

Appendix one

Additional Consultation December 2015- January 2016

1. Summary of consultation responses

A total of 89 completed surveys were received online; a further 34 written responses were received by email. The responses came from 94 organisations including, 32 boroughs, a funder, a housing partnership, the Mayor's Office for Policing and Crime and 59 voluntary and community sector organisations. Responses were also received from individuals and service users. London Councils was also copied into a number of letters sent to members of the Grants Committee from voluntary sector organisations highlighting their concerns with the Leaders' Committee position.

The replies broadly reflect the diversity of London's overall population and the nine protected characteristics under the Equality Act 2010. Further information on the equalities breakdown of responses can be found in **appendix four** of this report.

2. Analysis – Future grants programme priorities

2.1 Support for the Leaders' Committee position

The consultation asked respondents for further information with regard to their view on the Leaders' Committee position. A summary of the responses is provided below.

2.1.1 Borough responses

Twenty five boroughs stated that they agreed with the Leaders' Committee position to continue with a grants programme focused on three priorities (sexual and domestic violence, homelessness and poverty) but that it was unlikely that a new priority focused solely on capacity building of the Third Sector, could be considered as a priority for the grants programme going forward. This reflects the constraints on local authority budgets as outlined above. One borough stated that refocussing a future programme in this way would enable it to fund capacity building at a local level.

Despite the majority view outlined above, four boroughs stated that they did not agree with the Leaders' Committee statement because they felt there should be a role for London Councils in funding a priority focused on capacity building. These boroughs highlighted the important role that the VCS are playing in delivering local authority activities and the need to ensure the organisations were sufficiently supported to be able to deliver quality services

and maintain organisational sustainability. These responses highlight the increase in demand on VCS services and the role they play in supporting communities' and individuals' resilience. Capacity building includes support to form partnerships in order to compete for larger significant contracts against private competitors whilst reflecting the needs of vulnerable people. Pan-London funding for capacity building was felt to be a low cost means of investing in the VCS in London.

The City of London states this case most strongly and calls on the boroughs through London Councils to reiterate their commitment to capacity building the third sector. The City highlights the need for a pan-London capacity building service and that London Councils is well placed to show leadership in this area given its democratic mandate and experience in this area. City Bridge Trust has funded London Funders to commission a review of infrastructure support to the third sector, which is due to conclude this month. The response requests that London Councils allocates some resources to ensure sufficient officer time to work with City Bridge Trust and other London Funders to shape the implementation on the report's findings.

Alongside these four boroughs, a further five boroughs highlighted a role for continued pan-London delivered capacity building, if not necessarily through London Councils, nor at the same level. In particular this was around equalities led organisations, specialist support, building new models, supporting HR issues, representation for specific parts of the community and disseminating information on policy changes. These boroughs highlighted the risks in not delivering a programme that contained a priority focused on capacity building the third sector, stating that the current Priority four projects might not survive and local authorities might struggle to address the gap at a local level.

In support of their statement boroughs also made some general comments about the grants programme as follows.

Six boroughs reiterated the fact that there are huge pressures on local authority budgets and that boroughs are having to make very difficult choices in the light of limited resources. The need to ensure that the programme delivered value for money, robust outcomes and tackled issues that could only be addressed at a pan-London level was felt to be even more relevant in this context. Two boroughs stated that given this context a pan-London programme was vital in delivering a coordinated response using limited resources. It was felt that the programme was able to respond to key specific target groups and needs that in any one borough would be difficult to address due to comparatively small numbers of people

experiencing the issues in question or from specific communities with cultural or language needs that can best be met on a Pan-London basis. The role of consortium funding was seen as key to this in providing an opportunity to access specialised or culturally specific support through a wider partnership of providers. The role of the programme in leveraging in more resources from other funding streams was also highlighted.

Echoing views raised in the initial consultation five boroughs emphasised the importance of commissions and priority areas working closely with local provision to complement existing provision, embedding services locally and avoiding duplication. Generally boroughs welcomed the fact that the position taken by Leaders' Committee at this stage reflected a need to address changing issues relating to inner and outer London. One borough stated that outer London issues needed to be reflected further.

