

**Reforming grant-giving in public
administration: the *Funding scheme to
support national organizations in the
voluntary and community sector, a case
study***

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Summary and key judgements

How the government allocates grants, especially to organizations, has always been the subject of public interest. Here, as a case study, the writer requested the Department of the Environment, Community and Local Government to release the documentation related to the operation of the 2000 white paper based *Funding scheme to support national organizations in the voluntary and community sector* for 2008-2010 and 2011-2013, the critical times being the review periods preceding each, 2007 and 2011.

Preparation for the 2007 scheme comprised two external reviews, five bilateral meetings with voluntary organizations and an internal review. 2011 preparation comprised a survey of funded organizations, four bilateral meetings and an internal review. The processing of applications is remarkable for its lack of collegiality, for, according to the department, no meetings took place between the officials concerned as part of the review, assessment or appeals. Nor was there a structured engagement with the voluntary and community sector. In the 2011 scheme, the minister reduced the funding of recommended organizations by €212,000. One organization not recommended for funding was subsequently approved (GROW), while one organization recommended for funding was subsequently disapproved (Older Women's Network), in circumstances which raise serious questions.

The assessment process presented a number of serious problems in the areas of marking for 'disadvantage', 'key' or 'coalface' services and 'added value':

- The term 'disadvantage', one of the most important criterion for marks, was applied inconsistently. Some organizations working with groups living in extreme poverty received unusually low marks. By contrast, some groups whose file unambiguously indicated that they did not work in the area of disadvantage received very high marks for disadvantage, leading to some bizarre outcomes. Voluntary organizations working in the disability field received consistently the highest marks, but some disability groups received inexplicably low marks for disadvantage.
- The application of the term 'disadvantage' was interpreted inconsistently between the two schemes. Some organizations received high marks for their work in disadvantage in 2007, but the same organizations received inexplicably lower marks in 2011, sometimes as much as 30% lower.
- Both schemes required organizations, under the 'disadvantage' heading, to work at the coalface or directly provide key services to groups in disadvantage. This is methodologically problematical, with one score used for two quite different tests.

- Many groups, as a result, saw their 'disadvantage' score marked down. This marking down was applied inconsistently from one group to another. In some cases, high scores were maintained on the basis that although the organization did not work at the coalface, its member organizations did. In other cases, a failure to do so was a reason for being marked down. This inconsistency extended not just from one organization to another, but from one scheme to another. In 2007 an organization might not be marked down for not working at the coalface but might be in 2011.
- The appeals system was inconsistent. Whereas some organizations were, in the *Feedback on assessment*, given reasons for their rejection, other organizations were given no reason at all and they had no basis on which to make an appeal.
- The reasons for the rejection of the appeal were, in numerous instances, different from or additional to those cited in the initial *Feedback on assessment*.
- Although appellants were given a *Feedback on assessment*, they do not appear to have been given the original assessment sheets which would have provided the detailed information necessary for them to have made an appeal.

In 2011, organizations were required to demonstrate an 'added value'. Many organizations were marked down on the basis that they were 'similar' to other organizations, yet these were almost never named or identified; and lacking in distinctiveness, even though they had long and unique histories, approaches, means of operation and philosophies.

This case study raises serious issues in the quality of public administration. The knowledge base for the scheme appears to be low, lacking familiarity with the topography and history of the voluntary sector, with no evidence of basic reference texts having been consulted. There appears to have been no objective system for assessing 'disadvantage' or of having consulted key government or non-governmental texts that might have led to informed judgements.

Knowledge of the means of operation of the sector appears to be low, coupled with a negative view of its advocacy role, contrary the principles of the white paper on which the scheme was based. An observation on the funding scheme itself is that it appears to be 'crowded out' by health related organizations, 51% of the applicants, as a result of the decision in the 1994 health strategy by the Department of Health to renounce core funding of voluntary organizations.

Finally, recommendations are made to reform the scheme so that in its fourth round it may comply with both the principles of administrative justice and the white paper itself; and be built on a firm knowledge base:

- A collegial approach within the department to review, assessment and appeal;
- A structured, strategic consultation with voluntary and community organizations;
- An improvement in the knowledge base, so that assessment and appeal officials familiarize themselves with key governmental, academic and research texts on the profile, typography and MO of the voluntary and community sector;
- Introduction of guidelines for assessing 'disadvantage', 'key services', 'coalface services', 'added value' and the number and type of organizations to support per subsector or any subsequent terminology. Any one criterion should score for one function at a time;
- The need to address the problem of poor applications, through such mechanisms as a technical assistance facility and/or a screening round;
- The inviting of external advisors to assist in the assessment process;
- Application of the principles of administrative justice to the assessment and appeals system with:
 - Appellants given the original assessment sheets as a basis for appeal;
 - The exclusion of reasons for rejecting an appeal reasons that are different from those original given in the original decision;
 - An independent system of quality control to verify both the assessment and appeals process;
- The re-opening of the decision in *Shaping a healthier future* about the core funding of voluntary organizations working in the health field, following by the opening of a dialogue of the Department of the Environment, Community and Local Government; the Department of Health; and the voluntary and community sector with a view to the Department of Health re-accepting its responsibilities for funding voluntary organizations and with the Department of Social Protection about a scheme that will effectively fund national anti-poverty networks;
- The restatement of 'advocacy' as a factor for upmarking voluntary organizations in the next scheme.

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Introduction

How the government in general and its departments and agencies in particular allocate grants for the public good has always, rightly, been the matter of considerable public interest. Writers on public administration have focussed on such issues as the quality of the process, the administrative capability of the system, the relationship between public or civil servant and ministers, the role of the minister, the patterns of allocations (especially by geography), transparency and accountability.

As a case study, the writer requested the Department of the Environment, Community and Local Government to release the documentation related to the operation of the funding scheme to support national organizations in the voluntary and community sector. This scheme is a key funder of voluntary and community organizations and the decisions of the most recent round attracted a high level of interest and comment that extended to the Oireachtas.¹

This scheme had three deciding periods (2003-4; 2007; and 2011) with three subsequent funding rounds (2004-7, 2008-10 and 2011-2013, the first two over-running). The documentation here concerns only the second and third scheme. Initial refusal to supply documentation was successfully appealed. One part of the 16-part information request was refused, which was the original application forms and supporting documentation, on the basis that their volume was so large (33,000 pages) as to cause significant disruption to the work of the department. The documentation sheds light on three aspects of the funding scheme: the processes followed (chapters 1-2); marking and selection (chapter 3); and appeals (2011 only) (chapter 4). Conclusions are drawn and recommendations for reform made (chapter 5). The primary intention was to examine the scheme with a view to seeing what improvements could be made in the next, fourth round, due 2014, but where preliminary thinking is likely to take place in 2013.

My thanks are due to Donal Enright and Pat Boyle in the Department of the Environment, Community and Local Government who assisted in the provision of information and in subsequent enquiries.

This report is accompanied by a background paper *Reforming grant-giving in public administration: the Funding scheme to support national organizations in the voluntary and community sector, background paper*, also published by EAPN and OPEN, 2012.

¹ Oireachtas Brief §18, June 2011, www.oirewachtasbrief.ie.

1 2007 scheme

The launch of the 2007 scheme was preceded by two reviews, bilateral meetings with four voluntary organizations and the review of a related scheme which gave rise to concerns of double funding.

1.1 Reviews

The 2007 scheme was preceded by two external reviews; an internal review of the social partnership funding programme; and bilateral meetings with a small number of voluntary and community organizations.

The external reviews were conducted by Goodbody's (focussed on the scheme) and Indecon (a broader review of the white paper, but which included the funding scheme). Both were positive about the first round of funding and set the stage for its continuation.

Second, there was a review to compare those organizations funded under the previous scheme with organizations also receiving funding under social partnership (*Review of schemes for national organizations and social partnership*, undated, 4 pages). Based on references to discussions having taken place in the 'early summer', the most likely date for this review was summer 2007. The primary objective of this review appears to have been to address the issue of organizations which received funding both from the national scheme and from the social partnership funding under *Toward 2016*. Social partnership funded 17 national voluntary organizations to the value of €1m annually, of which ten were also funded under the national scheme, creating the obvious risk of what the review called 'double funding'.² This *Review* recommended:

There should be no duplication and where two or more organizations are essentially carrying out the same function, it should only go to one of them except in extraordinary circumstances.

Funding from this scheme should be ceased from 2009. This will result in a saving of almost €1m which can be used more effectively elsewhere.

