



WRDA Response to the Department for Communities (DfC) Consultation on Voluntary and Community Sector (VCS) Infrastructure Support

February 2024

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1. Introduction:

The Women's Resource and Development Agency (WRDA) is a membership organisation that supports women's groups and networks across Northern Ireland. Our members are a key part of WRDA, they keep us relevant and ensure we are working on the issues which really matter to grass roots women. We keep our members up to date with the latest developments in the wider women's sector and provide them with opportunities to publicise their own work. We also act as an information hub for the women's sector, while also striving to raise the profile of women's issues in the wider media.

WRDA carries out regular policy work and lobbies decision makers on behalf of women. We work to enhance how the women's sector and women on the ground are communicating with all levels of government, ensuring women have their rightful say in the policies affecting them, including the development of a Bill of Rights for Northern Ireland. As part of our vision to make women a visible force for change in Northern Ireland, we are actively lobbying and campaigning on issues that affect women.

We work with politicians, policy makers and influencers to advocate for law and policy that promotes women's rights and equality and for services that meet women's needs. We take a participative, grassroots approach to this work. All women have the right to be involved in decision-making and we aim to amplify the voices of the women who engage with the women's sector. We also work on a range of initiatives relating to health, including breast, cervical and bowel screening awareness and the Maternal Advocacy and Support project.

WRDA also provides the secretariat for the Northern Ireland Women's Policy Group which is a platform for women working in policy and advocacy roles in different organisations to share their work and speak with a collective voice on key issues. WRDA were involved in the development of the WPG COVID-19 Feminist Recovery Plan, which was launched in July 2020 and relaunched in July 2021, which provided a comprehensive overview of the impact of the pandemic on women in Northern Ireland and their civil, political, economic and social human rights.

1.1 Endorsements

WRDA would like to endorse the response submitted to this call for evidence by the Women's Support Network, Women's Platform, Northern Ireland Rural Women's Network and the Northern Ireland Women's Budget Group.

1.2 Further information

This response was prepared by Elaine Crory, Women's Sector Lobbyist at the Women's Resource and Development Agency. For questions or queries regarding this response, please contact Elaine at elaine.crory@wrda.net.

2. Past Consultations Responses, Evidence Submissions and Briefings:

The WPG has published a wide range of evidence through various evidence submissions, public consultation responses and specific briefings on issues relating to DfC Infrastructure Support for the Voluntary and Community Sector (VCS). Responses made by the WPG, and some of our members, in relation to these issues include:

- Women's Policy Group (WPG) (2021) WPG NI COVID-19 Feminist Recovery Plan: Relaunch - One Year On. Available [here](#).
- WPG Response to DfC Spending Plans EQIA (2023) Available [here](#).
- WPG Response to DfC Consultation on Discretionary Support (2023) Available [here](#).
- Several WPG members fed into the Gender Equality Strategy Expert Panel Report (2021) which is available [here](#).
- WRDA (2018) 'Women at the Heart of Public Consultation: A guide for Public Authorities and Women's Organisations' Available [here](#).

2.1. Primary Research by WPG and member organisations

- WPG (2021) Primary Research into the Impact of the COVID-19 Pandemic on Women. Available [here](#).
- Women's Regional Consortium (2022) Primary Research into the Impact of the Cost of Living Crisis on Women. Available [here](#).
- WRDA (2024) Primary Research into the Impact of the Cost of Living Crisis on Women's Health. Available [here](#).

3. General Comments on the DfC VCS Infrastructure Support Consultation:

3.1 Comments on the revised 'Concordat' and values therein

WRDA have deep reservations about the proposals for infrastructure support laid out in this consultation. Although the proposals seem to be guided by laudable values, we are concerned that the proposals will mean the loss of key infrastructure that currently supports the sector, and we are concerned that the new structures proposed may inadvertently undermine the values laid out in the proposals for a revised Concordat.

In section 2 of the consultation document, the Department lays out the values that the Joint Forum have articulated as the guiding principles that should form the basis

of the Department's relationship with the Community and Voluntary sector. These include values that add new depth to the relationship, such as active participation, social justice and sustainability. It is a vision that WRDA, and undoubtedly a large part of the sector, can support unreservedly and that we unequivocally welcome. However, the reality must match with the written word, and we have concerns about whether this is possible given the proposals made later in the document in relation to infrastructure support. For example, the value of collaboration, which aims to foster collaboration and cooperation across the sectors, will be undermined by the practical outcomes of removing certain streams of support, and moving all of the organisations that were previously eligible for ring-fenced support into a "sub-regional and sub-sectoral" category, which will foster competition for survival, rather than mutual collaboration.

