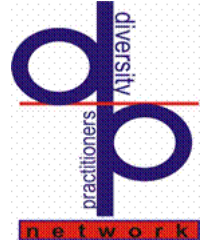


# brap

making equality work for **everyone**



## **Tackling race inequalities: a discussion document**

A response by brap on behalf of the Diversity Practitioners  
Network

**This response was written by brap on behalf of the Diversity Practitioners Network. Members of the Diversity Practitioners Network include:**

Birmingham DiverCity, Arts Council for West Midlands, Centro, Wolverhampton City Council, University of Wolverhampton, MacMillan Cancer Research, Race Equality Sandwell, brap, Diverse City Services, Paragon Healthcare Group, FH Consultancy, Birmingham City Council Personnel and Training, Birmingham Cancer Care, Birmingham University, Birmingham City University, Forward Partnership, Aston University, Advantage West Midlands, West Midlands Police, West Midlands Criminal Justice Board, JHP Training, Oldbury and Smethwick PCT, West Midlands Fire Service, The National Trust, Irish Travellers, The Birmingham Rep, Mercian Housing Association, Jobcentre Plus, Central Television

## Introduction

1. The Diversity Practitioners Network (DPN) is a coalition of over 40 organisations committed to implementing the very best equalities practice. Members of the DPN have realised that there are numerous problems associated with traditional approaches to equality, which tend to be based on advocating and acting upon the needs and concerns of particular disadvantaged groups or 'strands'.
2. Problems associated this approach to equality include:
  - **narrowness:** traditional strand-based approaches to equality lobby for change on the basis of the particular needs or concerns of a particular group. This is not conducive to equality practitioners seeing the commonalities between different types of discrimination and therefore implementing the kind of structural change that will produce sustainable equality in the long term
  - **conflict:** following from the above, the traditional approach to equality encourages different groups to compete for attention and resources. As such, people who should be united in the common pursuit of fairness often find themselves in conflict for finite resources
  - **limited progress:** simply put, after forty years of anti-discrimination legislation we have seen only limited progress on equality issues. This is not to denigrate the success that has been achieved, but, instead, recognise that discrimination and disadvantage still have real effects on people's life chances today
3. Member organisations of the DPN are exploring the possibilities of using human rights principles to inform their work. This response is underpinned by this approach to equality.

## General comments

4. We welcome the opportunity to comment on this important and timely strategy. It is clear that this document represents a significant investment of time and resources on the part of Communities and Local Government (CLG) and it comes at opportune moment in the equalities movement.
5. The DPN also recognises the many and valuable successes of the existing race strategy, *Improving Opportunities, Strengthening Society*, and applauds the co-ordinated and cross-government approach to reducing inequality the strategy represents.
6. While most of this response is given over to a critique of the notion of a race strategy, it is important to note that the DPN supports initiatives to reduce discrimination and disadvantage arising from racism. However, the DPN believes that future equalities practice must be based on cross-equality approaches; in this instance, this means the DPN believes a race strategy is less preferable to a cross-equality strategy.

## Is there a need for a separate strategy to tackle race inequality? If so, what should the priorities be?

7. As stated above, we do not believe that a separate, cross-government race strategy is appropriate.
8. The discussion documents correctly notes that "increasingly, the focus is moving away from an [equality] approach based on separate equality strands to one where an individual is able to achieve his or her potential regardless of race, disability, gender, religion or belief, age or sexual orientation."

9. This trend is evident in the replacement of the former Commission for Racial Equality, Disability Rights Commission, and the Equal Opportunities Commission with a single, cross-strand Equality and Human Rights Commission. Furthermore, the new Equality Bill (in its current form) gives legal parity to eight equality groups, a provision that includes the introduction of a single equality duty on public services.
10. Given this changing landscape, many public bodies are already creating single equalities schemes and are taking steps to identify the aspects of discrimination and inequality that are common to all eight grounds of equality. In their implementation of these schemes, a small number of organisations are looking for initiatives that will enable their services to become responsive to the needs and concerns of a wide range of excluded groups *at the same time* (as opposed to eight different initiatives running separately to improve equality on each ground).
11. We believe that this is an important step forward. By targeting resources at improving access to core mainstream provision for *all* groups (rather than focusing on ‘add-on’ initiatives to fill gaps) service providers may begin to design delivery in a way that is conducive to long-term, sustainable equality.
12. The challenge facing service providers, then, is to identify the linkages between the eight strands. In many respects a race strategy is a diversion from this important task. Time, resources, and political will would be better spent investigating how the application of human rights principles could improve service delivery and make public bodies more responsive to the needs of their users.
13. Furthermore, publishing a race strategy at this critical juncture in the equalities movement would send out the wrong message. A range of private, public, and third sector organisations are looking to government for an example of how to implement the new, cross-strand equality approach laid out in the Equality Bill. A race strategy would confirm, both symbolically and practically, that the government is still operating with a single-strand approach.
14. There is the opportunity for CLG to show real leadership here and take bold and innovative steps to build upon the recommendations of the Equalities Review. We explain how this could be done later in this response.
15. We acknowledge, as the discussion document does in setting out the ‘case’ for a race strategy, that the “new approach to equalities law is a cause for concern for some people, who fear that the necessary focus on the new equality strands might lead to a dilution of the existing strands.” Although we recognise the ‘political’ reasons for doing this, we do not believe that publishing a new, updated race strategy on its own is an appropriate response.
16. Change inevitably causes uncertainty and anxiety. In the case of the transition to a new approach to equality, this is understandable: as we noted in the introduction, the existing model of equality puts different groups in competition with each other for resources. The shift to a cross-strand approach may lead many groups to think they will receive less funding in the future.
17. In this respect, CLG should explain to people who are worried about the ‘dilution’ of existing strands that disproportionately privileging one group over another is not compatible with a society that promotes fairness for *everyone*. It should also seek to reassure people by explaining that a human rights based approach does not mean that particular people are automatically excluded from funding and policy decisions; instead it means allocating resources in the most equitable way possible by identifying and balancing the needs of all

