Cohesion Guidance for Funders

Consultation
# Contents

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Foreword</td>
<td>5</td>
</tr>
<tr>
<td>Introduction</td>
<td>6</td>
</tr>
<tr>
<td>Cohesion and Funding – key principles</td>
<td>10</td>
</tr>
<tr>
<td>Putting this guidance into practice</td>
<td>14</td>
</tr>
<tr>
<td>Annex A: what the Commission recommended on single group funding</td>
<td>21</td>
</tr>
<tr>
<td>Annex B: Equalities Impact</td>
<td>23</td>
</tr>
<tr>
<td>Annex C: Next Steps</td>
<td>24</td>
</tr>
<tr>
<td>Annex D: Your views</td>
<td>25</td>
</tr>
<tr>
<td>Annex E: The Consultation Code of Practice</td>
<td>26</td>
</tr>
</tbody>
</table>
Foreword

In June 2007, the Commission on Integration and Cohesion published *Our Shared Future*, setting out practical ways in which local authorities could help to build strong communities by promoting cohesion and integration locally.

This consultation document is an important part of the response to the Commission. It follows the recommendations the Commission made about what it termed “single group funding” – and the idea that funders should not automatically award grants to third sector activities organised on the basis of single identities, but should consider how their funding can be used to provide opportunities for interaction.

I am aware of concerns raised about this recommendation, particularly from third sector organisations worried about funding for the specific and targeted projects they run for marginalised groups. This document therefore seeks to set out how we believe funders can help deliver cohesion.

We now have strong evidence for how meaningful interaction between people of different backgrounds can directly build cohesion. And that means that now is the time for all funders to consider this question when awarding grants and look for opportunities to maximise such interaction. And to ensure that when funding a single issue or single identity activity, the clear business case for it is communicated effectively to other communities not benefiting from it.

The outcome should not be the loss of services targeting particular communities. This guidance does not aim to cancel projects working specifically with young black men to tackle gun crime, for example. Nor does it preclude work with Muslim communities to prevent violent extremism, or work supporting victims of hate crime, or services specifically targeting women.

These projects can and should continue, and the good work of the third sector in approaching alienated and excluded parts of our communities should be recognised. But we need to make the best use of funding, so we can deliver both equality of opportunity and cohesion. To ensure that however well-meaning, activities focused on particular communities do not prove divisive.

To do that effectively, we are launching this consultation to draw on the extensive experience in communities, so that we can provide the best possible guidance to funders and set out how we think this will help build cohesion, and I look forward to the progress this will deliver in bringing local people together, in shared activities that help them participate fully in their local communities.

**Rt Hon Hazel Blears MP**
Secretary of State for Communities and Local Government
Introduction

Context

1. This consultation is part of our response to the Commission on Integration and Cohesion’s final report, *Our Shared Future*, and relates in particular to Annex D of that document. The report, its case studies and supporting research documents can be found at www.integrationandcohesion.org.uk

2. The Commission was a fixed-term advisory body, tasked with developing practical recommendations aimed at building cohesion in local communities. Its report set out a new framework for local cohesion work, based on four key principles:

   • the sense of *shared futures* – an emphasis on articulating what binds communities together rather than what differences divide them, and prioritising a shared future over divided legacies
   • a new model of *rights and responsibilities* – one that makes clear both a sense of citizenship at national and local level, and the obligations that go along with membership of a community, both for individuals or groups
   • an ethics of hospitality – a new emphasis on *mutual respect and civility* that recognises that alongside the need to strengthen the social bonds within groups, the pace of change across the country reconfigures local communities rapidly, meaning that mutual respect is fundamental to issues of integration and cohesion
   • A commitment to equality that sits alongside the need to deliver *visible social justice*, to prioritise transparency and fairness, and build trust in the institutions that arbitrate between groups.

3. In responding to the Commission, our objective is to set out clearly how those four principles – and the emphasis on interaction outlined in the rest of the Commission’s report – can be made tangible in local practice. And to show clearly how cohesion can be successfully embedded in wider policy areas to ensure a greater impact.

