

Proposals to introduce a Community Right to Challenge
– consultation
Summary of responses



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August 2011

ISBN: 978-1-4098-3070-2

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Summary

The Localism Bill was introduced into Parliament on 13 December 2010¹. It sets out a framework for a Community Right to Challenge with powers for the Secretary of State to specify certain aspects in regulations. The Department for Communities and Local Government published *Proposals to introduce a Community Right to Challenge* and conducted a public consultation between 4 February and 3 May 2011. Subject to Parliamentary approval, it is intended that regulations will be prepared for the Right, informed by responses to this consultation. The consultation was targeted at relevant authorities (county, district and London Borough councils) and relevant bodies (parish councils, charities, voluntary and community bodies and relevant authority staff) but open to all. It was carried out in accordance with the Code of Practice on Consultation.

Two-hundred and six organisations and individuals responded to the consultation, indicating a broad level of interest in making the Right effective and fit-for-purpose. A full list of respondents is at Annex A.

Type of response	Number
Relevant authority	82
Parish council	32
Fire and Rescue Authorities and bodies	12
Voluntary and community bodies	40
Other	40
Total	206

The Community Right to Challenge aims to hand the initiative to voluntary and community bodies, charities, parish councils and relevant authority staff with good ideas about how services can be run differently and better and ensures they have the time they need to prepare an effective bid to deliver the service.

The consultation asked questions around the issues listed below, in addition to what support and guidance should be provided.

¹ <http://services.parliament.uk/bills/2010-11/localism.html>

Issues addressed in the consultation questions	
1. Which services should not be subject to challenge	(Questions 1 and 2)
2. Extending the definition of relevant authority under the Community Right to Challenge	(Questions 3 and 4)
3. When a relevant authority will consider expressions of interest	(Questions 5 and 6)
4. Information to be included in an expression of interest	(Questions 7 and 8)
5. Minimum and maximum periods during which a relevant authority must reach a decision on an expression of interest	(Questions 9 and 10)
6. Grounds for rejecting an expression of interest	(Questions 11 and 12)
7. Minimum and maximum periods between an expression of interest being accepted and a procurement exercise being initiated	(Questions 13 and 14)
8. What support and guidance would be helpful	(Questions 15 and 16)

Question 1

Are there specific services that should be exempted from the Community Right to Challenge? If yes, why?

One-hundred and sixty-four respondents answered yes or no to Question 1.

Of these, 112 (68%) said that specific services *should* be exempted from the Community Right to Challenge. 52 (32%) said the Right should apply to all services.

Question 1 : Summary of responses				
	Yes	No	N/A	Total
Relevant authorities	51	17	14	82
Parish councils	16	11	5	32
Fire and Rescue Authorities and bodies	10	0	2	12
Voluntary and community bodies	19	11	10	40
Other	16	13	11	40
Total	112	52	42	206
%	54	25	21	100

The most frequently made suggestions for services to exempt were:

Comments	Number of responses*
Fire and rescue services discussed in Section 2 of the consultation document	35
Services that involve safeguarding vulnerable people	33
Planning and local development	23
Emergency planning/civil contingencies	18
Relevant authorities should decide which services will be exempt in their area	13
Democratic services (including elections and electoral roll)	10
Promoting fire safety/fire prevention	10
Waste and environmental services	9
Services relating to health and safety, e.g. demolition and dangerous structures	8
Managing school admissions	7
Advice services to the public (including advice on planning applications, housing, and schools admissions)	6
Public health services	5
Services in schools which fall within the relevant authority's remit	5

*Many respondents suggested more than one service

Some respondents made suggestions that would be outside of the scope of the Community Right to Challenge, either because they are functions (for example, providing support to relevant authority Committees), or because they are not services for which relevant authorities are responsible (for example, policing).

Question 2

Are there any general principles that should apply in considering which services should be exempt?

One-hundred and twenty-one respondents answered this question. Of these, 66 (55%) said that they agreed the Right should not apply to functions, and that exemptions should be applied where existing legislation requires services to be delivered by the relevant authority.

