



ILDN Submission of May 5th 2017

Re. SICAP 2018-2010

To

Catherine Byrne TD,

**Minister for Communities and the National Drugs Strategy,
Department of Housing, Planning, Community & Local Government**

Key Recommendations

1. Adopt a Community-Led Local Development Approach
2. Enhance the programme's capacity for local flexibility and encourage innovation
3. Broaden the understanding of Social Inclusion
4. Incorporate Thematic, Area-Based and Life-cycle approaches
5. Link the outcomes of the programme to cross-Government commitments to tackle poverty and social exclusion
6. Widen the current monitoring framework to assess impact of the programme across goals and individuals
7. Provide adequate funding to the programme
8. Put in place a modified Resource Allocation model
9. Review commissioning model to ensure continuity of delivery to disadvantaged community and individuals

Introduction

The current Social Inclusion Community Activation Programme (SICAP) is the primary social inclusion programme of Government. It has provided a structured approach and a dedicated funding stream to support inclusion focused action. Through SICAP significant, effective and excellent work has been enabled and undertaken to date.

In representing 46 organisations that deliver the programme, ILDN has a detailed understanding of the strengths and weaknesses of the programme and how it has impacted on the communities and individuals that it serves. ILDN offers its recommendations for the SICAP successor to help to bring about the optimum design and delivery of a programme that can address some of our most intractable inclusion issues and do so in a manner that is fair in its resource allocation and offers value-for-money.

Our understanding of these issues has been developed, not only through the operation of the programme by our members but also through the sharing of information, best practice and research throughout the ILDN network prior to and during the operational period of SICAP. We also maintain a dedicated Research & Evaluation Committee who review the operational and impact aspects of the programme on a regular basis. Programme monitoring is also a prescribed agenda item for meetings of the six ILDN Regional Groups, the ILDN Social Inclusion Committee, ILDN Administrators Forum, the ILDN Board and the ILDN National Council.

Current Programme

In briefly addressing the current programme, ILDN acknowledges its many successes. In planning for a successor programme, the following general aspects need to be addressed as the programme has been 1) overly-prescriptive and top-down, 2) not locally responsive 3) too limiting in its definition of the problem of social exclusion and ways of addressing same and 4) significantly under-resourced.

Overly-Prescriptive

To date, SICAP has been a pre-designed programme with prescribed targets. This top-down approach has positioned local groups solely as sub-contractors to the State and not as partners in programme development and delivery. This significant change of dynamics has been counterproductive to the overall objectives. Whilst we welcome robust oversight, our

members' unique experience in social inclusion design and delivery can to used more effectively.

Not Locally-Responsive

A one-size-fits-all approach has not worked for all or our communities and target groups. Local identification of needs and solutions, albeit in a national framework, is necessary to facilitate local motivation and innovation. If needs and solutions are externally-identified, local participation, commitment and buy-in suffers.

Too Limiting in Defining the Scope of the Work

SICAP has squeezed the definition of the social exclusion problem, focussing on labour market problems, and this has had an inevitable impact on the scope of solutions. If SICAP 2 is to be a true social inclusion and community development-led programme, it must take a more holistic approach to the identification of social inclusion needs and solutions. LDCs can address wider socio-economic and cultural issues pertaining to exclusion with as much capacity as they currently bring to activation. Addressing these areas ultimately supports activation in the medium and longer term. Our long experience with those most distant from the labour market demonstrates both the value of and the need for pre-development work prior to activation but this work must be given sufficient weight and resources within a social inclusion programme.

Significantly Under-Resourced

There have been very significant cuts to social inclusion programmes in recent years. The 2017 annual budget of €37.5m² is the culmination of successive cuts and is just 44% of the 2008 LDSIP budget of €84.7m. This requires restoration or significant reversal.

