



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

Submission in response to the Department of the
Environment, Community and Local Government
consultation on the Draft Framework Policy for Local and
Community Development in Ireland

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Introduction

The National Women's Council of Ireland (NWC) welcomes the opportunity to submit to the Department of Environment, Community and Local Government (DECLG) consultation process on the *Draft Framework Policy for Local and Community Development in Ireland* (hereafter the Draft Framework Policy).

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 consulted with our membership and their views and concerns are reflected in the following pages.

Our mission is to lead and to be a catalyst for change in the achievement of equality between women and men. Broadly, our work involves highlighting and addressing gender-based discrimination against all women with an emphasis on women experiencing multiple forms of discrimination. We have a strong track record in working with and supporting a wide diversity of women including Traveller women, lesbian women, women living with disability, migrant women and lone parents.

We collaborate closely with the community and voluntary (C&V) sector. We are chair of the National Observatory on Violence against Women, the convenor of the Women's Human Rights Alliance and of the European Network against Racism Ireland's women's subcommittee, and are a member of a wide range of networks, including the C&V Pillar. Our work involves the promotion of best practice in highlighting and advancing women's equality concerns within the C&V sector, as well as within State institutions at national and international levels.

The NWC has been funded by Pobal under the Scheme to Support National Organisations to establish 4 regional networks across Ireland to bring together women from a range of backgrounds and sectors who will identify key priority areas for focus and action at regional level. These networks will be supported in identifying means of engaging with, and feeding into policies and plans arising out of, the new local alignment processes.

In a year that sees the global commemoration of the 20th anniversary of the Fourth Beijing World Conference on Women, the Irish government is presented with the opportunity to take transformative decisions to advance gender equality and women's participation in all areas of public and private life.

Policy Context

The NWC commends the breadth of policies named under this section of the Draft Framework Policy and the multiple protection and support implications directly arising from them for government. 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, 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 Framework Policy.

Further, the Department should take into account when finalising the Framework Policy the legislative implications for public bodies, including local authorities, arising from the Irish Human Rights and Equality Commission Act 2014 which confers on them 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'ⁱ. Public bodies are now required in their annual reports to report on related 'achievements and developments'ⁱⁱ 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 Department should request and act upon support available to it from the Irish Human Rights and Equality Commissionⁱⁱⁱ and should ensure that all public bodies involved in local development and community development act to embed good practices in fulfilment of those responsibilities pursuant to this legislation into their daily operations.

Evolution of Local Development and Community Development in Ireland

Despite initial elucidation of the distinct histories of local development and community development, important as a means of recognising their interconnected and mutually influencing relationship, appropriate distinction of identities is not consistent throughout the document. It is the view of the NWCi that this Draft Framework Policy must have as its base line an understanding of the separate yet complimentary principles, roles, tasks and processes of local development and community development. The NWCi believes the term 'Local and Community Development' utilised by the DECLG to be misleading and not reflective of the significant differences between the two approaches. They should therefore be referred to separately as 'local development and community development'.

In addition, the Draft Framework Policy lacks a clear and comprehensive definition of community development that includes the most challenging aspect of its function, which is to act as a critical voice and employ collective action to bring about positive and, where needed, radical social and structural change.

Overemphasis is placed in the document's description of community development on service provision, despite the explicit recognition in the *White Paper on a Framework for Supporting Voluntary Activity and for Developing the Relationship between the State and the Community and Voluntary sector*, still the official policy of the DECLG, that "we have moved far beyond the attitude that statutory agencies fund voluntary organisations merely for utilitarian reasons, i.e. to provide services that the State cannot or will not deliver directly itself because of resource constraints."^{iv}

The Framework Policy should seek to draw on the principles of the White Paper, principally those that assert the importance of autonomy and independence and acknowledge that work to achieve equality needs to be independent and autonomous of the structures in society that can and do perpetuate inequalities.

The DECLG should utilise the definitions provided within *Towards Standards for Quality Community Work: An All-Ireland Statement on Values, Principles and Work Standards (2008)*^v, a document developed in consultation with relevant communities and groups by the Community Workers Co-op. The CWC recommends the following definition, which the NWCI wholly endorses:

Community work or community development involves a long term process of analysis of social and economic situations and collective action for change in favour of those who benefit least from national and global social and economic developments based on that analysis. It is centred on a series of principles that seek to go beyond consultation to participation and beyond capacity-building to consciousness-raising and empowerment. It recognises the changing and often hidden nature of the structural inequalities based on 'race', class, gender and disability, to name but a few. It seeks to be transformative rather than conforming and empowering rather than controlling. It seeks to challenge the causes of poverty and disadvantage and to offer new opportunities for those lacking choice, power and resources.