Other guidance on funding and the third sector

4. This guidance will not replace other guidance covering work with the third sector, in particular the *Compact* which governs relations between the statutory and third sectors. The Funding and Procurement and Black and Minority Ethnic (BME) Codes in particular will be relevant. Compact publications can be downloaded from: www.thecompact.org.uk/information/100023/publications/
5. Similarly, it will not replace the Treasury and National Audit Office guidance for funders available at/through www.hm-treasury.gov.uk/documents/public_spending_reporting/charity_third_sector_finance/psr_charity_thirdsector_publications.cfm

Who should read this document

6. This consultation on guidance for funders is for England only; the guidance is aimed principally at local authorities and their partners (particularly LSPs); along with third sector funders. There may be a read across from the principles it contains, for other grant-making organisations funding local and community-level projects.

What does this consultation cover?

Funding of all kinds of activities and services

7. This consultation is about guidance on both the funding of mainstream activities and the funding of activities which are targeted towards particular groups within society. Both of these provide opportunities to promote cohesion, where they provide people with opportunities to make links with other people from different backgrounds.

8. In this document, by ‘mainstream’ service provision we mean service provision which has the objective of providing for all service users. Sometimes, in practice, there may be some groups whose needs are not fully met by such provision as it stands and who will receive support particularly targeted towards their needs.

9. The ideal will be for mainstream provision to move towards a state where all people are properly supported (if this is not already the case). This might be achieved through improving mainstream provision so that it meets the needs of all users, or through collaboration with organisations working with particular groups of users – organisations which may have specialist skills supporting that group or groups – or by a combination of both of those. In this way a mainstream service will be able to ensure that a diverse group of users is supported and that opportunities for interaction are maximised. Similarly, provision which supports a particular group of users may be able to find ways to bring people together bridging the gap between its users and others.
**Social capital, bonding and bridging**

In considering how funding can promote cohesion, we are considering in particular the value of ‘bonding’ and ‘bridging’ activities and social capital.

Social capital is the ‘social glue’ between people, organisations and communities that enable them to work together to pursue shared objectives.

There are three categories of social capital:¹

- **Bonding** – based upon enduring, multi-faceted relationships between similar people with strong mutual commitments such as among friends, family and other close knit groups

- **Bridging** – formed from the connections between people who have less in common, but may have overlapping interest, for example, between neighbours, colleagues, or between different groups within a community

- **Linking** – derived from links between people or organisations beyond peer boundaries, cutting across status and similarity and enabling people to exert influence and reach outside their normal circles.

We know that cohesion is higher amongst those who bridge for almost every ethnic group. Analysis of the Citizenship Survey shows that having friends from different backgrounds is a strong predictor of community cohesion, even when other factors are taken into account. Bridging can therefore reinforce cohesion. For this reason, we are particularly keen for funders to use resources to promote bridging activities wherever appropriate.

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.

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**For all kinds of people**

10. There are many facets of identity according to which people may be grouped or choose to group themselves. For example, ethnicity, faith and culture – which may be significant in terms of cohesion. Gender or age may also be the basis of groupings. Also, in terms of cohesion, we know that tension between younger and older people may be a factor, as may be tensions between rural and urban settings or between other geographical divides.

¹ *The well-connected community: A networking approach to community development*, Alison Gilchrist, 2004
11. This guidance will have a bearing on work with any grouping which may be relevant to cohesion (dependant on the local context, as in different settings different factors may be relevant). However it should not be taken to place any barriers in the way of support for particular groups where cohesion is not a relevant issue: for example, single group work with victims of domestic violence would not be an area where there should be an expectation of or preference for bridging activities.

12. Also, it is important to recognise that how groupings are defined may vary according to context. Apparently ‘single’ groups may actually encompass people from, for example, a wide range of ethnic or cultural backgrounds. Bringing this range of people together across that range of backgrounds may constitute bridging activity, where the groupings concerned are ones between which few people have formed strong relationships or between which relationships have been damaged for some reason. Again, it is the local context which will determine where this is the case and it will be important for local funders to have a sensitive appreciation of the local cohesion situation in order to make informed judgements.

**From all kinds of funding streams**

13. This will also apply both to funding streams specifically aimed at promoting cohesion and to general funding streams, as again, all kinds of activities may provide opportunities to promote cohesion.
Cohesion guidance for funders

Cohesion and funding – key principles

Our suggested approach to funding as a tool to promote cohesion

14. We propose to issue guidance setting out how funders supporting community-level activities, in particular local authorities and their wider partners – can promote cohesion and integration.

