

Consultation Response Form

This is the response form for the consultation on the green paper, *Integrated Communities Strategy*. If you are responding by email or in writing, please reply using this questionnaire pro-forma, which should be read alongside the consultation document. The comment boxes will expand as you type. Required fields are indicated with an asterisk (*).

Full details of the proposals being consulted on can be found at <https://www.gov.uk/government/consultations/integrated-communities-strategy-green-paper>.

The consultation will begin on Wednesday 14th March 2018 and will end on 5th June 2018. All responses should be received by no later than 23:45 on 5th June 2018.

To prevent losing your responses, you may wish to draft your response to the questions in a Microsoft Word document, before copying and pasting into the form.

Navigating the form

There are 14 questions in this form. You **do not** have to answer every question.

Submitting additional information

At the end of the form information is provided on how you can submit additional information or evidence to support your consultation response.

Thank you for taking the time to complete this form. Your responses will inform how we take the proposals forward.

Your details

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First name	Judith
Family name (surname)	Mudd
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Are you happy for the Ministry of Housing, Communities and Local Government to contact you to discuss your response?

Yes

Are the views expressed on this consultation your own personal views or an official response from an organisation you represent?*

Please select an item from the drop down menu:

Organisational response

Please provide the name of your organisation:

British Sociological Association Equality & Diversity Group, in consultation with research published by the online magazine, Discover Society.

If you are responding on behalf of an organisation, please select the option which best describes your organisation.*

Please select an item from the drop down menu

Other (please specify below)

If you selected 'Other', please state the type of organisation:

Charity

General Overview

The questions in this section relate to the Introduction – Building Integrated Communities.

Question 1

We define integrated communities as communities where people - whatever their background - live, work, learn and socialise together, based on shared rights, responsibilities and opportunities. Do you agree with our definition?

Please select an item from the drop down menu

Choose an item.

Please enter any additional comments below:

The BSA recognises the value of integration within society and communities. However, as sociologists we also recognise its complexity and we are concerned with the approach taken in the Green Paper. The basis for our concerns are detailed below and echo the debates around the Green Paper contained in a recent edition of Discover Society (<https://discoversociety.org/2018/05/01/focus-integrated-communities-a-response-to-the-governments-strategy-green-paper/>).

In particular we have serious concerns about how integration is defined and understood and the way that feeds into the Paper's recommendations; including how these recommendations will be achieved in practice and with what funding. Our chief concern is that segregation, integration, inequality and disadvantage are defined and discussed in terms of one type of difference – ethnicity. While the Green Paper makes some mention of gender and social class differences, ethnicity remains its primary focus. Although the objectives mentioned in the two Forewords do not specify disadvantage and inequality of opportunity only in terms of ethnic differences, the rest of the Green Paper seem to have a disproportionate focus on this.

The disproportionate focus on ethnicity means that the Paper fails to acknowledge the intersectionality of social disadvantage and inequality and how that informs societal problems. It also gives a misleading impression that ethnic groups are homogeneous and individuals in these groups only face barriers due to their ethnic backgrounds. This understanding of ethnicity risks fueling the misunderstandings that contribute to conflict in society. A wealth of sociological research is available to understand these issues in a more useful way.

Question 2

We believe that the varied nature and scale of integration challenges means that tailored local plans and interventions are needed to tackle the issues specific to particular places. Do you agree?

Please select an item from the drop down menu

Choose an item.

Please enter any additional comments below:

The BSA agrees that integration strategies should be tailored to local community needs, however it also needs to better understand how local communities come to be divided. For example, the Green Paper points out that “There are town and city neighbourhoods where ethnic minority communities are increasing in concentration with growing isolation from White British communities.” (page 12) However there is no mention about segregation of the white majority community. There is no discussion either about whether some white majority individuals are choosing not to live in ethnically diverse neighbourhoods. In other words, this segregation of white majority communities may have an equally deleterious effect on the integration of British society as the segregation of ethnic minorities. Local initiatives that start from a premise that the problem lies within one group, will make the mistake of representing them incorrectly as homogenous, further cement the idea that ‘they’ are the problem and fundamentally fail to tackle the social complexities of what is occurring in that locality.

Question 3

Do you have any examples of successful approaches to encourage integration that you wish to highlight, particularly approaches which have been subject to evaluation?

Please select an item from the drop down menu

Choose an item.

