



Consortium for the Regional Support for Women in Disadvantaged and Rural Areas

Response to: 'A consultation paper on proposals for the provision of strategic support to the voluntary and community sector in Northern Ireland 2017-2021'

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Women's Regional Consortium: Working to Support Women in Rural Communities and Disadvantaged Urban Areas

1. Introduction

1.1 This response has been undertaken collaboratively by the members of the Consortium for the Regional Support for Women in Disadvantaged and Rural Areas (hereafter, the Women's Consortium or, simply, the Consortium), which is funded by the Department for Social Development in Northern Ireland and the Department of Agriculture and Rural Development in Northern Ireland.

1.2 The Women's Regional Consortium consists of seven established women's sector organisations that are committed to working in partnership with each other, government, statutory organisations and women's organisations, centres and groups working in disadvantaged and rural areas, to ensure that organisations working for women are given the best possible support in the work they do in tackling disadvantage and social exclusion.¹ The seven groups are as follows:

- Training for Women Network (TWN) – Project Lead
- Women's Resource and Development Agency (WRDA)
- Women's Support Network (WSN)
- Northern Ireland's Rural Women's Network (NIRWN)
- Women's TEC
- Women's Centre Derry (WCD)
- Foyle Women's Information Network (FWIN)

1.3 The Consortium is the established link and strategic partner between government and statutory agencies and women in disadvantaged and rural areas, including all groups, centres and organisations delivering essential frontline services, advice and support. The Consortium ensures that there is a continuous two way flow of information between government and the sector. It further ensures that organisations/centres and groups are made aware of

¹ Sections 1.2-1.4 represent the official description of the Consortium's work, as agreed and authored by its seven partner organisations.

consultations, government planning and policy implementation. In turn, the Consortium ascertains the views, needs and aspirations of women in disadvantaged and rural areas and takes these views forward to influence policy development and future government planning, which can ultimately result in the empowerment of local women in disadvantaged and rurally isolated communities.

1.4 This response is informed by women's perceptions and perspectives articulated in focus group engagement, reflecting the views of the regional membership bases of the Consortium partners.

2. General comments

2.1 The Women's Regional Consortium appreciates the opportunity to respond to the Department for Communities' 'A consultation paper on proposals for the provision of strategic support to the voluntary and community sector in Northern Ireland 2017-2021'.²

2.2 Against a profoundly troubling structural background characterised by, inter alia, austerity exacerbated poverty and vulnerability,³ Brexit generated socio-economic and political uncertainty, including uncertainty over rights protections⁴ and projections of compounded economic hardship,⁵ the Consortium remains considerably concerned about the question of social

² Department for Communities', 'A consultation paper on proposals for the provision of strategic support to the voluntary and community sector in Northern Ireland 2017-2021', DFC: Belfast, 2016.

³ See, for example, B. Hinds, 'The Northern Ireland economy: women on the edge? A comprehensive analysis of the impacts of the financial crisis', WRDA: Belfast, 2011; J. Portes and H. Reed, 'Austerity has hit women, ethnic minorities and the disabled most', *The Guardian*, 31 July 2014; Fawcett Society, 'The impact of austerity on women, policy briefing', Fawcett Society: London, 2012; Scottish Government, 'The gender impact of welfare reform', Scottish Government: Edinburgh: 2013; and, L. James and J. Patiniotis, 'Women at the cutting edge: why public sector spending cuts in Liverpool are a gender equality issue', Liverpool John Moores University: Liverpool, 2013.

⁴ On this, see, for example, A. Dannreuther and A. Wagner, 'What Brexit would mean for human rights', Rightsorg [Online]. Available at: <http://rightsinfo.org/brexit-mean-human-rights/>

⁵ See, T. Helm and P. Inman, 'Theresa May's 'just managing' families set to be worse off', *The Observer*, 29 October 2016. [Online]. Available at: <https://www.theguardian.com/politics/2016/oct/29/theresa-may-just-managing-families-worse-off-brexit>

justice and gender equality for vulnerable female cohorts in deprived and rural areas of Northern Ireland.