If the scheme were to continue, it would need to change radically and only pay [social partners] for specifically attending [social partnership] meetings and for preparation for the meetings. One way of paying would be to introduce a maximum payment of €10,000 for each organizations: this would cost €170,000 total in a year.

The review also suggested an alternative of paying organizations €250/day to attend social partnership meetings, which would also cover travel and preparatory costs, with discussions under way to reduce this to €200.

² The 17 social partnership NGOs are Irish Rural Link, Age Action Ireland, Children's Rights Alliance, Carers Association, Community Platform, Congress Centres Network, Socil Justice Ireland, Disability Federation of Ireland, Irish Senior Citizens Parliament, St Vincent de Paul, Protestant Aid, Irish Council for Social Housing, National Association of Building Cooperatives (NABCO), Irish National Organization of the Unemployed (INOUE), National Women's Council, National Youth Council, The Wheel.

In the event, it does not seem that this review was acted on and did not constitute an impediment to some of the 17 organizations receiving funding in either 2007 or 2011. There is no documentary record to show further discussion or decisions on the review.

Third, a number of bilateral meetings were held with bodies previously funded under the scheme, as follows:

28th April 2009	Camphill Communities
30th April	ADHD Support Groups (INCADDS)
5th May	Children's Rights Alliance (CRA)
19th May	National Association of Building Cooperatives (NABCO)
9th June	Medical Research Charities Group

The precise circumstances under which these meetings arose is not available from the record, nor is there an explanation as to why these five bodies were selected. Of the five interviewed above, two organizations also received the social partnership funded referred to earlier - the National Associations of Building Cooperatives (NABCO) and the Children's Rights Alliance (CRA) - and this other funding line was discussed with both of them. The function of these meetings appears to have been for the groups to relate to the department their experience of the grant scheme and they seem also to have afforded the groups concerned the opportunity to impress upon the department their continued value as a funded organization.

1.2 Decisions

The 2007 scheme was announced by the Department of Community, Rural & Gaeltacht Affairs on 11th May 2007, with a notice appearing in the national press *Funding scheme to support national organizations in the community and voluntary sector* and guidelines being issue to applicants.

Once applications were made, they were assessed by staff of the department individually, using a marking system. According to the department,

For the 2008-2010 scheme, the assessments were not made at meetings and accordingly there are no records of such meetings, nor of discussions related to the assessment of applications (Department of the Environment, Community and Local Government, 17th November 2011).

This is contradicted, though, by minutes *Meeting 3rd October 2007*, attended by the four officials most closely involved in the assessment process (David Brennan, Aidan O'Reilly, Ann Walsh and Brid McDonagh). This is fact the only meeting of its kind recorded over the four years 2007-11.

Applications closed on 22nd June and a meeting was held between the official responsible for the scheme and the minister of state three weeks later. The minister of state had already received applications directly and personally (E-mail, David Brennan, 1027, 11th July 2007). The minister expressed concern that his department should not

fund activities that were direct health service provision or provide extra funding for health organizations that were already well funded. Two applicants already had €2m and they should not be funding them: 'We will get much better value for money by funding those organizations which have no funding or modest budgets', a concern which should be taken care of by additionality and value for money. He proposed that the department proceed with eliminating the ineligible and then preparing an A list of recommended projects (where activities for funding sought were core activities) and a B list of not recommended (where the proposals were for service delivery rather than core activities). A system was established for liaison with an official in the Health Services Executive (HSE) about health-funded organizations.

The assessment process specified that proposals be ruled out if applicant organizations were not national, if there were other doubts about eligibility, duplicating something else, for profit or had not made a return. They would then be ranked according to the departmental score and the views of other departments. Minimum marks required were 40. CEO salary would not be included if there were core funding from another agency (E-mail, Aidan O'Reilly, 1640, 10th October 2007). Points were awarded thus:

Focus on disadvantage	25
Extent of existing funding	25
Deliverables and impact	20
Proven track record	15
Value for money	15

The applications were evaluated using standard assessment sheets. These ran to a single page or second page, with marks under the appropriate heading and totaled at the end, with comments under each heading (but no summary comment). These comments on the assessment are largely factual and based on the application.

An undated, later note by David Brennan shed further light on the assessment process:

- Clearly ineligible applications were identified at an early stage, ruled out and the applicants informed (but invited to appeal);
- Each surviving application was then assessed jointly by two people;
- The marks awarded to each group were reviewed across the scheme by a third person to ensure consistency, resulting in a small number having their score increased or decreased following consultation with the other assessors (this is confirmed by capitalized, initialled notes updating the assessment sheet file).
- The cut-off point was determined at 53, the quality of applications below that point being poor.
- Once scored, the applications were reassessed to determine what funding should then be awarded. Where organizations were already funded by another department, then that other department was consulted. This process seems to have been quite extensive, but it does not appear to have impacted greatly on outcomes. Allocations were now determined by the criteria of (1) the amount sought (2) the portion eligible, ruling out programme costs and (3) funding from other agencies matched against evidence of need.
- These allocations were then reviewed by a third person, with a small number increased or decreased following consultation with assessors.

Although applications closed in June, important decisions on approval were still pending in October, when the official in charge progressed the non-recommended category. This category would be listed in order of merit and 'the minister of state will have the final say on this'. The reason for not being recommended was that 'they are not appropriate to the scheme i.e. the project application is not for core cost, but where they are seeking to expand programme activities already funded by other programmes' (David Brennan, e-mail, 1229, 22nd October 2007). 16 were proposed for the non-recommended list, the reasons given being summarized:

National Traveller Women's Forum: Already funded through the CDP
 Down Syndrome Ireland: Looking for specialist trainers
 Cluid: Looking for housing managers
 Multiple Sclerosis Society: Looking for service staff, the HSE's responsibility
 Special Olympics Ireland: Already got €2m, was not a true application for core costs
 Meningitis Ireland: Looking for a community services nurse, partially ineligible
 Irish Wheelchair Association: Proposing six outreach officers, services, not core costs
 DESSA: Another CDP, not our responsibility
 Women's Aid: Already core funded under CDP, programme not core costs
 Rehab: Training project coordinator, not core costs
 Irish Society for Autism: Senior teacher
 Irish Council for Social Housing: Staff for advice services, programme, not core
 Life Pregnancy Care: Support and outreach, programme not core
 National Learning Institute: Instructors and trainers
 Senior Helpline: Development worker, programme not core
 DEBRA: Support worker, therapist, specialist - not core costs

Two were largely ineligible, but had a small component of core costs:

Muscular Dystrophy: Two coordinators
 Spirasi: Psychotherapists and physicians

Five were on the queries list:

National Women's Council: 'Already has major funding from Justice'. Does this not already cover this. 'Question added value and value for money. More programme than core'.
 Inclusion Ireland: Same concerns.
 Community Creations: Never heard of them.
 National Collective of Community Based Women's Networks: 'How is this different from CWC, EAPN or the Irish National C&V Forum? It has scored remarkably high compared to the others. Why?'
 Active Retirement Ireland: Looking for CEO, admin and eight development workers: 'Recently advertised for CEO and other posts. This suggests that it has recently got a funding boost from the HSE. Can we check. I would question value for money and added value of the proposal'.

These comments were forwarded to three colleagues for discussion at a meeting the following Wednesday, with the comment 'If you feel I am being unfair to any of the above, please feel free to disagree on Wednesday'. There is no record, though, of this meeting having taken place. On 1st November, David Brennan questioned the eligibility of:

Samaritans: Clearly service delivery and HSE responsibility;
 Meningitis Trust: Hard to see as a national organization
 Marie Keating Foundation: Ditto, which had asked for outreach workers so as to become a national organization (David Brennan, E-mail, 0929, 1st November 2007, following observations from colleague).

A further issue intruded at this late stage, salaries (E-mail, Aidan O'Reilly, 1640 10th October 2007). The department took the view that grant aid should be based on the following salary levels, each with the application of a third overheads:

	Reference level	With 0.3 overheads
CEO	€60,000	€80,000
Manager	€45,000	€60,000
Development staff	€40,000	€53,000
Clerical/administrative	€30,000	€40,000

The level of overheads was informed by a discussion paper *Possible methodology for calculating costs in respect of membership of the C&V pillar*. Applicant organizations had sought overheads ranging from 4% to 147% of salaries. The Department of Finance had suggested that 33% should be assumed, based on the norm for public service posts, so this was the option recommended. To what degree these concerns were communicated to the voluntary and community sector in general and scheme applicants in particular is not known and there is no record of such communications.