The most frequently made suggestions for principles for exemption were:

Comments	Number of responses *
Where service fragmentation would put service users, staff and/or local people at risk, or would increase insurance risk	38
Where impartiality is essential	36
Where a service is closely linked to a function or other service that is exempt as a result of existing legislation	21
Regulatory services and services that enforce legislation	19
Where a service requires a provider with specialist knowledge, skills, or expertise to maintain the quality of that service	17
Where a service has already been contracted out or procurement has started	17
Where the current service is of a high quality and service users are satisfied	10
Where strategic co-ordination is required	9
Where confidentiality is essential	7
Where economies of scale would otherwise be sacrificed	7
Where it is in the public interest for the relevant authority to be directly accountable for service delivery	5
Where national security or resilience could be put at risk	5

*Many respondents suggested more than one principle

Question 3

We are minded to extend the Community Right to Challenge to apply to all Fire and Rescue Authorities. Do you agree?

One-hundred and twenty-nine respondents answered yes or no to Question 3.

Of these, 75 (58%) said that the definition of relevant authority under the Community Right to Challenge *should* be extended to all Fire and Rescue Authorities.

Question 3: Summary of responses				
	Yes	No	N/A	Total
Relevant authorities	35	17	30	82
Parish councils	14	12	6	32
Fire and Rescue Authorities and bodies	6	5	1	12
Voluntary and community bodies	9	15	16	40
Other	11	5	24	40
Total	75	54	77	206
%	37	26	37	100

Of those who said the Right *should* apply to all Fire and Rescue Authorities, the majority said that only some fire and rescue services should be subject to challenge, as reflected in responses to Question 1. The most frequently made additional comments on extending to all Fire and Rescue Authorities were:

Comments	Number of responses*
Some elements of fire and rescue authority services should be challengeable – risk assessment and management are key	48
All fire and rescue authority services should be challengeable as long as clear standards are in place	13
Which fire and rescue authority services are challengeable should be decided by the individual authority	8

*Not all respondents commented, and others made more than one additional comment

Of those who said the Right *should not* apply to all Fire and Rescue Authority services, the most frequently expressed concerns are in the table below:

Comments	Number of responses
Would present too much risk to people’s safety	40
Would affect the quality of service	20
Would risk loss of strategic overview	13
Would not be cost effective in the long term	9
Would risk duplication and confusion over responsibilities between agencies	8
Statutory requirement for fire fighters to be employed to attend fire and road traffic incidents	8
Responsibility for dealing with hazardous substances needs to remain with fire and rescue authorities	7

*Not all respondents commented, and others made more than one additional comment

Question 4

Should the current definition of relevant authority under the Community Right to Challenge be enlarged in future to apply to other bodies carrying out a function of a public nature? If yes, to which bodies?

One-hundred and thirty-seven respondents answered yes or no to Question 4.

Of these, 100 (73%) said the definition of relevant authority *should* be enlarged in future to apply to other bodies carrying out a function of a public nature.

Question 4: Summary of responses				
	Yes	No	N/A	Total
Relevant authorities	47	11	24	82
Parish councils	11	14	7	32
Fire and Rescue Authorities and bodies	4	1	7	12
Voluntary and community bodies	23	7	10	40
Other	15	4	21	40
Total	100	37	69	206
%	49	18	33	100

Of those who said the definition of relevant authority *should* be extended in future, the most frequent suggestions of bodies to extend the Right to were:

Comments	Number of responses*
All public bodies	29
NHS/Primary Care Trusts/health authorities or providers	28
Central government and agencies/Non-Departmental Public Bodies	25
Other public bodies (not named)	20
Department for Work and Pensions/Jobcentre Plus	12
The police	12
Housing associations	10
Parish Councils	6

*Many respondents suggested more than one body

Of those who made additional comments, the most frequent were:

- Sixteen respondents said that the definition of relevant authority should not be extended until the Community Right to Challenge's current application to local authorities is proven to be a success.
- Six said that any extension of the Right should take into account where services are jointly commissioned, due to the intrinsic link between services across commissioning bodies.
- Six said it would be important to consider services to be exempted from the Right when extending to other bodies.
- Six said local authorities should be considered relevant bodies for services that are the responsibility of other relevant authorities, e.g. District Councils able to express an interest in delivering County Council services.

