

Public Participation Network Structural Review

Feedback Template

Further to the publication of Mazars [*Structural Review of the Public Participation Network – Report*](#), the Department of Rural and Community Development is eager to hear the views of all Public Participation Networks, the CCMA, Local Authorities, host organisations and other relevant stakeholders on the report.

We want to work with you to prioritise recommendations, to address any gaps and to develop an implementation roadmap to guide any changes that may be made to how PPNs are structured. The process will not be limited to the recommendations made by Mazars in the structural review report, but will also be open to further ideas and recommendations prompted by the report and by your own experiences.

In advance of a webinar on the Report which is due to be held in September, we would be most grateful if you would share your feedback on the report. This will be used to structure the webinar, so that the discussion can be directed to issues which PPNs and other stakeholders feel are most significant.

We are therefore requesting written feedback from PPNs, the CCMA, Local Authorities, host organisations and relevant stakeholders on the recommendations made in Mazars report, any gaps which the report does not address, and any other issues of concern which you would like to raise.

We would also be grateful for your initial thoughts on implementation, for the roadmap which will be developed to guide action on strengthening the national Public Participation Network structure in the coming years.

We have set out some questions below to gather your input. We would be grateful if you would take time to consider the content of the report over the summer and return your feedback by email to the Department at PPN@DRCD.gov.ie, by Wednesday, 31 August 2022.

Section 1. Your views on Mazars Report and Recommendations

Following the publication of Mazars [Structural Review of the Public Participation Network – Report](#), the Department of Rural and Community Development is eager to hear the views of all Public Participation Networks and other stakeholders on the report.

A. General feedback

1.1 What is your broad feedback on Mazars Structural Review of the Public Participation Network – Report?

The Resource Worker’s Network (RWN) welcomes this opportunity to provide input in respect of the process, findings and recommendations of the structural review of Public Participation Networks which was commissioned by DRCD and carried out by Mazars in 2021. We intend this submission as a positive piece of work which indicates the RWN’s commitment to the development of truly effective and responsive structures to facilitate the participation of our communities in the decisions that affect them. We are ambitious for the PPN network and proud as workers of all PPNs have achieved to date. The concerns raised herein are made in that spirit: the RWN as the people responsible for running all PPNs throughout the country, are uniquely positioned to contribute to this process - our expertise and experience on the ground can we hope be of great value to DRCD.

We note that the Mazars Review is described by DRCD as a ‘root and branch’ review of participation network structures and that the review itself responds to a programme for Government commitment to ‘carry out a comprehensive review of Public Participation Networks to ensure that they are fit for purpose for climate action and community development.’”

It is a shared view of the RWN that the scope of, findings and recommendations of the Mazars Review should not form the basis for the future development of the PPN network as we consider them to be an incomplete analysis. RWN make this assertion on the basis that the ‘ecosystem’ within which the PPNs are mandated by legislation to operate (local government, elected officials, policy committees, local community development committees, national government departments particularly DECC & DHLGH to date) was not examined or scrutinised to see if they are resourced, trained and instructed to respond to the activities of the Public Participation Networks and few recommendations for these stakeholders are provided. **The Public Participation Network’s core remit is to bring the voices of community groups, including those marginalised and socially excluded into formal policy making structures of Local Authorities.** To examine the function and structures of the PPNs in absence of a similar ‘root and branch’ review of the structures to which the PPNs input is of limited use. We can not say with certainty for example that the recommendations made in the Mazar’s review will benefit and develop the PPNs because to an extent, they examine the PPNs outside of their function.

Problem Solving vs Effective Development:

It is our view that the Structural Review was carried out as an exercise in ‘problem solving’ resulting in a review that deals with what Mazar’s determined are the problematic areas of the PPNs (*“the intent of the report is to focus attention on areas requiring action and improvement, and as such (it) does not place the same level of emphasis on positive aspects of the PPN.”*). This we feel missed an opportunity to examine the changes needed to the PPN structures for them to develop well into the future. It is difficult for the RWN to engage fully with recommendations

made on the basis of problems which exclude for the most part the experiences of success. Problems within individual PPNs are subjective and relational in their nature. Applying a remedy that solves a problem in a particular context or location may well cause problems in another area or context. The RWN would prefer a positive developmental approach to be taken to enhance the PPNs rather than the problem solving approach taken by Mazars.