Some boroughs emphasised the need for more robust performance management of the programme and clearer reporting on the services available, referral routes and benefits for their borough residents. Echoing issues raised above about the pressures on local authority budgets one borough stated that boroughs' contribution to the scheme is often at the expense of investing in local grants pots and local community and voluntary sector groups making the need to demonstrate to residents a direct positive impact on the borough all the more important. In contrast, other boroughs stated that their satisfaction with the levels of benefit and reporting had improved and were now satisfactory.

It was felt that borough involvement in the process of commissioning was key and boroughs welcomed the chance to be involved in the next stage of the process. Further details on this are covered in Section Four of the main report. It was felt that future priorities should be flexible and able to adapt to changing needs.

Boroughs then wrote specifically about the proposed priority areas, reiterating issues raised in the earlier consultation.

Priority one – Homelessness

Seventeen boroughs made specific reference to their continued support for this priority area. It was felt that current services have helped manage demand presented to London local authorities. Two boroughs stated that funding to tackle homelessness should be reduced/ removed and undertaken locally. During the previous consultation a number of responses stated that there should be a stronger link between services to tackle unemployment and homelessness. This was reiterated by 14 boroughs in the recent consultation. Some

boroughs (3) urged caution given that both are complex and multi-faceted issues and that services should not be restricted to service users that are experiencing both issues. Five boroughs welcomed the refocusing of the service to reflect evolving homelessness issues presenting in inner and outer London. For example the growing numbers of street homeless (rough sleepers) in outer London.

Responses reiterated the importance of the grants programme focusing on areas that do not fall under local authority duties or target groups that would be challenging to support at a borough level due to the comparatively small numbers or transient nature. Examples provided include EEA nationals and non-UK nationals with no recourse, young people, and those with mental health needs, TB and other complex needs. Some boroughs highlighted issues related to street homelessness such as hotspots or encampments, whereas other boroughs emphasised other target groups such as the 'hidden homeless' and those in unsuitable accommodation. It was felt that the service should continue to support beneficiaries to access and maintain private rental sector tenancies, through advice and tenancy brokerage and tackle issues of rogue landlords. The focus on prevention and early intervention was felt to be key. It was felt that given the complex nature of the issues, services should provide holistic support covering, health, education, training and job skills. It was felt that frontline providers required support through training to ensure high quality and relevant services.

Priority two – Sexual and domestic violence

Reflecting the previous consultation twenty boroughs made specific reference to their continued support for this priority area citing the increase in demand and the positive role that current commissions have made in delivering services across London, supporting boroughs to manage demand. It was felt that services should link to the proposed Priority one homelessness provision reflecting the link between these areas. Service provision should also link to health services. Five boroughs stated the importance of making sure funded services are carefully aligned with existing models of service delivery (local, regional (MOPAC) and national (DCLG/Home Office)) to ensure there is no duplication. The way that services have integrated and complemented local provision was largely praised and boroughs highlighted the benefits that service users have gained from consortiums covering a range of specialist partners and types of service delivery.

Boroughs highlighted a number of key target groups that services should cover including women with no recourse to public funds, complex needs including mental health needs, children and young people (as victims and perpetrators), and victims of trafficking/sexual

exploitation. Borough responses reiterated their support for the current six strands covering prevention, counselling, advice, helpline, coordinated refuge provision (including data collection), emergency refuge provision, support to sexual and domestic violence voluntary and community organisations (VCO) and specialist support around female genital mutilation (FGM), forced marriage, honour based violence and other harmful practices. Borough responses expressed a desire to remain involved in the next stages of the commissioning process.

Priority three - Poverty

Reflecting the previous consultation 15 boroughs specifically reiterated their support for this priority and how previous activities had helped manage demand on local services. As above boroughs re-stated the importance of linking this priority to the proposed Priority One homelessness, in particular EEA non-UK nationals. The importance of holistic support, linked to local services was also highlighted. It was also felt to be important not to duplicate local or sub-regional commissioning on this area. Borough responses reflected on the target groups and confirmed support for services targeted at people with disabilities, including learning disabled, long term health needs and mental health. Other target groups were highlighted including, women facing barriers to employment, lone parents, drug and alcohol misuse, ESOL and people with very low skills.