Questions 5 and 6

Should regulations specify a minimum period during which relevant authorities must consider expressions of interest? If so, what should this period be?

One-hundred and fifty-nine respondents answered yes or no to Question 5. Of these, 98 (62%), said that regulations *should* specify a minimum time period during which relevant authorities must consider expressions of interest. Sixty-five per cent of relevant authority respondents who answered yes or no said this *should not* be specified in regulations.

Question 5: Summary of responses				
	Yes	No	N/A	Total
Relevant authorities	26	49	7	82
Parish councils	24	3	5	32
Fire and Rescue Authorities and bodies	6	2	4	12
Voluntary and community bodies	26	2	12	40
Other	14	7	19	40
Total	96	63	47	206
%	47	30	23	100

Eighty-eight respondents (including some who felt regulations should not specify a minimum period) made suggestions for the length of a minimum period. The most frequent suggestion was for a minimum period of three months.

Comments	Number of responses	%
Up to and including 1 month	11	13%
Over 1 and up to 3 months	24	27%
3 months	35	40%
More than 3 months	18	20%
Total	88	100%

Of those who *supported* a minimum period, the most frequent comments were:

- Twenty-two respondents said this would ensure relevant bodies had sufficient time to prepare and submit expressions of interest.
- Sixteen said this would level the playing field across different authorities and different types of relevant body.

Of those who did *not support* a minimum period, the most frequent comments were:

- Nineteen respondents said the range of services would make it very difficult to set one timeframe that could be applied across all types of service and all authorities.
- Seventeen said any period would need to fit with existing commissioning cycles, strategic planning and decision-making timetables.

Other comments included suggestions to submit expressions of interest at any time; to invite expressions of interest at certain times of the year; that it would be important to maintain local flexibility, even with minimum timescales; and that transparency would be important, e.g. in publishing and advertising timeframes.

Questions 7 and 8

Do you agree with the proposed information to be included in an expression of interest? Is there any further information that should be provided? If yes, what?

One-hundred and fifty-four respondents answered yes or no to Question 7.

Of these, 130 (84%) *agreed* with the proposed information to be included in an expression of interest.

Question 7: Summary of responses

	Yes	No	N/A	Total
Relevant authorities	56	10	16	82
Parish councils	23	4	5	32
Fire and Rescue Authorities and bodies	4	3	5	12
Voluntary and community bodies	29	3	8	40
Other	18	4	18	40
Total	130	24	52	206
%	63	12	25	100

One-hundred and thirty-nine made additional comments in their response to Question 7 and/or suggested further information in response to Question 8.

The most frequently made comments are in the table below:

Comments	Number of responses*
Service delivery proposals. Proposals for how the service would be delivered (including staffing models), the outcomes and how they would be measured, and how the relevant body would achieve value for money.	54
Details of the relevant body (and any partners if a partnership is proposed), including its track record of service delivery, relevant skills, accreditation and experience, its structure and governance, health and safety policy, etc.	44
Information should depend on the service or locality. 20 said there should be local flexibility. 13 said information required should be proportionate and appropriate to the service being challenged. Others said there should be sufficient information to enable the relevant authority to make a decision.	40
Relevant body’s understanding of relevant legislation and requirements to deliver the relevant service. 19 cited the Single Equality Duty, with some saying the relevant body should deliver requirements of the duty to a similar standard as the relevant authority would be required to.	28
Social value. Important to include social value in expressions of interest.	21
Relevant body’s plans for longer-term sustainability, how it proposes to manage the risk of service failure, and its contingency plans.	18
Support/engagement of service users. Relevant body should be able to show that they have support from service users and/or have engaged them.	18
Relationship between the expression of interest, pre-qualification, and the procurement exercise. Suggestions ranged from having no overlap, to brief details in the expression of interest with greater detail at the procurement stage, to the expression of interest being like a competitive tender.	15
Local connection. Include details of the relevant body’s local connection.	11
Transparency of data. Expressions of interest would be reliant on relevant authorities sharing details of current service delivery and relevant data.	7

*Many respondents made more than one comment.

