



National Women's  
Council of Ireland  
Comhairle Náisiúnta  
na mBan in Éirinn

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Submission to the Department of Housing, Planning,  
Community and Local Government's call for views on the  
development of guidelines for the implementation,  
monitoring and review of Local Economic and Community  
Plans

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## **Introduction**

The National Women's Council of Ireland (NWC) welcomes the opportunity to submit to the Department of Housing, Planning, Community and Local Government's (DHPCLG) consultation process on the development of guidelines for the implementation, monitoring and review of Local Economic and Community Plans. It is crucial that a robust system for reporting and accountability is established to demonstrate the impact of the actions in the plans and to inform learning for reviews of plans.

NWC is the leading national women's membership organisation in Ireland. Established in 1973, it represents a membership base of over 180 groups and organisations across a diversity of backgrounds, sectors and locations and is committed to the promotion of full equality between women and men. In preparing this submission, we have considered a total of 22 LECs and have included feedback from our members garnered from our work around the country.

## **Context**

While the promotion of equality between men and women may be a stated government commitment, it's the budgetary decisions and allocation of resources that shows whether that priority is matched by spending. Women's interests are affected by virtually all local government spending not just the fraction of the budget allocated for local development and community development programmes. There is potential for a broader approach to gender mainstreaming within the local authority area as a whole and not just within the Local Community Development Committees (LCDCs). All the plans should acknowledge that women's equality is not a minority issue. There needs to be specific focus on gender equality and the way in which gender equality intersects and overlaps with other forms of inequality. In some plans, women's interests were categorised within social inclusion and can run the risk of being diluted. Plans should include positive actions to target programmes and resources to tackle inequality between women and men as well as ensuring that women and men equally benefit from existing resources and programmes.

A key concern expressed by those NWC has engaged with in their local development work has been the absence of a gender perspective in many of the Local Economic and Community Plans. We commend some plans that have sourced robust data, established baselines and named specific actions to support women such as tackling violence against women, supports for lone parents and female entrepreneurship. It is clear that where there is an established strong voice for local women's groups and a willingness and capacity to incorporate the contributions of those groups into the development and drafting processes, plans are stronger in relation to equality for women.<sup>1</sup> While many local women's groups and or groups working with women participated in public consultations for their respective plan – some who are representatives on their LCDC's and on Strategic Policy Committees – there were specific challenges with the processes of the plan development and their subsequent implementation. They are:

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<sup>1</sup> Clare, Fingal and Monaghan bring a gender perspective to their plans

1. The degree of change in a very short period of time that LCDC's and Local Authorities have been required to undertake.
2. The lack of relevant expertise in social inclusion and gender equality.
3. The speed at which the plans were expected to be developed.
4. The varying approaches to consultation and development of individual plans.
5. Weak adherence to the guidelines circulated by the Local Government Management Agency (LGMA) on the promotion of equality in the development of the plans, including equality proofing and development of an equality and human rights statement.
6. The absence of a requirement to apply equality proofing to the economic plans.
7. The lack of inclusion of targets, timeframes, budgets, and measurable and quantifiable indicators of progress across all of the plans which undermines the capacity to monitor performance and hold each LCDC accountable for implementation of actions.
8. The absence of local gender disaggregated data available to those who drafted the plans.
9. The absence in stipulations from the LGMA within guidelines to include a gender perspective (though, importantly, there was a requirement for the community element of the plan to be equality proofed).
10. Inadequate resources available to LCDCs and individual members of LCDCs to enable them to carry out their work effectively.
11. A perceived lack of legitimacy of some plans due to superficial levels of engagement throughout the consultation process.
12. The degree to which the under-resourcing of women's groups and inadequate targeting of marginalised women in local development programmes throughout the recent period of economic recession has resulted in a lack of capacity to engage in the development of the plans.
13. Not all submissions received during consultation process or workshops reports are available online;<sup>2</sup> three plans had to be requested by email as they were not available on the council website and one plan was only accessible under the enterprise section.
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15. It is important for the individual LCDCs to build in time and opportunities for reflection and include their development and progress in the monitoring and evaluation process.

### **Policy Context**

The NWCI commends the breadth of national policies and strategies referenced in many plans, included as a means of informing the shape and approach of their implementation. However, it is with serious concern that we must call attention to the omission from that list of the National Women's Strategy (NWS) 2007-2016 in many of the plans<sup>3</sup>, which acts as the primary State policy document addressing key areas of concern for women in Ireland as social and economic actors, carers, service-users and decision-makers. The new NWS, under development at present, should act as a key reference point for the implementers of the plans and in any review process to be undertaken.

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<sup>2</sup> Department of Public Expenditure and Reform Consultation Principles and Guidance, November 2016  
<http://www.per.gov.ie/en/consultation-guidelines/>

<sup>3</sup> National Womens Strategy is referenced in Kerry, Cork, and Longford LECP.

Furthermore, the Department should take into account, when developing the guidelines, the legislative implications for public bodies, including local authorities, arising from the Irish Human Rights and Equality Commission Act 2014 which confers a positive duty to have regard to, in the performance of their functions, the need to '(a) eliminate discrimination, (b) promote equality of opportunity and treatment of its staff and the persons to whom it provides services, and (c) protect the human rights of its members, staff and the persons to whom it provides services'. Public bodies are now required in their annual reports to report on related 'achievements and developments' pertaining to, for example, State obligations to prioritise the most marginalised and vulnerable in society and to ensure that women enjoy equality with men in political and public life. The positive duty applies to LCDCs, which are thus required to fulfil the obligations arising from the Act. In this context, it is important that women's participation informs implementation and any reviews of policies and programmes.