We understand that the Department conducted surveys with sectoral organisations before making these proposals, but it is absolutely vital that the Department recognises that some of the work done under certain streams, such as the Women's RISP, are by definition not going to gather support from organisations which are not in the women's sector. This does not say anything of the value brought by those organisations both to their service users and to the Community and Voluntary Sector overall; whether or not that value is immediately obvious to all other organisations. The nature of such work is that it will not serve everyone, and it is for the Department to ensure that, in their framing of these proposals, they clearly articulate the reason for that stream, as it existed, otherwise smaller pieces of work and specialised work carried out by parts of the sector will be lost.

The value of independence also runs the risk of being compromised by the suggested approach, which would see more significant power consolidated into a small number of organisations, with sub-sectoral and sub-regional groups kept separate. This would grant a large amount of influence to the regional anchor organisation. In terms of independence, a very top heavy approach seems to have been decided upon, and indeed the regional anchor and other key partners are already decided upon. In terms of continuation of work, this may bring practical benefits in the short term but the larger concern is that this close relationship could lead to a lack of independence in practice.

The sensible approach would be to encourage independence by diffusing responsibility among organisations, and to therefore allow the regional anchors to be genuinely independent. As it stands, there is a real risk that other organisations in the sector will come to see the regional anchor as functionally a part of the Department itself. The potential imbalance may need to be reconsidered, and at the very least, safeguards should be put in place to address the potential for breakdowns in

professional relationships as a result of the top-heavy approach taken by the Department in this case.

3.2 The need for a strand specifically for women

Earlier iterations of this programme had a strand specifically for women's work, which in practice has been vital to the survival of the women's sector in Northern Ireland and its ability to thrive. While we understand that the new proposals will allow women's organisations to fall under the categories of sub-regional and/or sub-sectoral, we feel that the loss of a strand specifically for women is a mistake that sends concerning messages about what value the Department puts on the women's sector; a sector which delivers such vital work, and regularly contributes to work undertaken by DfC. In particular, the Department holds responsibility for the Social Inclusion Strategies, including the Gender Equality Strategy, which several women's sector organisations were instrumental in drafting.

In addition, the women's sector often provides vital structural support for a large variety of organisations - both within the women's sector and outside of it - for whom the regional anchor organisation is not accessible, as it is a membership organisation whose membership fee is unaffordable for many smaller organisations. This practical support will be lost if there is no dedicated strand for women's work, and the longer term risk is that there will ultimately be a loss of smaller organisations as a whole at the expense of the larger and non-specialist VCS organisations. Specialism is easily lost and very difficult to replace, and once lost, some of the smaller organisations could take years or decades to re-establish themselves.

Gendered social norms restrict and limit women's roles in the economy, thereby contributing to women's economic disadvantage relative to men. Women are more likely to be in receipt of social security benefits, more likely to be in low-paid, part-time and insecure work and also more likely to be providing care either for children or other family members which limits their ability to carry out paid work. This contributes to keeping women's incomes generally lower over their lifetimes and therefore means they are more likely to be dependent on men or the State through social security benefits. This lack of economic independence can make women more vulnerable to gender based violence, to precarious circumstances and to being preyed on by paramilitaries and others. The reality of gender inequality is the background that led to the dedicated strand for women in the first place.

Gender inequality has not diminished in recent years. In fact, levels of equality have worsened in the past 14 years as a result of austerity, Covid-19 and its unequal outcomes, and the current cost-of-living crisis. All of these events have had a significant gendered impact, with the worst impacts falling on women from marginalised communities. In the past year, a very stringent budget set by the

Secretary of State has led to a very difficult financial year in which a number of key funds have been cut or removed entirely and, once again, women have been severely impacted, alongside children and people with disabilities. Some of these cuts came from the Department for Communities itself, such as cuts to Discretionary Support, and some were outside of it, such as the Department of Health's Core Grant. This means that, more than ever, the demographic we serve and the women's sector itself are suffering and struggling to stand in the gap between communities and government.

While we are acutely aware that the Department cannot act to influence the work of other Departments, an overview of the financial situation as a whole should be considered when making decisions as to what else a sector can lose and still maintain the work that it does. The Department for Communities has the greatest responsibility and opportunities for protecting those most impacted by financial inequality and those who are marginalised, and it is the wrong time to remove this dedicated workstream.

