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Learning lessons from local social/poverty impact assessment

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Abstract

This article examines the role of social/poverty impact assessment in contributing to the shaping of policy at a local level in Ireland. In doing so, it briefly describes the broader impact assessment landscape internationally, presenting key definitions and identifying underlying principles. From this the article highlights the key elements of social impact assessment, proposing a three-phase process to guide consideration of impact assessment, namely a pre-assessment phase, an assessment phase and a post-assessment phase. An analysis of these different phases then allows for a range of technical and more ‘theological’ assessment complexities to be presented. With this background in place, the article moves on to examine the local-level experience in Ireland. It acknowledges the highly innovative nature of poverty proofing as originally introduced in 1998 and retitled poverty impact assessment following a 2006 review by the Office for Social Inclusion. However, it points to the low level of engagement with poverty impact assessment processes at local level and suggests that poverty impact assessments have become largely subservient to other forms of impact assessment, particularly strategic environmental assessment. The article concludes that the local level does offer an important space for the practice of poverty impact assessment, but is unlikely to do so without the provision of appropriate capacity and resources, or without it being hardwired as a legislative obligation, albeit accompanied by mechanisms to sensitise and incentivise policymakers towards its usage.

Keywords: Impact assessment, local governance, local policy, social inclusion

Introduction

The art of designing policies that are effective and efficient and, more significantly, that embrace equity and equality concerns is challenging. Rather than being a singularly predictable, transparent and rules-informed process, it is instead, more often than not, opaque and, to those outside the process, more than a little mysterious. Policymaking sometimes seems to be more intuition rather than evidence-led or evidence-informed. It is also somewhat notorious for prioritising short-term political ambition while postponing consideration of longer-term societal needs, complicated further by the gap that can often exist from design to delivery. But most significantly, in the context of this article, generalised policymaking often speaks to the needs of the majority, to the standardised and to the privileged, and often fails to take account of the marginal, that which is different, that which pertains to the less powerful.

This is not to say that tools are not available to guide how policy is made, nor that all policymakers are unconcerned with the needs of the less powerful. As well as the proofing/impact experiences looked at below, the creation of the Irish Government Economic and Evaluation Service and the Department of Public Expenditure and Reform's Public Spending Code signals a concern to fine-tune the policymaking machinery, albeit motivated mainly by validly held but somewhat narrow value-for-money criteria.

In this article some of the array of policymaking tools will be examined, as will some of the constraints that challenge their deployment. The article particularly looks at the role of social/poverty impact assessment (S/PIA) and speculates about its relevance at a local, as opposed to a national, level. To do so, it first explores the language of impact assessment, proofing and the principles embodied within such terms, and reminds the reader that suspiciously obvious language may camouflage a host of hidden and contested meanings. The article then goes on to ask why we need such tools in the first place, and who might use them. Next, some of the complexities involved in applying proofing/impact assessment strategies are explored. Having set this conceptual landscape, the article then goes on to look at some recent Irish and international experience before concluding with some speculation about how proofing/impact assessment tools can be better deployed to enhance local policymaking and delivery.

Proofing and impact assessment – What are we talking about?

Internationally, there has been an increasing movement towards the development and application of various approaches to inform and assess the impact of policy, programmes and projects. The general consensus is that the origin of the concept can be traced to the early 1980s with the US described as the ‘first adopters of policy assessment’, motivated mainly by ‘regulatory and cost saving’ concerns (Adelle & Weiland, 2012, p. 26). The later adoption of policy assessment in the EU shared a concern for better regulation, particularly to lessen the administrative and economic burden of regulation. Impact assessment is defined by the International Association of Impact Assessment (IAIA) – the main professional body in the field of impact assessment – as ‘the process for identifying the future consequences of a current or proposed action’. It has four core components: generation of information to inform decision-making, promotion of transparency and participation of affected groups, identification of ways to mitigate or compensate for the negative impacts of policies and, finally, making a contribution to sustainable development (MacNaughton, 2015).

