

## **Compact Renewal Consultation 2010**

### **Response to the Voluntary and Community Sector**

*Published December 2010*

## 1. Introduction

Between 17<sup>th</sup> October and 30<sup>th</sup> November, Compact Voice and the Office for Civil Society launched a draft renewed national Compact document for consultation. This was accompanied with the announcement that new accountability mechanisms would be introduced to ensure greater compliance with the Compact at both local and national level.

On many important aspects there was a consensus amongst Compact Voice, the voluntary and community sector, and central and local government on how the Compact shall be taken forward. These were that the Compact:

- provides more effective accountability
- is easier to use and understand
- is aligned to new policy initiatives such as the Big Society
- remains relevant to challenges faced by the sector such as spending cuts and budget reductions

is delivered in time to be used during major policy announcements or changes, such as the October Spending Review

On that basis, Compact Voice sought the views of interested groups from the voluntary and community sector, in order to ensure that the final Compact document (and other accompanying aspects of it) would be able to add maximum value in these challenging times.

During the six week period, Compact Voice attended or supported nearly 50 events, reaching around 1500 people. This resulted in 129 written submissions from every region in England. Responses were sent from CVS', community groups, individuals, Compact implementation groups, infrastructure organisations, campaigning groups, social enterprises, and unions.

The report below considers some of the responses Compact Voice received from the voluntary and community sector. It identifies where specific suggestions were taken into account in the final document, and also addresses where concerns were considered but not taken on board, offering reasons why. It publishes specific comments or suggestions from the submissions we received, though they have been included anonymously.

This response document is not exhaustive, and as with any consultation, the final document will not be able to reflect the wide range of opinions and suggestions expressed during its development. Compact Voice has tried – when possible – to ensure that the views of the voluntary and community sector were adequately represented in the final document. Submissions from statutory bodies (including local government, Government departments, and non-Departmental public bodies) we passed onto the Office for Civil Society.

This document follows the same structure as the final document. It combines quotes from the submissions, Compact Voice's narrative about the specific issues being discussed, and where appropriate, extracts from the final Renewed Compact. It should be read in connection with the following resources:

- The Renewed Compact
- Press statement on the Renewed Compact from Compact Voice and OCS

The Compact - Accountability and Transparency Guide. Over the next few weeks, additional resources will be published on using the Renewed Compact (see 'Next Steps' below).

## **1.1 Shortened Consultation**

	Following the announcement of the six week consultation period, we received a mixed response, with some organisations concerned about the short timescale, while others understood the need to have the Compact in place during what many were anticipating would be a difficult time for the sector across England.
“ ”	<i>“A shorter time frame for developing the Renewed Compact makes sense – but only if it will be meaningfully used during the spending review, and it will make a difference.”</i>

## **1.2 Accountability Mechanisms**

	<p>Subsequently, the Cabinet Office announced that the Commission for the Compact would cease operations as part of their closure of many non-Departmental Public Bodies.</p> <p>Many of the responses and submissions acknowledged the closure of the Commission, stating that a potential function they arguably should have had (to investigate where breaches of the Compact have occurred) should be transferred to a similar organisation. Many supported the need for additional accountability mechanisms.</p>
“ ”	<i>[There should be a] requirement that Compact partners make an annual public statement as to what they have done to implement and uphold the Compact which should include details of any complaints and how they were dealt with.</i>
	<p>Compact Voice worked with OCS in developing what these additional accountability mechanisms could look like. Accompanying the launch of the Renewed Compact is the announcement that the following has been agreed across Government:</p> <ul style="list-style-type: none"><li>• Government departments are now expected to include a statement about the Compact in their business plans from 2011-12 onwards</li><li>• Organisations can raise concerns about Compact compliance directly to Government departments, copying in the Minister for Civil Society</li><li>• Should this not resolve any disputes, organisations can complain about Compact breaches through their MP to the Parliamentary Ombudsman, who will investigate if appropriate</li></ul> <p>Local organisations can complain about Compact breaches directly to the Local Government Ombudsman who will investigate if appropriate</p> <p>Additionally, the Minister has announced an inquiry into Compact working, to be delivered collaboratively by the Public Affairs Select Committee and the National Audit Office. This will provide new scrutiny about how the Compact can be strengthened and improved across England.</p> <p>As well as these new measures, organisations can still contact the Compact Advocacy Programme about Compact breaches, which advocates on behalf of sector organisations in cases of Compact non-compliance. More information about these new accountability and transparency measures is available in the document ‘The Compact - Accountability and Transparency Guide’.</p>