As is well-documented,⁶ the agency, well being, life chances and life outcomes of such cohorts can be profoundly diminished by different kinds of marginalisation, exclusion and poverty, including in-work poverty as well as variants affecting workless households. Unfair cultural-structural gender inequality that cuts across the private and public spheres continues to fundamentally contribute to this gender vulnerability; and, ongoing austerity has complicated this picture of cultural-structural injustice precisely by adversely impacting women and the most vulnerable disproportionately.⁷

In large part, the enduring nature of the gendered vulnerability at hand in deprived and rural areas speaks to a distinct failure of successive administrations in the jurisdiction to deliver substantive change to gender inequality, as evidenced, for example, by the review of the current gender equality strategy.⁸

Extant government regional infrastructural support arrangements help facilitate Consortium endeavour to address the cumulative adverse impact of this structural gendered vulnerability and inequality on affected cohorts' everyday lives. However, as participants informing this response underlined, 'much more remains to be done' remedially to deliver substantive and sustainable social justice change on this front, improving equality of opportunity and outcomes across all prevailing indicators.

From this perspective, we particularly welcome this consultation as affirmation of government intent to build on this remedial work to date by explicitly

⁶ See, for example, Hinds, *op. cit.*; also, H. McLaughlin, 'Women living in disadvantaged communities: barriers to participation', Women's Centres' Regional Partnership, Belfast: 2009.

⁷ *Supra* note 3 pertains.

⁸ The review found that across all departments, only 37 out of the 126 outcomes or 'action points' in the applicable 2008-11 strategy action plans had been achieved, equating to 29 per cent. OFMDFM, 'Gender equality strategy 2006-2016 review', OFMDFM/NISRA, Belfast, 2013.

recognising and accommodating the 'distinctive needs' of 'women living and working in areas of greatest need...support[ing] [therein] an increase in participation and influence of women in community development in tackling poverty and disadvantage'.⁹

Yet, as research suggests, in order to optimise the potential inherent in the consultation to improve outcomes for vulnerable women, government would need to cultivate an appropriate gendered perspective across all implicated decision making.¹⁰ Such a commitment would, of course, be innately strengthened were government to explicitly attend to the wider accountability and social justice case for underpinning all policymaking and public service delivery with equality responsive budgeting structures, including gender budgeting variants.¹¹ As is well established, the latter represents a robust policy mechanism through which government may comprehensively target improvement in equality of opportunity and outcome between men and women, precisely by 'measuring outcomes to ensure results' across different gender categories.¹²

The remainder of the paper will elaborate on this claim-making, setting out a plethora of associated concerns:

- (i)** the potential adverse implications for service delivery of the document's treatment of sustainability;
- (ii)** rural constituency dismay at the departmental decision not to rural proof the proposed policy;
- (iii)** cohort consultation disaffection, correlated to a general lack of transparency on the question of the scope of permitted consultation respondent capacity to actually influence policy; and,
- (iv)** the case for government to optimise the potential of the wider women's sector to remedially address disadvantage.

⁹ DFC, *op. cit.*

¹⁰ On this, see, S. Quinn, 'Equality responsive budgeting', ECNI: Belfast, 2013.

¹¹ *Ibid.*

¹² *Ibid.*

Participants in the focus group engagement articulated these concerns and raised associated misgivings, as will be shown.

3. Specific comments

3.1 Sustainability and demotion of grant reliance

The Consortium is concerned at the potential adverse implications for service delivery of the document's treatment of sustainability, including its demotion of core cost grant reliance, particularly in the case of delivery for vulnerable cohorts in rural and disadvantaged districts.

The document's treatment of the question of sector sustainability calls time on core cost grant funding, championing instead a plethora of 'financial products' promoting social enterprise, most notably, social economy modelling.¹³ Participants sharply critiqued this treatment, arguing that it failed to grasp the fundamental funding realities impacting many community based providers of vital, specialised frontline women-only services for vulnerable cohorts across the jurisdiction. The nub of that critique was this: that in the absence of core cost grant funding such providers are often '*too small to be sustainable*' and, as such, grant continuity of this kind often remains a sine qua non of service continuity.