15. This guidance will be based on five guiding principles that serve as a statement of policy intent:

- Firstly, there is a clear link between equality and cohesion and we recognise the need for work with particular groups to tackle evidenced need amongst particular communities or groups experiencing inequalities.

In *Improving Opportunity, Strengthening Society: Two years on*, published in August last year, the Government reported that:

“despite many encouraging trends, certain communities still suffer poorer outcomes in education, health, employment, housing and the criminal justice system. This was confirmed in the final report of the independent Equalities Review, *Fairness and Freedom*, which was published in February 2007.”

There are a number of examples of this work, for example, Communities and Local Government’s own REACH project.

The REACH Project

Black boys and young Black men face serious challenges in every sector of society. They are less likely to do well at school, more likely to be unemployed and much more likely to become involved in the criminal justice system than their peers.

REACH is Communities and Local Government’s figurehead project to raise the aspirations, attainment and achievement of Black boys and young Black men, enabling them to reach their potential. The REACH group consists of approximately 20 members, drawn from a variety of fields including the black third sector, education, local authorities, academia and the police. Members include representatives from many of the recognised leading third sector organisations on this issue.

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Equal life chances is an important part of cohesion – building equality is part of building cohesion as well as vital in its own right.

• **Secondly, all groups need to consider how they can promote cohesion and integration as well as meeting the diverse needs of the community.** Where relevant, organisations – both mainstream and those serving particular groups – should be encouraged to be more open, accessible and to build bridges with others.

• **Thirdly, the evidence shows that building relationships between people promotes cohesion.** We know that cohesion is higher amongst those who undertake bridging activity – building relationships with people different to themselves – for almost every ethnic group. Analysis of the Citizenship Survey shows that **having friends from different backgrounds is a very strong predictor of community cohesion**, even when other factors are taken into account. This can therefore reinforce cohesion. For this reason, we are particularly keen for funders to use resources to promote such activities wherever appropriate. Indeed, much work with particular groups already also involves or has links to opportunities for people from different backgrounds to meet and develop relationships with one another.

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**The Fusion Project, Oldham**

The Fusion Project in Oldham enables young people from a wide range of different communities from within the Borough to establish new and lasting friendships with young people with whom they would not otherwise come into contact. Every secondary school in the Borough nominates four peer leaders from their year 10 cohort; each young person is placed in one of three groups, with no more than two young people from the same school in each group. The project is organised as a 5-day residential during which the young people forge a strong group identity, develop their understanding of different cultures and learn more about each other as individuals. Participants maintain the relationships formed through regular reunions after the residential.

“I’ve learned about lots of other religions and cultures. Now if I heard someone being racist I would challenge them.”

“I have spent five days with someone with disabilities and he is fantastic, before Fusion I would have overlooked him, but now I talk to him and want to see how he is”

— comments from Fusion participants

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Therefore, fourthly, to meet our goals on integration and cohesion, funders should seek to find the appropriate balance between bridging activities, building relationships and links between people from different backgrounds, and activities which support particular groups alone.

Bridging activities will ultimately lead to more positive perceptions of cohesion. Work with a particular group is appropriate wherever there is an evidenced need within the community concerned and it is clear that such a single group approach rather than a mainstream one is the best way to tackle that need. However, if activities do not provide, over the longer term, opportunities for people to meet others from different backgrounds to come together, there is a risk that this might lead to insularity and people remaining in a ‘comfort zone’ outside which they do not interact.

A women’s centre might want to run a programme offering nutritional advice to young mothers. Recognising that this is an opportunity for young mothers from different backgrounds to get together, but that language skills or cultural differences might hinder interaction, they might design the programme so that some components enable women from different backgrounds to come together and share experiences and ideas.

By contrast, a centre solely for people from a particular ethnic group which provided no opportunities for people to meet or interact with others from different backgrounds might prove detrimental to cohesion in the long term and if there was not an evidenced need for the provision, funders might consider how an approach involving opportunities for interaction could lead to better cohesion.

And finally, that all of this will be driven by the local context and specific local needs at the time of funding.

It’s not possible to define precisely how much interaction ought to be undertaken and how much work to promote equality is needed, because the answer is different in each local context, and changes over time.

The local context might include consideration of:

- what the current levels of cohesion and tension were
- what the profile of the local community was, such as highly diverse, or made up of two distinct settled groups
- what the makeup of an individual community was – were all settled, or had some recently arrived?
The right balance between bonding and bridging activities will vary from place to place, depending on the composition of communities and patterns of need; and so funders will need to have a good understanding of the needs of local communities.

