



Consultation response

'Comprehensive Area Assessment – Joint Inspectorate Proposals for Consultation – Summer 2008'

Submitted to the Audit Commission

20 October 2008

Understanding and supporting
women and their organisations

This document is available in other formats. Contact the Women's Resource Centre on 020 7324 3030 or info@wrc.org.uk

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About the Women's Resource Centre

The Women's Resource Centre (WRC) is a charity which supports women's organisations to be more effective and sustainable. We provide training, information, resources and one-to-one support on a range of organisational development issues. We also lobby decision makers on behalf of the women's not-for-profit sector for improved representation and funding.

Our members work in a wide range of fields including violence against women, employment, education, rights and equality, the criminal justice system and the environment. They deliver services to and campaign on behalf of some of the most marginalised communities of women.

There are over ten thousand people working or volunteering for our members who support almost half a million individuals each year.

For more information about this response or the WRC, contact:

Karen Moore
Policy Officer
Email: karen@wrc.org.uk
Tel: 020 7324 3030

Women's Resource Centre
Ground Floor East, 33-41 Dallington Street
London EC1V 0BB
www.wrc.org.uk

Introduction

The CAA proposals represent a huge challenge for the inspectorates in terms of collecting and reporting on data, particularly against a backdrop of efficiency savings and streamlining services. Overall, WRC are supportive of the framework but have outlined some areas we have concerns about. A significant issue in our view is that of how inequality is being framed within the CAA proposals.

We are concerned that the concept of inequality in this consultation is being linked with groups considered to be at high risk or vulnerable which could result in overlooking broader equality issues in terms of, for example, race, gender and disability.

No mention is made in the document about the legal obligations of statutory bodies to proactively address discrimination in these three areas and it is difficult to see how long term progress and improvement will be achieved or sustained without identifying or addressing systematic discrimination as a key priority.

It would be helpful for the Audit Commission to clarify how the CAA will link in with the IDeA Equality Framework for Local Government.

Do you broadly agree with our proposals for the overall CAA framework?

Overall, WRC are supportive of the proposed framework for assessment. Hopefully, it will result in a reduction in administrative burden on local statutory services which will enable them to focus on supporting and empowering their local communities. In addition, we are pleased that all 198 National Indicators will be reported on in the CAA, not just those chosen by local areas for inclusion in their Local Area Agreement. It is essential that reporting on all National Indicators is robust, regardless of whether they have an attached target within their LAA or not. For this to happen, there needs to be a minimum baseline of information to measure against. Some of the National Indicators are more likely to be chosen than others – yet all of the Indicators are important for an area to assess how well they are meeting local need.

However, we are unclear about what the impact of the CAA will be and where the accountability lies if organisations and partners are failing to meet the needs of their local areas. The emphasis seems to be on CAA enabling local people to hold local public services to account which seems unrealistic at best.

Some of the assessment is focused on perception, which whilst important (particularly in terms of community safety), can mask the reality of a situation, so it needs to be complemented where possible with a sound evidence base (there is a specific example of this later on).

We strongly support the focus on addressing inequality, but have concerns that this has been too narrowly defined. The focus appears to be on groups considered to be at very high risk and who are already likely to be in contact with statutory services. Many of the most vulnerable and marginalised communities cannot or will not access mainstream services and this experience of social exclusion prevents them from having a voice.

For example, the impact of violence on the physical and mental health of women is significant and often long-term, affecting their ability to seek employment and training, and ultimately their ability to provide for their children and make the best decisions for their families. Women in violent relationships can experience profound feelings of isolation and low self-esteem. These feelings are often compounded by their economic dependence on an abusive partner; a result of women's disadvantaged position in the labour market and their disproportionate childcare responsibilities.

Obstacles to social inclusion specific to women, including vulnerability to poverty, inadequate childcare provision, violence and women's low pay compared to men, all help to entrench the cycle of poverty. For many women this situation may be worsened by immigration issues and language or cultural barriers to accessing mainstream services. These issues are intrinsically linked to women's status in society and inhibit women's ability to fully participate in engaging and influencing decision making.

We support the focus on how well public sector bodies work with the private, voluntary and community sectors to commissioning services. In our view this must

take account of the extent to which local areas have a mixed economy of service provision such as grants, service level agreements and contracts to ensure that small, specialist voluntary organisations are not marginalised in commissioning processes.

We were disappointed and slightly bewildered to see that the CAA will not routinely inspect local strategic partnerships (LSPs) or other partnership arrangements even though the Audit Commission recognises that they are crucial. We have serious concerns about LSPs in terms of their ability to represent the views, concerns and priorities of local communities. Their central role in improving local communities should make them a key focus of CAA.