Questions 9 and 10

Should regulations specify a minimum and maximum period during which a relevant authority must make a decision on an expression of interest? If so, what should these periods be?

Question 9 – Minimum period

One-hundred and forty-nine respondents answered yes or no to Question 9.

Of these, 90 (60%) said that regulations *should not* specify a minimum period during which an authority must make a decision on an expression of interest. However, 78 per cent of parish councils and 57 per cent of voluntary and community bodies said regulations *should* specify a minimum period.

Question 9: Summary of responses

	Yes	No	N/A	Total
Relevant authorities	11	59	12	82
Parish councils	21	6	5	32
Fire and Rescue Authorities and bodies	2	4	6	12
Voluntary and community bodies	16	12	12	40
Other	8	9	23	40
Total	58	90	58	206
%	28	44	28	100

Forty-three respondents made suggestions for the length of a minimum period. These ranged from two weeks to six months. The most frequent suggestion was three months.

Comments	Number of responses	%
Up to and including 1 month	11	26%
Over 1 and up to 3 months	13	30%
3 months	15	35%
6 months	4	9%
Total	43	100%

Question 10 – Maximum period

One-hundred and twenty-eight respondents answered yes or no to Question 10.

Of these, 86 (67%) said that regulations *should* specify a maximum period during which a relevant authority must make a decision on an expression of interest. However, 59 per cent of relevant authorities said regulations *should not* specify a maximum period.

Question 10 : Summary of responses				
	Yes	No	N/A	Total
Relevant authorities	24	35	23	82
Parish councils	21	1	10	32
Fire and Rescue Authorities and bodies	4	2	6	12
Voluntary and community bodies	25	0	15	40
Other	12	4	24	40
Total	86	42	78	206
%	42	20	38	100

Eighty-two respondents made suggestions for the length of a maximum period. These ranged from two weeks to 18 months. The most frequently made suggestion was three months. This was followed by suggestions for two – three months and for six months.

Comments	Number of responses	%
Up to but not including 2 months	10	12%
Between 2 and 3 months	18	22%
3 months	24	29%
Between 3 and 6 months	4	5%
6 months	18	22%
Over 6 months	8	10%
Total	82	100%

Of those who made additional comments in response to questions 9 and 10, the most frequent were:

- Twenty-six respondents said timescales should be decided locally.
- Twenty said the time relevant authorities require to make a decision will vary depending on a number of factors including the number of expressions of interest received, whether modifications are required, if radical changes are proposed, and if there are other complexities e.g. the service being shared with another authority. They said these would make it difficult to set national periods.
- Thirteen said periods would need to fit with existing commissioning cycles.
- Twelve said it will be important to avoid delays in decision making and nine said that decisions should be made as soon as possible.
- Six said relevant bodies need certainty around timescales and the process must be transparent.
- Six said relevant authorities should be able to extend any period set in regulations or offer an alternative timescale in exceptional circumstances.
- Five said relevant authorities should set reasonable timescales either at the start of the process or once expressions of interest are received and then make a judgement based on their number and complexity. Several respondents said this issue could be covered in guidance.

Questions 11 and 12

Do you agree with proposed grounds whereby an expression of interest may be rejected? Are there any other grounds whereby relevant authorities should be able to reject an expression of interest?

One-hundred and fifty-six respondents answered yes or no to Question 11. Of these, 115 (74%) *agreed* with the proposed grounds whereby an expression of interest may be rejected.

Question 11 : Summary of responses				
	Yes	No	N/A	Total
Relevant authorities	52	17	13	82
Parish councils	20	6	6	32
Fire and Rescue Authorities and bodies	6	1	5	12
Voluntary and community bodies	24	9	7	40
Other	13	8	19	40
Total	115	41	50	206
%	56	20	24	100

One-hundred and thirty-five made additional comments in their response to question 11 and/or suggested further information in response to Question 12.

The most frequently made comments are listed below.

