

Whoever you are, whatever your problem

## Exeter Citizens Advice Bureau

Registered Charity No. 1091143  
A Company Limited by Guarantee.  
Registered in England & Wales No. 4334063



Public Services Team  
Office for Civil Society  
Cabinet Office  
Admiralty Arch  
The Mall  
London  
SW1A 2WH

Wat Tyler House  
3 King William Street  
Exeter  
EX4 6PD

[www.exetercab.org.uk](http://www.exetercab.org.uk)  
[www.adviceguide.org.uk](http://www.adviceguide.org.uk)

22<sup>nd</sup> December 2010

Dear Sirs

### Modernising Commissioning Green Paper

I write on behalf of Exeter Citizens Advice Bureau in response to your consultation on the above green paper.

Firstly, let me say that we are pleased to have the opportunity to respond to this important consultation, but fear that the range and quality of responses will be reduced due to the timing of the consultation. The Christmas/New Year period is a time when many civil society organisations close and as such opportunities to respond will be limited.

We offer the following comments in relation to the questions posed.

### New opportunities

We believe that local authorities, civil service and health authorities/NHS can go further in creating new opportunities for civil society organisations. Particularly in areas such as; housing benefit administration, independent complaints adjudication, HR and employee assistance. There is also scope for 'overlaps' between the role of civil society organisations and the public sector to be moved wholly to civil society organisations, such as help with completing forms, welfare benefit checks and debt repayment plans.

We are concerned by the move to payment by results as this has a significant impact on cashflow when civil society organisations are keen to keep reserves at the lowest level to ensure service continuation. The potential long lead in between costs and repayments

Exeter Citizens Advice Bureau  
Acknowledges the financial support of:

| Opening Hours | Self-Help   | Face-to-Face Advice | Telephone Advice |
|---------------|-------------|---------------------|------------------|
| Monday        | 10.00-15.30 | 10.00-12.30         | 14.00-16.30      |
| Tuesday       | 10.00-15.30 | 10.00-12.30         | 14.00-16.30      |
| Wednesday     | 10.00-13.00 | CLOSED              | 10.00-13.00      |
| Thursday      | 10.00-15.30 | 10.00-12.30         | 14.00-16.30      |
| Friday        | 10.00-15.30 | 10.00-12.30         | 14.00-16.30      |



Community  
Legal Service



would make such contracts less attractive for civil society organisations with low reserves and limited cashflow.

The transfer of community building would require some form of continued running cost contribution to prevent it turning into a 'white elephant'.

The taking on of 'asset-based' services is hindered by the need for continuing running costs and the need to earn income to keep such assets viable.

Partnership between civic society organisations and employee-led mutuals could be further encouraged by increasing volunteering schemes and opportunities, a national 'compact' between NACVO and the LAG, and a financial incentive or working capital scheme.

A role for civic society organisations which involves them in reviewing local authority services with a view to identifying those that are appropriate for civic society organisations to deliver would be a welcome initiative. This role could be co-ordinated and led by local Councils for Voluntary Service.

### **More Accessible**

The most important area for commissioners to bear in mind is that they need to provide timely information and keep to realistic timescales. The recent timing drift that came about in the Legal Services Commission civil legal aid tendering exercise was a prime example of where missed deadlines were passed onto providers with little or no appreciation of the impact of such delays. Moreover, we believe that civic society organisations can play a key role in delivering the Big Society as long as commissioners value the role of volunteering and take this into account.

It would be helpful to test the measures proposed for making it easier for small firms and organisations to do business with government with real applicants to ensure that they are fit for purpose and accessible to civic society organisations.

The Red Tape Taskforce should apply a test to ensure that the process is open, transparent and appropriate for civic society organisations.

A fair balance of risk can be achieved by giving equal strength to bids that are locally based and have value as a consequence, to that of bids from national organisations with a strong financial balance sheet.

TUPE is an issue for two reasons. Firstly the pension liabilities, and secondly whether the staff transferring across are of a good standard, or whether there is an incentive for local authorities, and others, to transfer across under-performing staff.

The Big Society Bank must offer grants alongside loan capital. It must also be prepared to take some risks and have higher write-off costs as a consequence. The overall approach needs to be flexible and they could also 'underwrite' bids where there is long time lag between delivery and payment.

We believe that a good starting point in relation to consortia is to be clear what this means and use the term consistently. Is it a legal entity, an informal arrangements or something else? Who holds the risk/responsibility for delivery? Providing clarity in these areas will, we believe, remove major barriers.

### **Value**

Commissioners need to fully value the role of volunteering in determining social value. Also, many civic society organisations carry out campaigning and social policy work alongside service delivery. These areas should be valued by commissioners for the social, environmental and economic value they bring.

We believe that these proposals must be based around local needs and local consultation.

### **Citizen and community involvement**

Local HealthWatch could be assisted by paying for local focus groups and consultations with civic society organisations and their users.

The Joint Strategic Needs Assessment guidance should be mindful of issues around low income, debt, and the positive impact of quality, timely, advice on general health and well-being.

Civic society organisations can act as advocates and represent users through social policy evidence gathering at the local level. However, such work should be resourced properly.

Civic society organisations and statutory partners would benefit from opportunities to share ideas, information and local needs. This would improve working relations.

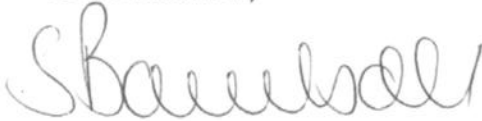
Public service commissioners would benefit from training in valuing and understanding the role and benefits of volunteering, and also around the comparative merits of soft outcomes as well as hard outcomes.

Through local CVS organisations, civic society organisations can be involved in co-ordinating the role and voice of the sector in relation to community budgets.

Civil society organisations can contribute to Local Integrated Services through local knowledge, evidence and awareness of community needs. But this would need resourcing (money and time).

The issue of personal budgets is a tricky one. Where services were previously funded through grant income and were, therefore, free at the point of delivery, would mean a move to upfront charges for personal budget holders. There is also no security of funding for service providers.

Yours faithfully

A handwritten signature in cursive script, appearing to read 'S Barriball', written in dark ink.

**Steve Barriball**  
**Director**