Six boroughs commented on the interrelationship between employment and poverty. This included issues around welfare reforms, in-work poverty and the need for funded services to also cover budgeting skills to assist service users manage the high cost of living in London (especially for young people). As above the importance of value for money and robust outcomes, including sustainable job outcomes was emphasised. Boroughs commented on models of commissioning and two boroughs specifically emphasised the benefits of sub-regional projects with a strong encouragement towards partnership working to embed the various elements highlighted above.

Not all boroughs supported this area of funding and one borough stated that it did not feel it should be delivered through the grants programme.

There is a separate report on this agenda regarding Priority three Poverty (ESF) given the different timescales that it operates under. As outlined further in that report, the above issues have been taken into account in drawing up the prospectus for the new Poverty/ ESF round to ensure it reflects these issues. For example the link between unemployment and homelessness has been incorporated into the prospectus.

2.1.2 Voluntary and Community Sector (VCS)

The majority of VCS responses (87%) did not support the Leaders' Committee position. This was in the main due to respondents supporting the continuation of a priority focused on capacity building in the third sector (45 responses). Support is outlined in responses from organisations currently funded under Priority four, but, in greater number, from frontline organisations that currently receive support from Priority four projects. In addition, organisations from other sections of the voluntary sector have commented on their disagreement with London Councils position.

Reasons cited for this position include the following. Priority four has played a role in furthering equalities objectives (disability, race (including refugee) and age are the most regularly cited characteristics) (27 responses). Current Priority four commissions provide specialist advice to equalities led frontline organisations in a way that reflects their needs and accessibility issues (not available through mainstream provision), raise the profile of issues affecting that equalities group and support the representation of those communities. In addition the current Priority four commissions have worked to improve the accessibility of other frontline projects, for example through the delivery of disability access training. Responses highlight the fact that equalities groups (women, disabled) have been disproportionately affected by the welfare reforms and cuts to public services creating increased demand for services in these areas.

Responses also stated that existing services have a significant and positive impact and that monitoring information has demonstrated robust outcomes and value for money. The context of the VCS increasingly stepping into areas previously delivered by local authorities, facing increased demands and more competition for resources, are all highlighted as reasons for supporting a strong VCS through capacity building to ensure quality services and manage risk. Responses have highlighted the fact that the increase in demand on their services has meant that management staff have been diverted away from strategic, organisational and networking/ partnership building activities to frontline delivery. The cross-sectoral working needed to address these challenges was felt to be best supported via capacity building support. Capacity building was seen as a key way that boroughs could shape the voluntary sector and support the levering in of extra resources. Responses also highlighted the review being undertaken by London Funders for City Bridge Trust.

Priority one - homelessness

Support for the other three priority areas was also outlined and some further issues relating to these. With regards to Priority one, respondents highlighted the importance of services focusing on the following target groups, BAMER, LGBT, migrants, those with no recourse, women, people with learning disabilities, physical health problems, history of offending, drug and alcohol misuse, mental health issues and in general non-priority single homeless. Particular issues were raised with regard to young people such as the affect of welfare reforms and the proposed housing support changes. A pan-London service was highlighted as essential for this target group given the transient nature of this group, lack of local-authority connection and the need to flee violence, harassment and destructive family homes.

Responses welcomed the links being made in the proposal between homelessness and employment services, the emphasis on early intervention and prevention and the changes in homelessness presenting in inner and outer London. Eleven responses highlighted the need for continued support for frontline organisations. These responses highlighted the unprecedented levels of change in homelessness and the need for frontline homelessness organisations to keep up to date with these changes (such as private rent sector and rogue landlords). The ability to effectively work across sectors, building partnerships and working with local authorities (such as the link between homelessness and employment and homelessness and sexual and domestic violence) was felt to be best supported through specialist homelessness organisational support. The role of this support was also felt to be key in supporting voluntary and community organisations to manage risk when filling in gaps/ delivering statutory services. The current service was felt to have a strong equalities focus, supporting small equalities led organisations and raising awareness about equalities issues such as mental health.