In pursuit of an appropriate definition of local development, which sufficiently considers its inevitable and potentially positive impact on society, the NWCI refers the DECLG to a description provided in a 2010 study commissioned by the Directorate General for Regional Policy of the European Commission entitled *Cohesion Policy Support for Local Development: Best Practice and Future Policy Options*, which states:

Local development initiatives are sometimes defined as area-based integrated strategies mobilising a large number of local stakeholders using specific methods, such as partnership. This definition focusing on the inputs is correct, but incomplete; it has also to take into account the explicit objectives pursued by the strategy (outputs) which are crucial for the local partners, specifically in terms of socio-economic results and better living conditions. It has to include the developmental dimension of the strategy, with its long term objectives and the structural change that can be achieved (outcomes)^{vi}.

While we note the DECLG's recognition of the role that women's groups – including those concerned with Traveller rights, migrant rights and disability rights – have played within the community development sector, and vice versa, there is a distinct absence of any reference to the future role of women's groups elsewhere in the document. There is no acknowledgement within the document that much of the community work underway in Ireland today is done by women with women. The Framework Policy must recognise that women's equality is not a minority issue, but that the rights and needs of women cut across all sections of society. The NWCI considers community development to be a key strategy to facilitate marginalised and socio-economically disadvantaged women to enjoy full participation in public

life and address inequality, and the final Framework Policy must include an explicit commitment to this end.

Further, 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. In the new context of the alignment of local development and community development with local government, community-based projects concerned with disadvantaged women's equality should, as with the broader community development sector, maintain their independence and autonomy while remaining closely linked to the alignment structures.

To ensure both outcomes, it is essential that the National Collective of Community-based Women's Networks (NCCWN), which has a proven track record of reaching and supporting marginalised women's empowerment and has mechanisms in place to facilitate active representative participation, retains its distinct funding. The projects associated with the NCCWN operate from an approach that is informed by feminism and community development. Both approaches recognise that women experience oppression on the basis of their gender that is often compounded by other forms of systemic and systematic oppression and discrimination. They also facilitate work to empower marginalised women to fully participate economically, socially and culturally in society. Activities of local authorities and local government structures aimed at improving the lives of women and progressing equality for women in Ireland (whether explicitly or implicitly) could benefit from actively engaging with the NCCWN and NWCI when planning, developing and implementing plans, policies and programmes. This applies in particular to budgets setting and the drafting of Local Community Development Plans.

The Current Landscape

While the Draft Framework Policy details the political and policy landscape from the perspective of the current government, the document provides no rigorous assessment of the social and political context in which communities find themselves. No evidentiary data is provided to acknowledge the degree to which the recession and subsequent austerity measures have plunged communities into deeper poverty and social exclusion. Evidence shows that it is those on the lowest incomes who have shouldered the greatest losses under austerity. According to the OECD 2013 report *Crisis squeezes income and puts pressure on inequality and poverty*, "focusing on the top and bottom 10% of the population in 2007 and 2010 shows that lower income households either lost more from income falls or benefited less from the often sluggish recovery"^{vii}.

The Department of Social Protection's Social Impact Assessment of the main welfare and direct tax measures in Budget 2015 states that, 'the distributive impact is uneven, with higher than average gains for better-off quintiles. Middle and lower income quintiles gain less than the average, with the smallest gain in the bottom quintile.'^{viii} The 2013 CSO *Women and Men in Ireland* report tells us that while 41.8% of men earned under €20,000 in 2011, more than half (50.3%) of women were in this category^{ix}. Sectors where women workers predominate, such as retail and hospitality, are at the frontline of aggressive

casualisation of labour conditions, leaving unacceptable numbers in part-time precarious work. The CSO 2013 Survey on Income and Living Conditions (SILC) also found that the rate of consistent poverty has almost doubled to 8.2%. TASC's *Winners and Losers? Equality Lessons for Budget 2012* report suggests that women are concentrated in the lower income groups and consequently, changes to taxes and benefits that disproportionately impact on low-income groups can also be expected to disproportionately impact on women^x. These outcomes for women are, of course, compounded by the particular circumstance disproportionately affecting women. The CSO SILC found, for example, that 63% of lone parents are experiencing deprivation; according to lone parent family support organisation OPEN women head the vast majority of one-parent families (87%)^{xi}.

However, the Department must be cognisant not to place undue emphasis on economic recovery within the final Framework Policy to the detriment of social justice, cohesion, equality and the prioritisation of the most marginalised and disadvantaged. Economic security and development are key to providing women with independence and autonomy, but without the appropriate planning, processes and implementation they are at risk of further marginalising already deeply disadvantaged communities.