² *Vote 34, Subhead D.4 for 2017*

Recommended Key Principles for SICAP 2

Integrated Approach

An integrated approach to complex needs requires community development processes and practices in conjunction with focused activation measures in the SICAP 2 Framework. The wider focus should include challenging and addressing structural inequality, disadvantage, discrimination and cultural erosion as well as immediate labour market disadvantage.

A community development model needs to be adopted across all goals of the programme and not just Goal One, and should underpin how individuals and groups are engaged with. Horizontal themes need to be further embedded and play a greater role in the programme.³

A Local Response to Local Needs

Whilst a national framework and objectives are necessary, the new programme should support an area-based approach that encompasses meaningful local input and identification of needs and responses, resulting in properly targeted local interventions based on collective action. Coupled with this, there needs to be provision for local innovation and learning to inform mainstream policy and practice.

A Broad and Improved Understanding of Social Inclusion

The new programme goals should span the development and progression spectrum, giving due regard to raising awareness and knowledge, predevelopment work, local collective action, capacity-building, core skills, lifelong learning, employment, self-employment and the social economy.

Activation measures need to be complemented with an equal weighing for pre-development work and non-case load work with at-risk populations (socio economic status, racial or ethnic minority groups or those engaged in high risk behaviour such as substance misuse) that underpins and contributes to an individual's capacity to take up labour market opportunities.

ILDN members do not cherry pick their service users. Many of our target groups are distant not just from the labour market but also education and even basic training. They often

³ *Horizontal Themes of SICAP 1. Promoting an equality framework with a focus on gender equality and anti-discrimination practices; 2. Applying community development approaches to achieve the participation of disadvantaged and marginalised communities in the wider local development context; 3. Developing collaborative approaches with local (through the LCDC) and national stakeholders to improve how mainstream policies and programmes are delivered so that they have a more positive impact on the socially excluded.*

require a significant amount of intensive, early, pre-development work to move them closer to formal education, the labour market and equal participation in society.

The current Goal 1's sole focus on groups prevents the recording of the work done with individuals outside of education and employment whilst Goals 2 and 3 need to include a recognition that education and supports may have impacts other than, if complementary to, activation. The value of the pre-development work needs appropriate weighting within the programme.

In general, the programme needs to be a social inclusion programme more than just in name. Social inclusion complements activation but is not synonymous with it.

Thematic, Area-Based and Life-Cycle Approaches

The new programme must accommodate different approaches to make maximum impact.

- A **Thematic approach** e.g. Supporting Jobless Households would enable programme responses to impact on the whole family rather than just individuals.
- The lack of an **Area-Based** approach is predicated on the assumption that areas are equal in their starting resources and that social, educational and community infrastructure is uniform across the state. This is incontestably not the case. Local variation is a given and the legitimising of an area-based approach would facilitate the bringing together of a range of stakeholders to respond to actual not presumed needs regarding employment, community infrastructure, training and access to services.
- Because the social inclusion needs of marginalised groups and individuals do not just exist during a person's presumed economically-active years but also in their other phases of life (e.g. as disadvantaged child, college entrant, older person) and roles *in* life (e.g. as parent, carer), a **Life-Cycle Approach** is required to ensure the mutually reinforcing nature of the state's economic and social investment. Areas of work that need to be further legitimised include early intervention and preventative programmes, community education and non-caseload work with children and young people. It is also incongruous to operate a national social inclusion programme that excludes individuals aged 65+ as valid individual targets.

In general, therefore, the approach and the range of target groups needs to be expanded.

Resource Allocation Models

The current SICAP Framework correctly attempts to use an evidential basis for the deployment of resources and the current resource allocation model has had its value but there are two significant and immediate shortcomings:

- The lack of social housing development in recent years has given rise to a large-scale increase in disadvantaged families and individuals now in private accommodation through the local authority 'Rental Accommodation Scheme' (RAS) or in hotel accommodation. This is not captured under the current Deprivation Index and produces large scoring variations between housing developments/estates of largely similar profile and need.
- Rural disadvantage, particularly in remote areas, is not adequately captured and weighted by the HP Pobal Deprivation Index⁵ and the development of a Rural Allocation model which takes account of this would be welcomed.