groups. As such race-based groups will not necessarily miss out if they can show that their activities, policies, and initiatives help meet an important need.

18. Finally, CLG may wish explain that a cross-strand approach is the most effective means of promoting fairness to as wide a range of people as possible whilst also tackling race inequality.
19. As stated above, no one would deny that the disadvantage facing black and minority ethnic communities is a real factor affecting people's life chances, and that the concerns of race-based groups are therefore legitimate and understandable. The investment of time and resources into producing a race strategy is certainly worthwhile in this respect and has produced valuable results. In an ideal situation, where resources are infinite, it would be equally admirable to invest resources into producing a similar strategy for other equality groups. However, resources are not infinite and producing eight separate strategies is not feasible.
20. Given this situation, the DPN would argue that the best approach is to promote fairness based on a cross-equality analysis of people's needs. Necessarily, the priorities for this approach could not be based on 'strand', but, rather, the level of freedom people have in certain aspects of society, or whether their rights are being protected by particular organisations. As such, an integrated approach focuses much more directly on reform of service delivery. Not only does this kind of structural change benefit a wide range of people simultaneously, it is also conducive to more lasting and sustained equality practice.

### **Should we expand our policy areas? If we do, do we risk diluting the focus on the five public service areas mentioned above?**

21. Having stated that a race strategy is not appropriate, the DPN obviously does not wish to comment on additional questions regarding the structure, priorities, and scope such a strategy should take. We would, however, like to suggest how CLG could take a cross-equality strategy forward.
22. The discussion document notes that the Equalities Review, published in 2007, recommended that the government measure the extent to which people have freedom in ten central and valuable areas, such as 'physical security', 'a long life', 'a comfortable standard of living', and 'valued activities'.
23. In the question above, the document is asking whether the focus of the current strategy – education, housing, health, the criminal justice system, and the labour market – should be expanded to include the other areas highlighted by the Equalities Review. There is a recognition that underneath the headings of the ten areas there are a range of more specific freedoms the Review sought to promote.
24. Since a robust evidence base is the first step in making informed and effective decisions, we believe that the government should encourage local authorities to measure inequality facing different ethnic groups against the ten areas of freedom identified by the Equalities Review. In line with the recommendations made by Burchardt and Vizard in *EHRC Briefing Note: the Equality Measurement Framework*, the framework should be populated with 'spotlight' indicators to avoid the amount of data becoming unwieldy. This would mean that the number of different areas monitored would not become too cumbersome. From this starting point, other equality groups could be added to the framework as appropriate (including additional strands such as socio-economic status, homelessness, and so on).

25. Burchardt and Vizard also recommend that equality should be measured in relation to:
- equality of outcome (equality of what is actually achieved)
  - equality of autonomy (the degree to which people have independence and control over their lives)
  - equality of process (a measure of discrimination and unequal treatment)<sup>1</sup>
26. Measuring inequality in this way provides a much richer picture of how fairly services interact with their users. Using this framework, indicators could be identified that measure the level of fairness and freedom individuals have in relation to certain organisations. This would allow public bodies to publish meaningful indicators against which their progress on achieving fairness could be measured. Government would then have a crucial role in monitoring public bodies to ensure they are protecting their user's rights.
27. We are aware of work being jointly undertaken by the LSE and Oxford University to show how these ideas may be implemented practically at a local authority level. Since this is a Government Equalities Office-funded project, we would recommend that CLG engage more closely with this and other departments to achieve a co-ordinated approach to tackling inequality.
28. We recognise the challenges involved with doing this – not least that local authorities already find the existing framework of equality targets difficult to respond to. However, we also believe that a fairer, more equitable society is an important goal and one worth investing in.

### Further information

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<sup>1</sup>The Centre for Analysis of Social Exclusion: *EHRC Briefing Note: The Equality Measurement Framework*. Available at: [http://sticerd.lse.ac.uk/textonly/case/research/equality/Briefing\\_Equality\\_Measurement\\_Framework.pdf](http://sticerd.lse.ac.uk/textonly/case/research/equality/Briefing_Equality_Measurement_Framework.pdf)