The departmental officials concluded their review of the applications in November 2007 (undated), the recommendations being forward to the principal officer, David Brennan, the Assistant Secretary, the Secretary General and the Minister of State (Aidan O'Reilly, November 2007, precise date not given). This explained that the new scheme, to run 2008-2011, would combine the white paper funding of federations, networks and umbrella bodies with the scheme to support national anti-poverty networks. A separate new scheme of for training grants would follow. €5.85m was recommended for 63 groups, averaging €92,817. Ineligible organizations had been notified of their right to appeal.

The Minister of State, Pat Carey, amended the note on 23rd November to increase the allocation to the Carmichael Centre. The scheme was subsequently announced and launched publicly, but there are no further records relating to the launch (Department of the Environment, Community and Local Government, 17th November 2011).

2 2011 scheme

The 2011 round is reviewed under the following headings: review and decisions.

2.1 Reviews

As was the case with the second scheme, the third was preceded by a review, commencing March 2010. This began with terms of reference circulated within the department in the spring with a view to a discussion the following day (E-mail, Don Sexton, 1653, 8th March 2010) but we have no record of any subsequent discussion on 9th March. The review took the form of a survey of funded organizations; as before, bilateral discussions, presentations and interviews with recipient organizations and a subsequent short report to the minister, Pat Carey, in December 2010, following which applications were invited (Don Sexton to Minister Hogan, 13th April 2011). The department states:

The review was not made at internal meetings and accordingly there are no records of such meetings (Department of the Environment, Community and Local Government, 17th November 2011).

The review was commenced with a completion date of 30th September 2010. The purpose of the review was to test the degree to which the scheme was meeting its objectives, analyze its impact, make recommendation and propose options for the improved targeting of available resources and options for simplifying administration and implementation (*Review of scheme to support national organizations - terms of reference*, undated).

As was the case with the bilateral process before, the department met a small number of voluntary organizations, but we have no information as to the circumstances under which they were selected. The presentations by recipient organizations appear to have been made by the Carmichael Centre; Care Alliance Ireland (7th April 2010); Huntingdon's Disease Association; and the Neurological Alliance (dates not available).

A questionnaire was devised to go to all the 64 scheme recipients in May 2010, with replies requested by 4th June 2010. The review asked organizations about their work under the 2008-11 grants, along with two other questions: *Impact of funding should scheme be discontinued* and *How scheme would be improved*. Almost all the organizations replied.³ *Voices that Matter* sent, to the minister of state, an extensive formal proposal as to how the new scheme should be funded and organized, along with a request for a meeting (27th July 2010). The minister of state's office asked the officials handling the scheme for advice as to whether such a meeting should take place (E-mail, Caitriona Casey, 1013, 4th August 2010). No reply is available and we do not know if this meeting took place.

³ The exceptions were Arthritis Ireland, Barnardos, Irish Countrywomen's Association, Medical Research Charities Group, Muintir na Tire, the National Association of Traveller Centres and the Voluntary Drug Treatment Network.

On 24th September, the assistant secretary requested a meeting with officials handling the scheme on the review. She asked for a list of the organizations that had cooperated with the review and a summary of their tabularized replies. This review was completed on 19th October 2010 and forward to the minister as *Review of supports for the community and voluntary sector*.

On 22nd November 2010, the Secretary General, Joe Hamill, formally proposed to the minister the outlines for the third scheme (*Review of supports for the community and voluntary sector*). His proposal was for it to focus on disadvantaged or coalface services, with a clear emphasis on deliverables, impact, value for money and efficiency, with applicants demonstrating added value, while those cooperating or sharing with other actors should be rewarded. He suggested there be two funding bands of €50,000 and €120,000, but that should not be defined yet. This issue led to some internal discussion over the following three weeks and it proved to be the principal issue leading up to the finalization of the scheme.

The original proposal was for two funding bands: €30,000 to €50,000 and up to €120,000 (E-mail, Rita McNulty, 1259, 9th December 2010). These lower figures were eventually dropped. The minister of state had indicated that he did not want specific reference to funding bands, but the assistant secretary was adamant that one should be identified (€120,000 was the figure), in order to set realistic expectations. Three years ago, there had been very unrealistic requests, so this was an attempt to manage the process (E-mail, Rita McNulty, 1652, 9th December 2010).

On 10th December, the minister of state commented that applicants should provide more information about their other funding sources, for example other private sources of funding (philanthropy, donations, fundraising, membership fees etc (E-mail, John Regan, 1024 10th December 2011). There should be recognition of groups showing a degree of consolidation and cooperation, especially in the area of chronic pain. Finally, applications were posted in the national press, with a closing date of 24th January 2011.

2.2 Decisions

The assessment process took place in February 2011. This was described in a departmental record *Note on the assessment and selection process* (18th March 2011). This stated that applications had been invited for core operating costs (staffing, administration and running costs), with priority given to groups providing key services for the disadvantaged. Funding was limited to €120,000 a year and was not available for training. Applicants must have a legal basis (financial and tax requirements) and be a national organization with nationwide membership. The selection criteria were marked by points as follows:

Services for the disadvantaged	20
Added value within the sector	20
Deliverables and impact	25
Viability, value for money and governance	20
Level of cooperation, consolidation	15

The outcomes were:

Initially ruled as ineligible	37
Later ruled as ineligible	4
Too low a score to be recommended	44
Successful	<u>64</u>
Total	149

Those ineligible were informed and advised of their right to appeal, which involved a person not participating in the initial assessment. Each application was assessed individually and then reviewed by an assessment team of four: 'following consultations with the assessors, applications could have their overall score increased or decreased'.

The department's recommendations on the 2011 scheme were sent to the minister for approval on 13th April 2011. Notes on the documentation indicate that the minister proposed changes and made queries on 29th April 2011 and these were returned to the officials on 6th May. The final list was approved by the minister on 2nd June. The handwritten ministerial comments on the 2011 recommendations are available. The minister hand wrote 'No' against almost all the 'No' recommendations, presumably to confirm them. In a number of cases he added comments, suggesting that he was working his way through the list verbally in consultation with his officials (though there is no formal record of such a meeting). In some cases he added a question mark, or in two cases an asterisk (*). Examples were:⁴

<u>Organization</u>	<u>Minister's comments (<i>italics</i>)</u>
National Youth Federation	<i>No - see NYCI [National Youth Council of Ireland]</i>
ARCH	<i>No - as above</i>
ACCORD	?
AWARE	*
GROW	*
Irish Society for Autism	<i>Why not?</i>
Irish Rural Link	<i>Why not?</i>
Respond	<i>No - should come from [illegible]</i>
Nat. Assn. Traveller Centres	<i>No - see ITM [Irish Traveller Movement]</i>
SHINE	<i>What is its programme?</i>
Nal Vol Drug Service	<i>No - drugs task force</i>
Irish Senior Citizens Parl	?
Unmarried Separated Fathers	?
Irish Country Women's Assn	<i>Why not?</i>
National Women's Council	?
Down Syndrome Ireland	?
Parkinson's Assn	?

⁴ Note that in this and in subsequent lists, names of organizations are, in the interests of space, abbreviated. Organizations concerned are asked to be understanding of this and not interpret this as intended to be in any way disrespectful.

The minister marked a tick against positive recommendations, presumably to confirm them, but also marked these comments against positive recommendations, as follows:

<u>Organization</u>	<u>Minister's comments (italics)</u>
Natl. Assn Youth Drama	<i>Arts Council</i>
Genetic and Rare Disorders	?
NABCO	?
NCCWN	?
Spina Bifida	?
Irish Cncl Social Housing	?
Open Heart House	?
Older Women's Network	<i>Age Action Ireland</i>
Nat. Traveller Women Forum	<i>Check duplication with ITM</i>
MOVE Ireland	?
Centre Independent Living	?
Muscular Dystrophy	<i>Check [illegible]</i>
Football Assn Ireland	?
Chronic Pain Ireland	?
Business in the Community	?
Natl Community Vol Forum	?
Red Cross	<i>[€50,000 crossed out]</i>
Aspire	?
Asthma Society	?
Barnardos	<i>Circle €69,857 for Volunteer Development Manager</i>
Irish Autism Action	<i>Circle €85,078 for CEO</i>

The reason for scoring out the Red Cross is not apparent. The Red Cross has always received core funding from the Department of Defence. There has been a prolonged controversy over the management of this government appointed body, which may nor may not be related. The Red Cross proposal had been highly rated in the assessment (83 marks).