Priority two – sexual and domestic violence

A large number of organisations welcome the continued support for Priority two. It was felt that the services should be carefully designed to best complement and not duplicate local and other regional services (delivered via the Mayor's office for policing and crime). For this reason it was felt that services should focus on post-IDVA care and work to support multi-agency working around harmful practices (and not perpetrator work which is being explored by MOPAC). Target groups highlighted include LGBT, children and young people, and women with no recourse to public funds. Holistic refuge provision was felt to be important including access to job search, counselling, finding PRS property and legal advice. One response called for the inclusion of second stage refuge accommodation in response to the difficulty in moving women on from first stage refuge accommodation.

Thirteen responses highlighted the vital role played by organisations that support the sexual and domestic violence voluntary sector. These responses highlighted the very precarious state of the sector and the need for support to improve organisation's financial sustainability and resilience. Women's organisations are often small and dispersed across London and require cross borough support. Organisations need to deliver accessible, inclusive and responsive services based on an understanding of their users and the legislative environment they work in, which was felt to be best delivered by specialist support. Support was needed to gather data to demonstrate need and impact, network and form partnerships, income generation, organisational health, develop policies and in providing representation to this area of work in sub-regional and regional decision making.

Priority three - poverty

There were not many comments on priority three in addition to those raised during the previous consultation. Responses welcomed the links to priority one.

2.1.3 Service Users/ individuals

Responses to the Leaders' Committee position from services users and individuals were divided (nine in favour and twelve against). Reasons for not agreeing with the position echoed those of the VCS responses in terms of a desire to have a priority focused solely on capacity building the third sector. Responses stated that priorities one to three depend primarily on the third sector to deliver them and that this was wasted investment without investing in capacity building the VCS. Also that this was most efficiently done at a pan-London level. The negative impact related to the Leaders' position was highlighted in particular to the Deaf/ disabled VCS and BAMER VCS.

Other responses were in support of the Leaders' Committee position in terms of the retention of priorities one to three. One survivor of domestic violence commented on how vital LGBT specific domestic violence services had been to them. It is worth noting that, in terms of the current Priority four, the service users are frontline organisations and these responses are outlined in section 2.1.2 above.

2.1.4 Other stakeholders (GLA, other funders)

A letter from Stephen Greenhalgh, Deputy Mayor for Policing and Crime was received regarding the Grants Review. The letter outlines support for the continued funding of services to tackle sexual and domestic violence and states that priority two links closely with services funded by the Mayor's Office for Policing and Crime (MOPAC). The letter highlights

the benefits to the sexual and domestic violence sector involved in this joint working approach. Elements that were mentioned include the funding of specialist refuge provision and coordination and data sourced by UKROL which has identified gaps in types of specialist provision feeding into the work of the London VAWG Board (created to deliver the Mayor's VAWG strategy).

The links between domestic violence and homelessness are reiterated and the letter states that this reflects further work that the VAWG Board is taking forward with the boroughs (through London Councils). The letter calls for the continued funding of the support element of Priority two given the very precarious position the sexual and domestic violence sector is currently in. This would ensure organisations have diverse income streams, good fundraising strategies, strong governance and financial controls. The letter is included as **appendix six**.

A funder, Lloyds Foundation submitted a response which outlined their support for the three proposed priority areas, however, stated the importance of capacity building, especially in an environment where support for infrastructure organisations is declining and it is harder for charities to access the capacity building support which could help them to become more sustainable in the long term.

East London Housing Partnership¹ submitted a response which welcomed the proposed priority focused on tackling homelessness. The submission focused on the importance of early intervention and prevention and the links between unemployment and homelessness. Research suggests that an approach is needed that encourages people to seek help before they lose their accommodation. The response also suggested that the proposed Priority one should be linked to the proposed Priority two. Safe settled accommodation provides the base from which survivors can rebuild their lives free from the threat and fear of abuse and be empowered to return to work, education or training, taking back control of their lives. At present move-on accommodation for survivors in refuges or in temporary accommodation or staying with family or friends is limited. Wider policy context was highlighted such as the reduction in the benefit cap to £23,000 per year in London from April 2016, proposed changes to the National Planning Policy Framework, which could lead to the redefinition of affordable homes, might reduce the future provision of genuinely-affordable homes and the sale of housing association stock through the voluntary extension of right to buy by housing associations, could result in the loss of move-on accommodation for homeless households, with the potential loss of 14,000 homes in East London alone.