## The Consultation Responses

### 2. GENERAL COMMENTS ABOUT THE DRAFT RENEWED COMPACT, AND ITS FOREWORD

#### 2.1 Consultation Period

	<p>The majority of respondents acknowledged that the shortened time period for consultation was necessary to ensure the Compact was used during spending decisions.</p>
“ ”	<p><i>The Compact principles of working will facilitate dialogue between VCS organisations and public bodies to ensure that all funding decisions consider the needs of communities and the role that the VCS can play in building a Big Society. The timing of the launch of Renewed National Compact is, therefore, critical and should take place as soon as possible after the CSR. For this reason, we are not objecting to the shortened consultation period that has been imposed.</i></p>
	<p>However, some were critical of this approach.</p>
“ ”	<p><i>The entire process sets a bad precedent. It is making some fundamental changes with little prior notice and half the Compact standard consultation period.</i></p>
	<p>The process took seriously the views of those who had shared their insight and understanding in deciding what the Compact – and its resultant partnerships - should look like. Much of the initial draft has been significantly amended in order to take into account the opinions and suggestions offered by the sector. These are described below.</p> <p>More importantly, the Renewed Compact introduces new mechanisms which will enable the Compact to be used more effectively during spending decisions. Compact Voice expects that these mechanisms should be used immediately, and will enhance existing local Compacts and partnerships.</p> <p>While many respondents acknowledged that the principles of the Compact had not been adhered to in recent months, Compact Voice believes that a Renewed Compact which takes into account the Coalition Government’s thinking will strengthen its use at both local and national level.</p>

**2.2 The change from 'Third Sector' to 'Civil Society Organisations'**

	A significant number of responses raised concerns about the use of the term Civil Society Organisations (CSOs). Whilst some simply wanted the term to be more clearly defined, others noted the term could encompass wider organisations such as trade unions and political parties which have not been previously covered by the Compact. Some responses expressed concern that the term had been introduced by government without their support or engagement, preferring 'voluntary and community sector' to describe them.
“ ”	<i>Why don't they ask us what we want to be called/described as?</i>
“ ”	<i>The term CSO is not explained. This is not the language the sector uses. A CSO could potentially include many other groups, such as trade unions, independent schools, universities etc. Does this therefore widen the range of bodies covered by the Compact?</i>
	Government were prepared to refer to the Voluntary, Community and Social Enterprise sector (VCSE). However, following discussions with Compact Voice's board, it was felt VCSEs was another new term anyway, and cumbersome, while CSO's is more ambitious and forward looking. The final text reads:
	<b>INTRODUCTION:</b> While it is understood that civil society is a contested term, for the purposes of the Compact, civil society organisations include charities, social enterprises and voluntary and community groups.

**2.3 Local Compacts**

“ ”	<i>Further information is required on how the relationship translates locally</i>
	The Renewed Compact is a national document which applies to the relationship between Government and CSOs. However, both Compact Voice and government recognise the importance of local Compacts. While it is not appropriate for a national Compact to replace or dictate the development of local Compacts, it is important that they recognise each other. As a result, local Compacts were mentioned in the foreword of the final document:
	<b>INTRODUCTION:</b> Local areas are encouraged to follow the principles in this document. These will play an important role in ensuring empowered and sustainable communities.
	This approach was supported by many:
“ ”	<i>For most of the VCS, their local Compact is more important than the national Compact, but there is more likelihood of commitment at a local Compact (sic) when there is a national one in place.</i>