He scored out numerical recommendations for funding amounts in a number of places, replacing them with lower amounts, as follows:

<u>Organization</u>	<u>Recommended amount</u>	<u>Ministerial decision</u>
OPEN	€110,000	€100,000
Rape Crisis Network	€100,000	€90,000
Irish Autism Action	€95,000	€90,000
Safe Ireland	€95,000	€90,000
Children in Hospital	€110,000	€100,000
Irish Traveller Movement	€110,000	€100,000
FLAC	€110,000	€100,000
INOUE	€110,000	€100,000
Children's Rights Alliance	€110,000	€100,000
The Wheel	€110,000	€100,000

If we look at the final approved list, there are four changes:

- The reductions above, totalling €100,000;
- The Irish Council for Social Housing was reduced from €45,000 to €25,000;
- The Older Women's Network was eliminated (€42,000); and
- The Red Cross was eliminated, €50,000.

The total savings were €212,000. In the event, one organization was added following the appeals process, Suas, €42,000, reducing the saving to €170,000, which was retained by the department.

One organization not recommended to the minister was subsequently funded, GROW, with a grant of €20,000 (the smallest allocated under the scheme), so the final saving was €150,000. GROW is a national organization for the promotion of mental health, based in Kilkenny.

One may surmise that the ejection of the Red Cross was because of its substantial funding from another department, but that is not the case with the other. The case of the organizations added to and taken from the ministerial list presents us with a particular problem. Their marks were 58 and 60 respectively. The problem arising is simply stated:

Why was the Older Women's Network recommended to the minister if it did not receive sufficient marks (58) to merit recommendation?

Why was GROW not recommended to the minister, granted that it did receive sufficient marks (60)?

The minister commented with 'Age Action Ireland' against OWN and the unusual asterisk mark against GROW. References to other organizations, as in OWN's case, are suggestive of a concern about duplication of funding. Subsequent investigation established that OWN was not funded because internal problems came to the attention the department at a later stage; and that the minister used his prerogative to over-rule his officials to add GROW to the list. This explanation, though, leaves two issues unresolved, first:

Why do the final marks for OWN (58) not reflect the fact that it was originally approved, for which it must have received 60 marks or more; and why did GROW achieve 60 marks when, to have been on the not recommended list, it must have received less than 60 marks;

and second, why the internal issues that affected OWN were not communicated to OWN, for they did not appear to form the central issue to its unsuccessful appeal?

There are a number of possible explanations, such as error, or that the marks were re-adjusted retrospectively. Hopefully the latter is not the case, for that would compromise the integrity of the scheme.

3 Marking and selection

This section looks at how the projects were selected, the two rounds being taken together. This is divided into the assessment method; issues arising; disadvantage; coalface services; and added value (3.1-3.5). The examination of marking and scoring is necessarily detailed, because these were schemes where every mark counted. In 2011, being one mark short of the qualifying 60 marks made the difference of a grant of up to €100,000, or not, with a profound effect on its subsequent organizational trajectory and the welfare of its clients. Every mark counts and this analysis should bear this in mind.

3.1 Assessment method

Similar assessment sheets were used for both the 2007 assessment and the 2011 assessment, although the categories and marking schemes were different, as follows:

2007		2011	
<i>Focus on disadvantage</i>	25	<i>Focus on disadvantage</i>	20
Extent of existing funding	25	Cooperation/integration	15
<i>Deliverables and impact</i>	20	<i>Deliverables and impact</i>	25
Proven track record	15	Added value in sector	20
<i>Value for money (VFM)</i>	15	<i>Viability/VFM/governance</i>	20

Both had a focus on disadvantage; deliverables and impact; and Value-For-Money (VFM), varied in 2011 as ‘viability, VFM and governance’ (italics). ‘Extent of existing funding’ (2007) was replaced by ‘cooperation and integration’, reflecting the cohesion process at local level and concerns that voluntary organizations should cooperate more closely together at national level. ‘Proven track record’ was replaced with a requirement for organization to prove the value that they brought to the voluntary sector or the subsector in which they worked.

Two features stand out from the assessment process in both years:

- The assessment sheets mainly comprise summaries of the proposals made by applicants under these headings. Judgements on them actually comprise only a small proportion of text.
- There is a high level of consistency in the detail, nature and approach of the assessment officers across all the applications, both in 2007 and 2011. Although the application forms are not to hand, they show evidence of having been read thoroughly, carefully and absorbed, although the judgements arising raise questions.

3.2 Issues arising

The assessments appear to show some significant problems in the applications. The assessors were critical of:

- Required information not having been provided, for example in the area of governance;
- Lack of detail on impact and deliverables. This was a recurrent criticism.

- A failure to link the tasks of the funding requested to the new posts of those who are to execute them. Conversely, organizations offering such detail were commended ('deliverables are well set out').
- High salary levels in the case of some organizations (conversely, others were described as 'reasonable'). There were numerous comments about individual salaries being 'high', or 'excessive', reflecting the discussion in 2007.

Typical phrases evident in the assessments are:

*Better impacts could have been contemplated. Envisaged impact is not well presented
Little evidence provided as to how these posts will have an impact. No linkage.*

No link to the new posts sought.

No impact is set out. No other impacts/deliverables are provided. No details of governance.

These criticisms reflect a lack of professionalization, incapacity and under-development within voluntary and community organizations. There are ways for addressing such issues. Solutions include a technical assistance facility (advice, small grants) to assist organizations to improve the quality of their application; and an intermediate round in the application process, in which applications would be screened for technical defects and given the opportunity to address them (a procedure followed by Combat Poverty Agency).

Salary levels, which were noted as an issue by the department in 2007, were an important feature in the assessments. The issue of salary levels, especially of the Chief Executive Officer, may be considered from a number of different angles. It is apparent from the documentation that CEO salaries varied hugely, the range being from €18,000 to €123,000 (some of the lower salaries were not necessarily full-time), with little standardization. Although some were tied to public service scales, for example in the HSE, most were not linked to any obvious benchmark. There was no necessary connection between salary and the size of organization or turnover, for some high salaries were evident in small organizations, as were low salaries in some high-profile, large national organizations. Some CEO salaries appear to have moved substantially ahead during the celtic tiger period, using an American model of remuneration. The degree to which the department sent out warning signals about salaries is not known, but such concerns had been expressed in the media and the Oireachtas. Some voluntary organizations do not appear to have been alert to the degree to which this might be a concern by the assessors. The precise degree to which salary concerns finally affected funding outcomes is not by any means clear.

3.3 Disadvantage

Going through the five criteria of 2007 and the five of 2011 (some of which were repeated), three presented particular problems: 'disadvantage', 'disadvantage' and its relationship with 'key' and 'coalface' services; and 'added' value, which are dealt with in turn (3.3 and 3.5). First, the criterion 'disadvantage' was applied inconsistently:

- Some organizations working objectively in the disadvantage area received unusually low marks;

- Some organizations received high marks under 'disadvantage', even though the assessment notes were clear that they had no particular focus on disadvantage.

The benchmark for high marks for working in the area of disadvantage is 22, this being the number of points awarded to the Alzheimer Society, Special Olympics, Cheshire Foundation and the Irish Society for Autism (2007). Other organizations, though, working with at least as disadvantaged groups receive much lower marks. Although Travellers have long been identified as the poorest single group in the country, the National Traveller Women's Forum received scores of only 17/25 (2007) and 15/20 for disadvantage (2011). The Voluntary Drug Treatment Network was described, citing the evidence of the Health Research Board, as working with the 'extremely' vulnerable and disadvantaged and 'our most socially deprived and disadvantaged communities' but reached a score of only 15/25 (2007). Although unemployed people have long been identified as the largest single group at high risk of poverty, the Congress Centres for the Unemployed received a score of only 12/25, less than the half-way point (2007). Although BeLongTo was assessed as working with 'a highly vulnerable group often suffering bullying, are homeless and suffer drug and substance abuse', with no negative comments, it received only 12/20 (2011). The Community Workers Cooperative, whose aims, language and objectives as well as extensive literature have an intensive focus on disadvantage, was awarded only 12/25 (2007) and 10/20 (2011) respectively.