SIA is a component part of this broader field of impact assessment. Based on consultation with practitioners in the field, the IAIA describes this as:

the processes of analysing, monitoring and managing the intended and unintended social consequences, both positive and negative, of planned interventions (policies, programs, plans, projects) and any social change processes invoked by those interventions. Its primary purpose is to bring about a more sustainable and equitable biophysical and human environment. (Vanclay, 2003, p. 6)

Crucially, SIA is seen as being more than a one-off task. It is not a static exercise but rather a more dynamic process of analysing, monitoring and managing both intended and unintended social consequences arising from a policy or intervention. As such, SIAs are not simply carried out to identify ways to lessen negative outcomes but to encourage a more ‘proactive stance to development and better development’ (Vanclay, 2003).

Within the SIA family, increasingly specialised and distinct assessment processes are emerging to focus on the needs of particular

groups or categories, including poverty proofing/impact assessment, equality proofing, gender proofing, rural proofing, human rights impact assessment (HRIA) and health impact assessment, to name but a few. Over forty different types of specialist impact assessment processes have been identified, leading some to advocate for greater integration of approaches in an era of reduced government engagement and willingness to fund impact assessment (Morrison-Saunders et al., 2014). Many of these follow the same definitional formula as the catch-all SIA, emphasising some level of prediction and analysis of consequence as well as options for policy redesign or mitigation. For the remainder of this article the unified term S/PIA will be used to capture the broader field of social impact.

Why do we need social/poverty assessment tools?

Advocates of the use of S/PIA tools, as might be expected, point to the benefits they produce, proposing that they help to maximise policy and project effectiveness, while at the same time minimising costs (Vanclay, 2003) and avoiding encounters with a variety of potential risks (Esteves et al., 2012). The opportunity to bring evidence to the policymaking process and to counter ‘interest-based policymaking’ is also highlighted, as is the enhanced capacity to integrate cross-cutting issues into policymaking (Adelle & Weiland, 2012, p. 26) and to alert planners to changes in key ‘zones of influence’ (Morrison-Saunders et al., 2014, p. 3). However, little of the impact assessment literature delves more deeply into the nature of inequality in society that ultimately generates the need for assessment mechanisms in the first place. Some additional rationales therefore need to be considered.

Firstly, not all ‘citizens’ benefit equally from all policies. Policies, consciously or otherwise, produce differential impacts, and that potential for difference needs to be captured and accounted for. Within debates on the relational state it is proposed that the state’s primary concern is with ‘standardisation’, the suggestion being that:

States work best when a problem has a technical, mechanical solution which can be employed everywhere within a shared geographic space. They are at their worst when they need to respond flexibly to local particularities, when they need to act nimbly or with nuance, and – most importantly of all – when they delve into problems of the nation’s spirit or of the human heart. Anything which requires difference, contingency and essential

unpredictability is not going to be a skill of the state. (Stears, 2012, p. 39)

The argument can be made therefore that standardised policymaking needs to be adjusted towards nuance and nimbleness, in part recognising that policymakers may simply not realise or conceive of how policies can have different impacts on different groups.

There is of course a further argument that policymakers do in fact realise the differential impact of their policy decisions but choose to pursue them to achieve conscious and deliberate outcomes, such as the favour of the majority or indeed of powerful minorities. The often unstated and camouflaged strains of a moral underclass discourse may shape policymaking, where the ‘socially excluded are presented as distinct from the rest of society’ and where the main concern is with the behaviour of the poor rather than with processes within wider society (Levitas, 2004, p. 44). Officials, as well as elected representatives, may be subject to such motivations, as concluded by the ‘Task Force on Inequality in America’ convened by the American Political Science Association:

The privileged participate more than others and are increasingly well organized to press their demands on government. Public officials, in turn, are much more responsive to the privileged than to average citizens and the least affluent. Citizens with lower or moderate incomes speak with a whisper that is lost on the ears of inattentive government officials, while the advantaged roar with a clarity and consistency that policymakers readily hear and routinely follow. (American Political Science Association, 2004, p. 1)

Because of this, some would argue that the public administrator is obliged to counter this tendency by consciously seeking to deliver greater equity in policymaking and service delivery (Pops & Pavlak, 1991). S/PIA would seem to be central to the pursuit of such objectives.

What are the main features of social impact assessment/proofing?

Beyond headline definitions, the basic component parts of impact assessment are easily assembled from the relevant literature and

practice, though not all approaches pursue assessment from the same starting point or at the same level of detail. Understanding these is a necessary prerequisite to any consideration of local-level action on S/PIA.