- Twenty-one respondents said relevant authorities should decide the grounds for rejection.
- Twenty-one or more of the proposed grounds for rejection should be more tightly defined.
- Ten said there should be an appeals process or independent arbitration for relevant bodies whose expression of interest is rejected.
- Nine said relevant bodies should be given a chance to modify an expression of interest before it is rejected for any reason.

Of those who suggested additional grounds for rejection in response to Question 12, the most frequent were:

- Twelve respondents suggested where an expression of interest is not in accordance with the relevant authority's policy or strategy.
- Twelve suggested where the relevant body being the service provider would be likely to put at risk the relevant authority's legal obligations, such as the Single Equality Duty.
- 12 suggested where the local community is opposed to, or there is insufficient local support for, the expression of interest and/or carrying out a procurement exercise.
- Ten said where a relevant authority would be left with a part of a service/package of services that is unviable or more costly ('cherry-picking').

Questions 13 and 14

Should regulations specify a minimum and maximum period between an expression of interest being accepted and a relevant authority initiating a procurement exercise? If so, what should these periods be?

Question 13 – Minimum period

One-hundred and forty-one respondents answered yes or no to Question 13.

Of these, 76 (54%) said that regulations *should not* specify a minimum period between an expression of interest being accepted and a relevant authority initiating a procurement exercise. However, 69 per cent of parish councils and 80 per cent of voluntary and community bodies said that a minimum period *should* be specified.

Question 13 : Summary of responses

	Yes	No	N/A	Total
Relevant authorities	16	51	15	82
Parish councils	18	8	6	32
Fire and Rescue Authorities and bodies	1	4	7	12
Voluntary and community bodies	20	5	15	40
Other	10	8	22	40
Total	65	76	65	206
%	31	38	31	100

Fifty-one respondents made suggestions for a minimum time period. These ranged from one week to 12 months. The most frequently made suggestion was three months.

Comments	Number of responses	%
Up to and including 1 month	11	21%
Between 1 and 3 months	8	16%
3 months	22	43%
Up to and including 6 months	6	12%
Between 6 and 12 months	4	8%
Total	51	100%

Question 14 – Maximum period

One-hundred and forty-three respondents answered yes or no to Question 14.

Of these, 85 (59%) said that regulations *should* specify a maximum period between an expression of interest being accepted and a relevant authority initiating a procurement exercise. However, 65 per cent of relevant authorities said that a maximum period *should not* be specified.

Question 14: Summary of responses				
	Yes	No	N/A	Total
Relevant authorities	24	45	13	82
Parish councils	22	3	7	32
Fire and Rescue Authorities and bodies	5	2	5	12
Voluntary and community bodies	20	5	15	40
Other	14	3	23	40
Total	85	58	63	206
%	41	28	31	100

Seventy respondents made suggestions for maximum time period. These ranged from one week to three years. The most frequently made suggestion was six months, closely followed by three months.

Comments	Number of responses	%
Up to 3 months	13	18%
3 months	18	26%
Between 3 and 6 months	4	6%
6 months	21	30%
Over 6 months	14	20%
Total	70	100%

Of those who made additional comments in response to Questions 13 and 14, the most frequently made were:

- Thirty-two respondents said that time periods would need to differ depending on a number of factors, including the size and nature of the service and its complexity.
- Twenty-one said these periods would need to fit with existing commissioning cycles or other relevant authority processes such as decision making.
- Thirteen said relevant bodies will need sufficient time to prepare themselves to bid in any procurement exercise.
- Seven said it was important to avoid unduly delaying the procurement exercise.

Question 15

What support would be most helpful?

One-hundred and twenty-nine respondents answered Question 15.

Only one felt that support should not be provided. The main issues which respondents commented on were who should benefit from support, the type of support that should be provided, and the skills that support should help to develop.

Who should benefit from support:

Eighty-four respondents (65%) said that support should benefit relevant bodies. Fifteen (12%) said it should benefit both relevant bodies and relevant authorities. Eight (6%) said that funding should be allocated to relevant authorities to cover the additional costs of administering the Right and the procurement exercises that may be triggered.²

The type of support that should be provided:

Seventy-nine respondents (61%) advocated intensive training for relevant bodies for example through mentoring by experts in other organisations. Thirty-six (28%) said support should be locally based, delivered either through existing voluntary and community sector infrastructure, or with the assistance of relevant authorities. Twenty-three (18%) suggested particular support tools and methods such as help-lines, web-based toolkits, workshops and fora for relevant bodies to share their experiences and enable them to form consortia.