**2.4 Bias of Renewed Compact**

	Some people felt concerned that the Compact does not take into account specific consideration of their group, or is biased in favour of others.
--	---

“ ”	<i>As it stands it seems more relevant to organisations which are funded on a commissioning/contractual basis, which tends to mean the larger, more "professionalised" providers of public services, rather than community groups.</i>
	As described above, the Compact applies to all Civil Society Organisations, described within the document as follows:
	<b>INTRODUCTION: There is a huge variety of CSOs ranging from small community groups to large international organisations. All share a commitment to social aims and objectives and while many do not have a direct link with the state, those that do recognise the value of a positive relationship with public bodies and the wider benefits that a productive partnership can bring to citizens and communities.</b>
	Specific guidance will be published will help parts of the sector understand how the Compact applies to them. Existing guidance on community groups will be updated to reflect the changes in the renewed Compact.
“ ”	<i>This appears too Government sided rather than a middle ground.</i>
“ ”	<i>It seems 'top down.' We sat down together to make the [local city] Compact and would like to see it reflected in the national one (people feel ignored).</i>
	<p>The Renewed Compact was negotiated between Government and the voluntary and community sector, represented by Compact Voice, and informed by the consultation, Compact Advocacy cases, Compact Champions and experts working in local areas, Regional Leaders and Compact colleagues.</p> <p>The final text reflects the best possible negotiated document taking into account this range of opinion and interest</p>
<b><u>2.5 Language Issues</u></b>	
“ ”	<i>There needs to be clarification about commitments versus undertakings in the draft text – a jargon buster at the back might help.</i>
	The word ‘commitments’ has now been changed to ‘undertakings’ throughout the document. Accompanying material will be developed which will help describe the Compact’s relationship to a range of stakeholders and circumstances.
“ ”	<i>Using language such as “wherever possible, when applicable” is deliberately broad and makes it less useful.</i>
	Instances where such phrases have been used have been kept to a minimum. However, it is relevant that they should be used in certain circumstances to ensure that the Compact is used flexibly and appropriately.

## **2.6 Aims of the Compact**

“ ”

*The Compact should also be about improving communication between the sectors, improving how we could work better together in an open way. This may be implicit but should be more explicit.*

This has been strengthened in the foreword, as well as the accompanying accountability mechanisms.

“ ”

*The document would be stronger if it was based on a partnership approach consisting of joint statements of commitment rather than a list of undertakings by either side.*

NARRATIVE: The five Compact outcomes described in the document represent joint statements of commitment by both sectors.

“ ”

*'Big Society' could date the document quicker than is necessary.*

Compact Voice believes that the Compact can be used as a key mechanism to deliver the Big Society. We also recognise that the Compact should exist outside of specific policies – and indeed political parties. As such, the 'Big Society' is mentioned in the introduction, but not elsewhere.

## **2.7 Volunteering**

“ ”

*Making every effort to understand the barriers that prevent people from volunteering and finding ways to overcome them.*

“ ”

*[We] would like to strongly support the commitment to keeping CRB checks free to volunteers. This commitment is fundamental to efforts to maintain and increase levels of volunteering. Not including this statement in a Renewed Compact will send a strong, negative message to the sector.*

The Compact is designed to cover the relationship between organisations and statutory bodies, rather than policies affecting the management and maintenance of individual staff or volunteers. The sector felt very strongly that the commitment to ensure free CRB remained and this was retained in the final version.

## **3. A STRONG, DIVERSE AND INDEPENDENT CIVIL SOCIETY**

### **3.1 Independence**

“ ”

*As the spending cuts deepen and competition for resources grows, it is vital that independence is recognised and valued.*

“ ”

*As well as improving the relationship between the public sector and the voluntary and community sector, we believe the Compact should also help voluntary organisations and community groups maintain their independence. For this reason, we would like section 1.1 strengthened by changing the wording from “respecting the independence of the sector” to “ensuring the independence of the sector”.*

Following a number of responses emphasising how important this commitment was, it was strengthened by amending 'ability to campaign' to 'right to campaign', and amending 'respect' to 'respect and uphold'.