In an ideal world, it is proposed that impact assessment, social or otherwise, should be ‘purposive, rigorous, practical, relevant, cost-effective, efficient, focused, adaptive, participative, interdisciplinary, credible, integrated, transparent and systematic’ (Morrison-Saunders et al., 2014, p. 3). As if this did not present a sufficiently challenging formula, it is further suggested that SIA in particular requires an understanding of core concepts such as ‘culture, community, power, human rights, gender, justice, place, resilience, sustainable livelihoods and the capitals, as well as of the theoretical bases for participatory approaches’. The influence of these dimensions in creating and changing social relationships is also highlighted, leading to the conclusion that those likely to be involved in the SIA process would need to be aware of and to ‘reflect on potential biases’ (Esteves et al., 2012, p. 40).

Another key dimension of SIA is the distinction drawn between impact assessment as a predictive tool or as the basis for negotiation. On one hand, narrowly predictive approaches frequently take on a technocratic character, believing that social and other impacts, in a positivist sense, are simply out there waiting to be uncovered by the rigorous investigation of an expert official or researcher. By contrast, a negotiated approach to SIA operates from the belief that social impacts are ‘socially constructed through the processes of conflict and negotiation that emerge around proposed change – not waiting independently to be discovered and evaluated’ (Lockie, 2001, p. 283). In any case, even if S/PIA processes are built around a midpoint between the narrowly technocratic and the broader deliberative approaches, there are considerable implications for the types of skills and capacities needed to support and enable processes of participation, dialogue, deliberation and resolution of potentially conflicting perspectives.

Impact assessment may be further enriched or complicated by reference to overarching standards or frameworks that lie beyond the immediacy of a specific policy issue. In particular, efforts have been made to integrate human rights considerations into impact assessment processes though it is suggested that historically ‘impact assessment has not explicitly considered human rights’ (Kemp & Vanclay, 2013, p. 86). The more specific HRIA process has been defined by Paul Hunt,

the UN Special Rapporteur on the right to health, as ‘the process of predicting the potential consequences of a proposed policy, programme or project on the enjoyment of human rights’ (MacNaughton, 2015, p. 65). Arising from this is a recognition that alongside policy specific indicators there are explicit and normative standards, such as human rights, against which policy, programme or project decisions can be judged.

Taking all of these issues into account and drawing from the literature on SIA, the core components of an S/PIA process are presented in Table 1 in three phases: pre-assessment, assessment and post-assessment.

Table 1: Phases of social impact assessment

<i>Stage</i>	<i>Detail</i>	<i>Key principles</i>
Pre-assessment		
Build foundational understandings and capacity	General processes to build capacity around understandings of ‘culture, community, power, human rights, gender, justice, place, resilience, sustainable livelihoods and the capitals, as well as of the theoretical bases for participatory approaches’ and personal bias (Esteves et al., 2012) Building capacity in impact assessment Developing participatory/deliberative disposition and skills	Beyond instrumental and towards transformative capacity
Assessment		
Screening	Determining if the policy intervention will have a significant impact	Transparency Public
Scoping	Establishing assessment team and assessment plan Work planning and timetabling Early stakeholder analysis/identification Identifying the rights that may be impacted upon Identifying information sources	Participation of affected groups Equality and non-discrimination
Information provision	Initial information provision – to the public and affected populations	Accessibility Relevance
Data collection	Asking the right questions (The World Bank, 2003) Establishing baseline data Collecting data on potential impacts – quantitative and qualitative, user friendly,	Appropriateness Accessibility

Table 1: Phases of social impact assessment (contd.)