Fifty-two respondents (40%) said there was a need for specific training in the use of the Right itself. Of these, twenty-four identified training for relevant bodies to prepare effective expressions of interest. Eight suggested more general training, including on the process and raising awareness of the Right and what relevant authorities and relevant bodies should expect from the policy.

² An assessment of the administrative costs of the Community Right to Challenge can be found on pages 15 to 17 of the Impact Assessment. This can be viewed at: <http://www.communities.gov.uk/documents/localgovernment/pdf/1829777.pdf>

Skills that support should help to develop:

Respondents made suggestions for a range of skills that could be strengthened with the provision of support and which respondents felt could give relevant bodies a better chance of being selected as the service provider and subsequently delivering services effectively. Many respondents made more than one suggestion on this issue:

- Forty-seven respondents said relevant bodies needed to be trained in **procurement**, for example completing tenders, understanding European Union procurement law and effectively demonstrating social value.
- Thirty-five identified **business skills**, including business planning, identifying funding sources, running a service and obtaining insurance.
- Twenty suggested training for relevant bodies in how to develop robust **governance** structures and put effective procedures in place.
- Ten said relevant bodies needed access to **legal advice** e.g. on establishing themselves as a legal entity and understanding obligations in service contracts such as compliance with human rights and equality law.

Question 16

Are there issues on which the Department for Communities and Local Government should provide guidance in relation to the Community Right to Challenge?

One-hundred and thirty-seven respondents answered Question 16.

Only eight (6%) said guidance was unnecessary. The main issues which respondents addressed were who guidance should be aimed at, the form it should take, and its contents.

Who guidance should be aimed at:

Thirty-seven respondents (27%) felt guidance should be aimed at relevant authorities, twenty-eight (20%) said it should be for relevant bodies, and twenty-two (16%) said it should be for both. A third of those responding did not specify.

What form guidance should take:

Only seven respondents said guidance should be statutory. Most felt guidance should be simple, written in plain English and include practical examples of how the Right should work.

Contents of guidance:

Seventy-three (53%) of respondents said that guidance on how the Right would work would be useful. Suggestions as to the contents of guidance included:

- **Procedures** – using worked examples and providing templates for the various mechanisms – especially expressions of interest.
- **Services exempted from the Right**, and in particular, how to differentiate between a service and a function.
- **Grounds for rejecting/modifying an expression of interest** – including how to identify those that are frivolous or vexatious.
- How relevant authorities can fit the various **timescales** associated with the process around commissioning and procurement timetables.
- How **social value** should be demonstrated and assessed.
- How **disputes** over the outcome of a challenge should be resolved in the absence of a formal appeals process.

As with the question on support, respondents were also keen that guidance address the processes and issues connected with the Right. Some made more than one suggestion on this issue:

- Forty respondents (mainly relevant authorities) requested guidance on **procurement**, particularly how to ensure contact with relevant bodies during the process was consistent with European Union procurement law.
- Thirty-six felt that guidance on **relevant legislation** was important, particularly for relevant bodies. Those mentioned included Best Value, the proposed General Power of Competence, equality and human rights, Freedom of Information, Data Protection, and employment law including the Transfer of Undertakings (Protection of Employment) (TUPE) Regulations.
- Thirteen felt some guidance on **financial issues**, particularly how to access funding, including for example to assist with start-up costs for running services, would be useful for relevant bodies.