¹ East London Housing Partnership is an alliance between the eight East London local authorities and East London registered social landlords

2.2 Equalities Considerations

The consultation asked respondents for further information on whether respondents agreed with the equalities analysis. A summary of the responses is provided below.

2.2.1 Borough responses

The majority of boroughs (93%) agreed that the analysis correctly identified the equalities groups currently benefitting from each priority within the current grants programme. One borough stated that equalities information largely mirrored the equalities information they had gathered at a local level.

Whilst there was widespread agreement with the current analysis, four boroughs stated that although in agreement, would like to see improvements in the monitoring information presented to ensure that the data is robust and monitoring information is re-focused to relate to each borough (including equalities information broken down by borough). Two boroughs highlighted the fact that the analysis does not highlight the impact of implementing the Leaders' Committee in principle position. Another borough highlighted the limitations of equalities information in relation to Priority four, given that information relates to frontline organisations and not individuals. Two boroughs highlighted the fact that the analysis would benefit from more information on migrants and refugees given the emerging need in this area. One borough highlighted the issue that equalities data does not provide a breakdown of where an equalities characteristic is incidental to or related to the choice to access a particular service. Another borough also stated that equalities data does not show when an individual represents a number of equalities characteristics. Two boroughs did not agree with the analysis based on their concern about the robustness of the data.

2.2.2 Voluntary and Community Sector

The majority of responses from voluntary and community organisations (81%) did not agree that the analysis correctly identified the groups currently benefitting from each priority within the existing grants programme.

This position largely related to the fact that the previous equalities information published with the Grants Committee report (18 November 2015) and additional consultation (December 2015 – January 2016) focused on the groups that had benefitted from each priority rather than a more explicit outline of what the impact would be should London Councils deliver a programme that did not include a priority focused on capacity building. Respondents felt that more information could be included such as the outcomes that have been achieved by current commissions under Priority four. There was also felt to be an issue with the data

provided in the equalities assessment as it largely reflected the monitoring data collected from the individuals from frontline organisations (that attended training and events) and did not reflect the end beneficiaries of the frontline services provided by these organisations. A large number of responses were from Deaf/disabled people's frontline organisations. These stated that insufficient attention had been paid to the impact the Leaders' Committee position would have on Deaf/disabled people's organisations and the knock on effect for the thousands of disabled people these organisations serve.

It was also felt that the equalities assessment did not fully explain that equalities led organisations (in particular disabled people's organisations) were often small, limited infrastructure and had limited networking opportunities. It also did not explain that current capacity building support enables frontline organisations to support their service users with intersectional issues (e.g. disabled women's access to domestic violence services). Additionally that more could have been provided on the range of support that is available including, opportunities for the development of stronger organisations, better skilled staff, partnership working, collaboration and delivery of better services. It was therefore felt that, the in-principle position of the Leaders' Committee would disproportionately affect these groups in general (in that they have a greater need for capacity building), compounded by the fact that current commissions under Priority four provide specialist support to equalities led frontline organisations and provide advice and training that support frontline organisations to deliver services in a way that is mindful of equalities considerations.

One point of clarity was raised. With regard to the previous equalities assessment there was a reference to 'increased preference for mainstream providers'. Officers would like to confirm as correct the assertion in one response that this relates to the move of funders towards more mainstream providers, not service users.

Whilst most responses focused on the current Priority four, issues regarding the other priorities were raised. In relation to the current Priority two, the current support services within this priority were discussed. These were felt to be vital in supporting frontline sexual and domestic violence organisations to deliver best quality services, through specialist training and sharing of good practice. In addition, currently the Ascent partnership which delivers against all six of the direct delivery domestic violence strands is coordinated by Women's Resource Centre (currently funded under the support element of Priority two). Similar views were shared about the current support element of the current Priority one. Other views about Priority one and two were shared such as the importance of gathering

monitoring information about LGBT service users accessing homelessness and sexual and domestic violence services.

2.2.3 Service Users/ individuals

Two thirds of service users/ individuals agreed with the equalities information provided by London Councils. Those that did not agree focused on similar issues to the VCS organisation responses, in terms of there being insufficient information on the impact of delivering a programme that did not have a priority focused on capacity building, in particular in terms of Deaf/disabled and BAMER organisations. It is worth noting that the in terms of the current Priority four the service users of this service are frontline organisations and these responses are outlined in section 2.2.2 above.