The RWN has noted the concerns voiced on occasion by DCRD on the workload for the department created by the oversight and support for the PPNs. The RWN considers that whatever department has oversight of an 18,000 member group strong network will need to seek the resources required to enable the structure to be supported. In this contribution to the process and in our pre-budget submission to DCRD the RWN addresses the resourcing of the PPNs themselves and the action needed. We consider that DCRD may need to seek further resources for itself to support the future development of the PPNs.

The PPN's role and particular remit – to bring the diverse voices and expertise of community groups into formal decision making structures - is challenging for the more hierarchical structures of Local Government and Government Departments to respond to effectively. A comparable example is the Volunteer Centres - when the Volunteer Centres do their work well people have great experiences volunteering and the country as a whole benefits from their efforts. In contrast, when the PPN do their job well, a variety of voices are brought to the table in decision making structures, voices of those who wish to influence the decisions being made. This, whilst valuable and necessary and the whole point of the PPNs, can be uncomfortable for those not used to, resourced or trained to take this input on board. Democracy is time consuming, but those of us involved in PPNs understand that when we work well we can improve the decisions made in and for our communities and concerning our resources. We can change the consciousness and ideologies informing policies and can troubleshoot problems which may be only apparent to members of our communities with particular lived experiences.

We consider that the Mazar's Review failed to engage with the nature of participative democracy and mostly engaged with stakeholders as regards how they viewed the operation of the PPNs themselves.

It should be noted that from the very earliest stage of this review process (i.e. setting the terms of reference and tendering for this review to be carried out), our representatives on the PPN National Advisory Group have insisted that any review which examines the PPNs outside of their mandated and obligatory links to other structures including the Local Authority will serve little or only a partial purpose.

The RWN in our annual reports from each PPN have identified with some clarity, areas where the PPNs and Local Authorities' engagement can be improved. We also wish to highlight that we have collectively and as individual PPNs carried out research and made submissions both locally and to the DCRD on the following:

1. Resourcing of PPNs
2. Terms, conditions and turnover for PPN staff
3. Operation of SPCs/Committees
4. PPN representatives' experiences on Committees

The RWN do not consider that their collective work on identifying strategies for improvements of aspects of the PPN's operations is given sufficient consideration in the Mazars review and recommendations.

1.2 Are there areas that you think are important but which were not addressed by the report? If so, please give detail

Areas of importance unaddressed by the report include the following:

1. Local Government decision and policy making structures preparedness for engagement from PPNs. The RWN considers that a structured change management programme needs to be carried out within LAs in order to facilitate the cultural change required for them to engage with deliberative democracy.
2. The operation of, processes and effectiveness of Strategic Policy Committees. JPCs and LCDCs and their suitability for purpose.
3. The methods of establishing 'independence' for PPNs other than through an annual declaration.
4. Resourcing of the PPNs - the PPNs funding has not increased since their establishment resulting in a circumstance where we have an effective annual decrease in funds alongside an increasing workload. Whilst this receives mention within Mazars report it is a current live issue and the effectiveness of PPNs is entirely dependent on them being resourced for the work expected of them.
5. Staff Terms and conditions: Resource worker retention, reporting structures, staff development and promotional opportunities and terms and conditions are all considered in the Mazars report. However RWN do not consider any recommendation contained in the Mazars Report sufficient to ensure better retention, performance and an improved work environment. The RWN acknowledges DRCD's assertion that it can have no responsibility for individual workers' contracts - this is not what is necessary. At a minimum, DRCD can ensure the PPNs are resourced sufficiently to provide for predictable and ordinary situations such as maternity leave, sick leave, increments, pension, staff development and recipients of these funds can be obliged to demonstrate how they are meeting these requirements. It has been possible for DCRD to issue guidance on the Grades and the ring fencing of funds for workers and such an approach in a circular letter indicating that funding recipients must demonstrate their compliance is unproblematic from our perspective. This would be consistent with the terms and conditions of the majority of workers who are hosted within local authorities and with employment legislation as recommended by Mazars. We welcome discussion and engagement on this point.
6. Deliberative and participative democracy 'flat' or non-hierarchical structures.
7. What the PPNs are designed to achieve and whether there is a shared understanding of this at Local Government and Department level.
8. The necessary role of the Department of Housing, Local Government and Heritage in engaging Local Authorities fully in participative processes.
9. The report presents no vision or future-focussed ambition for the PPNs and the role they are designed to play.
10. The horizontal collaborative networking capacities of the PPNs which are already apparent in most local authority areas where working together through PPN structures and events has led to an increase in cooperation between community groups to achieve desired goals even without reference back to LA structures.