3.3 Human Rights implications and responsibilities

It is essential to note that Northern Ireland is bound by the international human rights obligations of the UK, as State Party to all key human rights conventions, including the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW). Progressive realisation of rights is a key principle of the international human rights framework, in recognition that implementation is affected by many factors including resourcing; however, this incorporates a complementary principle that existing rights cannot be rolled back or weakened¹. This is vital in the context of budget cuts, as the impact may affect the ability of some rights holders to enjoy and exercise their rights, and therefore must be assessed with alternatives and relevant mitigating action considered.

The relevant guidance to the UK in this regard is provided through recommendations from UN monitoring bodies for each of the nine core frameworks, which set out actions for the UK to strengthen realisation of rights for all. The full set of recommendations for Northern Ireland and the UK from UN monitoring bodies is extensive, ranging from over 300 recommendations from the Universal Periodic Review in 2022² to Concluding Observations on the UN Convention on the Rights of the Child, for which the UK was examined in May 2023³.

¹ See [International Covenant on Economic, Social and Cultural Rights](#) for a discussion of both principles

² Human Rights Council (January 2023) [Report of the Working Group on the Universal Periodic Review: United Kingdom of Great Britain and Northern Ireland](#)

³ UN Office of the High Commissioner on Human Rights press release 19 May 2023 '[Experts of the Committee on the Rights of the Child Note Progress in Addressing the Age of Marriage in the United Kingdom, Ask about High Poverty Rates among Families with Children with Disabilities and the Proposed Illegal Migration Bill](#)'

With regard to women and gender equality, it is relevant to note that the most recent Concluding Observations for the UK express concern that protections for women in Northern Ireland are falling behind those of women elsewhere in the UK, and a key recommendation is 'to put protections in Northern Ireland on an equal footing with those in England, Scotland and Wales'⁴. The CEDAW Concluding Observations also urge action to redress the impacts of austerity and welfare reform, in particular the two child limit, which it has found to be against CEDAW principles. The Committee on the Rights of the Child, meanwhile, has recommended that the Northern Ireland budget is scrapped, due to the severe impact on children and young people.⁵

The likely impact of the proposed loss of the Women's RISP programme is to reduce realisation of rights set out in CEDAW, in particular in relation to the ability of women and girls to have access to adequate social protection systems⁶. This is also a basic entitlement in the International Covenant on Economic, Social and Cultural Rights (ICESCR)⁷, which defines destitution as a violation of the inalienable human rights of every individual. It should be noted that the UK will be examined under both ICESCR and CEDAW over the next 18 months, and that the need to address and mitigate the increasing poverty, inequality and destitution following austerity and welfare reform has been highlighted across UN human rights treaty bodies in recommendations to the UK from previous examinations.

4. Response to Consultation Questions:

Section 1 - Introduction

1. Are you responding as an individual or on behalf of an organisation?

Organisation.

2. What is the name of your organisation?

Women's Resource and Development Agency.

3. Does your organisation operate more in urban or rural areas?

X More urban

⁴ CEDAW Committee (March 2019) [Concluding Observations on the 8th periodic report of the UK](#)

⁵ UN Office of the High Commissioner on Human Rights press release 19 May 2023 '[Experts of the Committee on the Rights of the Child Note Progress in Addressing the Age of Marriage in the United Kingdom, Ask about High Poverty Rates among Families with Children with Disabilities and the Proposed Illegal Migration Bill](#)'

⁶ CEDAW [Article 11](#)

⁷ [International Covenant on Economic, Social and Cultural Rights](#) 1976

- More rural
- Evenly split

4. Which of the following best describes your organisation?

X Voluntary and Community Sector organisation

- Public Sector organisation
- Private Sector organisation
- Funder

5. If you are answering on behalf of a voluntary and community organisation, which of the following best describes your organisation?

X Community organisation

If Other, please specify below:

N/A.

Section 2 - Supporting the Sector's relationship with Government

6. The Joint Forum has proposed a draft framework of values and practices as a foundation for a future Concordat. To what extent do you agree with these values and practices as a way of supporting the relationship between Government and the Voluntary and Community Sector?

Please select one of the following responses for each value.

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
Value 1: Accountability	X				
Value 2: Active Participation	X				
Value 3: Social Justice	X				

Value 4: Independence	X				
Value 5: Collaboration	X				
Value 6: Sustainability	X				

Please share anything you would like add specific to each of the individual values:

We have concerns, as noted in Section 3 above, with regard to the feasibility of these values in practice, given the structures laid out later in the document.

Specifically, collaboration can be undermined by the need for V&C sector organisations to compete for space and for funding where previously there was at least one specific stream. This encourages competition and narrows the pool of organisations who can reasonably compete.