2.2.4 Response to issues raised with regard to equalities information

In response to the issues above officers would like to draw members' attention to the following.

- a) In response to issues raised above more information is provided in **appendix four** with regard to the impact of funding a programme focused on sexual and domestic violence, homelessness and poverty and not funding a priority focused solely on capacity building in the third sector. This includes the level of reliance on London Councils funding of existing commissions and further details on services currently provided and outcomes achieved.
- b) In response to the issue that it is not clear whether equalities characteristics are incidental to or relevant to the accessing of specialist services, this is addressed through the further detail on commissions in **appendix four** (previously only short examples were provided) and through the fact that in section 2.2.2 and 2.3.2 current frontline VCS organisations have confirmed that they access specialist equalities services in a way that would not be possible/ relevant from mainstream provision.
- c) Information was provided in the previous consultation about the equalities categories represented by frontline organisations that received support form Priority four commissions. Further information has been provided on frontline organisations supported by current commissions.
- d) Equalities information is currently gathered on the nine protected characteristics as outlined in the Equality Act 2010. Further information could be gathered in the new programme if it was desirable. Only data that has been gathered to date can be presented.
- e) On a quarterly basis the current 24 funded commissions submit 297 separate figures in their reporting database as well as a progress report and case study. This includes

67 equalities fields and up to nine pieces of data for each of the 33 boroughs. To provide equalities information per borough this would increase data collected by an additional 2,211 figures each quarter. The same issue is relevant to why information is not presented related to the multiple equalities characteristics of an individual.

- f) It is important to keep in balance the level of monitoring data provided by projects ensuring this is proportional to the grant level and that data collection does not come at the expense of service delivery. It is also worth noting the resources available to review the data which is currently the full time equivalent of four staff.
- g) Whilst equalities information is not gathered on a borough basis (as detailed above), officers can provide boroughs with a list of frontline organisations currently supported in their borough on request which provides an indication on the types of equalities groups supported.
- h) Beneficiary information is not held in relation to Priority one and two. In many cases this would not be practical (for example callers to helplines). In particular with Priority two there are safety concerns in holding this data. The grant agreement with organisations outlines the expectations on data kept and this is checked and verified on monitoring visits.

2.3 Potential negative equalities impacts

The consultation asked respondents for further information on potential negative equalities impacts related to the position that Leaders' Committee was minded to take at its meeting 8 December 2015. A summary of the responses is provided below.

2.3.1 Borough responses

The majority of borough responses (68%) stated that they believed there would be negative equalities implications related to agreeing to fund a grants programme that did not contain a priority focused solely on capacity building in the third sector. These responses stated that there could be a negative/ disproportionate impact on organisations supporting people with the protected characteristics of age, race, religion, disability, sex, sexual orientation, and gender reassignment. Six responses outlined that equalities led organisations are often smaller and less well-resourced and therefore in greater need of capacity building and support with fundraising and adapting services. These groups are also disproportionately impacted further by welfare reform and reductions in available funding and a favouring of mainstream provision by funders. It was felt that the impact could be an increase in closures of voluntary organisations and reductions in quality of service and representation of views as a result of the end to networking opportunities. It was feared that this could influence other funders to withdraw from this area and the result would be an increased pressure on local authority resources.

Boroughs that did not feel that there was a disproportionately high impact on equalities groups highlighted the wider context of this decision which is being considered at a time of huge pressures on local authority budgets. That funding allocated to the grants scheme is at the expense of other services being delivered locally which also have equalities considerations. These responses (three responses) highlighted the positive equalities impact of the proposed three priorities and that using limited funds on the services that directly impact on people with the protected equalities characteristics was the best use of resources. Other responses stated that their capacity to make a judgement was impaired by insufficient data.

2.3.2 Voluntary and Community Sector (VCS)

The majority of VCS responses (91%) stated that they believed there would be negative equalities implications related a grants programme that did not contain a priority focused solely on capacity building in the third sector.