Please enter any additional comments below:

The BSA recommends that if the Government is serious about trying to positively intervene on problems of social integration it first needs to properly understand who is segregated, identify exactly why this is a problem, take account of extensive evidence about the impact of the current anti-migration discourse, and of racist harassment, on people's willingness to mix and then needs to invest in places and initiatives to encourage social connection in the long-term. The Green paper does not take account of the Government's own responsibility for creating conditions where people can mix and appears once again to lay responsibility for social problems at the door of those who have been vilified - thereby scapegoating migrants and risking further exacerbation of anti-migrant sentiment. Moreover, while the Green Paper argues that integration is the responsibility of local communities it avoids accepting national responsibility for the current discourse and for the decline in community facilities leaving impoverished local authorities and communities to do all of the work with no resources. A wealth of sociological research exists to both show how anti-immigration views can be encouraged by national as well as local discourse and also how local communities create alternative understandings of their locality.

Chapter 1: Strengthening Leadership

The questions in this section relate to Chapter 1: Strengthening Leadership.

Question 4

The Green Paper proposes that we need to build the capacity of our leaders to promote and achieve integration outcomes. Do you agree?

Please select an item from the drop down menu

Choose an item.

Please enter any additional comments below:

The BSA recognises the need to build the capacity of leaders and furthermore governments to promote and achieve integration outcomes, however a key problem is that national and local government leaders do not reflect the broad social spectrum of social background that exists within the UK. This leaves their ability to lead from a position of understanding weakened. We know that various minority and disadvantaged groups are not present in decision making roles and this is something that needs to change. Where they are present is in local community charities and organisations. Such organisations are struggling to survive in the era of austerity and the loss of that knowledge and leadership is a major risk to the goals of the Green Paper.

Chapter 2: Supporting New Migrants and Resident Communities

The questions in this section relate to Chapter 2: Supporting New Migrants and Resident Communities.

Question 5

The Green Paper proposes measures to support recent migrants so that they have the information they need to integrate into society and understand British values and their rights and responsibilities. Do you agree with this approach?

Please select an item from the drop down menu

Choose an item.

Please enter any additional comments below:

The BSA has some concerns over the Government's use and implementation of the terms rights and responsibilities, as noted in the answer to Qu.4, and British Values- or Fundamental British Values (FBV). Of particular concern is the way the focus on values is used to replace acknowledgement of involuntary structural inequalities with an individualised and blaming concern with attitudinal issues. The Green Paper endorses and promotes the idea that some minority communities are a security risk not because they are held to incite or engage in violence or activities, but because they bear the wrong kinds of values. FBV in this respect marks an easy retreat into a master signifier – that of Christianity – which operates not only as a default identity position for the nation, but in a way that becomes set against minorities from different faith backgrounds. FBV in this context represents a set of codes whose primary function is to reaffirm qualities of Britishness and national identity in a way that has specific implications for British Muslims. There is undoubtedly an implicit narrative around the threat of 'Islamic radicalism' that connects FBV, SMSC, Prevent and this Green Paper. These efforts to reify Britishness have heralded a dynamic in which the reification of Britishness occurs where the interests of British Muslims as stakeholders in both nation and national security are diminished.

Question 6

The Controlling Migration Fund was constructed to deal with the short-term migration pressures and associated costs that local authorities can encounter. Do you think it adequately achieves this objective?

No

Please select an item from the drop down menu

Choose an item.

Please enter any additional comments below:

It is clear that any impact of migration on local services should be properly recognised and catered for. Generally, migration is a benefit, but just as other demographic changes need to be planned for in the provision of education, housing and health services. Migrants make fewer claims upon welfare services than does the rest of the population, but there will be specific areas where pressures arise for local authorities. This has occurred in the context of cuts to local funding to meet these costs which the CMF in no way adequately mitigates.

Chapter 3: Education and Young People

The questions in this section relate to Chapter 3: Education and Young People.

Question 7

The Green Paper proposes measures to ensure that all children and young people are prepared for life in modern Britain and have the opportunity for meaningful social mixing with those from different backgrounds. Do you agree with this approach?

Please select an item from the drop down menu

Choose an item.

Please enter any additional comments below:

The BSA agrees that education is vital as a space within which children can interact with people from varied backgrounds and come to value different ways of living. However, the government needs to acknowledge how segregation is occurring in schools. There is not enough recognition of social inequality in both people's lives and in the funding of education in generating educational segregation. In particular the ability of white middle class families to remove themselves from diverse educational settings.

Question 8

The Green Paper sets out proposals to support parents with their choice of out-of-school education settings. Do you agree with this approach?

Please select an item from the drop down menu

Choose an item.

Please enter any additional comments below:

Click here to enter text.

Chapter 4: Boosting English Language

The questions in this section relate to Chapter 4: Boosting English Language.

