Irish Local Development Company

response to the

Department of Environment, Community & Local Government

Draft Framework Policy for Local & Community Development in Ireland

April 2015

Introduction

The Irish Local Development Network (ILDN)[i] welcomes the opportunity to submit feedback on the Draft Framework Policy for Local & Community Development. In this paper we set-out our vision for Local and Community Development and show what framework needs to be put in place to support this vision and ensure capacity building at all levels. We will assess the impact of tendering on community programmes and will outline the considerations that need to be addressed when making investment decisions. We also include a number of policy documents that we believe should be referenced in order to better inform the framework for Local and Community Development.

Community Development

The definition of community development on page 5 of the draft framework document alludes to it being a distinctive approach but the document does not discuss the principles of Community Development or how this approach is reflected in the framework. Overall it would appear that while Community Development is used throughout the framework, it is more of a term of describing work at community level, rather than a methodological approach to community work.

Truly integrated and effective delivery of services (if this is what the community identifies as a necessary response to issues raised) must go beyond the bolting together of similarly themed plans and actions and confront the necessity to share resources and decision-making across agency boundaries. This is the responsibility of national and local government and is a by-product rather than the sole objective of 'Local and Community Development'.

In this respect, the framework policy appears to vacillate in its objectives between providing a framework for community development and achieving more effective service delivery. A clue might lie in the line in the section on 'the current landscape' which states that '*the framework policy seeks to support and enable the key national objective of economic development, through action at the local and community level*'. Notwithstanding the importance of economic development in disadvantaged areas, social development and inclusive participative democratic processes are the ultimate goal of community development but are largely absent from this document.

Community Development is predicated on collective action, social justice, promotion of equality, participation, representation, inclusion, acceptance of diversity and is needs led. It is integral that the voice of those most disadvantaged is heard and supported to be heard. Empowerment of communities happens through genuine participation and involvement in decision making at all levels.

With this in mind, the community sector needs to be supported and resourced as part of civil society, as an independent (and sometimes contrarian) voice, rather than as a 'subject' of statutory agencies to be included in consultation and planning exercises, the outcomes of which are poorly monitored and dependent on the implementation practice of individual agencies. Therefore we must ensure that engagement processes allow evidence to come to the fore and decisions to be reached in an agreed and transparent manner, which are not only fair and balanced, but are made in the interest of the common good, for present and future generations.

The Vision (pg. 13) of the framework document refers a lot to promoting participation in decision-making and in public life. But local and community development is not all about this. It is also about being able to improve the everyday quality of life of individuals, families, children, older people etc. by being able to provide innovative and *flexible* supports/services within communities by empowering communities to identify and respond to their own needs.

Models of Community Development

In many instances, prominent models of community development, such as the Men's Sheds movement, emerge organically as a response to a particular set of circumstances within communities, rather than as an outcome of a policy initiative. However, in recent times there are examples of effective collaboration between the State and community and voluntary organisations such as the Traveller Primary Healthcare Project, Saorview Digital Outreach and Social Finance funding through operators such as Clann Credo and UCIT, and activation through FIT Fastrack to IT. The key features of the success of these initiatives are a vibrant community and voluntary sector based on a bottom up approach and complemented by an enabling policy framework and adequate funding streams. Reciprocity between community and voluntary organisations and State in these examples has led to tangible positive outcomes for communities without compromising proper accountability.

Local Development

There is a need for the implementation of a coordinated approach to socio-economic disadvantage. This should be driven by local partnership structures, with an acceptance of their contributions locally and their experience in the field. A more focused methodology structure for capturing and evaluating and supporting this work is needed. This structure could be supportive in addressing future local needs in a relevant and flexible manner while acknowledging those LDCs are most answerable to e.g. the individuals and communities they work with.

Community-Led Local Development (CLLD)

According to the European Commission (EC) in 2014; "*Community-led local development is a method for involving partners at local level including civil society and local economic actors in designing and implementing local integrated strategies that help their areas make a transition to a more sustainable future. EC believe CLLD can be a particularly powerful tool, especially in times of crisis, showing that local communities can take concrete steps towards forms of economic development, which are smarter, more sustainable and more inclusive, in line with the Europe 2020 Strategy*".[ii]

ILDN endorse this EC definition and welcome the reference in the framework document to the wider use/expansion of the CLLD model across a broader range of EU funds. We note however that under the European Structural and Investment (ESI) funding element of the Social Inclusion and Community Activation Programme (SICAP), it was decided that the CLLD approach would not be adopted which we see as a lost opportunity.

Institutional framework to support Local and Community Development

In the interface between the state, the local development sector, local authorities and local communities, there must be an open, transparent dialogue and interface in order to support capacity building at all levels. There must also be a belief in the concept and principles of community development within these structures.

Development supports, such as training and capacity building, must be put in place for elements of the community that are most disadvantaged to allow them to have an equal footing in these structures. Educational supports must also be given to those who represent the statutory sector and the needs of those who are most marginalised, to allow for equality and meaningful participation.