Additional comments

One-hundred and nineteen respondents made additional comments. These covered a wide range of issues. Key themes included:

- Thirty-six respondents said it would be important to manage the expectations of relevant bodies who may not necessarily win the eventual contract; talked about barriers facing smaller voluntary and community groups such as being able to offer similar terms and conditions for staff transferring under Transfer of Undertakings (Protection of Employment) (TUPE) Regulations; and the implications of smaller voluntary and community bodies facing a higher risk of failure.
- Twenty-three raised concerns regarding maintaining quality and standards – seven talked specifically about the Single Equality Duty and seven talked about accountability and transparency.
- Twenty-one expressed concerns about the Right potentially being costly and/or bureaucratic.
- Seventeen said, to a greater or lesser extent, that there should be some degree of flexibility and local discretion in how the Right is implemented.
- Sixteen felt relevant bodies should provide evidence of a local connection (and some added local support), with some respondents calling for the definition of relevant body to be limited to local bodies.
- Nine warned of the risk of relevant bodies (and in any subsequent procurement exercise other potential providers) ‘cherry-picking’ services or parts of services that may be more easily delivered, less expensive to deliver, or more lucrative but that being separated from the rest of the service or group of services would leave the relevant authority to deliver a less sustainable, more expensive or unviable part of the service/package

Annex A

List of respondents

1. Action for Market Towns
2. Action with Communities in Rural England
3. Age UK
4. Agencies and Trainers for Involved Communities
5. Archbishops' Council of the Church of England
6. Association of Consultant Architects
7. Association of North East Councils
8. Association of Public Service Excellence
9. Basingstoke and Deane Borough Council
10. Bath and North Somerset Council
11. Bishop's Itchington Parish Council
12. Bodmin Town Council
13. Bracknell Forest Council
14. Bridport Local Area Partnership
15. Bridport Town Council
16. Brighton and Hove City Council
17. Bristol Compact/VCS Assembly
18. British Humanist Association
19. Calderdale Community Forum (collated response from consultation events with voluntary and community groups)
20. Cambridge City Council
21. Cambridgeshire County Council
22. Canterbury City Council
23. Catch22
24. Cheshire West and Chester Council
25. Cheswick Green Parish Council
26. Chideock Parish Council

27. Chief Fire Officers Association
28. Children England
29. City Of Wakefield MDC
30. City of York Council
31. Colchester Borough Council
32. Community Action MK and Milton Keynes Community Property Company
33. Community Council of Devon
34. Community Development Foundation
35. Community Matters
36. Cornwall Council
37. Crisis
38. Cumbria County Council
39. Cumbria Fire and Rescue Service
40. Daventry District Council
41. Derbyshire Fire & Rescue Service
42. Devon and Somerset Fire and Rescue Authority
43. Devon Association of Local Councils
44. Devon County Council
45. Durham County Council
46. East Riding of Yorkshire Council
47. East Riding of Yorkshire Rural Partnership
48. Eastfield Voice
49. Ellesmere Town Council
50. Enfield Council
51. Erewash Borough Council
52. Essex County Council
53. Evangelical Alliance
54. Federation of British Fire Organisations
55. Fire Industry Association
56. Forest Heath District Council
57. Fulford Parish Council
58. Gloucestershire Rural Community Council

59. Greater Manchester Fire and rescue Service
60. GreenSpace Forum Ltd
61. Hampshire Association of Local Councils
62. Hampshire County Council
63. Haringey Association of Voluntary and Community Organisations
64. Harvest Housing Group
65. Herefordshire Association of Local Councils
66. Herefordshire Council
67. Hertfordshire Association of Parish and Town Councils
68. Hertfordshire County Council
69. Home Builders Federation
70. Honiton Town Council
71. Institute for Archaeologists
72. Institute for Chartered Secretaries and Administrators
73. Involve Yorkshire and the Humber
74. Isle of Wight Council
75. Keep Britain Tidy
76. Keighley Town Council
77. Kent County Council
78. Kingsbridge Town Council
79. Kirklees Council
80. Lambeth Council
81. Lancashire County Council
82. Lavenham Parish Council
83. Leathermarket JMB
84. Leeds City Council
85. Leicester, Leicestershire and Rutland Combined Fire Authority
86. Lighthorne Heath Parish council
87. Lincolnshire County Council
88. Little Houghton Parish Council
89. Local Government Group
90. Locality