Question 9

(a)

The Green Paper proposes a number of measures to improve the offer for people to learn English. Do you agree with this approach?

Please select an item from the drop down menu

Choose an item.

Please enter any additional comments below:

Whilst the BSA welcomes any support given for people to take up the opportunity to learn and improve their English there are some caveats to the Government's approach that need to be addressed.

The Green Paper uses the 2011 census and combines two different categories in the data: 'don't speak well' or 'don't speak at all'. One of the problems with relying on this data for a news story, a Green Paper and a national strategy is self-reporting doesn't necessarily produce reliable results: people might say they can't speak English very well, but the reality might be different. The data suggests the number of people who couldn't speak English at all is nearer to 138,000, that is 0.3% of the population.

Though the report outlines the numerous ways the Government supports people to participate in ESOL there is no accounting for the cuts that have taken place since 2010. According to Refugee Action, Government funding for English for Speakers of Other Languages (ESOL) in England dropped from £203 million in 2010 to £90 million in 2016, amounting to a real term cut of 60%. The link between boosting English skills and the labour market is significant but it misses other significant factors. Migrant and refugee groups have pointed out that access to ESOL would also be helped by making it flexible – many people who might like to use it can work long, unconventional hours. They might have childcare needs or need mental health support, areas that have also been cut extensively.

(b)

Do you have any other suggestions on how we can improve the offer for people to learn English?

Please select an item from the drop down menu

Choose an item.

Please enter any additional comments below:

The BSA suggests that addressing other issues that would enable people to participate in English lessons could improve the offer to learn English. For example, there is a need for greater help with childcare and with transport. A major factor would be not cutting investment to ESOL. Additionally not cutting investment in mental health and social care that could impact on a person's ability to take up the opportunity of English lessons. A further way to improve the offer for people to learn English would also be to reframe it as an offer and opportunity rather than a punitive step for some people to take to prove they want to integrate.

Chapter 5: Places and Community

The questions in this section relate to Chapter 5: Places and Community.

Question 10

The Green Paper proposes measures to ensure that people, particularly those living in residentially segregated communities, have opportunities to come together with people from different backgrounds and play a part in civic life. Do you agree with this approach?

Please select an item from the drop down menu

Choose an item.

Please enter any additional comments below:

The BSA recognises that the Green Paper makes useful suggestions about building shared communities by increasing interaction and contact between different ethnic groups. It is important to note that people do mix in their everyday lives in shops, work, neighbourhoods and shared spaces. The growing body of work on everyday multiculturalism and commonplace diversity is testament to this.

These strategies are supported by evidence that contact between individuals of different groups reduces prejudice and helps build a more cohesive and unified society. However, this strategy should be useful in reducing inter-group prejudice and bias along other dimensions – gender, age, class, disability, sexual orientation – as well. Thus it is not clear why these integration strategies are only directed at groups based on ethnicity?

If the Government are to succeed in socially integrating communities they have much to address. This would include adopting a more responsible and balanced discourse around migration, and acting against the inflammatory anti-migration, anti-Muslim, anti-refugee rhetoric in popular newspapers; and pro-actively encouraging 'white' British people to be open to 'mixing'.

Chapter 6: Increasing Economic Opportunity

The questions in this section relate to Chapter 6: Increasing Economic Opportunity.

Question 11

The Green Paper proposes measures to provide tailored support to people, especially those who may not currently be active in the labour market, to build their confidence and skills to take up employment. Do you agree with this approach?

Please select an item from the drop down menu

Choose an item.

Please enter any additional comments below:

The BSA has concerns that an individualist approach to activity in the labour market will lose sight of the multiple and cumulative impact of wider historical, structural and institutional determinants that can shape the skills, capital and agency of people that further act as barriers to, amongst other things, paid employment. The Government's approach in the Green Paper has individual responsibility and accountability at its core. The ongoing problems created by institutional racism will not be tackled by aiding people to be more confident; people's suspicion about particular organisations may be well founded. There is clear evidence of barriers racial and ethnic minorities face in having equal opportunities to education and employment and these seem more important to tackle.

Chapter 7: Rights and Freedoms

The questions in this section relate to Chapter 7: Rights and Freedoms.

Question 12

The Green Paper proposes measures to encourage integration and resist divisive views or actions. Do you agree with this approach?

Please select an item from the drop down menu

Choose an item.