In relation to the currently funded commission delivered by Inclusion London responses outlined the following negative impact on Deaf/ disabled people. That 280 disability organisations representing 300,000 plus Deaf/disabled people will cease to receive capacity building support, reducing the organisations' ability to deliver essential services to disabled people or secure funding/ diversify funding streams for long term survival. Responses highlighted an increase in demand for these services in the context of reduced statutory services.

Responses also focused on the negative impact on black, Asian, minority ethnic, refugee (BAMER) VCS organisations. Responses stated that this sector had experienced significant losses in resources and financial support. Refugee communities were highlighted as an area associated with growing levels of need and disproportionately affected by other equalities issues such as mental health. Without Priority four it was felt that refugee community organisations would not have the capacity to participate in a range of government strategies including the Mayor of London refugee and migrant integration strategy.

The potential negative impact on older people was also highlighted. In 2014 there were 983,000 people in London are over the age of 65 years. Responses highlighted the increase in older people predicted over the coming years and the increase in social care needs putting pressure on local authority budgets. Without a priority focused on capacity building, it was felt that boroughs would have less effective support from the voluntary sector to meet this challenge. Many local older people's organisations are small and volunteer-led, often without paid staff and largely unfunded. In relation to children and young people responses highlighted the risks associated with VCS organisations moving into areas of delivery traditionally undertaken by local authorities and the role that capacity building support can provide such as through safeguarding training.

Responses also highlighted the role that Priority four currently plays in raising awareness of the needs of particular equalities groups and supporting the participation of various equalities groups in society and local decision making processes. This activity supports local authorities in their duty to undertake the key elements of the Equality Act 2010 in terms of challenging discrimination and advancing equality of opportunity. Responses highlighted the lack of funding opportunities for capacity building services, in particular with an equalities focus and the fact that this would be difficult and more costly to commission at a local level.

The majority of responses focused on the current Priority four. However, responses also highlighted issues related to the current Priority one and Priority two. For example, the vital

role that the support to sexual and domestic violence frontline organisations plays and that withdrawing from this would have a great impact on small BAME women's organisations. Frontline organisations were surveyed by Imkaan (funded under a partnership led by Women's Resource Centre) and all stated that they would not have been able to obtain the same kind and level of support elsewhere.

Other responses stated that there was not a fundamental negative impact given the equalities reach of the proposed three priorities. Nevertheless these responses stated the importance of building into the commissioning process strong safeguards relating to effective outreach and provision of accessibility support, for example interpretation support.

2.3.3 Service Users/ individuals

In response to this question twelve service users/ individuals did think that there would be negative equalities implications and seven did not. Responses included service users with hearing impairments and disabilities who outlined the importance of a strong disability led voluntary sector. Also highlighted was the potential impact on small BAME led organisations and it was felt that these would be further disadvantaged and compromised in their ability to compete for funding with larger mainstream providers. It is worth noting that in terms of the current Priority four, the service users that use these services are frontline organisations and these responses are outlined in section 2.3.2 above.

2.3.4 Other stakeholders (GLA, other funders)

Lloyds Foundation highlighted potential issues that could be caused by Leaders' Committee position including of a lack of support for organisations to grow and develop, as opposed to receiving money only for delivering services. The long term funding challenges means that charities are in more need than ever to be supported to make themselves more sustainable. The importance also of commissioning processes that support smaller equalities led organisations (such as encouragement of partnerships) was also emphasised. East London Housing Partnership emphasized the importance of linking the proposed Priority one and two to ensure that people with protected characteristics are not disadvantaged.

2.4 Mitigation

The consultation then asked respondents to consider what mitigation could be taken to address any potential negative impacts that they had highlighted. A summary of the responses is provided below.

2.4.1 Borough responses

Borough responses outlined a range of measures that could be used to mitigate potential negative impacts of the Leaders' Committee position. There were a range of suggestions that focused on the role that local authorities can play in supporting the mitigation of any potential negative impacts associated with the Leaders' Committee in principle position. Four boroughs emphasised the importance of boroughs assessing what the local impact would be and two stated that they could share their local impact assessments to support mitigation. Four boroughs also requested that London Councils share more information on the frontline organisations supported so that local authorities can play a part in assessing impact and addresses this locally.