In addition, naming a number of organisations as anchor or regional organisations may run the risk of compromising the value of independence; the close relationship between the Department and the anchor organisation implied by this structure means that true independence from the Department may be practically impossible.

7. Please let us know if you think there are gaps in the proposed framework of values and practices or anything additional that you would like to see included:

We do not believe that there are gaps in the framework as such, but we are deeply concerned that later proposals for restructuring the sector will undermine this framework as it currently stands.

8. The Joint Forum has been considering options to ensure that a future Concordat/agreement leads to meaningful change and an improved relationship between the sectors. To what extent do you agree that a future Concordat/agreement would be strengthened if a legal duty were created to require NI Executive Ministers to act in compliance with the concordat values and practices when making decisions and carrying out ministerial responsibilities?

X Agree

9. The Joint Forum is keen to hear views on what the ambition and scope of a new Concordat/agreement should be between Government and the Voluntary and Community Sector.

Please share any thoughts, ideas or challenges below:

N/A.

10. The 2011 Concordat was framed as an agreement between Government and the voluntary and community sector. The Joint Forum believes that a future Concordat should apply to a wider range of “civil society” organisations: a very broad definition that includes everything outside the state (public sector) and the market (private sector). This is also sometimes called the “third sector” or the “social sector”. There is some debate around the term we should use when we speak about this broader sector. Which would be your preferred term?

- Third sector
- Social sector

☒ Civil Society

- Other
- No preference

If Other, please specify below:

N/A.

Section 3 - Vision and Headline Outcomes (for infrastructure support)

Vision:

“A confident, independent and collaborative sector which empowers and sustains local action and volunteering; a sector that represents the diversity of our communities and supports the delivery of inclusive and accessible services and programme for government outcomes through partnership, innovation and challenge”

11. The draft framework proposes a vision for infrastructure support. To what extent do you agree with this vision?

- Strongly Agree

☒ Agree

- Neither Agree nor Disagree
- Disagree
- Strongly Disagree

If you would like to expand on your answer please do so below:

Again, while we agree with this vision and we believe that this is what the sector needs and would help it to thrive, we are concerned that some of the proposals elsewhere in this document will not facilitate that in the way that they could.

The Department has developed 4 headline outcomes to articulate what success looks like against this vision.

1. Leadership and Advocacy headline outcome

Strong leadership and effective advocacy within the sector promotes the interests of our diverse communities and enables community connection and engagement.

12. To what extent do you agree with this Leadership and Advocacy headline outcome?

X Strongly Agree

- Agree
- Neither Agree nor Disagree
- Disagree
- Strongly Disagree

13. To what extent do you agree with the supporting outcomes? Please select one of the following responses for each outcome.

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
Sector leaders have skills and confidence to support their organisations and communities	X				

Sector leaders work together around shared issues	X				
Sector leadership is diverse and representative of the sector and communities	X				
Data and evidence from the sector is effectively collated, analysed and communicated	X				
Public policy and decision making (central and local government) is informed by evidence from the sector	X				

14. If you would like to expand on your answer please do so below:

The sector as a whole is too often cut off from public policy making, the evidence it gathers insufficiently weighed and considered when policies are considered, and indeed the evidence is often absent when government carries out EQIAs analysing the impacts of proposed policies and budgets. Sector leaders work together more often than not, and their leadership skills are not lacking. The missing piece is the valuing of their expertise and the weighing of their evidence.

Volunteering headline outcome

Volunteering activity is enabled and supported to maximise benefits for individuals, organisations and communities.

Supporting Outcomes:

- People volunteering with organisations are well supported and valued
- Voluntary management committees can access the support they need
- The value and impact of volunteering is understood and communicated

- Organisations in the sector are supported to recruit and manage volunteers
- Volunteer management skills are developed within organisations
- Volunteer opportunities are accessible
- People volunteering are representative of our diverse communities

15. To what extent do you agree with this Volunteering headline outcome?

- Strongly Agree
- X Agree
- Neither Agree nor Disagree
- Disagree
- Strongly Disagree

16. To what extent do you agree with the supporting outcomes? Please select one of the following for each outcome.

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
People volunteering with organisations are well supported and valued	X				
Voluntary management committees can access the support they need	X				
The value and impact of volunteering is understood and communicated	X				
Organisations in the sector are supported to	X				

recruit and manage volunteers					
Volunteer management skills are developed within organisations	X				
Volunteer opportunities are accessible	X				
People volunteering are representative of our diverse communities	X				

17. If you would like to expand on your answer please do so below:

N/A.

Core Capacity and Resilience headline outcome

Core capacity and resilience of organisations within the sector is sustained and further developed to enable people and communities to thrive.