<i>Stage</i>	<i>Detail</i>	<i>Key principles</i>
Data collection (contd.)	multi-site, multi-method Questioning and understanding the ways in which policy impacts are identified and assessed Assessing institutions (public and private) and the way they behave (The World Bank, 2003)	
Data analysis/ rights analysis	Analysing impact Adding a rights-based analysis	Inter-dependence of rights Participatory analysis
Policy adjustment	Identification of potential policy changes and/or mitigation strategies and/or enhancement/compensation strategies Debating/negotiating/deliberating options with all relevant stakeholders Openness to reform institutions as well as policies Feeding back into policy choice	Openness – to genuine adjustment vs minimalist mitigation Negotiation and deliberation
Publication	Publishing and sharing the assessment	Openness and transparency
Post-assessment		
Monitoring and accountability	Develop a monitoring plan to trace and track changes and adjustments in policy (Burdge, 2003)	Transparency and traceability

Briefly, the pre-assessment phase is concerned with building capacity, in particular moving beyond the traditional, instrumental capacities usually associated with public administration towards the types of transformative capacities required to manage and value the involvement of those affected by policy choices. This also picks up on challenges to deepen understandings of power, community, culture, etc., as well as to encourage reflection on pre-existing prejudices and bias.

The assessment phase refers to the, by now, standard elements of S/PIA: screening, scoping, information provision, data collection, data analysis, policy adjustment and publication. As presented here, the emphasis is on a model that preferences engagement, openness, transparency, participation, negotiation and deliberation. However,

one would be foolish to assume that such ambition can be easily achieved. In practice, the more ambitious model may well be replaced with a narrower, more technocratic perspective that limits the exercise to the realm of the professional and the ‘expert’, in the pursuit of financial and time savings.

The final post-assessment phase emphasises the role of monitoring and accountability, designed to ensure that the ‘impact of impact assessment’ is observed and measured. Not only can valuable learning be gained from such an approach but also the very knowledge that impact assessment processes are themselves being assessed may well contribute to the quality of the process. Clearly, this is not something that should take place at the end of the assessment process only but should be supported by ongoing data-gathering exercises in support of final evaluation.

Complexities

Of course, despite the array of reasonable and rational arguments in favour of S/PIA, actual delivery is never quite so straightforward. Complexities abound, both of a technical and a more theological nature, some of which have to be named before moving on to consider local-level practice and potential.

The extent or reach of assessment

First, to the technical complexities. The key elements table above sets out three potential phases of assessment, each demanding considerable time and resources. Undertaking a full S/PIA on the scale envisaged through these different phases demands a high level of commitment, time, resources and energy. In reality, that level of commitment is frequently absent, with priority often given to impact assessment processes that are hardwired into legislation, particularly environmental impact assessment. However, even with such hardwiring there can often be a large gap between the stated policy of impact assessment and its implementation (Adelle & Weiland, 2012). This may well lead to compacted assessment processes where screening practices become quite restrictive, time frames for public participation are limited or, in some cases, public participation is removed entirely (Morrison-Saunders et al., 2014).

The impact assessment hierarchy

It was noted earlier that multiple ‘specialist’ impact assessment types exist (Morrison-Saunders et al., 2014). However, within the broader

family of impact assessment not all are created equally, with S/PIA often seen as the poor relation (Esteves et al., 2012). A consequence of this diminished status is the likelihood that, instead of a comprehensive S/PIA, only a partial analysis may be undertaken, often within a broader process of impact assessment. While this undoubtedly reflects the pressure that exists on policymakers to address multiple and possibly competing assessment requirements, it nevertheless results in the relegation and/or amalgamation of S/PIA processes to the point where they risk becoming meaningless.

KSD (knowledge, skills and disposition) deficiency

Compounding or perhaps causing the diminished status of S/PIA is a deficiency in the mix of knowledge, skills and disposition needed to support it, where knowledge refers to the exposure to, and understanding and analysis of, the range of power, community, human rights and other issues referred to earlier; skills comprise the not inconsiderable technical capacity required to carry out an impact assessment; and disposition speaks to the belief in the need for impact assessment in the first place. Of these, disposition is probably the most important ingredient, without which the willingness to pursue knowledge and skills is likely to be weak. Just how the appropriate disposition can be fostered would require a much more extended discussion than is possible here. Suffice to say that a further ‘disposition cocktail’ of advising, incentivising and legitimising is needed to encourage the type of individual and organisational norms and values that are likely to be amenable to S/PIA as a core component of policymaking and planning.