One would expect organizations not working with the disadvantaged or minimally so to receive low marks under the 'disadvantage' section and this is the case. For example, the Irish Marching Bands were deemed, similarly, to have 'very little focus on disadvantage', but were given only 5 marks while the National Youth Federation was similarly adjudged to have 'no particular focus on disadvantage' and given 10/20 (2011). Unexpectedly, other organizations similarly not working with the disadvantaged were awarded high marks under the category 'disadvantage'. Active Retirement Ireland was assessed as follows: 'There is no specific focus in their current activities on older people who are particularly disadvantaged. ... The organization itself does not provide key services to disadvantaged target groups and have been marked accordingly', but was given 18/25 marks (2007), more than groups working with Travellers. The Irish Countrywomen's Association, although assessed as having 'little emphasis on disadvantage' was nevertheless given 12/20, or 60% of the available marks

The Irish Mountain Rescue Association was rated 15/25 for its focus on disadvantage and helping vulnerable people (2007), rising to 15/20, 75% of the available marks (2011). Whilst it is accepted that people lost on mountains are, temporarily and pending their rescue, at high risk, to assess hillwalkers as a disadvantaged group in society requires explanation. So far as we know, hillwalkers have never been identified as a group at extreme risk or vulnerability in the National Anti Poverty Strategy. It would be interesting to see if this were the case in other states of the European Union, especially the Alpine countries (e.g. Austria). Neither the organization's website, nor its most recent annual report, make any reference to its work in the field of disadvantage, despite having received grants both years.

As noted earlier, groups working in the area of disability generally received high marks for working in the area of disadvantage. Aside those already mentioned with 22 marks, they rated highly e.g. Headway, 20; Post Polio, 20; Dyslexia Association, 20; Brainwave, 18; Down's Syndrome, 18; Huntingdon's Disease, 18; and Motor Neurone, 18 (2007 scores). These are repeated in the 2011 assessment (e.g. Muscular Dystrophy, 18/20; Alzheimer, 16/20). By contrast, though, others, though, were far down, like Camphill Communities (12), Parkinson's Association (14), Irish Wheelchair Association (12) and the Disability Federation (10). Although the National Association of Recreational Clubs with the Handicapped (ARCH) works exclusively in the area of special needs, it received only 8/20 points (2011).

Inconsistency is also evident from from one scheme to another. For example, the National Traveller Women's Forum is rated as 17/25 in 2007, but 12/20 in 2011, corresponding to 68% and 60% of marks respectively - but is that an indication that its work with the disadvantaged declined 8% in the interim - or did it reflect a decline in the quality of the application? The Irish Wheelchair Association was down from 18/25 in 2007 to 12/20, down from 72% to 60%. Spirasi was down from 20/25 (2007) to 12/25 (2011), 80% to 60%, a 20% drop. Camphill Communities fell from 20/25 (2007) to 12/20 (2011), down from 80% to 60%, although there is no evidence that they or their client group changed. The Disability Federation of Ireland's 'disadvantage' rating suffered the most catastrophic fall of all, from 20/25 (2007) to 10/20 (2011), down from 80% to 50%. The logical implication of this is that DFI's focus on disadvantage fell 30% in four years, or that people with disabilities lost 30% of their disadvantage in the same period, but there is no obvious evidence to support either a contention. By contrast, some other organizations were rated upward for their work with the disadvantaged, yet it is not clear whether that represented a real refocussing around disadvantage.

3.4 'Key' or 'coalface' services

Connected to the problem of the application of the term 'disadvantage' is the term 'coalface services' (used in 2007) or 'key services' (2011). In practice, the assessments appeared to use these terms interchangeably, although there are semantic differences between them. The criteria of the scheme specified that priority be given to organizations providing such services to the disadvantaged. This had the effect that organizations which otherwise scored high on 'disadvantage' were marked down if they worked with the disadvantaged, but not directly through coalface or key services. This is inherently, logically and methodologically problematical, for one score was used for two different functions.

Such a reasoning appears to have modified - downward - the disadvantage rating for quite a number of organizations, such as the National Traveller Women's Forum, noted to be 'not directly involved in service provision'. Although the European Anti Poverty Network is the only group to have 'poverty' in its title, it got only 12 marks out of 25 (2007), with the comment that 'they are not directly involved in providing key services to disadvantaged target groups'. Similarly, the Community Workers Cooperative (2007) has a 'clear focus on disadvantage, it is the above activity rather than providing key services to disadvantaged groups' and it gets 12/25 (2007). The National

Collective of Community Based Women's Networks, although it worked in community development and social exclusion, was 'not directly involved in providing key services' and was marked at less than the half-way mark on the disadvantage scale, 12/25 (2007) and 9/20 (2011). The National Community and Voluntary Forum dealt with disadvantage but 'did not provide "key services to disadvantaged target groups"' and scored only 10/25 (2007). Similarly, People with Disabilities Ireland was 'not significantly involved in direct provision' and scored 15/25 (2007). The same pattern is evident in 2011, for example with the Irish Senior Citizens Parliament, assessed as 'no coalface activity' and awarded only 10/20. European Network Against Racism 'don't themselves provide the coalface services' and was scored low (8/20, 2011).

As was the case with the 'disadvantage' definition, this system was also applied inconsistently, for there is compelling evidence of some organizations *not* being so down marked. Inclusion Ireland, which has 160 affiliated members, was assessed accordingly: 'As such it is not as directly involved in service provision, but it had a good focus on disadvantage' and scored 20/25. In the case of the Simon Federation, 'it does not in itself "operate services at the coalface" but the local Simon communities do and the score was 17/20 (2011 assessment). The Disability Federation of Ireland had 'a focus on disadvantage through its member organizations' (2007, a similar phrase in 2011) and was rated a high 20/25. Breaking Through was 'not directly involved in service provision' but nevertheless allocated 17/20, or 85% of the available marks under the section (2011).

Such down-marking was not only applied inconsistently between organizations, but between one scheme and another. In 2007, the The National Association of Traveller Centres was ruled to be not a frontline service, but its member organizations were tackling poverty, so it received the high mark of 18/25. In 2011, though, it was ruled that they did not 'provide key frontline services', being scored this time 12/20, the extenuating circumstances apparently no longer applying. Such down-marking was also applied inconsistently between type of organization. The National Traveller Women's Forum worked directly with 65 member organizations, but that was ruled not to be a direct service. By contrast, many disability-related organizations with a similar organizational model received higher marks; e.g. Dyslexia Association with its 33 groups (score: 20/25) and Multiple Sclerosis and its 41 branches (score: 22/25) (2007).

3.5 Added value

The 2011 round differs from the 2007 in that the assessors were expected to make judgements on 'added value within sector'. Whilst this is an intrinsically difficult exercise, the nature of the some of the judgements made is extraordinary and some examples are given.

In the case of the Camphill Communities, 'it is difficult to see the added value of Camphill within the sector' (10/20). This is an astonishing judgement, granted the history and philosophy of Camphill and its founder, Rudolf Steiner, which marks it out as unique, distinctive and bringing a high level of added value.

In the case of the Migrant Rights Centre of Ireland, the assessment was that it 'seems more like an advocacy group and it is difficult to see how they have an added value within the sector', which pre-supposed that advocacy was not in itself an added value.

Irish Rural Link: 'There would seem to be little to distinguish IRL from groups such as the community and voluntary fora'. This is a surprising judgement, granted that IRL focusses on rural development in rural areas, while community and voluntary fora which are open to *all* voluntary organizations in each local authority area, including all the urban areas where the majority of the population of the state now lives and where IRL is entirely absent. It is not comparing like with like, but IRL was awarded only 9/20 (2011) and was unsuccessful.

The assessment judged that SHINE, formerly Schizophrenia Ireland, 'seems to provide a similar service to other organizations working with people with mental ill health'. This is a strange judgement, granted the distinctive role and client group which Schizophrenia Ireland had mapped out for itself since its foundation in 1979. The 'other organizations' are not identified.

European Anti Poverty Network was assessed as having 'little to distinguish' it from 'other such organizations', but they were not identified. None other has 'Europe' in its title, so this might be a challenge.

The Irish Senior Citizen's Parliament: 'Sector has many similar groups and there is nothing unique about the services being provided...large overlap in this sector'. Again, the other groups are not identified nor was account taken of the Parliament's unique mobilizing role and structure. The documentary basis for the 'large overlap' was not supplied, sourced or referenced.

Similarly, Age and Opportunity is assessed as: 'Large overlap of groups in this sector. ... Large overlaps of groups in this sector providing similar if not the same services. There is little unique about this group except its range of activities'. Again, this suggests a lack of understanding of the sector working with older people, for Age & Opportunity pioneered healthy ageing in Ireland and runs unique programmes such as *Go for life!*, *Bealtaine* and *Get vocal!*

Community Workers Cooperative: 'Seem [sic] little different than [sic] a myriad of similar organizations who have similar members and goals'. These other groups were not identified. Since its foundation in 1981, the CWC had been the only association of community workers in the country, suggesting distinctiveness rather than similarity.