18. To what extent do you agree with this Core Capacity and Resilience headline outcome?

X Strongly Agree

- Agree
- Neither Agree nor Disagree
- Disagree
- Strongly Disagree

19. To what extent do you agree with the supporting outcomes?

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
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Voluntary and community organisations can access a range of support which meets diverse needs	X				
Organisations are supported to work effectively within a changing funding and regulatory framework	X				
Organisations are supported to demonstrate the impact of their work	X				
Organisations are supported to access funding and diversify income	X				
Organisations are supported to acquire, develop and sustain assets			X		

20. If you would like to expand on your answer please do so below:

These are valuable goals, however it is vital that we recognise that these organisations are often capable of demonstrating the value of their work and are already adept at finding pots of funding wherever they are available - particularly so when they are small organisations with small margins - but what is missing is not the skills so much as the willingness to value these organisations and available funding for which they qualify. With the withdrawal or ending of certain funding streams in recent years, 'replacement' funds increasingly do not meet the needs of these groups, or the groups are often ineligible to apply. This is not an issue that can be addressed by an increase in skills.

With regards to acquiring assets, as a Women's Sector organisation it is vital to say that this kind of goal is far beyond the abilities of many organisations in the sector and as such a relatively low priority.

Collaboration and Partnership headline outcome

Effective collaboration and partnership enhance the impact of the sector's work.

21. To what extent do you agree with this Collaboration and Partnership headline outcome?

X Strongly Agree

- Agree
- Neither Agree nor Disagree
- Disagree
- Strongly Disagree

22. To what extent do you agree with the supporting outcomes?

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
Sector infrastructure convenes diverse and representative partnerships and networks	X				
Sector-led partnerships support effective engagement with government	X				
Sector-led partnerships support local resilience and civil contingencies arrangements		X			

Collaboration and partnership enable peer support and sharing of knowledge, skills and competence	X				
Collaboration and partnerships support organisations to sustain services and improve their impact	X				

23. If you would like to expand on your answer please do so below:

N/A.

24. Are there any key elements or themes missing from either the vision or headline outcomes?

- Yes

X No

Section 4 - Delivering the Ambition

Our recent engagement and discussion with stakeholders points to five key areas where the Department for Communities can lead and deliver in support of sector outcomes:

- Creating effective partnerships: working with sector partners, with government and independent funders
- Sustained investment in sector infrastructure: commissioning an integrated framework of support geared towards a common outcomes framework
- Creating a more enabling regulatory and policy environment: delivering the agreed reforms to charity regulation and strategic policy
- Applying and championing improved funding practices: exploring, developing, applying and sharing good practice
- Improving understanding about the work and impact of the sector: collating, interpreting and sharing data and evidence

25. The Department has suggested five key areas for delivery against the proposed outcomes. To what extent do you agree that focusing on these delivery areas will support the outcomes framework?

- Strongly Agree
- ☒ X Agree
- Neither Agree nor Disagree
- Disagree
- Strongly Disagree

If you would like to expand on your answer please do so below. Note that additional sections of this survey will allow space for more comments on the detail of these delivery areas.

The last point, regarding the understanding of the work of the sector and the impact of its work is particularly vital; the Department has some way to go to fully appreciate the specialism and expertise that exists in the sector.

Creating effective partnerships

This section focuses on the Department's direct relationship with sector infrastructure organisations and local government.

Proposals for Sectoral Infrastructure partnerships

- We will work in partnership with sector infrastructure organisations to ensure effective delivery against the agreed vision and outcomes.
- The Department will seek to work with a regional infrastructure delivery partnership covering the whole of NI, capable of designing and delivering appropriate training and support and with the resources to convene and support sector leaders at a regional level (including supporting a network of community infrastructure partners) and deliver an integrated programme of research and data development for the sector.
- The Department will seek to work with a network of Community infrastructure partners which supports the diversity of community and voluntary action across council areas. Community infrastructure partners will provide a baseline of community development and volunteering infrastructure support and will be expected to operate as a collaborative network. Community Infrastructure Partners will work closely with Regional Delivery Partners where appropriate to identify and meet sectoral support needs and the role will include delivery of direct training and advisory

programmes, peer support and mentoring work, local convening and stakeholder engagement, survey and data collection.