Information and analytical deficiencies

The absence of, or lack of access to, information or an unwillingness to invest resources in the generation of data can present a significant challenge to S/PIA efforts. This is true not only in situations where data gathering is under-resourced but also in circumstances where data are insufficiently disaggregated to a local or group-specific level. In such circumstances, richer qualitative data can potentially be obtained from participation processes attached to the impact assessment mechanisms. However, in the context of the deficiencies described above, deeper participation may well be the first element to be abandoned in the pursuit of more ‘efficient’ assessment exercises, losing the potential to gain deeper insights into the relationship between policy and poverty reduction. As described by Esteves et al. (2012, p. 37):

Assessments are sometimes little more than a social and economic profile of the impacted communities compiled from secondary data sources. Analysis sometimes lacks identification of the spatial, temporal and stakeholder distribution of impacts and benefits. Integration with environmental, health and cultural heritage issues can be superficial.

Theological complexities

Alongside these technical issues, a degree of ‘theological’ complexity also has to be considered, i.e. the extent to which those charged with sponsoring and/or carrying out S/PIAs actually believe in them or in the principles that underpin them. It is one thing for a centralised, higher-order system to decide that impact assessment needs to be undertaken by local or lower-order units; but it is entirely different for those local/lower-order units to embrace that decision. Resistance, be it political and/or administrative, active or passive, public or private, may well be encountered simply because different people believe in different things and because ‘non believers’ may not have sufficient stimulus and/or incentive to adjust their belief systems; they may well judge that there will be little consequence from ignoring impact assessment requirements. For example, best practice suggests that participation has to happen early in the life of an S/PIA so as to be able to ‘incorporate community concerns, local knowledge and mitigation strategies in project design’ (Lockie, 2001, p. 278). However, not all agree about the value of participation and some openly see it as unnecessary, wasteful, unproductive and, for some, democratically illegitimate (Finn, 2017). In a similar vein, Lockie further argues that professionals trained in the application of technocratic approaches ‘are uncomfortable with, or sceptical about, the involvement of what they regard to be an ill-informed public’ (Lockie, 2001).

Inevitably, these and other ‘theological’ differences bring with them the potential to subtly or less subtly undermine the S/PIA process. In the next section some of these issues will be explored in the Irish context.

Learning from experience – Social/poverty impact assessment at local level in Ireland and beyond

The origins of S/PIA in Ireland can be traced back to the 1998 National Anti-Poverty Strategy (NAPS), in which a decision was taken to roll out a programme of poverty proofing. It was intended that

poverty proofing would assist in monitoring the achievement of the NAPS targets and enable government departments to assess anti-poverty impact (O'Connor, 2001). While originally designed to apply at a national level, the *Programme for Prosperity and Fairness* (covering the period 2000–2) committed that 'poverty proofing would be extended on a phased basis to a local level through the local authorities and Health Boards' (Government of Ireland, 2000). However, neither poverty proofing nor PIA gained any significant traction at local level in Ireland. When asked by Denise Mitchell, TD, in March 2017 to 'outline the circumstances under which a PIA is undertaken; the number that have been undertaken in the past four years; and if he will make a statement on the matter', the Minister for Social Protection's written reply noted the government decision in 2012 to 'incorporate PIA into an integrated social impact assessment (SIA) in order to support the implementation of the national social target for poverty reduction and to ensure greater policy coordination in the social sphere'. However, the only SIAs referred to in the answer were those undertaken to assess the impact of the welfare and tax provisions of the annual budget (Dáil Éireann, 2017), not the wider reach originally envisaged.

Despite this, the Department of Social Protection still lists PIA as a requirement and confirms that a 'PIA should be carried out at every stage at which significant policy proposals or changes are being considered' (Department of Social Protection, 2016). At local level, a number of plans and strategies are subject to a PIA; for example, county development plans, county development strategies, corporate plans, operational plans, service plans, to name but a few. However, there is little available evidence to suggest that the Department of Social Protection guidelines are being followed¹ and few working examples of local-level PIA assessments in Ireland can be located. This is despite the undertaking of a Poverty Impact Assessment Support Programme for Local Authority Social Inclusion Units, which built on a support programme for pilot PIAs in Donegal and Limerick City in 2009 (Sean O'Riordan and Associates, 2011). The objectives of