### **Implementation of Plans**

Programme actions, impact and outcomes need to be measured in terms of effective outcomes for women, particularly marginalised and socio-economically disadvantaged women. The voice and experience of marginalised women needs to be recognised and valued within the current structures. Some LCDCs have ring-fenced a seat for women's groups in their communities which is very positive. Setting a baseline at the outset of the development of the plans would help a monitoring committee in reviewing their progress. An appropriate governance structure would need to comprise representatives from both the LCDC and the Economic SPC. The Donegal LCDC has put forward a useful approach to review and monitor its plan by listing clear percentage targets to be reached on a year by year basis. Meaningful engagement by civil society is critical to the successful implementation of the plans, in particular the monitoring and evaluation dimension. Accountability and ownership should be clearly assigned to local, regional and national agencies and departments.

### **Ongoing Monitoring and Review**

The following could be useful for a monitoring and review sub group to consider;

1. How have the differentiated needs of women and men in the community been reflected in the plans?
2. What percentage of local authority resources are targeted at marginalised and other women?
3. Is there a gender balance within the membership of the LCDC?
4. What is the gender breakdown of the chairpersons of the LCDC?
5. Review the use of social criteria and clauses in public procurement processes to ensure there is a positive benefit where public spending occurs.
6. Demonstrate how targets and indicators are linked to Europe 2020 targets and the Sustainable Development Goals?
7. How will the LECP objectives fit into the development of a new National Planning Framework Ireland 2040?
8. It is important that the plan and framework are flexible and dynamic to changing circumstances at a local level.

9. There should be a requirement for gender disaggregated data in be included as part of the socio-economic profile in all reviewed plans.
10. How successful have the LECs been in engaging with civil society? The NWCI in 2016 developed a consultation checklist for LCDC's when consulting on policies and services affecting communities. NWCI provided this guide as a means of supporting members of LCDCs and relevant local authority staff in pursuit of more inclusive and equal communities. This is available at the following link:  
[http://www.nwci.ie/index.php?/learn/publication/what\\_women\\_want\\_consultation\\_checklist\\_for\\_local\\_community\\_development\\_comm](http://www.nwci.ie/index.php?/learn/publication/what_women_want_consultation_checklist_for_local_community_development_comm)

### **Measurement and Reporting of Progress**

Strategies without time-bound metrics and indicators cannot yield concrete results as accurate measurement is not possible and outcomes cannot be properly measured and understood. This leads to a poor use of scarce resources and low public confidence as they are perceived as aspirational and ineffective. Weak monitoring also results in less accountability and transparency as performance cannot be adequately measured. Effective and transparent structures which facilitate good communication and linkage between local authorities, regional assemblies and the Department must be developed to underpin robust implementation.

It may be useful to explore some international examples. The Organisation for Economic Co-operation and Development has developed a regional wellbeing web tool and this could offer a new way to gauge what policies work to achieve a better quality of life for communities.<sup>4</sup> The Carnegie Trust has also developed wellbeing frameworks and Scotland has a national performance framework.<sup>5</sup>

### **Recommendations**

NWCI's recommendations are:

1. In the implementation of local alignment policies and structures, women's equality concerns must not be segregated, but must be integral to planning processes, policy development and programme delivery across all the functions of the Local Authority.
2. Work with and resource NWCI and the National Collective of Community Based Women's Networks to lead a collaborative national level initiative to gender audit Local Economic and Community Plans.
3. An overall body or unit within the department, including representatives of the NGO sector, should monitor the Local Economic and Community Plans. Representatives of government departments, statutory agencies, should be represented on this body to ensure effective implementation of commitments and to enhance ownership and delivery. A competencies approach should be taken when deciding membership of NGOs of this body.

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<sup>4</sup> <http://www.oecd.org/regional/how-is-life-in-your-region.htm>

<sup>5</sup> <http://www.carnegieuktrust.org.uk/project/wellbeing-in-northern-ireland/>  
<http://www.carnegieuktrust.org.uk/theme/flourishing-towns/>

4. An independent mid-term review should be committed to and carried out in order to gauge the progress being made on the implementation of the commitments and actions in the plans and to identify and address roadblocks to implementation. External review and assessment is important to counter any lack of objectivity and build credibility into the achievement of the objectives of the plans.
5. Time-bound metrics and indicators which measure progress towards the agreed results and impacts must be agreed by all relevant stakeholders. These metrics and indicators must be easy to measure, understand and relate clearly to the agreed impact and qualitative and quantitative outcomes.
6. Outcome-oriented performance monitoring approach should influence the design of the monitoring framework taking into account the qualitative and less tangible nature of desired impacts and outcomes
7. The monitoring framework should have at its centre the objective of assessing the impact plans have had on effective equality
8. Engage the Irish Human Rights and Equality Commission to provide support in ensuring a human rights and equality proofing of all plans.
9. Any review of the LECP must reference the new national women's strategy 2017-2020<sup>6</sup> in terms of the significant role local government can make in advancing equality for women.
10. Support and resource the skills in the local government sector necessary to ensure participation of marginalised women and a strong gender focus.
11. Make annual implementation plans public.
12. Involve a broad range of stakeholders in inputting into the review and monitoring as a participatory evaluation tool. For example, the engagement of marginalised groups in the structures could be measured and reported on. Stakeholder workshops could be held including the experience and voice of women who need change most.
13. Expand and strengthen the functions of local authority planners who require information and analytical skills to assess whether women and men benefit equitably from particular policy and programme decisions.

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<sup>6</sup> New National Women's Strategy is currently being drafted by the Department of Justice and Equality