For example, a small faith-based community centre might apply for funds to run a youth club for young people in a particular local area where there have been recent tensions between different groups of young people. Given that this is the sort of opportunity that could be used to bring people of different backgrounds together, funders might work with organisers to ensure that young people of all different backgrounds are invited to participate – or might encourage the community centre to articulate how the project will build cohesion in the local area by bridging across community divides rather than underlining differences by providing the service for only one group of young people if all young people have a need for the service offered.

In a different context, a different approach might be taken. For example, in an area with a significant number of newly arrived young people who had specific language needs and were particularly vulnerable as a result of traumatic experiences in their country of origin, it might be appropriate to provide specific support for that group.

16. None of this is intended to add significantly to the burden of funders or applicants. Although it will be an additional checkpoint in the process, we believe it will make funding for integration and cohesion more effective, will enable us to get more from limited public funds by joining up policy goals, and will help avoid unintended consequences of funding by joining policy areas up from the outset. Our aim is that all funding be awarded in a way that maximises the opportunity for interaction across different groups.

Consultation question 1:
Are these principles the right basis for this guidance?
Funding for cohesion: putting this guidance into practice

What funders can do

17. There are some simple, practical steps that funders can undertake to help ensure that the work they fund promotes cohesion:

- they can support projects which provide ways for people from different backgrounds to come together and build relationships with one another in safe and supported ways
- they can 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
- they can review funding portfolios over time to ensure that funding meets the above requirements as far as possible and that they are helping to promote cohesion and integration whilst also responding to the diversity and needs of the communities they serve.

Northern Ireland

Guidance in Northern Ireland clearly states that approaches that reinforce segregation must be challenged. Although the Good Relations policy recognises that in order to address fears, suspicions and concerns it may first be necessary to develop single identity projects, it also makes clear that single identity work can entrench attitudes and stereotypes and can only ever be partial in a community where others share the public space.

All community relations and community development programmes are therefore required to identify how they will address sectarian or racist behaviour to enable communities to work more effectively together and identify the good relations outcomes of their work. The test therefore is not the structure of the project itself – recognising the diversity of the sector, but the quality of the outcomes and whether they do in fact promote good relationship-building work.
Key questions for funders

18. This section therefore suggests five key questions for local authorities and other funders to consider when funding community-level activities:

- **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?**

  Our aim is for funders to make better use of funding to maximise opportunities for building relationships across communities, so that projects delivered for a particular group in isolation are not seen as the only option for working with communities experiencing cohesion challenges. So the first question is really one to draw out:

  - whether the group or community in question is being supported by mainstream provision or has a clear need for services outside of the mainstream
  - whether the single group work proposed for funding by the grant is genuinely the only way to offer the right skills and knowledge for the delivery of services
  - whether funding is being awarded in a way that builds cohesion, or whether an activity or resource that only caters to one group or community will be more divisive

  There will certainly be times when the answer to these questions is yes – and where there is a clear business or equalities case for this funding to proceed. Third sector organisations often develop programmes that fill gaps in mainstream provision, for example, and organisations focused on particular groups often have the right skills to deliver services in a culturally sensitive way.

  And it should also include consideration of the balance between required cultural sensitivity in the provision of services – recognising that small identity-based organisations are often those with the know-how and experience in this area – and a clear need for interaction across groups. So for example, considering whether those smaller groups might help develop a culturally sensitive model of mainstream services that worked across a number of groups, reducing the need for separate provision.

  Getting these issues right will help funders avoid problems associated with supporting activities which do not reflect changes in patterns of need or in the efficacy of mainstream services.
• **Can the organisation delivering this activity include, in its project plans, plans for future interaction across groups?**

There are a range of ways in which project plans can set out how activities can foster cohesion in the longer term. One of these could be a statement from the applicant setting out how they will build their own capacity, and identify objectives for becoming more outward-facing.

Funding organisations could consider routinely asking that proposals set out how activities (either ‘mainstream’ activities or those supporting a particular group or groups) could move over time (such as over the life of a three or five year funding agreement) from beginning by supporting a particular group or groups to bringing people from different backgrounds together – perhaps beginning integration once initial capacity building activity had been carried out. (On capacity issues, see the section on ‘confidence and skills to bridge and link’ below.)