In relation to the National Policy Group on Local and Community Development (NPG) referenced in the framework document, safeguards are needed within its membership to ensure that the process is balanced, and to establish a strong connection based on trust between the top and bottom tiers. The Irish Local Development Network (ILDN), as the representative body of Local Development Companies, is requesting representation on the NPG, as we believe we can have a strong representative and coordinating role in the group. We also have strong relationships with those on the ground, and can consult with those most disadvantaged, in order to identify priority needs.

In the section of the draft framework document that gives the historical background to the origin of LDCs (pg. 7), when it talks about bodies that are central to community-statutory partnership today (pg. 8), organisations such as Family Resource Centres, Childcare Committees, Traveller Support Groups etc. are listed. However LDCs and Community Development Projects are not listed.

Local Authorities (LAs) are, throughout the framework, the only real named and recognised mechanism for input and delivery. However, Measure 4.4 states that the LA will work with local community and development bodies to _develop a local vision_ _in line with national priorities_. This presents a challenge as there can often be very real discrepancies between local needs and national priorities. The bottom-up approach, which we identify as one that gives all stakeholders an equal voice in the formation of policy, strategic investment, programme design and implementation, is at the core of Local and Community Development processes and this needs to be recognised in the framework document.

The Framework does not outline how LCDCs will be funded.

Tendering of community programmes

Competitive tendering of community development programmes is at odds with the objective of supporting the development of strong and sustainable communities and promoting social change through citizen engagement and participation.

In practical terms, the relationship between the provider of a 'community development service' (itself a contradiction in terms) and those living in disadvantaged areas needs to be based on mutual respect, recognising and building on strengths and social solidarity.

It cannot be driven by profit and the achievement of numerical targets divorced from the process of change itself. Social and economic exclusion has developed over a long period of time in the Irish state and must be tackled with a long-term approach that acknowledges the importance of developing relationships based on trust, knowledge and experience.

This will be impossible if Community Development programmes are subject to frequent and regular tendering, potentially resulting in a succession of delivery agents and the requirement to continuously 'start from scratch' in terms of building relationships with disadvantaged communities. This approach will lead to a disconnect between prescribed outcomes and the reality of how individuals and communities behave, and what their needs are.

Tendering and the privatisation of community development has a knock on effect to the delivery of a needs led community development programme. It shifts the focus from building capacity and resilience in communities in order to identify needs themselves and develop actions based on these needs which leads them to becoming empowered to take ownership of initiatives, to focusing on the fulfilling of the national targets to ensure the contract is met. This will result in a short-term focus based on service provision with insufficient emphasis on building long-term community resilience.

Tendering undermines organically developed community activity and will result in the loss of tried and tested models of development in practice. It will result in increased bureaucracy, uncertainty for communities and possible delays in programme delivery.

In conclusion, it will make it impossible for community development programmes to have a true bottom up approach. The programme priorities will have already been set at a national level before the 'Invitation to Tender' has issued. The experience of Local Development Companies in the tendering of SICAP is evidence of this.

Funding and investment

There are a number of considerations to be made when making local and community development investment decision. While investment decisions should be evidence based and designed to consider the long-term impacts for communities rather than short-term outcomes for individuals, flexibility must also be given to communities to address local issues in innovative and creative ways. Development models should be included which respond to community needs rather than relying on mainstream services that are becoming overstretched and may not meet the needs of a diverse society. These needs should be identified locally and how funding is invested should be based on the particular needs in that area.

All funding streams within the LCDC area should be allocated in a transparent and accountable manner and all agencies should be charged with working collectively to identify where the resources might be best spent. Cognisance of Local Development Companies and their on the ground work should be given due consideration also.

Larger targets coupled with reduced budgets makes supporting communities very difficult. Resources for 2015 are allocated on figures from 2011 Census, and in some instances this data is out

of date, and many areas and groups are outside the scope of SICAP targeting as a result, as they are not in areas of deprivation based on Pobal Maps.

There is no consideration given to the fact that many Local Development Companies (LDCs) in rural areas have large geographic areas to cover, some of which are sparsely populated but score high in deprivation. The budget cuts do not take into account rural proofing. Therefore there is a need for all plans to be integrated and for the most up-to-date information to be made available and used to identify the issues faced in each catchment area.

Monitoring and evaluation

Monitoring and evaluation is important to all funding programmes. Community and local development is no different. However, the monitoring and evaluation system should not be developed in such a way that it can only monitor outputs and outcomes that are pre-determined at national level. This erodes the bottom-up approach of community-development. The monitoring and evaluation systems must be able to monitor local objectives, outputs and outcomes.

