



**Brighton and Hove Community and Voluntary Sector Forum (CVSF)  
Position Statement on Proposed Changes to Equality Act 2010  
April 2011**

CVSF is the umbrella group for the community and voluntary sector in Brighton and Hove and represents 550 community groups and voluntary organisations in the city. This position statement sets out CVSF's strong opposition to the proposed changes to the Equality Act 2010.

We understand that these changes propose to:

- Remove the requirement for organisations to evidence any engagement with any stakeholders in determining and developing their policies
- Remove the requirement to evidence engagement when organisations are choosing their priority equality objectives
- Remove requirement to evidence where information or consultation has taken place to inform equality analysis

The duty to evidence engagement has greatly driven up engagement practice in Brighton and Hove. We can evidence the impact of this engagement in terms of improved services and greater awareness amongst commissioners and public sector partners more widely of the needs of equalities groups in the city.

Conversely we fully anticipate that the proposed removal of the statutory requirement to evidence engagement will undermine the progress we have made locally, result in poorer quality services and increased costs to the public purse:

- Our public sector partners state they will remain committed to maintaining implementation of good equalities practice, eg through adhering to standards set out in our exemplary citywide Community Engagement Framework and Equality and Human Rights Charter. This is of course positive however is a statement of good will rather than guaranteed intention
- Removal of the statutory obligations around engagement will inevitably result in engagement activities being targeted for future disinvestment. It is naïve and unrealistic to think otherwise. With fewer engagement resources, we can anticipate reduced engagement activities, a reduced range of engagement activities, decreased support for equalities groups to participate in engagement activities and overall poorer engagement.
- Without appropriate engagement, particularly of equalities groups, services will not be designed or developed in a way which meet local needs, which risks wasting limited public resources on ill-designed service delivery. It also risks people disengaging with these public services, increased dissatisfaction rates and possibly increasing demand for top-end / higher-cost services to meet users' growing/changing needs which were not addressed through earlier interventions.

The proposed changes to the Act restrict organisations obligations to:

- Develop a minimum of one equality objective to work towards every 4 years
- Provide evidence that an organisation is meeting the general duty to promote equality; eliminate discrimination; and foster good relations between groups

- Provide information relating to employees (for organisations with 150 or more staff) and others affected by policies and practice (service users)

This is a massively retrograde step and will greatly undermine the equalities focused partnership working which has developed in Brighton and Hove. The Equality Act has helped achieved greater transparency and sense of importance in meaningful equalities engagement, affording equalities group with a valuable tool to help ensure their voices are heard in decision-making processes.

These proposed changes give a strong message that the Coalition Government is not concerned about equalities issues. The limited consultation around these changes reinforces this message. The consultation does not seem to actively seek the views or responses from particular communities of interest which these changes will ultimately affect.

CVSF would urge that the proposed changes to the Equality Act are reconsidered and that the duties to evidence much needed engagement remain in tact.

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