91. London Borough of Barnet
92. London Borough of Camden
93. London Borough of Hammersmith and Fulham, Royal Borough of Kensington and Chelsea, and Westminster City Council (joint response)
94. London Borough of Hounslow
95. London Borough of Merton
96. Maldon District Council
97. Mary Tavy Parish Council
98. Merseyside Fire and Rescue Authority
99. Merseyside Waste Disposal Authority
100. Milton Keynes council
101. Minstead Parish Council
102. National Association for Voluntary and Community Action
103. National Association of Local Councils
104. National Council for Voluntary Organisations
105. National Federation of ALMOs
106. National Housing Federation
107. National Society of Allotment and Leisure Gardeners Ltd
108. Newark and Sherwood Community Sports Network
109. Newcastle City Council
110. Newcastle-under-Lyme Borough Council
111. Newton Abbot Town Council
112. Newton Regis, Seckington and No Man's Heath Parish Council
113. Norfolk Rural Community Council
114. North Norfolk District Council
115. North Somerset Council
116. North Yorkshire County Council
117. Northamptonshire County Council
118. Norwich City Council
119. Nottingham City Council
120. Nottinghamshire and City of Nottingham Fire and Rescue Authority
121. Nottinghamshire County Council

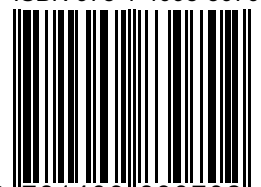
122. Oldham Metropolitan Borough Council
123. Oxfordshire Children and Voluntary Youth Services
124. Oxfordshire Community and Voluntary Action
125. Oxfordshire County Council
126. Places for People
127. Plunkett Foundation
128. Plymouth City Council
129. Portsmouth City Council
130. Private individual
131. Private individual
132. Private individual
133. Private individual
134. Private individual
135. Private individual
136. Private individual
137. Private individual
138. Private individual
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140. Private individual
141. Private individual
142. Private individual
143. Private individual
144. Private individual
145. Private individual
146. Private individual
147. Private individual
148. Private individual
149. Redcar and Cleveland Borough Council
150. Rodborough Parish Council
151. Royal Berkshire Fire Authority
152. Royal Town Planning Institute
153. Salford City Council

154. Sefton Metropolitan Borough Council
155. Sevenoaks District Council
156. Sheffield City Council
157. Shildon Town Council
158. Shropshire Council on behalf of voluntary sector task group representing voluntary and community sector and Council interests
159. Social Enterprise Coalition
160. Social Enterprise Richmond
161. Social Return on Investment
162. Solihull Metropolitan Borough Council
163. South Gloucestershire Council
164. South Oxfordshire District Council
165. South Somerset District Council
166. South Woodham Ferrers Town Council
167. Southampton City Council
168. South Lakeland District Council
169. Sport and Recreation Alliance
170. St Albans City & District Council
171. St Ives Town Council
172. St Stephen-in-Brannel Parish Council
173. Staffordshire County Council
174. Stoke-on-Trent and Staffordshire Fire and Rescue Authority
175. Suffolk Association of Local Councils
176. Suffolk County Council
177. Sunderland City Council
178. Surrey County Council
179. Talaton Parish Council
180. Taunton Deane Borough Council
181. The Centre for Public Scrutiny
182. The Lesbian and Gay Foundation
183. The Social Investment Business
184. The Theatres Trust

185. UK Business Council for Sustainable Energy, Association of Electricity Producers, Energy Networks Association, Gas Forum, the Renewable Energy Association and RenewableUK.
186. Unison
187. Urban Forum
188. Vale of White Horse District Council
189. Voice4Change England
190. Warwickshire County Council
191. Waveney District Council and Suffolk Coastal District Council
192. West Bletchley Council
193. West End Community Network
194. West Hallam Parish Council
195. West Midlands Fire Service
196. West Sussex County Council
197. West Yorkshire Fire and Rescue Authority
198. Whitnash Town Council
199. Wimborne Minster Town Council
200. Wolston Parish Council
201. Women's Resource Centre
202. Worcestershire County Council
203. Wycombe District Council
204. Wyre Forest District Council
205. YMCA Central Herts
206. Yorkshire Local Councils Associations

ISBN: 978-1-4098-3070-2

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