1.3 Is there existing good practice in particular areas that could serve as a model for addressing any of the findings in the report?

The RWN has many examples of good practice available to it from our wide experience and has over each consecutive annual reporting process documented same.

1.4 Do you have any other ideas or want to raise any other issues in relation to Mazars Report?

Secretariats:

We note and share the concern of our other stakeholders regarding the role of Secretariats. The report did not appear to sufficiently acknowledge the importance of the Secretariat (3.1.3). A PPN Secretariat is diverse and brings together valuable experience from the geographical and social spectrums within the county / local authority area. The Secretariat is the first port of call for advice and direction for the PPN workers and is public participation personified.

The report refers to an over reliance on volunteers and onerous responsibility on the Secretariat (3.1.3). While we acknowledge that the availability, capacity, and commitment of volunteers is finite and shouldn't be taken for granted, we would caution against the possibility of transferring responsibility and decision making to a higher level - this would go against the bottom-up approach that is intrinsic to PPN principles. One of the great successes of PPNs is their grass roots engagement.

Whilst we have received the assurances of DCRD that the secretariats are not under threat, we don't understand why a review of the PPNs is not inclusive of a review of the Secretariat structure if that is necessary. The secretariats have no role or function outside of the PPNs and therefore any review of the PPNs should have incorporated a review of the Secretariat's functions, role and future needs. We have no clear means of evaluating any proposal for a national coordination structure unless it is clear where the secretariat sits within that process.

We note the text of Mazar's comments at 3.1.3.1 :

“Further consider the role of the Secretariat and review its purpose as part of the PPN structure – the Secretariat plays a significant role with a high degree of responsibility in the operations of PPNs. As volunteers, this could be considered too onerous. As such, it is important to review the Secretariat structures in each PPN, to understand where gaps may exist in delivering on their responsibilities relating to agreements in place setting out the terms of the hosting arrangement and to ensure that boundaries are clear. Where responsibilities are too onerous and are impacting on the functioning of the PPN, consideration should be given to assigning responsibilities elsewhere. Consider elements of the current Secretariat role that could be delivered through a central support structure. Note: the review of the Secretariat structure should be considered in the context of the structure option chosen (see section 4.1 for structure options). The options differ in the level of central support provided, which would impact the role of the Secretariat. As a result the Secretariat structure is not explicitly referenced in the structure options proposed.”

It appears that Mazar's are proposing a further review of Secretariats and pending the outcomes of that, specific supports and or removal of certain responsibilities should be developed on an

individualised basis or as part of one of the proposed new structures. The RWN considers that any model proposed for the PPNs to consider should detail what role and responsibilities the Secretariats will have within it. We propose that DRCD revert to Mazars and ask them to detail how they visualise the role of the secretariat within each of their proposed options in advance of the Webinar. From the RWN perspective, the Secretariat is key in our line management, work plan and processes. Introducing any confusion about the Secretariat's role unless there is a firm plan to strengthen and resource it is likely to be counter-productive.

College System:

The RWN do not agree with the proposal to remove the College Structure. Retaining the 3 College Structure (3.3.1.1) is vital to the PPN. It ensures equal access of participation for minority communities (e.g. social inclusion & environmental groups), bringing the valuable knowledge and experience of these important cohorts into the planning & decision making arena. This is extremely important with the current challenges for disadvantaged communities and the environment.