Centre for Independent Living was assessed so: 'Service provided by CIL are similar to services and supports provided by a number of other organizations provided for people with a disability'. These other organizations are not named and this judgement ignores the initially controversial but pioneering role of the centre in developing independence and the role of personal assistants.

National Council for the Blind of Ireland (NCBI) was assessed as providing 'similar services to those provided by other organizations for visually impaired people', even though they were not named. It was allocated a low mark accordingly (8/20), even though it is the original service, is the largest and principal provider and was the only applicant for the blind in the funding scheme. The number of national blind organizations in Ireland is small in number, only three, NCBI being the principal generic service and the two others being specialized (Fighting Blindness, Guide Dogs for the Blind).

The argumentation used around distinctiveness is sometimes overtly contradictory. For example, Anam Cara received a low mark for added value (8/20), with the assessment that it is 'providing a similar service to other bereavement counselling services, except that their focus is on families who have lost a child'. The first half of the statement making an argument against added value, but the second in its favour, but the marking suggested that the former argument won out - but for reasons that were not explained.

Finally, in the area of added value, the 2011 scheme saw the funding of two organizations with very similar names: BRI, Acquired Brain Injury Advocacy (€75,000) and Acquired Brain Injury Ireland (€50,000). In the absence of their application forms, it is difficult to know the difference between the two organizations, though presumably, for those working in this field, it is substantial. The extraordinary feature of their assessments, though, is that this issue was not even addressed under the section 'added value', while, as we have noted above, such an issue has been raised in the case of organizations with no semantic or other similarity to one another.

Relating to the issue of 'added value' is that of 'significance', which was a term also applied inconsistently. The Wheel was adjudged to be a 'significant actor in the C&V sector' (2011) and awarded funding. Similarly, Irish Rural Link was adjudged in 2007 to be a 'well-established, significant group' of 'strategic importance' and approved for funding (2007). Four years later, though, the department discontinued its funding, which begged the question as to whether it was not longer well-established, significant or strategic, or whether the earlier 2007 judgement had been in error.

4 Appeals

Documentation is available of the appeals process in 2011 and this is reviewed under the following headings: the process, *Feedback on assessment* and appeals decisions (4.1-3).

4.1 Process

Unsuccessful organizations were informed of the negative outcome of their application on 7th June 2011 and advised of their right to appeal within 28 days, 5th July being the stated date. They were given a short *Feedback on assessment* which summarized the original application, its shortcomings (see below) and the mark applied (4.2). Applicants were told that the cut-off point for successful applicants was 60 marks.

The appeals were handled by one official, Karen Flynn, entirely single-handedly. According to the department:

There were no meetings to consider appeals and accordingly there are no records (Department of the Environment, Community and Local Government, 17th November 2011).

Appellants were given their final decision on 21st July with normally a half to full-page statement of their rejection. This was a lengthier summary of the application, frequently re-stating the case made by the appellant, but provided little if any useful information as to the shortcomings of the original proposal. Normally, the appeals officer kept a set of typed bullet-point notes, largely factual in nature under the criteria headings (disadvantage, impact, value for money) (this was, presumably, not made available to the applicant).

There were 45 candidates for appeal, of whom 20 appealed. All were marked up following appeal and none was marked down. Only one appeal was successful (5% success rate). Two organizations swiftly made extraordinarily detailed, lengthy, exhaustive appeals: Irish Rural Link and the Community Workers Cooperative, the original decision also being strongly challenged by Older Women's Network. These were suggestive of a high level of organizational capacity, bringing into question the negative evaluation of their capabilities in both the original assessment and the appeals process.

The only successful appeal was by Suas Educational Development. It is difficult to make a judgement on the circumstances, since clear reasons were neither given for its initial rejection nor its subsequent overturning. This overturning was sent to the minister's office for confirmation, the minister responding by requesting a briefing on the applications from Irish Rural Link and the CWC and why these were unsuccessful, but there is no subsequent record on file.

The following is the table of marks before and after appeal (- indicates no appeal was made):

Table: Outcome of appeals

	<u>Assessment</u>	<u>Appeal</u>
National Voluntary Drug and Alcohol Service Providers	54	56
Family Support Network	54	-
Medical Research Charities Group	51	55
Sports against Racism	39	51
National Association of Traveller Centres	50	55
Irish Men's Sheds Association	36	-
Camphill Communities	51	57
ACCORD	50	52
Down Syndrome	55	58
Belong To Youth Services	46	-
Migrant Rights Centre	56	57
National Youth Federation	42	-
Irish Rural Link	52	55
Irish Countrywomen's Association	57	-
Youth Advocate Programme IRL	49	-
Parkinson's Association	56	-
AWARE	54	-
Bodywhys	53	55
Older Women's Network	57	58
Shine	53	55
Irish Association of Youth Orchestras	50	-
Irish Senior Citizens Parliament	55	56
Community Workers Cooperative	53	56
Anam Care Parental & Sibling Bereavement Group	50	-
National Federation of ARCH Clubs	39	-
Irish Wheelchair Association	53	-
Spiritans Asylum Services	50	-
Age & Opportunity	50	-
Parental Equality	48	51
National Women's Council	56	57
Transgender Equality Network	57	-
Unmarried and Separated Fathers	55	57
Suas	55	61
Irish Society for Autism	53	-
One in Four	49	-
Start Strong	38	-
European Network Against Racism	50	-
CRAOL (Community Radio Forum)	49	-
Respond	52	-
National Federation of Voluntary Bodies	54	-
National Council for the Blind in Ireland	54	-
CARA Adapted Physical Centre	53	-
Coeliac Society	54	-
Focus Ireland	21	49
Camphill Communities	51	57

4.2 *Feedback on assessment*

The appellants had to base their appeal on the *Feedback on assessment*. This is an important document, because it is the only information given as to why applicants may have been unsuccessful. For those who were given reasons, these are a sample:

- National Youth Federation: No particular focus on disadvantage.
- Irish Countrywomen's Association: Does not give specific examples of its focus on disadvantage.
- Youth Advocate Programme: Don't give clear deliverables.
- Parkinson's Association: No concrete deliverable.
- AWARE: programme only available to transition year students...difficult to assess its effect.
- Start Strong: Vague and aspirational, with no tangible outputs listed.
- ENAR: Difficult to identify added value.
- Respond: No clear impacts...no concrete examples demonstrating value for money.
- Family Support Network: Don't provide coalface services on the ground.
- Irish Men's Sheds Association: It is difficult to evaluate the added value to the sector other than that it is another outlet where men can meet. They currently have no other source of funding which means that their viability and value for money is hard to assess.
- Belong To: Caters for a small target group in a sector already well served.
- Shine: Don't give specific deliverables, similar services are provided by other groups.
- Irish Association of Youth Orchestras: No clear impacts given, no concrete examples of value for money.
- Spiritans: Does not give specific examples of added value.

These phrases provide some, albeit limited basis on which to make an appeal. They are unusual, though, for most feedback is a restatement of the application and, as such, provides no useful information or even clues on which an appeal can be based. This leaves appellants 'trying to read the tealeaves' from a half-page statement. In the case of the Irish Wheelchair Association, for example, it was simply told that unfortunately it did not reach the mark but was given not even the slightest hint of a suggestion as to why this might be the case. Similarly, no discernible reasons were given to the Transgender Equality Network. One in Four was told, among other reasons, that it was unsuccessful 'due to the high number of applications received', hardly an informative basis for an appeal. The *Feedback on assessment* for the National Council for the Blind had a 15-line positive assessment of its role, followed by 'unfortunately the NCBI did not reach the qualifying mark'. The Coeliac Society similarly was told it received 54 marks, but without a single point of criticism. One is left with the impression that the *Feedback on assessment* was compiled by more than one person, one of whom was prepared to give robust reasons for rejection, the other none at all.

Appellants do not appear to have been given the actual assessment form, though, but instead the shorter, summarized *Feedback on assessment*. Whilst most of the statements give above are faithful restatements of the shortcomings identified on the assessment form, in other cases important information may not have been provided. An example is Camphill Communities, where the assessment form made two negative comments:

It is difficult to see the added value of Camphill within the sector. ...
It is difficult to see how they cannot provide core staff funding.

The *Feedback on assessment*, which one assumes should be a pertinent summary of the assessment form, gave Camphill the following reasons for its rejection:

The impact that the [post sought] will have is not made clear.