The Department has identified the need for three types of Community infrastructure partners:

- Community Infrastructure Organisations (sub-regional): Infrastructure organisations which meet the general infrastructure support needs of VCS organisations in a defined geographical area, providing inclusive, accessible services to any organisation operating in a locality.
- Community Infrastructure Organisations (sub-sectoral): Infrastructure organisations which support a significant sub-sector of organisations working on behalf of a vulnerable demographic and where those organisations have distinct infrastructure support needs arising from the nature of their work, that aren't met through general infrastructure support.
- Volunteer Centres: Infrastructure organisations that provide support and expertise within the local community to potential volunteers, existing volunteers and organisations that involve volunteers. The Department will invest in the core work of a network of volunteer centres to support the identified volunteering outcomes.

26. To what extent do you agree with the proposed approach to delivering regional infrastructure support?

- Strongly Agree
- Agree
- Neither Agree nor Disagree

X Disagree

- Strongly Disagree

27. To what extent do you agree with the need for three types of local infrastructure support?

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree

Community infrastructure organisations (sub-regional)		X			
Community infrastructure organisations (sub-sectoral)			X		
Volunteer centres	X				

In summary, this delivery area commits to:

- Create new range of partnerships with sector infrastructure organisations to support delivery against the outcomes framework.
- Redesign the Community Support Programme in partnership with local government.

28. To what extent do you agree with these commitments?

- Strongly Agree
- Agree
- Neither Agree nor Disagree

X Disagree

- Strongly Disagree

If you would like to expand on your answer please do so below:

Our concern is that the sub-sectoral category is too vague and broad to be able to include, and guarantee inclusion of, those groups that are particularly vulnerable to exclusion from mainstream support. Many women's groups will lack the eligibility to be able to apply for generic grants and other forms of support, and without the guard rail of a dedicated women's RISP programme, along with the voice at the table that this brings, minoritised and marginalised groups will be lost.

Sustained investment in sector infrastructure: commissioning an integrated framework of support geared towards a common outcomes framework.

Headline outcome: Strong leadership and effective advocacy within the sector promotes the interests of our diverse communities and enables community connection and engagement.

Indicative Priorities for Investment:

- Leadership development (developing leadership capacity within VCS organisations at different levels, including a focus on staff retention, succession planning, driving change and growth, peer mentoring).
- Support for advocacy and effective representation (developing the skills and knowledge within organisations).
- Development and sharing of good practice on inclusive engagement methods.
- Knowledge exchange mechanisms (both virtual and in-person; formal and informal; networks, seminars, conferences etc).
- Digital communication resources (to maximise reach and impact and enable effective sharing and dissemination of information).
- Research creating meaningful data and supporting a greater understanding of the health and impact of the voluntary and community sector.
- Building skills and confidence on participatory methods and practices throughout the sector.

29. To what extent do you agree with these priorities for investment under the leadership and advocacy headline outcome?

- Strongly Agree
- Agree

☒ Neither Agree nor Disagree

- Disagree
- Strongly Disagree

30. Can you suggest any other priorities?

Our concern is with the removal of the Women's RISP and its necessary inclusion in the "sub-sectoral" division outlined above. In our view, and our experience, not only is the women's sector effectively a sector of its own, the failure to hold specific space and funding for women's work amounts to a failure to recognise the value that the women's sector brings to the VCS as a whole, and to its service users. In a fiscal environment where the sector has seen a number of cuts and funding streams dry up, this will be perceived and experienced as another cut. For the organisations that carry on, there will be the need to compete with other organisations whose own work

niche is very different to our own, a fact that will make us competitive rather than co-operative with partners outside our sector.

Sustained investment in sector infrastructure

Headline outcome: Volunteering activity is enabled and supported to maximise benefits for individuals, organisations and communities

Indicative Priorities for Investment:

- Supporting the core work of volunteer centres (Infrastructure organisations that provide support and expertise within the local community to potential volunteers, existing volunteers and organisations that involve volunteers. The Department will invest in the core work of a network of volunteer centres to support the identified volunteering outcomes).
- Supporting the work of volunteers in management positions (developing skills and knowledge of, for example, volunteers on management boards and also support to encourage increased levels of volunteering in this area).
- Digital resources to support volunteering: accessible, user-friendly resources, to promote advice, guidance, volunteer-matching.
- Research to improve available data and increase understanding on issues affecting volunteering, the impact of volunteering and the future of volunteering.
- Outreach and communication to promote awareness and volunteer recruitment.
- Recognition and reward initiatives for volunteers.

31. To what extent do you agree with these priorities for investment under the volunteering headline outcome?

- Strongly Agree
- ☒ X Agree
- Neither Agree nor Disagree
- Disagree
- Strongly Disagree

32. Can you suggest any other priorities?

No.