To illustrate this substantive point, participants cited enduring obstacles to social enterprise modelling in the case of women centre frontline delivery. This unique delivery model features the provision of integrated community responsive support services, which ultimately allows centres to adopt a holistic approach in accommodation of the often complex service needs of vulnerable, marginalised and excluded women in disadvantaged areas. Recent research lends insight into what is at stake in this debate, illustrating how enduring uncertainty over the question of sustainability profoundly risks women centre contribution to the government's own anti-poverty agenda.¹⁴ That contribution is characterised in terms of the realisation of remedial

¹³ DFC, op. cit.

¹⁴ Morrow Gilchrist Associates, 'Evaluation of regional support arrangements for the voluntary and community sector', Morrow Gilchrist Associates: Belfast, 2015.

outcomes across different kinds of disadvantage, including intergenerational variants and that experienced by ethnic minorities, as well as different kinds of poverty, including in-work, gendered and child poverty.¹⁵

Of course, in promoting the principle of sustainability, the document does recognise that ‘*some* element of grant funding *might still* be the most relevant for some VCS organisations’.¹⁶ However, this recognition clearly falls short of an explicit acceptance of the substantive point underlined by participants about the correlation between grant and service continuity, particularly in the case of smaller providers addressing profound disadvantage at the level of the community.

Recommendation

We recommend that government take proper account of the projected service impact of the relationship between the realities of constrained provider sustainability at the level of community and service continuity, particularly in the case of frontline, specialised women-only delivery to vulnerable cohorts by smaller organisations.

3.2 Rural proofing: ‘box-ticking exercise’

This section outlines Consortium dismay at the departmental decision not to rural proof the proposed policy.¹⁷

The purpose of rural proofing, as understood by the executive, is broadly articulated in terms of due regard for the principles of equity and proportionality: ‘the purpose is to ensure ‘equitable’ treatment for rural areas through policy responses that are proportionate to the need’;¹⁸ and, the 2016 Rural Needs Act put the question of proofing on a statutory footing. The stated rationale for the decision not to proof entails the observation that the

¹⁵ Ibid. More precisely, that differentiated contribution is presented as entailing the delivery of a plethora of positive developmental outcomes at the level of the individual, the wider family, the community and society at large, from enhanced individual well being, agency and life chances through to improved community cohesion and economic capability.

¹⁶ DFC, op. cit.

¹⁷ DFC, ‘Rural proofing statement’, DFC: Belfast, 2016.

¹⁸ DARD, ‘Thinking rural: the essential guide to rural proofing’, DARD: Belfast, p.8.

application process for proposed support will remain 'open to all groups across the region' irrespective of location, whether rural and urban.¹⁹ However, participant critique of the decision posited that the case for proofing was explicit and unambiguous, justified by the statutory imperative of due respect for these fundamental framing principles.

More precisely, it was held that proofing was required on the grounds of an equity requirement to properly identify and take account of substantive rural need implications resultant from longstanding urban-rural imbalance in government investment in the sector and infrastructure at large. In illustrating this point, discussants pointed to imbalance in departmental funding of the wider women's sector,²⁰ a 2012 review of which put the rural figure of overall direct allocation to the sector at just 1.3 per cent.²¹

Discussants also called into question the validity of the decision-making process on proofing that applied in this case. As the executive's own guidance makes clear, taking seriously decision-making on proofing necessitates (i) a rigorous process of consideration, involving recourse to the pertinent rural evidence base, and that (ii) the statement on the outcome of that process should provide transparent grounds for the decision taken.²² The statement accompanying the consultation document implies that the question of rural proofing was addressed in large part in the co-design process that pertained: 'in considering what are the rural specific impacts of the proposed policy... co-design workshops were open to all rural groups ... and there were no location specific impacts raised'.²³

Participants objected to this policymaking manoeuvre, arguing that output from co-design workshops was, in itself, an insubstantial basis of evidence-

¹⁹ DFC, op. cit.

²⁰ As the Executive's own research puts it: '*compared with levels of government funding to women's groups in urban areas, there was a relatively low level of government funding to rural women's groups*'. DSD/OFMDFM, 'Review of government funding for women's groups and organisations', DSD/OFMDFM: Belfast, 2012, p.13.

²¹ Figure quoted in Morrow Gilchrist Associates, op. cit., p.51.

²² DARD, op. cit.