A modification is required to reflect target group engagement and give more balanced weighting to inclusion-focused work undertaken, irrespective of domicile.

The differing weight given to case and non-caseload in SICAP is detrimental to some core objectives as work that 'meets the targets' is prioritised. The full inclusion of groups and communities requires the changing of target and case load/non-caseload system to a more nuanced model.

Linkages to Other Programmes, Leveraging, and Legislation

SICAP cannot and should not exist in a vacuum – our members who deliver SICAP also deliver other related programmes and SICAP is part of wider suite of state actions and programmes.

ILDN members have proven capacity to leverage and deliver other programmes, many without a management fee. Indicators need to be built into the new programme to acknowledge and value the leveraging of funding and inter-agency collaboration. Likewise, a

⁵ cf. amongst others, work completed by Dr. Brendan O'Keefe, UL for Kerry County Council <http://atomik.kerrycoco.ie/ebooks/social.pdf> and South Kerry Partnership <http://www.southkerry.ie/wp-content/uploads/2011/11/OKeefe-Report-and-Deprivation-and-Disadvantage-in-South-Kerry-2011.pdf>

brokerage role should be included to acknowledge the natural and necessary linkage with other complementary, inclusion focused work. LDCs have traditionally been required to report on their impact and effectiveness in this area and this requirement should be reinstated in the context of a new programme with a re-weighting of success indicators.

The programme should also more closely link to the wider legislative framework e.g. the horizontal theme of *1. Promoting an equality framework with a particular focus on gender equality and anti-discrimination practices* should be strengthened and linked to the nine grounds of discrimination in equality legislation. The recent Public-Sector Equality and Human Rights Duty, November 2014, sets out a new statutory obligation on public bodies to pro-actively consider equality and human-rights issues in delivering on all their functions. The duty is an important evolution in our legislative framework to address discrimination, promote equality and protect human rights. SICAP 2 should support and provide mechanisms to address these issues.

Measuring the Programme and Outcomes

Outputs required in the new programme should value both the quantity and quality of the supported interactions implemented. Current targets and measurement methods are a disincentive to work with the most disadvantaged and complex cases. Therefore, the individual targets need to be calculated at more realistic levels that reflect the complexities of the challenges faced by many of our service users.

Because an individual is deemed counted after two interventions and carries no more *weight* if more work is done, it lends itself to working with those who require the least number of interventions, rather than properly supporting those who need extensive support. Extra work does not have any more value currently whilst failure to meet targets results in financial penalties. In many instances, more work is being done with individuals that does not end up on the system as, once there are two interventions, the target is deemed to have been met. Within SICAP, there is often nowhere to capture in detail the intensity of the work. The IRIS system does not capture the true nature of fundamental elements of community development or *Societal Value*. This has the potential to allow *gaming* of the system, dealing with easier participants and avoiding those with complex needs; an outcome that needs to be challenged.

Targets need to reflect the reality of working with disadvantaged people and the changing labour market. They should be based on the number and quality of interventions rather than

an individual headcount. Weighting should be given to the intensity and duration of an intervention.

Administration/Management

The new programme requires a better balance between the competing demands of programme delivery/development work and administrative/reporting requirements. At present, reporting requirements are overly-onerous, demotivating of staff, distracting from priorities and impacting the effectiveness of the programme and the value of the investment.

The registration process with IRIS for individuals is currently a barrier to participation and inappropriate for use with some groups e.g. non-English speakers. This should be reviewed and the forms simplified.

There needs to be greater flexibility with respect to the administration budget concerning the 25% spending cap. Equally, there should be a broadening of the apportionment system involving the 'Administration and Goals' staff costs to better reflect actual programme development and delivery practices.