Another could be to set out how activity supporting a particular group currently not adequately supported by mainstream provision could also work with mainstream services to build their abilities, rather than perpetuating a situation in which mainstream services fail to improve because they are relying on other providers to plug the gaps in a way which has the effect of hiding the more fundamental failing of the mainstream service. Plans could include an assessment of whether mainstream services should adapt so that special services are not needed, and whether the gap might be able to be filled on a generic rather than special basis. For example, whether outreach workers with specific skills in supporting a particular group could be partnered with workers from the mainstream organisation to transfer skills to them so that in the longer term the particular group could be effectively supported by the mainstream service.

These elements could be in addition to more general effective planning around clearly defining the needs being met by the activity, success criteria or exit strategies to avoid some of the difficulties and risks to cohesion of funding for activities with particular groups being renewed without reference to whether it is still needed, leading to resentment if the needs of other groups are being ignored as a result.

*For example, if an area is experiencing particular waves of new migration, it may make sense to fund a Polish new migrants’ group that offers particular support to Polish migrants. But the plans for this activity could include the aim for the group to find ways to become outward-facing (eg that it might twin with a similar Latvian community group), and should start as soon as possible to engage more fully across communities (for example, by running events that include settled communities). There might also be the option of a project for all new migrants, which adapted over time as its customers changed.*
• **Is there a need for a particular communications plan for this funding decision?**
  The Commission found 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 for housing. Their report recommended targeted communications to settled communities about integration and cohesion, for example – particularly in the family group of areas experiencing migration for the first time.

  This may be a consideration for funding decisions – particularly those larger grants. Again, the intention is not to construct additional burdens for funders but to save work later, created by failure to communicate at this stage. In particular, short and targeted communications – perhaps through a transparent list of all grants (not just those to particular groups) on a website, for example, or via public consultation – might help address issues of resentment in particular groups before they take hold.

  Local authorities may also like to consider at this stage whether this service or activity needs to be branded as a specific one for a specific community, or whether it might sit as part of a more generic strategy. For example, if small third sector organisations are being funded to support hard to reach communities, they might be badged as part of a wider customer service or customer contact strategy that emphasised the council’s commitment to providing tailored services to all groups, no matter what their background.

• **Is this funding aligned with the area’s wider community cohesion strategy?**
  Some local authorities have found that the easiest way to answer all of these questions is to make clear that activities will not be funded unless they are aligned with the existing community cohesion strategy. In that way, criteria for funding are locally determined, and locally monitored – meaning that each application can be considered on a case by case basis.

  This might mean making public a community cohesion strategy, and/or set of funding criteria – and referring all applicants to it from the outset. It might also mean including information on the evidence of positive outcomes from bridging activities, or explaining clearly the relationship between the area’s equality strategy (which may well rely on some organisations arranged around a particular identity or group) and the area’s community cohesion strategy.

  And related to the question of communications planning above, if there is a clear integration and cohesion strategy from within which to make funding decisions, they will be easier to communicate in themselves.
London Borough of Barking & Dagenham – linking commissioning to a cohesion strategy

The London Borough of Barking and Dagenham has adopted a commissioning approach to community capacity building, in preference to the previous demand-led model. Its statement of commissioning intentions includes a generic requirement for projects to show how they are delivering cohesion and sought to identify what the VCS could do to help deliver the borough’s cohesion strategy.

The requirement to show how services were promoting cohesion has also been included in the commissioning process for services elsewhere within the local authority.

In this way a wide spectrum of funding activity within the borough will be able to help deliver cohesion and in particular the authority’s overall cohesion strategy.

• **How else might this project or activity demonstrate its commitment to integration and cohesion?**

Even after the questions above, given the diversity of needs within communities, and of the third sector, there will be times when the funding process cannot be harnessed in the ways outlined above.

In those cases, local authorities may well want to think about other ways that their grant recipients can become involved in efforts to build integration and cohesion. For example, delivery of regeneration and housing programmes may result in local intelligence that will be useful to cohesion planning – it may be appropriate to invite organisations on to local networks aimed at monitoring tensions, for example. It may also be an idea to set up a learning network of grant recipients, so that they can share good practice, and act as ambassadors for both their projects, and the Council’s wider integration and cohesion aims.