²³ DFC, op. cit.

gathering on which to determine the vital question of proofing, and that this manoeuvre appeared to relegate the question of proofing to the status of a mere 'box-ticking exercise,' fundamentally failing therein to properly attend to the underlying policy and statutory imperative of proper rural need assessment.

Recommendation

The Consortium recommends that the department consider further and review its decision not to rural proof the proposed policy.

3.3 More meaningful consultation: transparency imperative

As previously implied, we note with particular interest that the document includes a commitment to ensure that 'the distinctive needs of ... women in community development ... inform policy development'; in other words, a commitment to ensure that consultation processes are meaningful and that stakeholder engagement actually has the potential to make a discernible impact on policy development. In fact, this commitment incorporates a specific ambition to actually '*increase*' the 'influence' of women on the ground in policy making.²⁴ We very much welcome this intent. However, for reasons that follow, this is a cautious welcome.

The Fresh Start agreement recognises the need for more 'meaningful' consultation engagement in the jurisdiction.²⁵ Participants underlined that need, noting the extent of consultation 'fatigue' and 'apathy' among sectoral stakeholders and, more generally, among women on the ground in disadvantaged and rural areas. This disaffection was characterised as rooted in frustration at the apparent failure of such engagement to produce substantive policy change. It was generally held that the substance of finalised consultation documents often did not vary to any significant extent from that of their draft counterparts.

²⁴ DFC, *op. cit.*

²⁵ Northern Ireland Executive, 'A fresh start: the Stormont agreement and implementation plan', NI Executive: Belfast, 2015.

This reported status quo was identified as compounded by a general lack of transparency on the question of the scope of permitted consultation respondent capacity to actually influence policy. More precisely, it was lamented that stakeholders and affected women cohorts tend to 'buy into' processes of engagement in 'good faith' yet, more usually, the nature of the prevailing limitations on their actual capacity to influence policy is not made explicit.

Rather, the idea was that departments often present draft policy as open to prospective change *when in reality the content often remains set in stone - a fait accompli - and the room to effect change and influence finalised content thus remains negligible*. A consensus subsequently emerged according to which such practice threatened to reduce the consultation process to the status of a mere 'box-ticking' engagement exercise, fuelling stakeholder suspicion that 'nobody is listening' to the voice of the marginalised and vulnerable, despite government explicitly encouraging – and consistently receiving - its articulation.

On this view, greater transparency on the nature of the actual potential of consultation engagement to influence policy is clearly required. In any given consultation, this should take the form of clarity on the question of what is most definitely 'off limits' and so non-negotiable, i.e. not subject to any potential change. Such transparency should help address consultation disaffection among affected stakeholders, precisely by preventing the fruitless investment of time and effort.

Such transparency should also help promote and cultivate the potential of consultation engagement as a key evaluative resource in evidence-based policy development. Research affirms that potential, noting that the participation of stakeholders in consultation engagement, including that of 'hard to reach' cohorts, can potentially afford government the opportunity to innately enhance its understanding of the given social problem under policy

review, and so substantively improve its policymaking and service design processes and outcomes.²⁶

This transparency imperative is also, of course, in keeping with a key recommendation of the recent Organisation for Economic Co-operation and Development's governance review of public administration in the jurisdiction:

to enhance public trust in the government's ability to pursue better outcomes for people the review *recommends that [the Northern Ireland government] improves dialogue with key stakeholders, notably from the community and voluntary sectors, and strengthen transparency and accountability mechanisms.*²⁷

Recommendation

In taking forward its intent to 'increase' the 'influence' of women on the ground in policymaking, we recommend that the department take seriously the fundamental threat to that potential influence posed by the relationship between (a) consultation disaffection among such cohorts and (b) the general lack of transparency on the question of the actual permitted scope of consultation respondent capacity to influence policy.

3.4 Austerity and poverty: maximising potential of wider women's sector

Against a background of austerity associated poverty and gendered vulnerability, compounded by projections of Brexit associated hardship,²⁸ this section considers the case for government to maximise the potential inherent in the consultation *and beyond* – across wider policymaking - for enhanced collaborative engagement with women sector capacity (specifically in the delivery of improved equality of opportunity and outcomes for vulnerable cohorts).