Headline outcome: Core capacity and resilience of organisations within the sector is sustained and developed

Indicative Priorities for Investment:

- Online resources (maintaining key data relevant to the sector including funding sources and regulation).
- Directory of local infrastructure support, better signposting to increase awareness of support available.
- Training programmes and resources (digital and in-person delivery with a flexibility to meet diverse needs), including post training consolidation and support/peer mentoring, with a focus on:
 - Income diversification (including accessing funding sources; income generation; tender writing and fundraising)
 - Business planning and Innovation
 - Governance
 - Monitoring, impact measurement, and reporting
- Acquiring, developing and managing assets (acquisition and development of land and buildings; support to manage and maximise assets including marketing, increasing accessibility and sign-posting to properly utilise and level up existing facilities)
- HR, staff recruitment and development, succession planning
- Building resilience; being responsive and flexible to meet changing/emerging needs
- Ad-hoc support and advice in response to changing needs

33. To what extent do you agree with these priorities for investment under the core capacity and resilience headline outcome?

- Strongly Agree
- ☒ X Agree
- Neither Agree nor Disagree
- Disagree
- Strongly Disagree

34. Can you suggest any other priorities?

No.

Headline outcome: Core capacity and resilience of organisations within the sector is sustained and developed

Indicative Priorities for Investment:

- Online resources (maintaining key data relevant to the sector including funding sources and regulation).
- Directory of local infrastructure support, better signposting to increase awareness of support available.
- Training programmes and resources (digital and in-person delivery with a flexibility to meet diverse needs), including post training consolidation and support/peer mentoring, with a focus on:
 - Income diversification (including accessing funding sources; income generation; tender writing and fundraising)
 - Business planning and Innovation
 - Governance
 - Monitoring, impact measurement, and reporting
- Acquiring, developing and managing assets (acquisition and development of land and buildings; support to manage and maximise assets including marketing, increasing accessibility and sign-posting to properly utilise and level up existing facilities)
- HR, staff recruitment and development, succession planning
- Building resilience; being responsive and flexible to meet changing/emerging needs
- Adhoc support and advice in response to changing needs

33. To what extent do you agree with these priorities for investment under the core capacity and resilience headline outcome?

- Strongly Agree
- ☒ X Agree
- Neither Agree nor Disagree
- Disagree
- Strongly Disagree

34. Can you suggest any other priorities?

No.

Headline outcome: Effective collaboration and partnership enhance the impact of the sector's work

Indicative Priorities for Investment:

- Development and facilitation of a strategic stakeholder Forum for VCS and government (currently the Joint Forum between government and the VCS).
- Development and facilitation of regional networks of infrastructure organisations, increasing connectivity and supporting relationship building (to include all DfC supported infrastructure partners).
- Development and coordination of peer learning/peer exchange programme (learning from Community Academy model and Collaboration NI).
- Development and facilitation of a VCS Civil Contingencies/Resilience Partnership.

35. To what extent do you agree with these priorities for investment under the collaboration and partnership headline outcome?

- Strongly Agree
- Agree

X Neither Agree nor Disagree

- Disagree
- Strongly Disagree

36. Can you suggest any other priorities?

While the latter two priorities here are valuable, the former refer to some of the issues raised in section 3 and elsewhere in this response; we are concerned that this structured approach is top-heavy and will favour large organisations with generalised concerns over smaller, more specialised and often vital parts of the VCS infrastructure. This may have the effect of freezing some of these organisations out of the model and forcing them to compete with each other for an ever decreasing amount of support, while larger organisations that do not feel the same pressures are receiving more support - and indeed a more prominent voice, at the expense of those who are more marginalised.

In summary, this delivery area commits to: Renew investment in sector infrastructure supports

37. To what extent do you agree with this commitment?

- Strongly Agree

X Agree

- Neither Agree nor Disagree

- Disagree
- Strongly Disagree

If you would like to expand on your answer please do so below:

N/A.

The Department for Communities is committed to creating a more enabling regulatory environment for the Voluntary and Community Sector through the implementation of the recommendations arising from the Independent Review of Charity Regulation in NI.

In summary, this delivery area commits to: Improve the regulation of charities

38. To what extent do you agree that improving charity regulation will support positive outcomes for the sector?

- Strongly Agree
- X Agree
- Neither Agree nor Disagree
- Disagree
- Strongly Disagree

If you would like to expand on your answer please do so below:

N/A.

Applying and championing improved funding practices: exploring, developing, applying and sharing good practice.

The Department recognises that our funding practices are a key factor in our ability to create and sustain effective partnerships with sector infrastructure organisations, and more widely to meet the challenge of “fair funding” and proportionate bureaucracy in the funding relationship between government and the sector.