	<b>1.1 Respect and uphold the independence of CSOs to deliver their mission, including their right to campaign, regardless of any relationship, financial or otherwise, which may exist.</b>
<b>3.2 Campaigning</b>	
“ ”	<i>No definition is given for what ‘responsible’ campaigning means or what is meant by the need to demonstrate ‘robust evidence’. What is meant by ‘responsible campaigning’ is very subjective.</i>
	The undertaking has been amended accordingly to explain ‘robust evidence’ more fully:
	<b>1.7 When campaigning or advocating, ensure that robust evidence is provided, including information about the source and range of people and communities represented.</b>
<b>3.3 Infrastructure</b>	
	Many responses expressed concerns that the draft Renewed Compact fails to mention national and local infrastructure organisations. The need for infrastructure to be adequately resourced was seen as important in supporting a thriving sector. However, there were a minority of responses which questioned the need for infrastructure organisations to be singled out for support.
“ ”	<i>We object to the removal of references to local support and development organisations. This is a serious omission and can only hinder the Big Society.’</i>
“ ”	<i>Organisations both large and small rely on infrastructure support that both understands the sector and can respond in a sector specific way. Infrastructure bodies save time and money.</i>
	As a result of these issues being prominently discussed, Compact Voice negotiated with Government about the value of infrastructure, which was recognised. In response, the renewed Compact now states:
	<b>1.3 Ensure that government collectively (through the Cabinet Office) recognises the need to resource national and local support and development organisations in order to assist CSOs with their capacity and capability to deliver positive outcomes.</b>
<b>3.4 Information Sharing</b>	
“ ”	<i>Commitments on information-sharing (how, why) would be relevant.’</i>
	This has been taken into account. Commitment 1.4 now reads:
	<b>1.4 Ensure greater transparency by making data and information more accessible, helping CSOs to challenge existing provision of services, access new markets and hold government to account.</b>

#### 4. EFFECTIVE AND TRANSPARENT DESIGN AND DEVELOPMENT OF POLICIES, PROGRAMMES AND PUBLIC SERVICES

##### 4.1 Social Value

“ ”	<i>We welcome the commitment to social value, though we believe this concept needs to be defined and explained.</i>
	The commitment was amended to be more easily understood. It now reads:
	<b>2.1 Ensure that social, environmental and economic value<sup>2</sup> forms a standard part of designing, developing and delivering policies, programmes and services.</b> <b>2.2 Consider the social impact that may result from policy and programme development, and in particular consider how these would impact local efforts to inspire and encourage social action and to empower communities.</b>
	There was a suggestion that:
“ ”	<i>Social value should be a condition of grants or contracts.</i>
	This has been incorporated into commitment 2.1 above.

##### 4.2 Impact Assessments

“ ”	<i>[We have] asked the Government to consider charities specifically within impact assessments for new policies and regulations. We are pleased that this concept is reflected in the Compact within commitment 2.2 which states that the Government should “assess the implications on civil society organisations of new policies, legislation and guidance”. However we would like this formalised in impact assessments across Government.</i>
	While this change was considered, it was felt that such a specific requirement may result in a tokenistic ‘tick-box’ approach when assessing the impact of funding decisions on charities. Undertaking 4.2 in the final text does require that Government ‘assess the impact ... before deciding to reduce or end funding’. This approach was felt to be more likely to embed a culture change in government.

##### 4.3 Removing Barriers

“ ”	<i>It is disappointing that there is no commitment to remove barriers that might prevent CSOs from contributing to policy development.</i>
“ ”	<i>Give early notice of forthcoming consultations, where possible, allowing enough time – how much time and who decides?</i>
	Some people expressed concern that the phrase ‘remove barriers’ had been changed from the previous Compact. Others were also concerned that the phrase ‘early notice of forthcoming consultations’ was vague. As a result, these have been addressed, with the commitment now reading:

	<b>2.3 Work with CSOs from the earliest possible stage to design policies, programmes and services. Ensure those likely to have a view are involved from the start and remove barriers that may prevent organisations from contributing.</b>
<b><u>4.4 Proposing solutions</u></b>	
	The draft Renewed Compact included an undertaking which said that the sector should: “Focus on solutions to issues, with clear proposals for change where relevant.”
“ ”	<i>It is not ... the role for VCS organisations to focus on solutions but rather the role is raise awareness of difficulties and be willing to work with government to explore suitable solutions.</i>
	Undertaking 2.9 now specifies ‘when putting forward ideas’ rather than the draft text which stated ‘focus on solutions to issues’. This recognises that it is appropriate in some circumstances to raise awareness of issues. However, the contribution that CSOs can make to addressing problems through practical suggestion has been recognised in the final document, with undertaking 2.9 now reading:
	<b>2.9 When putting forward ideas, focus on evidence-based solutions, with clear proposals for positive outcomes.</b>
<b><u>4.5 Twelve Week Consultation</u></b>	
“ ”	<i>The draft says "where possible" in relation to involving the sector in decision making - just as there were "good reasons" to truncate consultation on the renewed draft pressure of making cuts in a short time will make it easy for public bodies to say it wasn't possible to engage with VCS in the time available.</i>
	The undertaking to conducting twelve week consultations has been strengthened. It now reads:
	<b>2.4 Where it is appropriate, and enables meaningful engagement, conduct 12-week formal written consultations, with clear explanations and rationale for shorter time-frames or a more informal approach.</b>
	Compact Voice expects good practice which follows the recommended twelve weeks for consultations to be the standard. Only in exceptional circumstances should the best practice described in the Compact be deviated from. We will be issuing standards for what we believe is meaningful engagement.
<b><u>5. RESPONSIVE AND HIGH-QUALITY PROGRAMMES AND SERVICES</u></b>	
<b><u>5.1 Types of support</u></b>	
	<b>3.2 Consider a wide range of ways to fund or resource CSOs, including grants, contracts, loan finance, training, use of premises and so on. Work to remove barriers that may prevent CSOs accessing government funding, thereby enabling smaller organisations to become involved in delivering services where they are best placed to achieve the desired outcomes.</b>

“ ”	<i>The differences between funding and support types, and the merits of this variation, are often not understood. This is therefore an important commitment in the Compact.</i>
“ ”	<i>3.1 should be expanded to emphasise the value of statutory sector in kind support such as rooms, free training, etc. to small community groups.</i>
	This was retained in 3.2 - Consider a wide range of ways to fund or resource CSOs, including grants, contracts, loan finance, use of premises and so on.
“ ”	<i>In an increasingly competitive and complex funding environment, it is essential that grant funding is retained by public sector bodies as far as possible.</i>
	Grants are considered part of the ‘wide range of ways to fund or resource CSOs’ described in commitment 3.2 above.
<b><u>5.2 Multi-year funding</u></b>	
“ ”	The commitment to three year funding enables a VCS organisation to plan for the future, makes it easier to recruit staff, and means it does not have to use resources making repeated applications. It also provides security and a ‘match’ for additional funding.
	The clause committing to three year funding was changed to describe “multi-year funding”.
	<b>3.4 Commit to multi-year funding where appropriate and where it adds value for money. The funding term should reflect the time it will take to deliver the outcome. If multi-year funding is not considered to be the best way of delivering the objective, explain the reasons for the decision.</b>
	This change reflects a desire to make funding more flexible, and enable funding to be offered for longer than three years if appropriate, as well as reflect that in some circumstances, it is inappropriate for funding to be issued for three years (such as short term projects).  However, Compact Voice still expects three years to be a minimum standard for appropriate projects.
<b><u>5.3 Monitoring Requirements</u></b>	
“ ”	<i>Government should be committed to agreeing monitoring requirements beforehand.</i>
	This has been included in the final text of the Compact:
	<b>3.6 Agree with CSOs how outcomes, including the social, environmental and economic value, will be monitored before a contract or funding agreement is made.</b>
<b><u>5.4 Payments in advance</u></b>	
“ ”	<i>Small groups are vulnerable, will only get payment in advance if they can “prove need”.</i>