Do you agree that the three questions and supporting issues proposed for the area are the right ones?

We broadly agree with the three questions and the supporting issues but have some additional comments and suggestions.

Question 1: How well do local priorities express community needs and aspirations

We strongly support the CAAs focus on how the 'duty to involve' is being implemented, particularly in terms of how well councils and their partners understand the needs of vulnerable and marginalised groups. We also welcome the focus on engaging with the third sector. Where voluntary and community organisations (VCOs) agree we think it would be useful to seek views directly from those organisations working with local communities (particularly those supporting vulnerable and marginalised groups).

We also strongly support the focus on inequality and the need to ensure that the 'hard to reach / hard to hear' and 'those at risk of poorer outcomes' are highlighted in terms of engaging with local communities. However, we are sceptical about the ability of local authorities and their partners to achieve this in practice.

As the Communities White Paper acknowledges, the third sector gives a voice to the community, however, we are concerned that in terms of the local government agenda more broadly, the commitment to engagement with the third sector is wavering, in favour of engaging individuals. Both, however, are a vital part of civic engagement. The third sector, in particular, VCOs working with vulnerable and marginalised groups, have a clear understanding of their needs and therefore are able to articulate the challenges faced by these communities as well as providing solutions to addressing them.

There is a risk that consultation with individuals will result in only hearing from the 'usual suspects'. Whilst the experiences and views of individuals are important to developing local priorities, they do not necessarily have the specialist knowledge of a community that a VCO would have. Therefore it is vital that engagement and partnership working with the third sector is assessed within the CAA. In our view this should include whether engagement with the VCS (e.g. on LSPs) is resourced.

The third sector and particularly the VCS have a key role in articulating the needs and voice of some of the most marginalised and vulnerable groups. Specialist equalities organisations, such as women’s VCOs, have expertise on issues that local women face, on challenging discrimination against women, and are key to providing a voice for women in the local area, particularly the most marginalised and vulnerable women. They provide women-centred services which are able to meet the often complex needs of women. CAA assessment of third sector engagement should include disaggregation according to VCS organisations led ‘by and for’ specific communities, in order to capture data on the specialist equalities groups, as well as generic VCS. This would support the government’s agenda on increasing engagement with marginalised and ‘hard to hear’ communities.

For community engagement with local people to be done well, it needs to be supported by expertise at a local level. In order for it to be effectively measured, local areas first need to know how to do it. LAA leads should have proper community engagement training, and be able to access support and advice from the third sector, in order to make the CAA effective and meaningful.

In addition, ‘organisational assessment’, which deals with community engagement and working with the third sector, is just as important as the ‘area assessment’, and deserves the same focus and robustness, to ensure it is not simply a tick-box exercise. We have some concerns about the supporting issue ‘To what extent do local people feel their contributions make a difference to decisions about setting local priorities...’ This is based on perceptions of influence and whilst perception is important, this should be complemented by evidence.

For example, the Communities in Control Equality Impact Assessment states that:

‘... there are not notable gender differences in relation to subjective empowerment - that is the extent to which people *feel* that they can influence local (and/or national) conditions and decisions. Moreover, men and women seem to participate at similar rates in civic and political life.’

Solely focusing on men and women’s perceptions of influence overlooks important evidence which highlights the impact of gender on women’s access to decision making and influencing.

For example, in a study of local decision making in Manchester, Oxfam found that even when women were present in equal numbers to men (on LSPs), they tended to speak less often and for less time than men.¹

It is also more likely that women (despite making up over 50% of the population) will be under-represented in formal decision making:

Research on women's engagement and representation on LSPs has found:

¹ <http://www.oxfam.org.uk/resources/ukpoverty/downloads/notseennotheard.pdf>

- Across England only 1.8% of voluntary and community sector (VCS) representation on LSPs are women's organisations (despite comprising 7% of the voluntary sector).
- Only 11% of central LSP boards have 50% or more female representatives.
- Over 80% of LSPs did not monitor women's representation.²

For the priorities in the sustainable community strategies and Local Area Agreement to be sufficiently appropriate and ambitious to meet the locality's challenges and context, it is vital that both are underpinned by an equality and human rights framework.

In addition, they need to go further than just take account of inequality in the area. They also need to demonstrate how they are proactively addressing inequality, particularly with regards to race, gender and disability and in the future, sexual orientation, age and religion/belief. We strongly recommend that the CAA should incorporate a focus on the extent to which local authorities are meeting their legal obligations under the current Equality Duties. Progress towards equality will have a significant impact on ensuring that local priorities express (and meet) community needs and aspirations.

