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21st April 2011

Specialist in
Welfare Benefits

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Post: Specific Duties – Policy review
Government Equalities Office
Zone J9, 9th Floor
Eland House
Bressenden Place
London SW1E 5DU

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Dear Sir/Madam,



London Borough of
Redbridge



RAMFEL (Refugee and Migrant Forum of East London) and a front line advice provider and second tier umbrella body advocating for fairness, equality and social justice for hard to hear communities in London and Essex. Our work is particularly focused on equality and access issues as they pertain to asylum seeker, migrant and refugee, and Black, Asian and Minority ethnic communities living and working in east London.

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RAMFEL welcomes the opportunity to respond to the Policy review paper on the Equality Act 2010 and specifically the public sector equality duty: reducing bureaucracy



Whilst we appreciate the intention behind the hope to reduce bureaucracy, we would seriously question the assertion that 'there is room to strip out unnecessary proves requirements'.



We are concerned at the shortened period of the consultation, which is again not COMPACT complaint, and see no reasonable justification for this.

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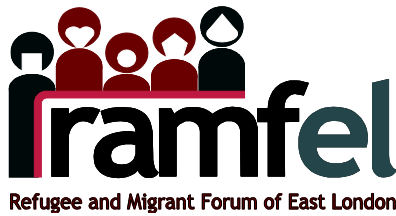


We would also maintain that the overemphasis on transparency is a red herring, since greater freedoms to information are already in place and implied through the Freedom of Information Act and localism bills.



Specifically we are concerned that the proposal to publish equality objectives very four years, allows for too long duration between reviews of objectives, and does a disservice to attempts at the local level to respond to the changing needs of local communities. To illustrate we are concern for example that in Barking & Dagenham where the pace of demographic change has been faster than any other borough of London and the south east, that the publication of





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objectives every four years would seek to leave some communities in, limbo as their needs would not be recognised and addressed in a timely manner

We believe that more guidance should be provided to local authorities in how they reasons and public information annually toy demonstrate their compliance with the general equality duty.

We are extremely concerned at the proposal to remove the requirement on public bodies to demonstrate

- engagement they have undertaken when determining their priorities
- engagement they have undertaken when determining their equality objectives
- equality analysis they have undertaken in reaching their policy decisions
- And information they considered when undertaking such analysis.



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Such removals would, we believe, result in a lack of transparency in the development of equality objectives, a also seriously undermine partnership working arrangements between the public sector and civil society organisations

It has been suggested that this is to allow space for public sector bodies to shift energies and resources to working with service users, however we do find it ironic that that the Government has presented such a short sighted vision and is unable to see that the process of consultation and service delivery can run simultaneously, we would point to JSNA's as a classic example.

We believe that in areas where there is existing far right presence either politically or by virtue of a large electorate that the failure to stipulate regulation and resort to guidance could be a serious hindrance to addressing equality issues locally and even allow some public sector bodies to reprioritise the level of resources levied against equality work.



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We also believe that without the requirement to set out how progress is to be measured there will be no opportunity to evaluate whether the objectives are being met or addressed adequately.

In short we believe that the suggestion that the equality duty can be delivered effectively without recourse to a regulatory framework is flawed and will ultimately undermine confidence in public bodies by sections of the Black Asian and Minority Ethnic community, and challenge work around integration, by not allowing for such work to be effectively and appropriately planned and managed.



Yours sincerely,

Lloyds TSB | Foundation for England and Wales

Rita Chadha
Chief Executive Officer



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