	Payment in advance has been included in commitment 3.10.
	<b>3.10</b> Ensure that the widest possible range of organisations can be involved in the provision of services through appropriate funding and financing models. This may include outcome based payments but also payment in advance of expenditure. Payment in advance of expenditure should be considered on a case by case basis where there is a clear need and represents value for money.
<b><u>5.5 Full cost recovery</u></b>	
“ ”	[There is] no reference to issues such as full cost recovery.
	The phrase ‘full cost recovery’ was felt not to be plain English, and while it was clear to some groups, others did not understand what this meant. As such the principle is in the new Compact, it is spelt out more fully.
	<b>3.8 Recognise that when CSOs apply for a grant they can include appropriate and relevant overheads, including the costs associated with training and volunteer involvement.</b>
<b><u>5.6 Government Guidance and Assessing Bids</u></b>	
“ ”	<i>I would really like to see [aspects of Section 3] turned into a clear Grantmaking, Commissioning and Other Funding Code of Practice, separately campaigned for and signed up to. This could then be referred to briefly, in a single item e.g. Government and their agents will abide by the Code of Practice.</i>
“ ”	<i>It is important to make clear how bids will be assessed in relation to grants, and for contracts to set out the scoring criteria. Neither of these is covered.</i>
	It was felt that proper bid processes is adequately covered in the HMT documents ‘Managing Public Money’ and the ‘Green Book’. As such it made sense to reference these rather than duplicate them.
<b><u>5.7 Paying Invoices</u></b>	
“ ”	<i>The commitment that invoices are paid within 10 working days has disappeared.</i>
	This was removed as it was unrealistic to have all government follow this in all circumstances..
<b><u>5.8 Sub-contracting and European Funding</u></b>	
	Points 3.9 (“Ensure that prime and sub-contractors ... commit to working within the Compact”) and 3.10 (“apply the Compact when distributing European funding”) of the draft Renewed Compact were supported. These points are listed as being “under review within government” and respondents felt strongly that they should be retained in the final document.

“ ”	<i>Points 3.9 and 3.10 HAVE to be in there for this document to have any worth at all. These are key stumbling blocks and without this level of support and underpinning the smaller, more vulnerable (yet at the frontline and in direct contact with communities) VCS might as well pack up and go home now.</i>
	These points were retained and enhanced as 3.11 and 3.12.
	<b>3.11 Ensure all bodies distributing funds on the Government’s behalf adhere to the commitments in this Compact. This includes the relationship between prime contractors and their supply chains. Demonstrate how funding arrangements and financial support can allow smaller and specialist providers to play a greater part.</b>
	<b>3.12 Apply the Compact when distributing European funding. Where conflicts arise with European regulations, discuss the potential effects and agree solutions together</b>
“ ”	<i>[‘Ensure that prime and sub-contractors and all other public and private bodies distributing public money’] should include not only distributing public money but also commissioning services.</i>
	The commitment described in 3.11 also refers to commissioning.
<b><u>5.9 Private Sector</u></b>	
“ ”	<i>[The Compact should include] a commitment recognising the private sector as part of the supply chain.</i>
	Undertaking 3.11 applies to the private sector as part of the supply chain.
<b>6. CLEAR ARRANGEMENTS FOR MANAGING CHANGES TO PROGRAMMES AND SERVICES</b>	
<b><u>6.1 Ways of supporting organisations</u></b>	
“ ”	<i>Section 4 has a misleading title – it should also be about changing funding arrangements not just ending them.</i>
	The title of this section has now changed from “Minimised impact of ending funding” to “Clear arrangements for managing changes to programmes and services”
<b><u>6.2 Funding changes</u></b>	
“ ”	<i>The commitment to review programmes and services to inform future practice has been lost [from the 2009 Compact]. This has proved to be a valuable commitment in the past and should be replaced.</i>
	<p>Undertaking 3.13 covers this undertaking in a broader manner to cover all partnership working, not just specific programmes and services.</p> <p><b>3.13 Encourage feedback from a range of sources on the effectiveness of the Government’s partnership with CSOs and how successful it has been in delivering their objectives. Consider placing this feedback in the public domain.</b></p>