One of the key points under Objective 5 (Monitoring and Evaluation) is that "*systems must be in place to monitor and measure performance, assess the impact of interventions & facilitate decision making regarding the allocation of resources*". The priority here seems to be about resources and quantitative outputs rather than community level change or benefit. Overall, this framework has a strong economic focus and it would seem to be weighed as heavily (if not more so) than community development.

In terms of monitoring and reviewing, there is no discussion as to how this will be monitored to determine its effectiveness/ appropriateness of communication etc. for the community.

Policy Context

In relation to the 'Policy Context' for the framework document (page 3-4) the policies named are very varied and include some which seem to be outside of the scope of this framework. We have however, identified the following policy documents that we believe should be included to further inform the framework for Local and Community Development:

- The Planning and Development Acts 2000-2011

- The National Spatial Strategy 2002 – 2020

- SmarterTravel: A Sustainable Transport Future 2009 – 2020 DTTS

- Report of the Next Generation Broadband Taskforce 2012 DCENR

- The Commission for the Economic Development of Rural Areas (CEDRA) report

- National Women's Strategy 2007-2016

General observations

- Objective 3 acknowledges that capacity building should take place in advance of community based planning and that there needs to be a commitment from all parties to engage with the process. However, the objective does not outline a measure in terms of how this will be done or by whom. Also, when discussing resources it is consistently in the context of <u>available</u> resources. There is no discussion about input to allocation of resources for specific priorities etc.

- The challenges and changes in funding seem the main context for reflection in the opening sections. It also seems to ignore the fact that the cuts in funding have been due to government policy over the past 7-8 years.

- The document – "a framework policy" is not actually a policy.

- Pg. 9 refers to the local and community development sectors continuing to influence policy makers however we don't see evidence of this still being the case.

- Pg. 10 outlines the three main aims of the European Commission's proposals for Cohesion Policy – i.e. bottom up, capacity building, community ownership. However, this is not being supported at national policy level anymore.

- On pg 11, there is reference to the fact that a 'one size fits all' model is not effective. However, that is now what we have.

- Pg. 11 3rd paragraph clearly identifies this framework within the context of **economic** development, not social inclusion, or local and community development.

- The framework document is missing Local Development Company (LDC) in its list of acronyms.

- We are very cognisant of the Europe 2020 strategy and believe that the framework must be bound in line with this strategy.

Conclusion

The draft framework is clearly developed within a context determined by national economic priorities. It refers to bottom-up principles and approaches, but then in other places, it clearly refers to local priorities having to align with national priorities. No thought has been given to what happens if local needs differ from national policy.

Any reference to bottom-up approaches and local flexibility completely within the draft framework contradicts recent experiences in this sector, particularly in the case of SICAP. SICAP, it can be argued, is a top-down programme with no room to adapt it to meet local needs and priorities.

The distinction in the draft framework document between community development and local development creates an artificial divide which does nothing to progress the policy environment and is not reflective of practice. Both are based on a common set of values and principles and fall under the umbrella of sustainable development. This needs to be acknowledged in future drafts of the framework for Local and Community Development.

While the Government should not seek to control and be involved in every aspect of voluntary activity, it does have a responsibility to provide an enabling framework to help the sector. While this involves direct supports, a delicate balance must be struck between having a relatively light regulation and maintaining proper accountability (Government of Ireland, 2006).[iii]

We would welcome the opportunity to give feedback on future drafts of this draft framework policy for local and community development in Ireland.

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The Irish Local Development Network (ILDN) is the representative body of Local Development Companies (LDCs) in Ireland. LDCs are non-profit organisations that deliver a range of programmes that tackle poverty and social exclusion, assist enterprise creation, support the long-term unemployed and offer education and training supports.

LDCs work in partnership with a number of government departments and agencies including the; Department of Social Protection, Department of Environment, Community & Local Government, Department of Education & Skills, Department of Children & Youth Affairs, Department of Transport, Tourism & Sport, and the HSE.

An example of some of the programmes delivered by the 50 LDCs include but are not limited to; the Social Inclusion & Community Activation Programme (SICAP) previously the Local & Community Development Programme (LCDP), the Rural Development Programme (LEADER), Tús, the Rural Social Scheme (RSS), Jobs Clubs, the Back to Work Enterprise Allowance (BTWEA), Rural Transport Programme, Healthy Food Made Easy, CE & JI Schemes Local Employment Service (LES), Local Training Initiatives (LTIs), Family Support Programmes, Suicide Bereaved Programme, Immigrant Integration Programme, and Women of the World Programme, as well as many more enterprise, training, activation, educational and community supports. These programmes are delivered using the community-led, bottom-up approach that has been recognised as best practice at an EU level.

A range of the work undertaking by LDCs can be found in ILDN's recent publication: Local Development Companies Combating Poverty & Social Exclusion

[ii]

Guidance on Community-led Local Development in European Structural and Investment Funds, Version 3: June 2014

[iii]

http://oireachtasdebates.oireachtas.ie/debates%20authoring/debateswebpack.nsf/takes/dail2009012900087?opendocument