In summary, this delivery area commits to:

- Support strategic relationships with government and non-government funders
- Apply and champion fair and improved funding practices

39. To what extent do you agree with these commitments?

- Strongly Agree
- ☒ X Agree
- Neither Agree nor Disagree
- Disagree
- Strongly Disagree

If you would like to expand on your answer please do so below:

Championing fair and improved funding practices is welcome.

This can be valuable in many cases but the Department should be careful to take direction from the VCS organisations in question; some funders do or would not welcome anything seen as stepping over the voices of their fundees, however supportive it is intended to be.

Improving understanding about the work and impact of the sector: collating, interpreting and sharing data and evidence.

The Department recognises that we need to make improvements to how we commission, collate, consider and communicate data if we want to understand what the sector needs and how best to support those needs. This will require a focus on both qualitative and quantitative information.

In summary, this delivery area commits to:

- Boost data on the VCS
- Improve understanding of the VCS

40. To what extent do you agree with these commitments?

- ☒ X Strongly Agree
- Agree
- Neither Agree nor Disagree
- Disagree
- Strongly Disagree

If you would like to expand on your answer please do so below:

In our view this is an absolute priority action, as presently the Department does not always understand or appreciate the value of the data collated and gathered by some

organisations within the VCS. An example of this is the failure of the Department to use data from the Expert Panel Report on the Gender Equality Strategy in its 2024 Budget EQIA, although all other social inclusion strategies were mentioned as sources of data. This creates the impression that the women's sector is particularly undervalued by the Department, compounding the loss of Women's RISP programme, and is particularly relevant when the proposed budget had - by the Department's own admission - a particular impact on women.

Annex 3 - Statutory Assessments

Equality screening of the policy framework has identified no adverse impacts. On this basis, the decision is that the policy framework should not be subject to a full equality impact assessment.

41. Do you agree with the conclusions of the Equality Screening exercise?

- Yes
- ☒ No
- Don't Know

If no, please provide your reasons:

It is incoherent to have a detailed EQIA that recognises the significant amount of work carried out by women's organisations under the Department's remit, but assigns no negative impact to the proposed changes, despite the fact that the Women's RISP programme is to be discontinued. If the intention of the Department is to ensure that women's organisations continue to be funded to carry out the kinds of work they are doing; including childcare in the women's centres, work with refugee and migrant women, but also infrastructure support, then W-RISP should be maintained as it functionally will be anyway. If the document produced is read at face value, however, it appears to be the case that open competition may result in no women's organisations being funded to provide infrastructure support. That is a negative impact on women, and the EQIA is difficult to parse in that context.

We believe that the decision that there will be no negative impacts from these changes on the basis of the protected characteristic of gender is a mistaken conclusion, and in light of the concerns raised here, by other women's organisations and directly with the Department, this decision should be reconsidered.

42. A Rural Needs Impact Assessment has been completed in line with the Department's duty under the Rural Needs Act (Northern Ireland) 2016. The needs of people in rural areas have been identified and taken into consideration with the aim

of providing balanced infrastructure support provision across all geographies. Do you think the proposed draft framework presents any other issues for rural communities?

- Yes
- ☒ No
- Don't Know

If no, please provide further comments:

The fact that respondents had to email to request this screening document is poor practice.

The RNIA is overall quite good but we note that although it acknowledges the support provided to rural communities and specifically to rural women by W-RISP it does not acknowledge that the rural projects and organisations guaranteed support by the restructuring of the Department's support to the sector involves ending that specialist support to rural women, a demographic routinely underserved by central support of any kind from any Department. The reality is that the removal of W-RISP represents a negative impact for rural women specifically, and this should be acknowledged.

5. Additional Comments:

To conclude, although we welcome the changes proposed to the Concordat and to the ways that the Department intends to engage with the Sector, particularly with regards to the evidence gathered by the sector and the promotion of the work that we do, we have grave concerns about the impacts and potential long-term effects of the restructuring of the sector's relationship with the Department.

With regards to the proposed arrangements, the approach suggested is a very top-heavy approach that will raise issues for the independence of the sector and may even undermine the values of the proposed revisions to the Concordat.

In addition, and more urgently, the impact of the loss of the Women's RISP programme will have a negative impact on the women's sector and on the women who use our services, regardless of whether or not some women's sector organisations are successful in applying for funding on a sub-sectoral basis. A sector that has faced cuts on almost every front needs support to continue its work, and particularly so from the Department with ultimate responsibility for Gender Equality. We reiterate our view that the Women's RISP should be maintained.

ENDS

For any questions or queries relating to this submission, please contact:

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