One of the weaknesses of the current planning and review timetable is that the learning from the review process is not fed into the annual plan. A comprehensive multi-annual plan, implemented annually and having a five-year operational period aligned to LECP development and implementation processes is suggested.

We are offering our members' experience and would welcome a role in helping to refine and render proportionate some of the record-keeping aspects of the programme.

Budgeting and Finances

As stated above, there have been very significant cuts to social inclusion programmes in recent years. The 2017 annual budget of €37.5m⁷ is less than half of the 2008 LDSIP budget with 53% more people now on the Live Register and much legacy work to be undertaken as a result of the crash.⁸ This requires restoration or significant reversal as the longer work gets left undone, the deeper the impacts and the higher the investment required at a later stage.

⁷ Vote 34, Subhead D.4 for 2017

⁸ 181,449 on Live Register in January 2008 compared to 276,892 in January 2017. Whilst the Live Register is not a measurement of unemployment as it includes part-time and seasonal workers and those signing for credits, it is used here for cross-temporal comparison

- Multi-annual budgeting facilitates consistent planning and innovation. At present, there is a constant treadmill of achieving annual quantitative targets; There also needs to be enough resources to run meaningful programmes.
- There is a need to re-introduce the provision of grants to local community groups and increase the maximum allowable grants for Social Enterprise.

Commissioning

The increasing move towards the marketization of essential social and community-based services deserves attention. In the UK, where such processes have been in place for several decades, the negative impact has been well documented.⁹ The issues arising include:

- Quantity over quality: whereby more holistic tailored services, designed to meet the needs of different groups and communities, are rejected in favour of basic, one-size-fits-all, cost-per-unit models that are delivered at minimum cost regardless of the outcomes.
- Economies of scale: commissioning bodies, to reduce costs, can often favour larger providers who are deemed to have greater capacity to provide more for less. This approach has led to the closure of smaller community-focused services, resulting in the erosion of community cohesion and loss of local intelligence about the community's needs as well as erosion of the local voluntary base.
- Cherry-picking service participants: performance focused measures result in contractors favouring those target populations most likely to achieve positive outcomes, thus abandoning more marginalised communities and individuals with complex needs.

The community and voluntary approach delivers *Societal Value* (SV) particularly to disadvantaged communities. SV comprises both financial/non-financial value creation by using resources to produce a just society. If society is to continue to benefit from the SV, then public policy must create and sustain an appropriate, enabling ecosystem. A commissioning/funding model that focuses exclusively on minimising public spending risks compromising quality and effectiveness, both short and long term, and does not provide value for money.

⁹ Daughters of Charity Community Services. Response to the Public Consultation on Commissioning Human, Social and Community Services. February 2016

Therefore, programmes that address poverty, social exclusion and inequality should be exempt from competitive tendering on the basis that they are providing *Social Services of General Interest*. Grant-allocation should remain a core method of funding where organizations provide a specialist service and serve disadvantaged and ‘hard to reach’ communities¹⁰ and when programmes are aimed at tackling social exclusion and inequality. Derogations available under EU directives should be utilized to maintain grant provision as the commissioning model. The current approach to the delivery of the LEADER Programme could give some guidance to this process whereby, in most areas, Local Actions Groups have partnered with LEADER Local Development Companies as their ‘preferred partners.’

Conclusion

ILDN and its member companies welcome the government’s commitment to the operation to a successor programme to SICAP and offer our support its design and implementation.

Our focus is on a broad definition of social inclusion actions and we continue to work with the most marginalized individuals and communities across the entire state.

This position paper has outlined the detrimental impacts that continued commodification, narrowing of focus and distorted weighting will have on the new programme.

There are positive and realizable alternatives that can achieve government policy objectives, meet value-for-money criteria and maximize the outcomes for all, not just those programme beneficiaries who are easy to access.

ILDN wishes the Minister and her Department success in the design of the new programme and assures you of our positive contribution to the planning process.

ENDS

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¹⁰ *Ibid*