Women are frequently doubly disadvantaged by policies that do not recognise their different realities and lived experiences, including unequal pay, responsibilities at work and home, and gender-based violence^{xii}. Ireland still has a deeply gendered division of care within families and the lack of affordable, accessible childcare is still one of the greatest obstacles to women's equal participation in the workforce and in political life. NCWI notes with concern the lack of attention in the alignment documentation to the issue of gender-based violence. This is of particular concern in a project that aims to address social exclusion. The prevalence and impact of domestic, sexual and gender-based violence (DSGBV) makes it a key contributor towards poverty, social exclusion and, indeed, long-term unemployment, as well as being a root cause of many other ailments in our communities such as physical and mental ill health, parenting issues and participation in the workforce and in society. The recession and austerity measures have increased barriers to safety and security for women and their children. Without due regard for the needs for programmes and supports aimed at creating the necessary conditions for women to fully participate in public and private life, communities will be burdened with deep-seated social exclusion and stunted development.

Community projects that work with women, groups like NCCWN's members, have been pushed to breaking point by persistent cuts to their own funding as well as stark reductions in public financing of essential supports like shelters and crèches, in turn putting greater demands on community support programmes. The community development sector is undergoing a process of dismantling, with funding slashes, threats to its independence and autonomy, and replacing funding that has been hitherto grant-aided to community development groups and voluntary organisations with tendering processes that have forced communities to compete against each other to remain in operation. Those working in community development cannot guarantee that the much-needed programmes they are currently undertaking will continue long enough to achieve the outcomes to which they commit. The invaluable work recognised in the White Paper and again in this Draft Framework Policy is becoming unsustainable.

It is important that not-for-profit organisations that not only provide services, but also make a wider social and economic contribution within their communities, including in some cases, through an advocacy role, should be protected and supported rather than undermined by national procurement process. Specific measures should be put in place to support this and to ensure that community and voluntary organisations are not disadvantaged in terms of the procurement processes, including through the active use of social considerations, criteria and clauses.

Community development projects are working at such low capacity that they are barely surviving, unable to carry out the full range of functions inherent to the community development approach – including research, needs assessments, advocacy and policy influencing. Many of those working in the community development sector are living with the constant threat of job losses and colleagues have had to step into the posts of those already redundant. Where public money is spent, it is absolutely essential that decent work, equality and wider benefits to the community be explicitly reflected and satisfied at all stages of the procurement process.

Any Framework Policy on community development must recognise that communities' voices, including women's voices, have been excluded from dialogue around the future of local development and community development. The implementation structures established have not been publicly critically evaluated by the State, pilots were run without being assessed, and while much continued confusion and dissatisfaction has been expressed by non-State stakeholders, little effort has been made to rectify clearly identified problems. Because these structures were created prior to the Draft Framework Policy being written, the document must now be developed to fit the means of its implementation, rather than the other way around.

The implications of not building a strong, effective, vibrant community development sector and equal, just, inclusive and empowered communities have not been – and must be – addressed in the final Framework Policy.

Vision

The vision outlined in the Draft Framework Policy is comprehensive and in line with the community development ethos, however key principles have been omitted.

Principles which must be included if the final Framework Policy is to be coherent and wholly inclusive are:

- A specific, explicit focus on women's social, economic, cultural and political equality and, in particular, the equality of marginalised women needs to be an *overarching and underpinning* principle of all the structures, functions and programmes associated with the alignment process.
- A rights-based approach must be applied where State representatives as duty-bearer would recognise its obligations and accountability under international human rights law to protect, respect and fulfil the inherent rights of the population, including through empowering rights-holders to know their inherent entitlements and providing for active participation in decision-

making processes. The right-based approach also requires the prioritisation of those experiencing greatest levels of vulnerability and marginalisation in society. The persistent use of the terms 'citizen' is inappropriate and excludes some of the most marginalised in Irish society.

Objectives

Among the objectives outlined in the Draft Framework Policy that are welcomed by the NWCI are:

- A recognition of the need to “develop the resources and skills available within local government and local and community development organisations and to facilitate meaningful collaborative work at local level”. The NWCI is eager to work at a local government level, particularly with the Local Community Development Committees, to provide training in gender mainstreaming, gender budgeting and gender impact assessment.
- Commitments to utilise community needs analyses and various participatory approaches outlined in developing Local Community Development Plans. In addition to this, ongoing gender impact assessments are also needed.

However, the NWCI is concerned at a lack of clarity in relation to the objectives of the Draft Framework Policy overall. It is essential that the document contain very clear goals which are targeted, time-bound and attached to measurable outcomes and outputs.

