG consultation on Cohesion Guidance for Funders

Introduction

1.1 NCVO is the largest general membership body for charities and voluntary organisations in England. Established in 1919, NCVO gives voice to over 5,700 organisations. Over three thousand of our members are local organisations, and over one third (35%) of our members have an income of less than £100,000. NCVO champions voluntary action: our vision is of a society in which people are inspired to make a positive difference to their communities. A vibrant voluntary and community sector deserves a strong voice and the best support. NCVO works to provide that support and voice.

1.2 We welcome the opportunity to respond to this consultation. In developing our response we have worked with a range of voluntary and community organisations (VCOs), including those representing the BME community sector and other 'single group' organisations. Their views, together with our wide knowledge of the sector, have informed our response.

1.3 NCVO supports the aim of promoting community cohesion and better integration of marginalised communities. However, we are concerned that the focus on funding VCOs, and particularly those representing 'single groups' is unhelpful and potentially counter-productive. BME and other single group organisations tend to work with the most vulnerable and marginalised communities. As such they should be seen as key partners and allies in working towards community cohesion and integration: part of the solution, not part of the problem.

1.4 We do not think the guidance is asking the right questions. The key question should be how can government and the voluntary and community sector work together to promote better outcomes for local people and communities. The emphasis should be on strengthening local partnerships and engaging people in setting priorities as part of a sustainable community strategy. This would not only generate more effective solutions, it would also be a more appropriate way of challenging perceptions of unfairness and empowering communities.

Independence

1.5 The Government's Third Sector Review highlighted the 'enormous' contribution' of the third sector in helping to 'strengthen the social fabric of communities and the country. But it also made clear that 'it is not the Government's role to define the purposes of individual organisations or set a vision for the sector as a whole'. Rather the aim is to strengthen partnership working between government and the sector to meet the shared aspirations of both for a better society. This distinction recognises and respects the independence of the sector and individual organisations. In our view the Cohesion Guidance crosses this boundary in ways that could undermine the sector's independence and the potential for partnership working. This in turn would be detrimental to achieving the goal of community cohesion that we all want to see.

1.6 As the Guidance recognises, charities have to take decisions that further their charitable purposes and the interests of their beneficiaries. Government cannot require them to take account of other considerations, however well-intentioned. This guidance cannot override charity law. That is true of charitable foundations as well as charities whose mission is to work with particular communities. In suggesting that charitable funders should take account of this guidance, the Government is acting *ultra vires*.

Voice and engagement

1.7 The Guidance focuses on services and activities provided by community groups, but does not address their wider role as advocates for their communities. VCOs are a catalyst for citizen and community engagement. Many also have developed expertise in reaching out to, and engaging with marginalised groups in non-stigmatising ways.

1.8 Therefore VCOs provide a vital link between decision-makers and communities, as well as between communities themselves. They can give people the support and confidence to participate in decisions that affect their lives and in society more generally. And they can help to ensure that a diversity of voices is listened to, enabling public bodies to engage with a much wider range of interests than would otherwise be possible. This aspect of their role, and its potential for enhancing community cohesion and integration, should be recognised and valued: without these organisations it will be even harder to engage with marginalised and disadvantaged communities.

Service delivery

1.9 The guidance identifies a central role for 'mainstream' services, but it is not clear what this means or why this only applies to services provided by voluntary and community organisations and not those provided by the public or private sectors. Moreover, we are unclear how this emphasis on mainstream provision relates to the move towards greater choice and personalisation for service users.

1.10 Being close to, and often based in the communities they work with and for, gives VCOs a good understanding of the needs of their users, members and beneficiaries: this is what drives their work. This means that they are able to provide holistic services and activities tailored to the needs of those they work with: an aim of the public service reform agenda. It also means that they are an important source of expertise for local decision-makers and commissioners of services, helping to identify service needs and gaps; helping to design solutions and services; and giving support and advice to citizens and communities to enable them to access services.

1.11 NCVO has long argued that public sector commissioners need to develop a more sophisticated understanding of how public service needs can be met and delivered and ensure that contracting, and funding, processes reflect this. If commissioners want to ensure that services meet the needs of all users, then this must be recognised and rewarded through the procurement process. Such decisions should be determined by the nature of the service, not by the sector of the provider.

Again we are unclear why this guidance applies only to third sector funding, rather than to promoting good commissioning practice.

Partnership working

1.12 Community cohesion and integration are complex problems, not amenable to simple solutions or central direction. In our view these issues can best be addressed by local statutory bodies and their voluntary and community sector partners working together through the Local Strategic Partnership (LSP). Their aim should be to identify co-ordinated action that meets the distinctive needs of their local area and the communities within it. Voluntary and community sector organisations, including those working with 'single groups', bring to this process their knowledge of local needs and provide a point of contact with, and links into marginalised and disadvantaged communities that would not otherwise exist.

1.13 A partnership approach would enable local solutions to be developed and tailored to the needs of the area and create greater opportunities for communities themselves to be involved in shaping their future. Such an approach is likely to be more sustainable in the longer term and provide greater scope for challenging perceptions of unfairness that can fuel resentment.

1.14 However, a successful partnership is one that is based on mutual respect and which recognises and values the contributions of each partner. This guidance, if implemented, would undermine effective partnership working by failing to recognise the positive contribution that VCOs can and do make and by implying that one partner can use its power as a funder to dictate terms.

Conclusion

1.15 NCVO supports the aims and principles of this guidance, but do not agree with the underlying assumptions it makes about the role of the voluntary and community sector. Community cohesion is everybody's business and therefore can only be addressed by all sectors working in partnership with local communities to identify effective solutions.

NCVO Policy Team
May 2008