



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

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.

The 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 read 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. 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. Within plans there should be specific targeting of programmes and resources as well as women benefitting equally from existing resources and programmes.

A key concern expressed by those the National Womens Council of Ireland 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, plans are stronger in relation to equality for women. ¹ While many local women's groups and or groups working with women participated in public consultations

¹ Clare, Fingal and Monaghan bring a gender perspective to their plans

for their respective LECP – some who are representatives on their LCDC’s and or Strategic Policy Committees –there were specific challenges with the processes of the LECP development and their subsequent implementation.

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 LECP’s were expected to be developed.
4. The varying approaches to consultation and development of individual LECP’s
5. Weak adherence to the guidelines circulated by the LGMA on the promotion of equality in the development of the LECPs including equality proofing and development of an equality and Human Rights statement
6. The lack 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. Are adequate resources available to individual LCDC’s and individual members of LCDC’s to enable them to carry out their work effectively?
11. How legitimate are some of the current plans if they did not achieve an acceptable level of engagement throughout the consultation process?
12. The degree to which the under resourcing of women’s groups and lack of targeting of marginalised women in local development has meant a lack of engagement in the development of the LECP’s.
13. Can the current structure of the PPN support the most marginalised in communities to be represented on local government structures such as the LCDC? In 2015, a total of 11,137 community organisations were included in the County Register, of which 19.78% opted to be part of the Social Inclusion College of their respective PPN.²
14. Not all submissions received during consultation process or workshops reports are available on-line³

² National Oversight and Audit Commission Performance Indicators Report October 2016

³ Department of Public Expenditure and Reform Consultation Principles and Guidance, November 2016
<http://www.per.gov.ie/en/consultation-guidelines/>

15. Three LECPs had to be requested by email as they were not available on the council website; one LECP was only accessible under the enterprise section.
16. 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 policies named in many LECPs. However, it is with grave 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 LECPs⁴, 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 NWS should act as a key reference point for the drafters and implementers of the 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. 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 outcomes for women, particularly marginalised and socio-economically disadvantaged women. The voice and experience of marginalised women needs to be welcomed and valued within the current structures. Some LCDC's 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. Donegal LCDC have put forward a useful approach to review and monitor the LECP listing clear percentage targets to be reached on a year by year basis. We are adamant that a high level of engagement by civil society is

⁴ National Womens Strategy is referenced in Kerry, Cork, and Longford LECP.

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;

How have the differentiated needs of women and men in the community been reflected in the LECP's?

What percentage of local authority resources are targeted at marginalised women?

Is there a gender balance within the membership of the LCDC?

What is the gender breakdown of the chairpersons of the LCDC?

Review the use of social criteria and clauses in public procurement processes to ensure there is a positive benefit where public spending occurs.

Demonstrate how targets and indicators are linked to Europe 2020 targets and the Sustainable Development Goals?

How will the LECP objectives fit into the development of a new National Planning Framework Ireland 2040?

It is important that the plan and framework are flexible and dynamic to changing circumstances at a local level.

There should be a requirement for gender disaggregated data to be included as part of the socio-economic profile in all reviewed plans.

How successful have the LECPs 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

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 have 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.⁵ The Carnegie Trust has also developed wellbeing frameworks and Scotland have a national performance framework.⁶

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 and support the NWCI and National Collective of Community Based Womens 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.
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. A 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. Approach IHREC to provide support in ensuring a human rights and equality proofing of all LECPs
8. Any review of the LECP must reference the new National Womens Strategy 2017 – 2020⁷ in terms of the significant role local government can make in advancing equality for women

⁵ <http://www.oecd.org/regional/how-is-life-in-your-region.htm>

⁶ <http://www.carnegieuktrust.org.uk/project/wellbeing-in-northern-ireland/>

<http://www.carnegieuktrust.org.uk/theme/flourishing-towns/>

⁷ New National Women's Strategy is currently being drafted by the Department of Justice and Equality

9. Support and resource the skills in the local government sector necessary to ensure participation of marginalised women and a strong gender focus
10. Make annual implementation plans public
11. Involvement of 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.
12. Expansion and strengthening of the functions of local authorities' planners require information and analytical skills to assess whether women and men benefit equitably from particular policy and programme decisions.

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*An Roinn Forbartha
Tuaithe agus Pobail*