Some particular areas of concern are as follows:

- The Draft Framework Policy does not set out priorities despite asserting otherwise and the Alignment Steering Group's specific recommendation that “a national Local and Community Development Policy should be developed [which] should sets out national priorities and a framework for the realisation of a cross-government approach at local level.” The document does, however, commit government to identifying national priorities at a later date.
- The objectives, as outlined, do not provide any indication of what is expected to be achieved, but rather how the State intends to work at local government level. They are not specific or measurable or time-bound and therefore will be difficult to monitor, implement and achieve. The commitment to “monitor and review this framework for local and community development in regard to the realisation of a whole of government approach” is welcome, though an elucidation with regard to how this will be carried out is essential.
- In order to achieve the stated objective to “support local and community development sectors in mobilising community participation and engagement with local planning processes”, the community development sector, including women's groups, will require significantly increased resources and support. The degree to which both are required appears to be significantly underestimated in the document.

Recommendations

The NWCI acknowledges that the principles and general tone of the Draft Framework Policy provide a good foundation for a dialogue on the future of local development and community development in Ireland. However, NWCI has a number of concerns in relation to the Draft Framework Policy in its current guise which must be addressed in order to secure a viable future for communities across Ireland, in particular marginalised and disadvantaged women in those communities:

NWCI's recommendations to the DECLG are:

1. The final Framework Policy must reference the *National Women's Strategy 2007-2016*. Importantly, the policy must make an explicit commitment to women's equality, with a particular focus on marginalised and socio-economically disadvantaged women.
2. Representation of all women, and particularly women in disadvantaged or marginalised communities, must be incorporated into all stages of policy development, planning and programme delivery. All policy/steering groups responsible for decisions on community development and local development – including Local Community Development Committees, Strategic Policy Committees and the proposed National Policy Group on Local and Community Development – should achieve a 40% quota of women representatives who can contribute an equality lens that takes into account the requirements of women living in poverty or social or geographic isolation. This should be achieved by making concrete national commitments on composition, function, terms of reference and standing orders of those committees and groups.
3. All the structures, functions and programmes associated with alignment need to be informed by a gender and class analysis and have a specific focus on addressing the causes of women's economic, social and political inequality. This means that programme outcomes need to be measured in terms of *outcomes* for women, particularly marginalised and socio-economically disadvantaged women. In addition, the *impact* of programmes and actions on women need to be measured. Gender and class proofing will be key tools to achieve this.
4. To create access and opportunity for women's participation requires that facilitation of childcare and other caring responsibilities are embedded into the operation of all structures. Particular note should be taken of the fact that women may need to be reconnected with democratic processes, and models such as the Women's Manifesto Project (an innovative programme from Longford Women's Link) should be explored, adapted and developed.
5. The final Framework Policy must be based on a clear and comprehensive definition of community development. This definition must address the ability of community development work to achieve social change. The policy needs to be informed by the principles espoused by the community development sector in Ireland articulated in *Towards Standards for Quality Community Work*, principally participation, empowerment and a focus on collective action.
6. There must be a recognition of legitimacy of the sector as an independent voice for change and of community work as a means to address social exclusion and inequality.
7. Not-for-profit organisations should be protected and supported rather than undermined by national procurement processes by embedding specific measures such as social considerations, criteria and clauses.

ENDNOTES

ⁱ Irish Human Rights and Equality Act 2014, Section 42, Subsection 1

ⁱⁱ Irish Human Rights and Equality Act 2014, Section 42, Subsection 2

ⁱⁱⁱ Under Irish Human Rights and Equality Act 2014, Section 42, Subsection 3

^{iv} http://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&ved=0CB4QFjAA&url=http%3A%2F%2Fwww.viron.ie%2Fen%2FCommunity%2FCommunityVoluntarySupports%2FPublicationsDocuments%2FFileDownload%2C26791%2Cen.doc&ei=OM4nVbqsMNPraLGxgdAO&usg=AFQjCNGsn2aYNuEjH_usH18xODJDg0kq2A&bvm=bv.90491159,d.d2s&cad=rja

^v <http://www.cwc.ie/2010/09/towards-standards/>

^{vi} http://ec.europa.eu/regional_policy/archive/consultation/terco/cp_support_local_dev_en.pdf

^{vii} <http://www.oecd.org/els/soc/OECD2013-Inequality-and-Poverty-8p.pdf>

^{viii} <https://www.welfare.ie/en/Pages/SocialImpact2015.aspx>

^{ix} <http://www.cso.ie/en/releasesandpublications/ep/p-wamii/womenandmeninireland2013/socialcohesionlifestyleslist/socialcohesionlifestyles/#.VSfb3JNmp8A>

^x <http://www.tasc.ie/publications/winners-and-losers-equality-lessons-for-budget-201/>

^{xi} <http://www.oneparent.ie/our-families.html>

^{xii} <http://www.swbg.org.uk/gia.html>