

EAPN Ireland
Submission to the Consultation on the
Draft Border, Midland and Western
Regional Operational Programme 2007-2013



1. Context

EAPN Ireland welcomes the opportunity to make a submission on the Draft Border, Midland and Western Regional Operational Programme.

EAPN Ireland is a national anti-poverty network with approximately 150 members throughout the country which are mainly community organisations. In order to inform the drafting of the Regional Operational Programme EAPN Ireland made a submission to the Operational Programme and also in June 2006 forwarded a report on three regional workshops entitled 'Resourcing the Eradication of Poverty' to the Border, Midland and Western Regional Assembly.

Both of these documents outlined key issues which covered the areas of Consultation, Monitoring and Measuring progress, Focus on Social Inclusion and Poverty, Implementation and Accountability, Mainstreaming, Partnership, Access to resources, Technical Assistance, the Peace Programme, Coherent Policy Making and additionality. The report from the regional workshops also outlines some key policy areas some of which need to be addressed in the Regional Programmes. The content of those documents should still be taken into account at this stage of the process in finalising the Regional Operational Programme and are available on the EAPN Ireland website at <http://www.eapn.ie/policy/49>.

EAPN Ireland would like to highlight its dissatisfaction with the fact that consultation on the National Strategic Reference Framework (NSRF) has not taken place in advance of discussions on Structural Fund Draft Operational Programmes. A full consultation on the NSRF should have informed the development of the Operational Programmes.

2. Specific comments on the Draft Operational Programme (OP)

a. Poverty and Social Inclusion

EAPN Ireland believes that the draft OP fails to identify how it will address issues of poverty and social inclusion and is developed in a way which seems to state that these issues are not relevant to the regional OPs. The EAPN is familiar with the EU Regulations and Community Strategic Guidelines and believes that the measures in the Draft Regional Operational Programme can be strengthened in order to address poverty and social inclusion issues. The *Commission Staff Working Paper on Cohesion Policy and Cities* (23.11.2005) outlines key in which social inclusion needs to be addressed in urban areas in terms of employment and non-employment areas and names specific groups which should be included e.g. immigrants, lone-parents, Travellers and Roma, older people, people with disabilities and early school leavers.

Recommendation

- As is Government policy, a poverty impact assessment needs to be carried out on the operational programme. The Office for Social Inclusion has recently developed guidelines for carrying out Poverty Impact Assessment and these should be applied in the process.
- Indicators need to be developed to measure the poverty and social inclusion impact of the measures within the OP.

- Proactive measures are required to ensure that people from disadvantaged geographic communities and specific groups such as lone parents, disadvantaged women, Travellers, immigrants and people from other ethnic minority groups, people with disabilities and older people can participate in and benefit from programmes. This may require specific targeted measures and is linked to the issues on monitoring and horizontal measures outlined below.
- In relation to strengthening specific measures in the draft OP a number of areas are suggested:

i. Under Priority Axis 1

- A programme should be developed with third level education institutions to develop, pilot and eventually mainstream a programme to stimulate entrepreneurship and research capacity within disadvantaged areas of the region. This should involve the identification of barriers and ways of addressing them. It should link with community organisations and build on existing experience. This relates to point ii. below.
- The lack of entrepreneurial supports and specific barriers experienced in Disadvantaged communities and by specific groups experiencing social exclusion are a particular barrier to progress within these communities and groups. A number of reports exist on this including reports from the projects supported under the Entrepreneurship strand of the EQUAL Community Initiatives. A Programme should be developed to help to identify ways of progressing work done under the EQAUL Community Initiative through developing a programme to support the development of entrepreneurship in disadvantaged communities and groups experiencing social exclusion. Access for people from disadvantaged communities to mainstream activities undertaken as part of OP should also be stressed and monitoring throughout the OP

ii. Under Priority 3 Axis 3

- In order to ensure this Priority addresses issues of poverty and social exclusion in urban areas a number of principles and related criteria should apply to the projects selected under these themes. Some of the principles or criteria should include that:
 - as much as possible the projects should benefit disadvantaged communities.
 - There should be active participation from anti-poverty community organisations in the groups making the application,
 - There should be ongoing real consultation and dialogue with local communities at all stages of the project including design, implementation and evaluation.
 - Supports should be put in place and resources provided to ensure that the capacity for disadvantaged communities to participate in the project is strengthened as much as possible. Community Development is an area specifically named in the Community Strategic Guidelines and the Commission Staff Working Paper on Cohesion Policy and Cities in 2005 also outlines a range of specific areas.

b. Monitoring/ Horizontal Principles

It is important that Equal Opportunities alongside sustainable Development are Horizontal Principles within the OP and that priority level indicators will track impact of the investment under these areas. This is based on learning from the NDP/CSP programme for 2000-2006 as outlined in section 7.2 of the Draft OP. However, the NDP 2000-2006 also includes horizontal measures for social inclusion. It is essential that social inclusion horizontal mechanisms are put in place in the Regional OP 2007-2013 and that this builds on current learning.

Recommendations

- The horizontal mechanisms to be put in place for the OP should include the area of social inclusion as well as equal opportunities as already identified.
- The equal opportunities horizontal monitoring mechanisms as well as addressing equality between men and women should also address equal opportunities for those covered under the grounds of Irish equality legislation.
- As highlighted in section 7.5 of the draft OP, the Community Strategic Guidelines calls on member States to be proactive in terms of promoting equal opportunities between men and women and preventing discrimination. It is important that project selection criteria addresses this issue but more detail is required as to what proactive measures are to be put in place. This could include measure in terms of enterprise development, services in urban areas, participation in research etc.
- Monitoring committees should be put in place to address oversee monitoring under the horizontal areas and these include representation from the relevant community organisations according to the 'Partnership' principle (Article 11) of the EU Structural Funds General Regulation.
- Sufficient resources should be allocated to ensure that groups are adequately resourced to carry out their role.
- It is essential that measurable indicators are developed for the Regional OP related to equal opportunities and social inclusion.

c. Partnership

It is essential that the EU Regulation (Article 11) is respected and that the community sector is engaged at all stages of the process in planning, implementation, monitoring and evaluation. However, in order to ensure that the OP clearly addresses issues of social exclusion in the region it is essential that people experiencing poverty and social exclusion are represented.

Recommendation

- People experiencing poverty and social exclusion should be actively involved in the planning, implementation, monitoring and evaluation of the Regional Operational Programme.
- Technical Assistance funding should be provided to community and voluntary representatives to support their full participation on monitoring Committees and other stages of programme implementation, evaluation etc.
- Information on relevant grants, programmes etc, should be communicated and made available to community organisations in the region using a variety of methods to ensure as many organisations as possible will be informed. This should be broader than the Regional Authority's website

d. Evaluation

We are disappointed that the draft programme in Chapter 8 Section 7 on evaluation does not name social inclusion as a key element at any level.

Recommendation

- Using clear indicators and targets the Regional OP needs to evaluate the Regional OP in terms of its social inclusion impact.

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