Furthermore, the Local Authority allocates the community seats on the Strategic Policy Committees to the social inclusion, community & voluntary and environmental sectors. The input from each of the Social Inclusion and Environmental College needs to be protected within decision making. Each of these colleges and member groups frequently need to influence policy in ways which might not be generally popular. This is their role and what they bring to the PPN - policy inputs not diluted by the need to be elected or by the views of a majority.

If the PPN is adjusted to represent the community and voluntary sphere as an undifferentiated group it is difficult to see how the inputs from minority groups will survive and indeed what benefit there would be for them in participating in the PPN and also how the PPN might differentiate itself and its role in policy from Councillors.

B. Feedback on Recommendations

1.4 Which three recommendations in the report do you think should be prioritised as the most urgent to address?

The RWN's three priorities differ from those proposed by Mazars, as will be evident from the submission to this point. The key issues we wish to see addressed with immediacy are as follows:

1. Resourcing of PPNs
2. Staff Terms and Conditions
3. Review of external factors that have been highlighted as impacting true participations.

In response to the recommendations included in Mazars report the RWN identify the following as important.

Staffing & Resources

PPNs, in their current form are not sustainable because they are under & ineffectively resourced both financially and in their staffing. The annual funding model is detrimental to forward-planning and it undermines any security of tenure for the PPN as an organisation and for the staff. This is demoralising and shows little commitment to public participation.

The key focus of the PPN is participation. However due to the wide variety of other duties and the increased call for participation at national level it is difficult for PPNs to facilitate participation effectively and efficiently without additional staffing resources. Engagement is time intensive.

The Mazars report highlights the challenges in employing and retaining staff (3.5.2). This is crucial as the staff is central to a well-functioning PPN. Roles & Responsibilities as well as Terms & Conditions need to be revised and standardised across PPNs. While staff may have different employers, a directive should be issued from the funding bodies that staffing terms and conditions should be standardised and aligned with the statutory sector and this should be adequately financed.

Coordination & Communication

To date PPN development has been self-directed with little national coordination. This, coupled with the lack of communication between stakeholders, the significant staff turnover and the practise of immediate action rather than/without strategic & forward planning & development has resulted in many of the issues that the report has raised and made recommendations for, particularly 3.3.2, 3.3.3, 3.4.1, 3.4.2, and 3.4.3

Part of the responsibility for coordination lies with the Dept Housing, Local Government & Heritage (due to their role in overseeing local Government and by extension the SPCs) and the Dept Rural & Community Development (due to their responsibility for PPNs). Working together these two departments could review and develop processes that could enable real deliberative democracy, citizen engagement, and strategic planning 3.3.1.

Working in silos is not efficient and adds an unnecessary workload on individual PPNs. Developing and rolling out common processes as well as providing consistent information would be extremely useful. This would also benefit communications, providing a strong collaborative message for PPNs both internally and externally. Retaining institutional memory and experience and making it accessible is also important, particularly in relation to staffing / secretariat / representative

turnover. With PPNs being increasingly approached to input at national level some coordination / guidance at national level would also be useful.

Whilst the RWN largely agree with the need to avoid duplication and the need for standardised supports, they are concerned with recommendations to establish ‘one way of doing things’, i.e. ‘the PPN way’. As a recommendation, this does not respect the participative nature of the PPNs. We exist to serve and amplify the diverse voices in our community groups and this is where the PPNs present a challenge when viewed from a corporate or institutional perspective or indeed a national one. The culture of a PPN and its individual colleges should be the culture of its member groups, not one identified for it by a national coordination unit. However, having individual cultures exist within each PPN does not in any way prevent the development of standardised operation methods for particular mandated tasks.

Because PPNs are engaging on many different levels and with diverse communities, communications and processes must be adapted to target each different audience. It must be coherent, concise, consistent and easily shared in and on different stakeholder platforms.

Back to Basics

The RWN is in large agreement that the original remit of the PPNs should be reinforced in messaging, communication and in the necessary shared understanding between stakeholders.