¹ A search on the website of the Department of Housing, Planning, Community and Local Government, the central government department responsible for local government, using the search terms 'poverty impact assessment' and 'PIA' produced no results. A search simply using 'impact assessment' produced fifty-eight results, fourteen of which directly related to regulatory impact assessment, twenty-one to environmental impact assessment and the remainder to general topics. At the very least this would seem to suggest that the parent department has a clear interest in regulatory and environmental assessment but comparatively little in S/PIA.

the PIA support programme were to provide technical assistance to three local authorities in the application of PIA guidelines – County Galway, Cavan and Dublin City – and advice to sixteen others if it was required. The programme also supported information, awareness and training seminars, and aimed to contribute to revising the PIA guidelines. Among the main lessons reported from this programme were the need to ensure ‘robust consultation’ processes as part of the PIA, linkage across fields within the local authorities, and recognition of the potential long-term effect of short-term policies. However, the report speculated whether the then Department of the Environment, Heritage and Local Government ‘needs to determine whether it is appropriate to embed PIA generally into the planning process’, saying that ‘there is little point in applying such a process if a common approach to the local policy process is not taken’ (Sean O’Riordain and Associates, 2011, p. 9). Given that local-level PIAs were already government policy, the proposition that they might not be embedded into the planning process indicates their largely optional character and the weaknesses in translating S/PIA aspirations into practice.

This impression is confirmed in the more recent *Guidelines on Local Economic and Community Plans*, produced by the Department of the Environment, Community and Local Government (2015), where reference to poverty proofing is scant and disconnected from the type of process envisaged by the Department of Social Protection. In these guidelines, while the requirement to demonstrate ‘measurable impact on named target groups and/or disadvantaged areas’ is stated (p. 4), any distinct requirement to carry out a PIA has been conflated into a broader amalgam of ‘horizontal priorities’ that include sustainability, equality, poverty, rurality (where appropriate) and disability. And while these themes could form the basis of a broader ‘social impact assessment model’, it is inevitable that a more distinct focus on poverty in local policymaking is weakened. It would appear that despite the PIA being a whole-of-government strategy and requirement on planning, the whole of government is not intent on applying it.

This apparent lack of enthusiasm from the responsible government department and the relatively weak translation of S/PIA principles and guidelines into local-level practice perhaps explains the poor visibility of S/PIA in a number of planning documents reviewed for this article. Even within recent planning documents produced by the three PIA support programme local authorities (County Galway, Cavan and Dublin City), the level of PIA is weak, suggesting perhaps that once

external technical assistance was withdrawn, the capacity and/or motivation to locate S/PIA at the heart of the planning process diminished. By contrast, statutorily required environmental assessments feature more prominently, suggesting that where there is a legal obligation to assess impact, local authorities will act accordingly.

These trends are repeated in other recently completed plans across a range of local authorities. For example, the Cavan, Westmeath and Fingal local economic and community plans emphasise the strategic environmental analysis requirement, based on the obligation on the local authority to carry out a screening assessment for environmental effects arising from the implementation of the objectives and actions contained in the plans. However, in line with the Department of the Environment, Community and Local Government guidelines, poverty impact in the eleven plans reviewed is either incorporated as one element of a broader community impact-proofing exercise alongside sustainability, equality, poverty, rural and disability issues or, alternatively, is largely ignored. Little detail about the nature and depth of the amalgamated proofing exercises is published, thereby undermining a key principle of transparency within S/PIA processes.

Outside of Ireland a number of local authorities are undertaking at least some level of poverty/equality impact assessment. One of the most comprehensive and transparent of these is the budget impact assessment introduced by Newcastle City Council. Underpinning this are some very significant commitments, not just to be fair but also to 'safeguard those frontline services which make the biggest difference to those in greatest need' (Newcastle City Council, 2017). Crucially, in Newcastle what constitutes fairness is not just left to individual interpretation but is instead linked to the broader recommendations and conclusions of the Newcastle Fairness Commission, which provides a form of benchmark against which local budget judgements can be made.

While the budget impact assessment takes place on an annual basis, it is part of a multi-annual, medium-term planning process. Where a budget proposal is identified as causing a reduction or an alteration in service delivery, an integrated impact assessment must be carried out, looking at the impact on particular groups but also the impact on vulnerable communities. For example, in the 2017/18 budget, sixteen specific proposals were adjusted in the aftermath of the impact assessment, based on detailed local socio-economic data and an extensive public consultation. The latter involved online as well as face-to-face engagement, and an innovative online 'People's

Budget' exercise was undertaken, inviting participants not just to suggest the rate of the council tax but also to propose how revenue should be used and cuts made. Crucially, the details of all such adjustments were published on the council's website.