Research affirms that the wider women's sector in the jurisdiction is possessed of such skill, experience and knowledge as allow it to deliver

²⁶ See, for example, D. Cook, 'Consultation, for a change? Engaging users and communities in the policy process', *Social & Policy Administration*, Volume 36, Issue 5, October 2002.

²⁷ OECD, 'Northern Ireland (United Kingdom): implementing joined-up governance for a common purpose', OECD: Paris, 2016, p.16.

²⁸ *Supra* note 5 pertains.

effective and meaningful integrated service provision at the level of community, taking account therein of the complex support needs of vulnerable, marginalised women and their families, including the multiply disadvantaged.²⁹ And, we note with particular interest the consultation ambition to facilitate support for women sector actors in this endeavour. Discussants set out the exceptional case for such interventionist support premised in arguments about the gender impact of austerity and projected vulnerability impact of Brexit.³⁰

As is well established, austerity reform of the tax and benefit system and public services has disproportionately impacted women adversely, as compared to men; whether, say, women as the primary users of shrinking public services, such as health and personal social care, or women as the recipients of diminished benefits and tax credits typically paid to primary carers in households.³¹

Such reform has threatened women's well being precisely by aggravating pre-existing – and heightening the risk of – poverty, including in-work variants and that affecting workless households.³² Discussants depicted the cumulative adverse impact of austerity-associated poverty on affected women's everyday lives in terms of, inter alia, problematic debt, social isolation, food and fuel poverty, employment difficulties, physical and mental ill health, substance abuse, self-harm and relationship pressures. And, a wider adverse impact on well being at the level of the wider family and community was consequently observed. Among those vulnerable cohorts deemed most affected by the reported associations between ongoing austerity, poverty and women's constrained well being were lone parent and pensioner groups, ethnic minorities, disabled cohorts and those in low pay, low status precarious employment, including those on zero hour contracts.

²⁹ See, for example, Morrow Gilchrist Associates, op. cit.

³⁰ Supra note 5 pertains.

³¹ Supra note 3 pertains.

³² Supra note 3 pertains.

This gendered poverty impact of austerity was, in turn, associated with the generation of exceptional demand on service delivery at the level of community among affected cohorts and, to address that exceptionality, discussants subsequently appealed for government to optimise the delivery potential inherent in the wider women's sector. However, at the same time, it was also observed that austerity cuts to sectoral resourcing – associated with service reduction/withdrawal and correlated job losses - continued to fundamentally threaten sectoral delivery and thus retention of the aforementioned skill, experience and knowledge base. This sectoral demise has included loss of crucial integrated educational, training and childcare opportunities, deemed of particular assistance in helping to address the complex relationship between women's educational disadvantage, economic exclusion and constrained well being, both mental and physical.

Concern over the additional likely impact on sectoral service demand from Brexit associated poverty was also noted. Research suggests how Brexit correlated structural change threatens to compound the gendered vulnerability at hand, projecting that 'many of [the] UK's poorest families will see [a] significant drop in income in [the] post-Brexit economy'.³³

Participants called on government to take seriously this associative conjunction, attending to the profound service implications for vulnerable cohorts of sectoral decline through provision of requisite resourcing capacity. The latter was defined in terms of longer term sustainable resourcing, as opposed to the commonly proffered yearly renewable variants.

Recommendation

In taking forward the proposals, government should consider how best it might maximise the potential of the wider women's sector to deliver integrated support services at the level of community for vulnerable women and their families, addressing therein the relationship between (a) austerity-associated sectoral decline, (b) exceptional austerity-associated sectoral service demand

³³ Helm and Inman, op. cit.

and (c) further projected sectoral demand pressures associated with forecast Brexit compounded poverty.

4. Conclusion

This paper has set out a compelling social justice case for enhanced gender responsiveness in decision-making under the proposed policy and beyond, such as might allow government to take better account of the particular needs, interests and perspectives of vulnerable, marginalised impoverished women in deprived and rural areas of the jurisdiction.

In a context of actual and further projected austerity-associated gendered vulnerability and poverty, compounded by Brexit associated projections of further hardship for the most vulnerable, that case is clearly made all the more urgent.