**Consultation question 2:**
Are these the right questions for funders to consider to help them promote cohesion through the funding decisions they make?

**Consultation question 3:**
How could the process of organisations setting out, in their project plans, plans for future interaction across groups, be developed, refined or extended? How should it be implemented to ensure it is proportionate and does not present barriers for organisations with differing levels of capacity?
Consultation question 4:
Do funders have the right information and resources to make these considerations part of their decision-making processes in an effective way?

Consultation question 5:
How can funders best work to promote cohesion with organisations with constitutions or charitable objects which may define the work the organisation is there to do, if those objects do not include specific reference to cohesion or integration activities?

Consultation question 6:
Can you tell us about examples of projects which have found innovative ways to balance ‘bridging’ activity and work meeting the needs of particular groups, to promote cohesion locally?

Consultation question 7:
Can you tell us about other examples of funders who work well with the organisations they fund in applying considerations like those set out in the questions above to promote cohesion locally?

Confidence and skills to bridge and link

19. We recognise that for particular groups to move from receiving specific support to ‘bridging’ and building relationships with others from different groups requires confidence and knowledge both to reach out beyond the familiar in the first place, and then establish and sustain a meaningful and purposeful relationship with others. (This issue has also been addressed in the Communities and Local Government consultation on a framework for inter faith dialogue and social action, Face to Face and Side by Side, published in December 2007 and also available on www.communities.gov.uk/corporate/publications/consultations

20. However there is also a need to develop confidence in communities as a whole and there may be a need for communities and Government to challenge the perspective that distinctiveness will be lost or assimilated through interactions with other strong identities.
The Churches’ Regional Commission in the North East (FiNER Project)

This project helped faith communities in the North East have a better understanding of how they can engage effectively with local authorities and public services. The project organised a number of events and workshops for faith communities, local authorities, public and third sector organisations. The main aim of these events was to engage faith communities in strategic planning and to develop a coherent strategy of engagement for the North East faith sector. Through participating in these events many faith communities developed a better understanding of how they could contribute to local strategic agendas; the events also helped to increase the ‘religious literacy’ in civic structures. The workshops fostered discussion and dialogue and enabled the faith and the public sector representatives to meet and explore opportunities for their future work together.

Consultation question 8:
Access to funding, leadership skills, and misconceptions may be issues which may limit the ability of organisations to bridge and link. Are there other barriers in your community or local area which need to be overcome? Who needs to take action, and what do they need to do?

Timescale

21. Funding processes should allow for any impacts of these considerations to take place over a period of time.

22. Funders may wish to review funding portfolios regularly over time – for example, on an annual basis – to identify where or whether progress is being made on cohesion and bridging activities. The Commission found examples of funding which had been continued despite the fact that local populations were now very different and where communities had been particularly divided.
Annex A

What the commission recommended on single group funding

23. The Commission carried out extensive regional consultation, looking at a range of different activities, including projects developing ‘bonding’ social capital – strengthening ties within particular communities – and projects developing ‘bridging’ social capital – making and strengthening links between different communities. They found that positive perceptions of cohesion depend on a complex interplay of a number of factors. They found specific cohesion projects that were having a local impact, as well as examples of mainstream programmes being “cohesion proofed” or delivered in a way that would increase interaction and a sense of belonging.

24. They therefore recommended that:

“Integration and cohesion therefore needs to be about both mainstreaming (for instance ensuring that physical regeneration schemes take account of the need to build social integration and cohesion) and targeted interventions (for instance, conflict resolution work with young men from different backgrounds)

25. In looking at ‘bonding’ activities, they noted the value of lots of this work – recognising that third sector organisations were often closing gaps in mainstream provision, and that where groups in the past had suffered direct or indirect discrimination from mainstream providers they were more likely to rely on service provision targeted to their particular community or group.

26. They found that those who have ‘bonding’ social capital are more likely to ‘bridge’ and that cohesion is higher amongst those who ‘bridge’ for almost every ethnic group.

27. But they also found that some activities were being delivered that were inadvertently working against integration and cohesion because they were being delivered to one community or group only, rather than focusing on a “whole community” approach. They outlined the potential pitfalls of funding activities that were focused solely on one group or community – including:

- where funding was encouraging people to identity themselves on the basis of a single feature of identity and separate themselves from others on that basis, increasing insularity and the creation of a “comfort zone” where people only mixed with others like them
• where funding was not flexible enough to adapt to changes in who are the vulnerable groups
• where mainstream providers had changed, so that separate provision was no longer necessary, but the withdrawal of funding was difficult.