This is a different reason. In the case of ACCORD, the assessment form had the comment, under the section on added value where it received 8/20 marks:

It is difficult to see the added value and focus on disadvantage.

This is a severe criticism, which may or may not have been merited, but it was not mentioned in the *Feedback on assessment*. Similarly, under 'deliverables', the Downs Syndrome Association received 11/25 marks, with the comment 'no deliverables apart from continued services are given', but there is no reference to this in the *Feedback on assessment*. In the case of the Migrant Rights Centre of Ireland, its rating under added value is 8/20, with the comment 'MRCI seems more like an advocacy group and it is difficult to see how they have an added value' but this criticism is not reflected in the *Feedback on assessment*, which does mention its self-advocacy role, but in a neutral way, which would not have alerted MRCI to the negative tone of the original comment.

The assessment of Bodywhys commented that 'It is difficult to see what service they can provide with €30,000 per annum', but the *Feedback on assessment* made no reference either to this difficulty or the figure. The assessment form for the National Federation of ARCH Clubs stated that the network 'don't actually provide services on the ground', but this was nowhere mentioned in the *Feedback on assessment*, where, presumably it would have wished to challenge this opinion.

It is apparent that there is quite a divergence between the reason given to failed applicants in *Feedback* - which is the only basis for their appeal - and the comments made in the assessment, to which they do not have access. The appeals officer, by contrast, did have access to the assessment form. This not only gave her a considerable informational advantage, carrying the risk of prompting her to make judgements on the basis of information not available to the appellants, which would be contrary to the principles of administrative justice.

4.3 Appeal decisions

Turning now to the appeal decisions given, these were generally short and, except in the one case noted above, confirmed that the original decision had been upheld. Generally, the critical reasons provided were quite short and some examples are given:

Medical Charities Research Group: Without MRGG's intervention,... it is assumed that the HRB [Health Research Board] would have to provide an alternative mechanism.

Sport against Racism: Executive chairperson is voluntary - no indication if this is feasible in long term. Overlap with other organizations.

National Association of Traveller Centres: No basis for statistics provided.

Camphill: It is unclear how funding focusses on disadvantage.

Quite a number listed other funding sources received by the organizations concerned, but the degree to which this was weighed in rejecting the proposal was never made clear. There were some comments on some costs for the money sought being high (e.g. web development in ACCORD), or difficulties experienced with particular services (e.g. ACCORD) but no indication as to whether this contributed to the rejection of the appeal. Some of the reasoning advanced is difficult to understand, such as the view that Camphill does not focus on disadvantage (it works exclusively with people with special needs). Quite a number were criticized for providing insufficient detail in their proposal, but in the absence of the application form, it is not possible to reach a judgement on this.

A significant problem is that there appears to be little connection between the reasons given for the initial rejection in the *Feedback on assessment* and the negative decision of an appeal, even if the conclusion is the same. Examples are given.

In the case of Bodywhys, the proposal was rejected on appeal on the grounds that there was no socio-economic breakdown for those assessing services and that an insufficient case was made as to how the fund would focus on disadvantage and social need. None of these reasons was advanced in the *Feedback on assessment*.

The *Feedback on assessment* criticized the Older Women's Network for not giving examples of its focus on disadvantage and that its service appeared to overlap with other organizations. The appeal was rejected on these and fresh grounds: lack of clarity of aims, value for money with the comment that the network was shifted in the direction of the health area.

In the case of the Irish Senior Citizen's Parliament, the *Feedback on assessment* criticized 'no evidence of coalface activity' and that it was 'similar to other groups', while the organization was rejected on appeal on the basis of lack of detail, lack of specific detail on salaries, failure to demonstrate disadvantage and inability to justify value for money - quite different grounds.

Parental Equality was rejected in *Feedback on assessment* on the basis of 'providing services similar to other groups' which were not identified, but rejected on

appeal on the basis of insufficient training of their volunteers, lack of contact details, lack of statistics and lack of targets - quite different grounds. The National Federation of Voluntary Bodies was rejected on the basis of providing a service similar to other umbrella organizations. One was identified on the assessment sheet (Disability Federation of Ireland was named), but not on the earlier *Feedback for assessment*.

In the case of the Migrant Right Centre of Ireland, the appeal decision stated that 'the main route for transfer of information is word of mouth, which is a concern'. Although the 'word of mouth' issue had been mentioned on both the assessment form and the *Feedback on assessment*, the mention was neutral and not expressed as a 'concern'.

Unmarried and Separated Fathers was rejected on appeal, *inter alia* because it 'shares this space with a number of other nationwide organizations', which were not identified and even though this was not a reason cited in the earlier *Feedback on assessment*.

The appeals process therefore raises serious questions about the information supplied to appellants; and about administrative justice, with reasons for appeal rejections being in a worrying number of cases quite different from those of the original rejection.

5 Conclusions

This study has raised important questions about the quality of public administration: review and assessment (5.1), the process of applications, marking and appeals (5.2), the knowledge base (5.3) and the role of the scheme (5.4). Final remarks are made (5.5).

5.1 Review and assessment process

Perhaps the most remarkable feature of the two schemes was the lack of collegiality involved in either the process of review or assessment. It might have been assumed, possibly by those with little knowledge of the operation of the civil service, that the members of the team of officials involved would consult each other in a structured way on the review and subsequent assessment processes in the scheme. Instead, as the department has outlined:

The review was not made at internal meetings and accordingly there are no records of such meetings. ...

The assessments were not made at meetings and accordingly there are no records of such meetings, nor of discussions related to the assessment of applications. ...

There were no meetings to consider appeals and accordingly there are no records. (Department of the Environment, Community and Local Government, 17th November 2011).

Although, to contradict this statement, one meeting was identified (3rd October 2007), the process is essentially an individual one, with assessments made by individuals on their own, with an element of cross-checking of the paperwork by colleagues, but not at meetings. When the Combat Poverty Agency handled the funding of voluntary and community organizations - antecedents of these schemes - it was normal for applications to be scrutinized at three levels, starting with an appraisal committee, which provided opportunities for peer review, interrogation, challenge and reconsideration.⁵ Such a process appears to be largely absent in the department. The appeals were dealt with single-handedly by one official working entirely on her own.

The system of review was also questionable. In 2007, the process for review was carried out by two sets of external consultants, Goodbodies and Indecon. In 2011, the process involved a survey of existing grant-aided organizations. In both cases, the department met with a handful of voluntary organizations to discuss their use of the scheme, five in 2007 and four in 2011, but we have no information as to why the organizations identified were selected. In neither case was there a structured dialogue with the voluntary and community sector as a whole, even though it approached the department for such a dialogue (*Voices that matter*). In neither case was there a structured, recorded discussion within the department itself. Granted that both schemes determined the main funding scheme for voluntary and community organizations for a period of six years, this is an extraordinarily narrow consultative base from which to operate.

⁵ For example, *Evaluation of the small grant schemes, 1993-5*. Dublin, Combat Poverty Agency, 1996, p11-14.

5.2 Processing applications, marking and appeals

Detailed examination of the process of applications, marking and appeals reveals a number of serious problems. These are:

- The term 'disadvantage', one of the most important criterion for marks, was applied inconsistently. Some organizations working with groups living in extreme poverty received unusually low marks. By contrast, some groups whose file unambiguously indicated that they did not work in the area of disadvantage received very high marks for disadvantage. Voluntary organizations working in the disability field received consistently the highest marks for working in the area of disadvantage, but some disability groups received inexplicably low marks for disadvantage.
- The application of the term 'disadvantage' was interpreted inconsistently between the two schemes. Some organizations received high marks for their work in disadvantage in 2007, but the same organizations received dramatically lower marks in 2011, sometimes as much as 30% lower.
- Both schemes required organizations, under the 'disadvantage' heading, to work at the coalface or directly provide key services to groups in disadvantage. This is methodologically problematical, for one score was used for two quite different tests.
- Many groups, as a result, saw their 'disadvantage' score marked down. This marking down was applied inconsistently from one group to another. In some cases, high scores were maintained on the basis that although the organization did not work at the coalface, its member organizations did. In other cases, its failure to do so was a reason for it being marked down. This inconsistency extended not just from one organization to another, but from one scheme to another. In 2007 an organization might not be marked down for not working at the coalface but might be in 2011.
- The term 'working directly' with member organizations was applied inconsistently to organizations with similar membership structures, some being marked down for their type of structure, but others not being so marked down.
- The issue of 'strategic value' was applied inconsistently. Organizations recommended for having a strategic value within the sector were awarded funding in one scheme, but this was not taken into account when denying funding on the following occasion.
- The appeals system had numerous inconsistencies. Whereas some organizations were, in the *Feedback on assessment*, given reasons for their rejection, other organizations were given no reason at all and they had no basis on which to make an appeal. Even more seriously, the reasons for the rejection of the appeal were, in numerous instances, different from or additional to those cited in the initial *Feedback on assessment*, which is contrary to the principles of administrative justice.
- Although appellants were given a *Feedback on assessment*, they do not appear to have been given the original assessment sheets which would have provided the detailed information necessary for them to have made an appeal, files which would have presumably been available to the appeals officer.