Other responses focused on the transition for funded commissions. There were mixed views about whether funding should be allocated for a transition period. It was felt that given a decision would be made in March 2016 this would provide commissions with a year to develop their exit strategies and alternative funding. It was felt that London Councils and local authority officers could play a role in supporting this process.

Four boroughs highlighted the review into the future of infrastructure that London Funders are undertaking on behalf of City Bridge Trust. It was felt that the recommendations from this review could provide mitigation. Responses highlighted an expectation that the London Funders approach will seek out more cost effective and innovative ways of achieving key infrastructure outcomes. Responses highlighted the key strategic role that London Councils could play on behalf of the boroughs in the implementation of the review's recommendations. Responses stated that this role could potentially involve a limited funding contribution from the boroughs.

Other suggestions included improvements to the proposed three priorities, including involving service users in shaping these services, improving awareness of commissions funded and through ensuring the proposed priorities are focused on the equalities groups no longer being served through Priority four (such as older people). Another response

suggested reallocating funding from the current Priority four to provide capacity building support to the proposed three priorities.

2.4.2 Voluntary and Community Sector

The majority of responses from VCS organisations (70) stated that London Councils should mitigate the negative impact through continued funding to a priority focused solely on capacity building in the third sector. If resources were such that this priority had to be reduced then responses felt it should be focused on equalities related activity. It was felt that these services were best commissioned on a pan-London basis and were important in strategically addressing the specific and increased risks of discrimination, exclusion, poverty and isolation felt by equalities communities in particular Deaf and disabled people, as a result of welfare reform and reductions in funding to Local Authorities most notable social care. Responses also reiterated the desire to maintain the support elements of the current priorities one and two.

CVS support was felt to be an inadequate mitigation given that not all boroughs have CVSs now, support would have to be free/ heavily subsidised and would be generic not addressing the specific needs of equalities led organisations.

One response suggested that one way to maintain this area would be to fund support under priorities one, two and three and that direct consultation with local community, BAME and refugee organisations is essential if a cost-effective, sustainable solution is to be found.

2.4.3 Service Users/ individuals

Responses from service users and individuals largely echoed the responses of the VCS organisations in terms of supporting a future priority focused on capacity building.

Alternatively to re-allocate capacity building for defined/specific purposes and evidence based needs. One alternative suggestion was through creating a stream of funding that enables BAME infrastructure organisations to be sustainable over the medium term. It is worth noting that in terms of the current Priority four, the service users that access these services are frontline organisations and these responses are outlined in section 2.4.2 above.

2.4.4 Other stakeholders (GLA, other funders)

Lloyds Foundation reiterated the importance of commissioning processes that are flexible and accommodating of smaller organisations to support equalities objectives. East London Housing Partnership reiterated the importance of linking the proposed Priority one and two

and the importance of specialist provision with regard to funding of emergency refuge accommodation.

2.5 Additional sources of evidence

2.5.1 On 23 February 2016 London Councils delivered an event for borough officers and members focused on tackling sexual and domestic violence. The event focused on issues faced by the boroughs and how these can be addressed through shared responses, in particular with VCS partners. The following key issues were raised at the event which can also inform this paper in terms of the challenges around tackling domestic violence in London.

- There are currently significant gaps between available resources and levels of incidence. For example, there are now 156 IDVAs in London, able to see approx. 12,400 cases per year. However, in 2015 there were 146,695 reports of DV to the police in London. Gaps were also highlighted around ISVAs, specialist support for trafficked women and specialist emergency refuge.
- The sexual and domestic violence voluntary and community sector was seen to be under threat from reduced resources, increased demand and moves from funders towards more mainstream provision. Support to the sector was seen to be vital, as well as collaboration, and longer term funding.
- A link with housing was made and in particular the impact of the benefit cap and local housing allowance, which have also created a shift in DV cases being presented in outer London boroughs as victims move away from inner London. Move-on accommodation was felt to be a large issue with perpetrators sitting in tenancies. Women affected by domestic violence and exiting prison were a key group in need of support with housing to enable them to reconnect with children and prevent re-offending.
- It was felt services should be victim focused with strong levels of service user involvement, and that victims were not as interested in borough boundaries as policy makers.
- Early intervention and prevention both key