1.5 Do you think that a central coordination structure, set out in section 4 of the report, would be beneficial to PPNs?

If so, which of the three recommended options do you believe would be most suitable?

If not, please provide your views as to why not

While we acknowledge that there is a definite need for some form of central coordination structure, we are unsure that the models provided in the report will address those needs. The PPN structure has been identified as complex - adding another layer would add to that complexity. Therefore adding a new structure / layer must be beneficial without being an added burden. We are concerned also that none of the proposed options will address the answering structures in local government and their preparedness for input from diverse voices through the PPN.

The RWN feel that this review was an opportunity to consider other options for the entire PPN network which may have informed different future paths. RWN would like to see analysis done of the possibility of the entire PPN structure being independently managed and operated by Civil Society. This would continue to entail accountability for funding from Government whilst the operational and policy aspects would be for the civil society groups to decide themselves through their own democratic structures. We welcome further discussion around such possibilities.

The report indicated that recommendation 3.1.1.1 “Further Review of the Secretariat” resulted in the Secretariat structure being omitted from the examples of a central coordination structure. This causes great concern and shows lack of understanding of the importance of the Secretariat structure. We request that a vision of the role of and supports for the Secretariat is requested from Mazars in regard to each of their proposed options in advance of the webinar.

We would welcome the opportunity to have a facilitated national conversation to further explore the suggestions of a central coordination structure so that any development would be understood and approved by PPN member groups and secretariats as fit for the purpose of facilitating their engagement in decision making purposes.

1.6. Did you identify any areas which you feel were not addressed in the recommendations made in the Report? If so, please share your recommendations in this regard

Previously noted at 1.2

1.7 Do you have any other feedback on the recommendations made by Mazars in the report?

The RWN noted many useful suggestions and recommendations within Mazar’s report. We welcome any opportunity to engage around these. We particularly welcome the various calls for resourcing of the PPNs to be improved.

The RWN is concerned with the wording included in the Programme for Government as to whether the PPNs are fit for purpose for Climate Action and Community Development. We feel there are a variety of views across Government departments on the role and capacity of the PPNs. Our remit around Climate Action for example, is to bring the voices of environmental groups into policy making at local government level. Our remit around community development is to ensure that the voices of the community development groups in our memberships are brought into policy making as above. We have an extra remit around seeking to ensure marginalised groups are facilitated to participate and whilst doing that work can overlap into community development we are not as such community development organisations. We consider that work to develop a shared understanding between stakeholders of the role, functions and capacities of the PPNs would be a necessary underpinning of future development.

Section 2. Your input on the Implementation Roadmap

A working group, representative of key stakeholder groups, will be established to develop a roadmap to guide implementation of the recommendations in the Mazars report and any additional recommendations that stakeholders agree on during consultation. We will seek members for the working group in due course.

The Implementation Roadmap will be used to guide action on strengthening the national Public Participation Network structure in the coming years.

2.1 What is your broad feedback on the areas that should be included in the Implementation Roadmap?

Many of the recommendations appear to need further research done in consultation with PPN stakeholders prior to the development & implementation of actions/processes.

2.2 What issues do you feel should be prioritised in the Implementation Roadmap process?

“Making everyone part of the journey” (page 56) - this is the most important sentence in the whole report

2.3 Did you identify any issues that should be considered as part of the Implementation Roadmap that were not included in Mazars Report? If so, please provide further detail

Buy in from stakeholders external to the PPN but whose work & processes impact on the PPN achieving its purpose.

2.4 Is there any other feedback you wish to share on implementation or any issues which you wish to raise?

There would appear to be a need for monitoring, updating and future implementation. While it is understood that a Working Group is to be set up to progress the implementation of agreed recommendations it is unclear who would be responsible to undertake this significant workload.

The RWN wishes to indicate our willingness to assist in whatever way we can with the processes at hand and our appreciation for the work being done by DRCD to support the PPNs. As detailed above we consider there to be an ongoing need for the DRCD to bring diverse voices into their deliberative and decision making processes as regards the next steps. The RWN will be pleased to help with this.