We support the focus on ensuring that robust decision-making across local partners is taking place but think this should be extended to include a specific focus on the performance of LSPs. Currently, it appears that LSPs largely operate free of scrutiny. Given their pivotal role in developing local priorities and making decisions about where local funding will be targeted it is imperative that the partnerships themselves are monitored and accountable.

We strongly support the focus on engaging with local communities to identify community perspectives and recommend that this is both formalised and extended to include the third sector. This will complement the data provided by the local authority and statutory partners and provide a degree of quality assurance.

Question 2: How well are the outcomes and improvements needed being delivered?

Taking the SCS and the LAA as the starting point to answer this question assumes that the priorities identified are the ones that reflect local community needs. Clearly, question one is designed to assess the extent to which this is the case. Our concern is that there will be limited opportunities for some groups, particularly those representing the interests of women to input into the development of local priorities.

In spite of the new Gender Equality Duty, there remains scant understanding of the need to address women's inequality, other than in the context of the gender pay gap and representation of women in senior levels of the workforce (which whilst important, disguise the fundamental structural inequalities women face). Unless women's VCOs are involved in the development of local priorities, major issues affecting women, such as violence and abuse will be omitted.

² Urban Forum, Oxfam and Women's Resource Centre (2007) *Where are the women in LSPs? Women's Representation in Local Strategic Partnerships*. Urban Forum. London.

The supporting questions that in question 2 are useful, providing that local authorities and their statutory partners and the inspectorates themselves have a clear understanding of the underlying issues. For example, the following questions: How safe is the area? How healthy and well supported are people? and How well is inequality being addressed? (and indeed all the other questions) have specific implications for women and girls and should be assessed accordingly. Embedding an equalities and human rights framework should ensure a gendered analysis of issues and data collection is both possible and routine.

It is well known that women have a greater fear of crime than men and community safety should be a priority. However, women and girls face danger within the home as well. Issues of violence against women (which includes rape and sexual abuse, female genital mutilation, forced and early marriage, stalking, crimes in the name of 'honour', trafficking and sexual exploitation, sexual harassment and domestic violence) are often hidden in society and therefore omitted from public policy.

Similarly, experiences of violence and abuse both in child and adulthood have serious implications for the health and well-being of women. It is estimated that 80,000 women will be raped each year and yet around 90% of those go unreported.³ Support services for survivors of sexual violence are few and far between and the only National Indicator which considers sexual violence has been identified as a priority by as little as four local authorities. In addition, the definition for two of the three indicators relating to violence against women, including this one, has been deferred until 2009.

The demand and need for support services such as Rape Crisis Centres is high and yet the remaining 38 centres (affiliated to Rape Crisis England & Wales) are facing a severe funding crisis and some are at risk of closure. We want assurance that the CAA will be sensitive enough to pick up issues such as this which are often not on the radar of local authorities and are well hidden within communities. Engagement with local women's VCOs to find out their expert knowledge on key issues impacting on local women is therefore vital.

In addition, the question 'How good is the well-being of children and young people?' potentially disguises key gender differences. The terms 'young people' often implicitly refers to boys, particularly as boys behaviour is often seen to be more problematic than girls. However, it is often young women who lack a voice or influence in society. Issues such as low self-esteem, experiences of bullying or racism or boys' tending to dominate mixed spaces conspire to exclude young women and therefore local areas should be addressing this by specifically focusing on these groups.

The groups that CAA has chosen to focus on in terms of assessing how well outcomes, services and improvements are being achieved are very much focused on those considered 'very high risk'. These groups are easier to identify and monitor as they are mostly already 'part of the system'. Other groups who are at high risk however may be hidden. For example, women with insecure immigration

³ Women's Resource Centre and Rape Crisis (England and Wales). (2008). *The Crisis in Rape Crisis: A survey of Rape Crisis (England and Wales) centres*. Women's Resource Centre. London

status who are unable to leave violent relationships because they have no recourse to public funds or girls at risk of female genital mutilation.

We recommend that the CAA addresses this by ensuring that the data being assessed is disaggregated by gender and other equalities groups and identifying whether local public services have specific policies designed targeted to meet the specific needs of women and girls. Alongside an equalities and human rights framework, allowing for gendered analysis of issues and data, this would ensure that equalities is measured more broadly than simply those currently seen by government as at high risk.

Do you agree that we should use the green and red flag approach for reporting the area assessment?

The green and red flag approach could be useful, particularly if it takes into account where 'insufficient account is being taken of inequality'.

Do you agree with our proposals for the key questions and focus for the managing performance theme of the organisational assessment for a) councils? b) fire and rescue services?