28. There was some evidence of this in Oldham after the disturbances in 2001, for example, where a number of youth groups continued to serve local areas where one or other ethnic or faith group predominated, rather than being used as a place to bring young people from different backgrounds together. As a result, Oldham now groups its youth centres into ‘community cohesion clusters’ – groups of four youth centres which are varied in terms of the ethnic composition or degree of deprivation or affluence of the areas they serve, with young service users planning the programme of work together – to ensure that its youth provision is maximising opportunities for interaction.

29. The Commission therefore recommended that the ideas about using funding to promote integration and cohesion included in Annex D of their report be used to develop guidance for local authorities. As part of mainstreaming cohesion, the Commission recommended that existing spend on VCS provision of services and activities should be assessed to see whether it was building integrated and cohesive communities, or whether it was inadvertently divisive.
Annex B

Equalities impact: Plan for full assessment

This consultation on cohesion guidance for funders covers both mainstream funding and funding aimed at particular groups within society. These groups may include, but will not be limited to, particular ethnic or racial groups.

It is our intention that this guidance will not be detrimental to the important work done to address disadvantage and inequalities in particular communities, as set out above. The issues raised could have an impact on different local communities and could contribute to equality and cohesion outcomes and are in line with the duty to promote good relations between people of different ethnic groups set out in the Race Relations (Amendment) Act.

In preparing this consultation document, we have worked with stakeholders including funders such as local authorities and third sector bodies delivering work supported by them. A number of stakeholders have raised concerns about the Commission on Integration and Cohesion’s original recommendations on this issue, and about how funders may apply any guidance in this area.

We therefore propose to complete a full equalities and cohesion impact assessment on the impact of guidance, drawing on the responses to this consultation, to be published with final guidance in the summer. Responses to this consultation will help inform that assessment.
Annex C

Next steps

We are working to publish final guidance in Summer 2008 as follows:

26 May 2008  Consultation closes

Summer 2008  Publish final strategy and summary of consultation responses
Annex D

Your views

The consultation period runs until **26 May 2008**.

Responses to this consultation will be used by Government and key partners to develop the final guidance. If you do not wish your response to be shared with non-Government partners in this way please make this clear in your response.

You can read this discussion paper and download a consultation response form through the Communities and Local Government website: www.communities.gov.uk/corporate/publications/consultations

Please send your comments by email to: cohesionfunders@communities.gsi.gov.uk

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Any queries about this discussion paper should be sent to this address, or, preferably, to the email address above.

A summary of responses to this consultation will be published in July 2008 on the Communities and Local Government website: www.communities.gov.uk
Annex E

The consultation criteria

The Government has adopted a code of practice on consultations.

The criteria below apply to all UK national public consultations on the basis of a document in electronic or printed form. They will often be relevant to other sorts of consultation. Though they have no legal force, and cannot prevail over statutory or other mandatory external requirements (eg, under European Community Law), they should otherwise generally be regarded as binding on UK departments and their agencies, unless ministers conclude that exceptional circumstances require a departure.

1. Consult widely throughout the process, allowing a minimum of 12 weeks for written consultation at least once during the development of the policy.

2. Be clear about what your proposals are, who may be affected, what questions are being asked and the timescale for responses.

3. Ensure that your consultation is clear, concise and widely accessible.

4. Give feedback regarding the responses received and how the consultation process influenced the policy.

5. Monitor your department’s effectiveness at consultation, including through the use of a designated consultation co-ordinator.

6. Ensure your consultation follows better regulation best practice, including carrying out an Impact Assessment if appropriate.

The full consultation code may be viewed at:
www.cabinet-office.gov.uk/regulation/Consultation/Introduction.htm
Are you satisfied that this consultation has followed these criteria? If not, or you have any other observations about ways of improving the consultation process please contact:

Albert Joyce  
Communities and Local Government Consultation Co-ordinator  
Zone 6/H10  
Eland House  
Bressenden Place  
London SW1E 5DU

or by e-mail to:  
albert.joyce@communities.gsi.gov.uk

Please note that responses to the consultation itself should be sent to the addresses shown in Annex D.