While the experiences reviewed here suggest a less than rigorous and somewhat shallow engagement at local level in Ireland, especially when compared with the standards suggested by the international S/PIA literature and practice elsewhere, a full and final conclusion on the current state of S/PIA in Ireland should perhaps await a more comprehensive analysis of the full range of local-level plans. However, in the next and final section some initial conclusions are presented.

Conclusions – Speculating about the future of social/poverty impact assessment

S/PIA is a process that encourages and enables conscious policymaking. It is designed to locate considerations of social development and poverty at the heart of the policymaking process. As such, it is not just a technical planning tool, a box to be ticked, though much of the evidence seems to suggest that this is how it is perceived. In this final section some initial conclusions about its relevance and value at the local level are drawn.

Some distinct arguments in favour of local-level impact assessment/proofing have been presented – more effective and efficient policy, prediction of impact, deliberation about impact and deeper citizen engagement. In much of the literature on participatory democracy the particular value of the local as the level at which deeper citizen engagement can be facilitated is asserted. It follows therefore that the type and level of stakeholder involvement envisaged in S/PIA processes can be best achieved at this more proximate, local level, though the potential for elite capture of stakeholder engagement processes must be guarded against. The local is also the level where there may be potential to see more immediate and tangible change for those living in poverty, possibly in small areas, but nevertheless ones that can make a significant difference. It could also be argued that the local is also the level where monitoring and accountability, key components of the S/PIA process, can be more easily pursued. Unfortunately, realising these possibilities meets a number of potential obstacles.

In the first instance, it is widely acknowledged that the range of policy competencies at local level in Ireland is weak and that much of

what local government and agencies do is to administer national policy. As a result, there may be a perception that S/PIA needs to happen at a higher level and can then filter its way down through local delivery mechanisms. However, this would ignore the potential that does exist, even within the restricted local policy landscape, particularly as a result of the increased responsibility for community and local development given to local government in the 2014 Local Government Act.

It must be acknowledged, however, that there is a real danger of overloading local government with responsibilities, without providing a commensurate level of resources and increased decision-making powers. Undertaking S/PIAs, and in particular the crucial participatory elements, requires considerable technical expertise, time and support. While experience has shown that this is not always available at national level, it is even less likely to be present within local-level institutions. As discussed earlier, supplementing existing capacity with external expertise offers some potential for progress. A precedent for this already exists in the way that local authorities buy in support to undertake environmental impact assessments. However, maintaining a continued focus once external support has been removed is a challenge, unless a strong capacity-building element is included. Simply expecting local government to take on another function without additional support and resources is unrealistic, and perhaps signals that national policymakers are also engaged in box-ticking exercises.

Ultimately, if the appropriate motivation exists to support the undertaking of meaningful and challenging S/PIA, capacity issues can and will be solved. Unfortunately, there is limited evidence to suggest that such motivation is present, either at local or national level, as evidenced by the contradictory directions being provided by the Department of Housing, Planning, Community and Local Government on one hand and the Department of Social Protection on the other, and the almost non-existent delivery of dedicated S/PIAs at local level.

Therefore, it would seem that to solidify the practice of S/PIA, a number of things are needed. The first is a single, more robust and whole-of-government statement of social/poverty requirements, to be developed and overseen jointly by the relevant government departments. In addition, and given the past poor experiences of PIA, documented both by the National Economic and Social Council and the Office for Social Inclusion, future requirements should be

incorporated into legislation and accompanied by a clear statement of the standards expected for measurement, prediction and stakeholder engagement. They should also be accompanied by strong regime of independently supported monitoring, accountability and a process for the application of sanctions for non-adherence.

At the same time, a mainstreamed, parallel process to build and resource sustainable knowledge, skills and disposition about S/PIA should be crafted and rolled out so as to enhance motivation and to recognise the increased burden impact assessment places on local policymakers. In this way S/PIA can have some prospect of moving beyond rhetoric towards making a real contribution to reducing poverty and enriching social development potential.

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