Please enter any additional comments below:

The BSA recommends that the first place to start in resisting divisive views or actions is in the Government. The very visible current state policy of creating a 'hostile environment' for immigration is a powerful marker of division that sends out a deeply worrying message. The Windrush generation scandal demonstrates the lengths to which the British Government is willing to go in pursuit of its agenda. What the 'hostile environment' does is to make everyone born overseas feel precarious, including individuals and families who have resided in Britain for decades. The Government's Green Paper signifies yet another requirement for some to prove their commitment to Britain, rather than a genuine concern for making their lives in Britain better and ensuring they have the same life chances as the rest of the population, those who do not have to prove when seeking work, housing, health or bank accounts, that their presence in Britain is legitimate.

Question 13

The Green Paper proposes measures to address practices which can impact on the rights of women. Do you agree with this approach?

Please select an item from the drop down menu

Choose an item.

Please enter any additional comments below:

The BSA identifies some problems in how the Green Paper proposals identify the problems s young girls and women face. Namely:

(1) Poor mastery of the English language; (2) poor participation in the labour market (3) “negative” cultural norms that oppress women and (4) forced marriages and lack of clarity concerning marriage norms in the UK.

First, whether any initiatives to improve levels of English speaking amongst women and young girls will require increases in funding within Adult Education and also availability of resources such as childcare to make it possible for young women to participate.

Availability of good, appropriate and low cost childcare is also fundamental to women’s access to the labour market. The costs of childcare in England remain amongst the highest in the world according to the OECD. An additional problem women face, particularly women from ethnic minority backgrounds, is the quality and security of jobs available to them. A precarious, low income labour market is not a context within which the labour market can be a source of reducing gender inequality.

In relation to points 3 and 4 challenging misogyny and women’s oppression within ethnic minority communities cannot be based on an ethnicised (and ultimately stereotypical) understanding of gender inequality as a “cultural” problem. It is vital to provide victims of gender oppression and violence with the infrastructures that enable them to subtract themselves from these situations. Again the cuts that local organisations are facing who work day to day with women in difficult situations can only acerbate the problems they face.

Chapter 8: Measuring Success

The questions in this section relate to Chapter 8: Measuring Success

Question 14

The Green Paper proposes core integration measures for national and local government to focus on. Do you agree these are the right measures?

Please select an item from the drop down menu

Choose an item.

Please enter any additional comments below:

The BSA very much recognises the need for a joined up approach at a local and national government level in order to implement the correct measure to ensure cohesive integration. The BSA would stress that a pre-requisite to meeting these aims are to fully understand the diversity between and within ethnic groups, the role of white segregation and the responsibility of Governments to the rights of ethnic groups. None of which this Green Paper explicitly addresses.

Submitting additional information

You can submit your additional information to the following email address:

IntegrationStrategy@communities.gsi.gov.uk.

You may wish to compress your document into a zip file before sending, or consider using a file transfer link if it is a large document.

If you send your additional information via email, please make sure the subject says "Consultation response: additional information from [insert your name/organisation]".

Personal data

The data protection legislation is changing and a new Data Protection Act will come into force in May 2018. It will give you greater powers to protect your own privacy, and place greater responsibility on those processing your data for any purpose. The following is to explain your rights and give you the information you will be entitled to under the new Act.

Note that this section only refers to your personal data (your name address and anything that could be used to identify you personally) not the content of your response to the consultation.

1. The identity of the data controller and contact details of our Data Protection Officer

The Ministry of Housing, Communities and Local Government (MHCLG) is the data controller. The Data Protection Officer can be contacted at dataprotection@communities.gsi.gov.uk

2. Why we are collecting your personal data

Your personal data is being collected as an essential part of the consultation process, so that we can contact you regarding your response and for statistical purposes. We may also use it to contact you about related matters.

3. Our legal basis for processing your personal data

Part 2 of the draft Data Protection Bill (subject to change before it becomes an Act) states that, as a government department, MHCLG may process personal data as necessary for the effective performance of a task carried out in the public interest. i.e. a consultation.

4. With whom we will be sharing your personal data

Responses submitted using this template will be stored securely on the Ministry of Housing, Communities and Local Government's secure IT system.

5. For how long we will keep your personal data, or criteria used to determine the retention period.

Please refer to the records retention policy on our website.

<https://www.gov.uk/government/publications/departmental-records-retention-and-disposals-policy>

6. Your rights, e.g. access, rectification, erasure

The data we are collecting is your personal data, and you have considerable say over what happens to it. You have the right:

- a. to see what data we have about you
- b. to ask us to stop using your data, but keep it on record
- c. to have all or some of your data deleted or corrected
- d. to lodge a complaint with the independent Information Commissioner (ICO) if you think we are not handling your data fairly or in accordance with the law. You can contact the ICO at <https://ico.org.uk/>, or telephone 0303 123 1113.

7. Your personal data will not be used for any automated decision making.