Assessing whether organisations are delivering priority services, outcomes and improvements that are important to local people needs to be linked to assessing progress in addressing inequality. To do this, the CAA could link to the Public Sector Equality Duties on race, gender and disability. However, using public bodies' own equality impact assessments as one element of evidence, as is suggested in Appendix 3 (p57) could be problematic.

Anecdotal evidence that we have collected from our members and our own direct experience has found the gender equality schemes and equality impact assessments generally fall well below expectations and in some cases may not be legally compliant. Southall Black Sisters were recently successful in their legal challenge to Ealing Council who had failed to appropriately equality impact assess plans to cut SBSs funding.

More generally, GESs tend to focus on 'HR gender issues' such as the pay gap and workforce representation rather than looking at systematic discrimination of women in society. As they are still relatively new this is perhaps to be expected and is all the more reason why CAA should include testimony from those who understand and represent the voices of marginalised groups, such as women's VCOs.

In order to tackle inequality, it is vital that there is clear understanding of what this means. For many public bodies equality means treating everyone the same. However, this does not necessarily translate into equal outcomes. We advocate a focus on substantive equality which means, in terms of gender, an explicit acknowledgement of the power imbalance between women and men which is

reproduced and reflected in key social, political and economic structures and institutions.

Do the proposals provide for an appropriate focus to be given to people in vulnerable circumstances?

Please see our earlier response to the three questions and supporting issues proposed for the area assessment. We have concerns that the focus on high risk groups will be at the expense of focus on groups who experience disadvantage and discrimination, such as women.

Do you agree that the CAA should evolve over time?

Yes.

Do you broadly agree with the way we are proposing to use the National Indicator Set within the CAA framework?

Yes. We are very pleased to see that all 198 indicators will be reported on as part of the CAA. It is vital that there is some mechanism of monitoring performance against indicators which haven't been selected as priorities in the LAA. We would like further clarification of how good/poor performance on these indicators will be managed e.g. what will happen to a local authority that is performing poorly on indicators which are included in an LAA? Which are not included in an LAA? As highlighted before, this measurement of indicators needs to be robust and have a baseline, in order to be meaningful.

We strongly agree with the points made in paragraph 25 of the equality impact assessment (p.55) regarding the need to take account of issues which the National Indicators may not cover.

Do you support our proposals to report the assessments as set out in our prototype CAA reporting tool?

The tool looks like a useful way of presenting the information. In the section '**Quality of life in 'x' – the area assessment in detail**' it would be useful if the supporting sections e.g. safe, healthy and well-supported etc. were broken down into more detail. So for example, when you click on 'Safe' you are given further options such as 'violence against women' (VAW) which looks at the levels of VAW in the area and what steps are being taken to address it.

In addition in the supporting sections we would welcome the following additional options: race, gender, disability so that progress against promoting equality and eliminating unlawful harassment and discrimination can be measured. Rather than duplicating information this could contain links to equality schemes and annual reports on progress or a brief summary of progress.

There is no mention of what action is being taken if services aren't up to scratch or if local areas aren't performing well.

Do you agree with our proposals for peer involvement?

We strongly agree with this proposal but there needs to be a balance in terms of representation. For example, representatives of different equality groups or organisations that work on equality issues need to be involved. We also recommend that there is an awareness of cross cutting issues, so for example, understanding how women who have experienced violence and abuse can advise on how housing or health services can better meet the needs of women.

Do you agree with our approach to self-evaluation?

This information must be disaggregated by gender and other equalities groups and should be complemented with evidence from other sources, including service users and VCOs. In addition, it is vital that the self-evaluation is based on sound evidence and we welcome the Audit Commission's commitment to ensuring data is robust.

Do you agree with our approach to gather relevant information from sources such as Citizen’s Advice Bureaux and Regional Business Forums? Are there any other sources we should consider?

We strongly recommend consulting with local VCOs in addition to the other sources mentioned, for the reasons we have outlined throughout this response.

Summary of recommendations

WRC is broadly supportive of the proposals made in this consultation but has some specific recommendations to make:

- It is vital that engagement and partnership working with the third sector is assessed within the CAA, and disaggregated by specialist equalities groups.
- We strongly recommend that the CAA should incorporate a focus on the extent to which local authorities are meeting their legal obligations under the current equality duties on race, gender and disability.
- We think it is vital that LSPs and other relevant partnerships are routinely inspected as part of the CAA.
- Engaging with local communities to identify community perspectives and recommend should be both formalised and extended to include the third sector.
- Engagement with local women’s VCOs is vital to ensure that issues facing the most vulnerable and marginalised women in local communities are highlighted.
- Data must be assessed according to whether it has been disaggregated by gender and other equalities groups.
- There needs to be a balance of representation in terms of peer involvement to ensure the views and experiences of all equality groups are taken into account.