<b>6.3 Funding similar work</b>	
“ ”	<i>4.2 should include ‘assess the need for reallocation of funding to another organisation serving the same group.</i>
	This has now been included in commitment 4.2.
	<b>4.2 Assess the impact on beneficiaries, service users and volunteers before deciding to reduce or end funding. Assess the need to re-allocate funds to another organisation serving the same group.</b>
<b>6.4 Three Months Notice</b>	
“ ”	<i>The CFDG Risk Survey 2010, revealed that most charities would struggle to cope with less than six months notice of funding cuts.</i>
	Compact Voice tried to secure a commitment to six month funding, recognising that this would provide greater support for the sector, particularly with the threat of imminent cuts causing concern for many. However, government were struggling to commit to the original three month timeframe in the current financial climate. As such it was agreed that it would remain at three months notice in the current financial climate.
	<b>4.4 Give a minimum of three months notice in writing when changing or ending a funding relationship or other support, apart from in exceptional circumstances, and provide a clear rationale for why the decision has been taken.</b>
	Compact Voice will be working with local authorities and the voluntary and community sector, including those now tasked with increased accountability, to ensure that this important principle of the Compact is used, noting that it has been strengthened to include not only the end of funding relationships, but also changes to them.
<b>7. AN EQUAL AND FAIR SOCIETY</b>	
<b>7.1 Equality Issues</b>	
“ ”	<i>It's vital and very welcome that the Renewed Compact has retained a section about equality and diversity.</i>
“ ”	<i>We note that a number of commitments concerning equality and the earlier stages of application processes have been lost, and consider that some (at least) of them are worth retaining in some form.</i>
“ ”	<i>5.1 [should] include and recognise the requirement in law for government to carry out timely equality impact assessments</i>
	The equality section has been discussed extensively with equality organisations. It has been agreed that the key equality undertakings are integrated within the text. The Compact is also not intended to replace or replicate existing legislation found in the Equality Act.

“ ”	<i>It does not even mention black organisations. This was a priority for the last compact why has it dropped off? Why are black organisations not a priority anymore? Our situation is getting worse and it is worsened by this deletion.</i>
	Undertaking 5.1 refers to <i>people specifically protected by legislation and other under-represented and disadvantaged groups. This includes all the protected characteristics described in the Equality Act, including the BME sector.</i>
<b>7.2 Reference to Equality Act</b>	
“ ”	We would like to see 'unlawful' inserted before 'discrimination' in commitments 5.3 and 5.5. This recognises that some discrimination is intentionally lawful - positive discrimination in favour of disabled people, for example.
	This has now been included:
	<b>5.3 Take practical action to eliminate unlawful discrimination, advance equality and to ensure a voice for under-represented and disadvantaged groups.</b>
<b>8. NEXT STAGES AND CONCLUSION</b>	
	<p>We believe that through active engagement with the voluntary and community sector, the final Renewed Compact represents a significant improvement on the draft document which was issued for consultation.</p> <p>The Compact document does not exist in isolation. The accountability and transparency guide, implementation guides, and supplementary material to be published over the forthcoming months will help ensure the Compact is used, understood, and brought to life.</p> <p>With the addition of stronger accountability mechanisms, a much needed enhancement to the Compact which many have called for has been introduced. This enables people to use their Compacts – at both local and national level – more effectively. The renewed Compact enables us to stop asking <i>if</i> people are using their Compact, and start to ask <i>how</i> they are.</p>

**Contact us:**

*Telephone:* +44 207 520 2451  
*Email:* compact@compactvoice.org.uk  
*Web:* www.compactvoice.org.uk  
*Twitter:* @compactvoice

*Postal address:* Compact Voice (NCVO)  
 Regent's Wharf  
 8 All Saints Street  
 London N1 9BR  
 United Kingdom