



British Federation of  
Racial Equality Councils  
the voice of racial equality councils and partnerships

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Olu Alake  
Head of Funding  
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Group Director Corporate Management  
Equality and Human Rights Commission  
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Dear Olu Alake and Carol Bernard

**Consultation October 2007 on Interim Funding Arrangements for the Equality and Human Rights Commission**

Thank you for asking the Federation of Racial Equality Councils to comment on *Interim Funding Arrangements for the Equality and Human Rights Commission*. Given the short time scale involved, I have circulated the documents to our members asking them to respond individually to the EHRC, but also set out herewith our collective response, based partly on the long-established position on grant aid BFOREC has developed in relation to section 44 of the Race Relations Act and on the comments and opinions on the Interim Funding Arrangements (October 2007) fed back to us by our members in the last week. You will appreciate that, while carefully considered, this response has been prepared in a hurry.

*Interim nature of arrangements*

We note that the 2007 – 08 CRE grants programme has been transferred to the EHRC and will continue until 31 March 2008. Also, that the Interim Funding Arrangements are intended to cover the period 1 April 2008 to 31 March 2009, after which it will be replaced by an entirely new funding programme. We welcome your promise that you will involve us in undertaking an extensive consultation exercise on these new proposals from April 2008. In the meantime, we focus our comments on your proposal for interim grant aid to the voluntary sector 2008-09.

### *Extended remit of the interim funding*

You make clear your aim of allowing organisations previously funded by the ‘legacy commissions’ (in particular, the CRE) to continue to apply for funding, while opening the door for new organisations dealing with the other strands of equality to apply for funding, too. You say that you will particularly welcome proposals for projects that work across the various equality mandates, human rights, and dimensions of discrimination.

We believe these statements make clear that the EHRC has already taken the decision *not* to ringfence any part of its funds for race equality work *nor* to go out of its way to preserve the existing network of single-strand voluntary sector race equality councils. You will be aware that our organisations have already had the experience of the *Getting Results* grant regime, which opened up a restricted grant pot to organisations which were prepared to deliver race equality outcomes, even though this was not their primary purpose. The consequences were obvious. Funding was spread more thinly and race equality organisations received less.

The EHRC quite rightly has to consider making grants to voluntary organisations delivering other strands of equality, but the implications for the race equality movement are clear. Unless the grant pot is radically increased in size, with some promise that voluntary sector race equality work will continue to be funded to a similar or increased level as under the CRE, the amount and proportion of funding available to specialist race equality organisations as a whole will continue to decline.

### *Need for an EHRC decision in principle to halt the decline of the race equality movement*

BFoREC believes that in addition to these interim funding proposals, the EHRC needs to take a decision in principle as to whether it wants to sustain and/or develop the existing national network of specialist local race equality organisations, or to adopt a broader non-specialist equality and diversity policy for the voluntary sector. We sense either that there is no clarity in the EHRC as yet on this matter, or that there is an intention of arriving at this conclusion by stealth.

As a national body representing the specialist voluntary sector race equality sector, we believe that any attempt to replicate the EHRC multi-strand approach at local level will lead to a serious decline in the effectiveness and expertise of our member organisations. We should stress, however, that we have no objection in principle to diversifying our approach to take on generic discrimination or harassment casework, or developing our skills in dealing with religious discrimination and conflict.

We are understandably anxious that we do not end up by weakening or destroying specialist voluntary sector organisations that have taken many years to establish and build.

### *Consultation question 1: Priority areas*

We welcome the continuity in priority areas reflected by the headings:

- cohesion / integration
- inter and intra-community conflict prevention and resolution
- complainant aid services

We find these very relevant to our work. As in previous years, however, it would help us greatly if examples were offered of the kinds of project EHRC would be likely to support under these headings.

Our members believe that the cohesion/integration and conflict prevention priorities are particularly appropriate to encourage projects relating to the needs of economic migrants and refugees.

From employment tribunal data, we also know that cases of discrimination are on the increase, and so we welcome any provision aimed at improving discrimination information, advice and representation services, generally. But we also need to ensure that our focus on racial discrimination is maintained that the already inadequate and overstretched services supporting victims of racial discrimination and harassment are improved and expanded.

*Consultation question 2: Supporting capacity development*

We have made clear elsewhere that the *Getting Results* funding regime was competitive, destabilising and unsupportive of infrastructural development, with destructive consequences for the REO network as a whole. We welcome, therefore, the proposal to support capacity-building development by working with and assessing organisations to increase their operational capacity.

Nevertheless, we feel that in the absence of a larger overall funding pot, the improvement of skills and resources to maximise organisations' chances of obtaining funding (even from a variety of sources) may only fuel competition and result in a new slate of winners and losers.

Even in regard to building operational capacity, however, there is the question of whether the aim is to develop specialist single strand expertise and service provision, or whether the capacitybuilding envisaged is intended to improve understanding of and skills in other areas of equality. Is there a deliberately ambiguity in the interim proposal? We need further clarification on the kind of capacity-building programme that is the EHRC is likely to fund.

*Consultation question 3: Ongoing engagement*

In conclusion, the EHRC should use its grants programme to:

- support and maintain the expertise and skills of specialist race equality organisations.
- provide training and other activities to improve organisations' capacity (a) to deliver race equality services and (b) to understand and embrace other equality dimensions and human rights.

Funding should be made available to develop relevant open learning materials for members and staff. The EHRC should engage with the race equality movement by scheduling regular meetings with the British Federation of Race Equality Councils to learn directly of the impact of its grants programme and other instruments.

Any future funding arrangement should, we believe, be planned on a three-year cycle and be based on an independent review of the competitive approach to funding applications, and whether it has resulted in any real benefit or dividend.

Yours sincerely,



Frank Reeves  
Secretary, BFoREC  
on behalf of BFoREC  
and its member organisations