Inconsistent processing and marking were highlighted by a number of high-profile cases. Although criteria changed from 2007 to 2011, the difference in outcomes was striking. To take two, Older Women's Network was highly rated by the assessors in 2007 (70 marks), but 57 in 2011; while Irish Rural Link scored 82 in 2007, but only 52 in

2011. Even allowing for organizational change in the meantime, such dramatically different outcomes are difficult to explain.

5.3 Knowledge base

The limited nature of the reviews of both schemes has already been noted. Neither scheme benefitted from a structured engagement with the voluntary and community sector, nor with the academic and independent research community which at this stage has a substantial knowledge of the voluntary and community sector in Ireland.

The lack of a knowledge base was highlighted by the decisions made under the assessment heading of 'added value'. In effect, this criterion sought to assess applicants on the basis of their unique contribution to the voluntary and community activity in Ireland. Many of these judgements made on the assessment sheets appeared to lack a significant knowledge of the voluntary and community sector in Ireland. The rejection of applications on the basis of limited or ill-informed knowledge is a serious matter. The statements of the assessors were problematical in the following ways:

- Many organizations were adjudged not to be distinctive, yet a basic knowledge of their history, evolution and role shows them to have a unique role (e.g. Camphill Communities, Schizophrenia Ireland, Centre for Independent Living). SPIRASI was adjudged to have failed to specify whether they provided any services that were different - yet it is the only organization with a specific expertise in assisting the victims of torture.
- Many organizations were adjudged to be 'similar' or 'identical' with other organizations, which even a passing knowledge of the sector would show not to be the case. This is particularly true in the area of disability and older people. This view was contested on appeal by the Older Women's Network, which compiled and added a table of older people's organizations and their different fields of work to illustrate their differences. This was ignored by the appeals officer.
- Although organizations were often condemned on the basis of their similarity to other organizations, there are almost no examples of these organizations being named;
- Even in subsectors where voluntary organizations are few in number (blindness), one was marked low on the basis of its similarity to other organizations, even though there are only two other in the field, none similar.
- There were numerous examples of judgements being reached on the basis of a lack of information, or the assessor being presumably misinformed. One national organization working in rural development was marked low on the basis of its similarity to 26 other organizations which work numerically with larger number of urban populations (community fora).
- One organization was marked down for being both not distinctive (working in the area of bereavement) and distinctive (the only organization to work with the bereaved parents of children).

Reading these judgements, it is difficult to see that the assessors informed themselves with some of the basic literature describing the voluntary and community sector. Two Institute of Public Administration publications come readily to mind, for these should

have been a readily available source of information to people working in Irish public administration. *Two paths, one purpose - voluntary action in Ireland north and south* provides an outline topography of the voluntary and community sector, providing information on many of the groups which subsequently applied to these schemes. In no other area were the assessors more emphatic about the similarity of groups working with older people. Here, pages 197-299 of *Social policy, ageing and voluntary action* provided detailed profiles of organizations working with older people and the distinctive role played by each. Finally, in the area of disability, *Painting our picture* (Disability Federation of Ireland) is a lengthy, 250-page guide to the different and distinctive bodies working in the disability field. It is inconceivable that the assessors could have reached their judgements about similarity had they made even a cursory scan of these basic texts.

It would not be unreasonable for the department to set guidelines for the number of type of organizations that it should support in a given field (e.g. size, density), but both schemes were operated without, from the documented record, any structured consideration being given to this issue. As a result, sweeping judgements were made about 'excessive overlap' and that an organization should not be funded because there were already others operating in the field (logically, that is just as much an argument that they should not be funded instead).

4.2 above noted the inconsistent application of the term 'disadvantage'. It is not evident if the assessors were working to an agreed definition of the term 'disadvantage', but the absence of documentation suggests that they were not. As a result, we ended up with bizarre outcomes such as that the Community Workers Cooperative, with 30 years experience of working in poverty, social exclusion and deprivation is adjudged to work less in the field of disadvantage than the Irish Mountain Rescue Association, whose current texts make no reference to such activity.

Assessing 'disadvantage', though, is a difficult task and this should be acknowledged. The assessors appear to have come to the view that disability presented the most severe form of disadvantage and set it at the top of the hierarchies of disadvantage. Disability has long been known as a high risk factor for poverty, so this is a defensible position, but having said that, disability does vary in its acuteness, social gradient and duration and it is not clear if these subtle factors were recognized. Apart from that, the hierarchies of disadvantage, risk, social exclusion and poverty do not appear to be clearly established, leading to inconsistent judgements that have already been noted, for example the low score of the Congress Centres for the Unemployment, 12/25 (48% of available marks), even though unemployed people are a high risk group. The long-established and extreme poverty of Travellers, for example, rarely merited scores as high as disability organizations. The essential point here is that the assessors should have been informed by an established set of definitions of disadvantage, from which there is now an abundant, well-established set of literature from the Combat Poverty Agency, the Economic and Social Research Institute, the annual European Union Standards of Income and Living Conditions (EU-SILC) and the government's National Action Plan for Social Inclusion. There is no evidence, from the documentary record, that any of these sources were consulted.

A final concern about the knowledge base is the apparent lack of knowledge of the *Modus Operandi* (MO) of some voluntary and community organizations. The most striking example is the case of the Migrant Rights Centre of Ireland, where the comment '74% of new migrants found about MRICI by word of mouth' is framed negatively in the context of its low mark (8/20) and as a 'concern' on appeal. This ignores the fact that, far from being idiosyncratic, this is a normal, universal, valued and effective way for migrant organizations to work (and many others as well). MRICI ended just 3 points short of the qualifying mark, so this was a costly misjudgment for it.

5.4 Role of the funding scheme

Three particular issues emerged from this study concerning the role of the funding scheme. Although there are some contrary examples, one group appears to have been marked down for its advocacy work (the Migrant Rights Centre of Ireland which 'seems more like an advocacy group'), while few organizations appeared to use the 'advocacy' word. Camphill Communities, in its presentation, even made the point that to the department that it eschewed advocacy. This is a notable development, for the white paper *Supporting voluntary activity*, which prompted the establishment of this funding scheme in the first place, not only endorsed the 'advocacy, campaigning and lobbying role' of the voluntary and community sector, but described it as one where government and the sector had a working relationship (p61). The assessment procedure appears to question an important principle of the white paper.

Second, a striking feature of the two funding rounds is the large number of health-related organizations applying for funding. Whilst health was and is an important part of the voluntary and community sector, the proportion of health-related organizations is calculated at 42% (2007) and 51% (2011), an overwhelmingly large category. It is not the function of this scheme to provide core funding for organizations which should be funded by other, core parent departments, the striking out of the Red Cross being an apparent example of the application of this principle. Although the schemes included many organizations that were funded by the Health Service Executive (HSE) (e.g. Barnardos), it was also apparent that there were many that were not, a classic example being the Parkinsons Association, whose documentation made it clear that it received no public money and is indisputedly located in the health sector. In 1994, under *Shaping a healthier future*, the Department of Health renounced its role in core funding health-related voluntary organizations, thereby creating a large class of funding 'refugees' obliged to seek funding from other departments, to the point of crowding out the Department of Community, Rural & Gaeltacht Affairs and subsequently the Department of the Environment, Community and Local Government. This 'crowding out' is an issue which should be recognized and addressed. A third and final comment is that the distinctive identity of the 'national anti-poverty networks' programme, integrated into the 2007 scheme is no longer evident and appears to have been lost.

5.5 Final remarks

This review of the *Funding scheme to support national organizations in the voluntary and community sector* raises serious issues of public administration, principal of which are:

- Lack of a collegial approach to decision-making and assessment;
- Lack of *structured, strategic* consultation with voluntary and community organizations while reviewing the two schemes;
- The inconsistent operation of the system of assessment, especially in the areas of defining disadvantage, key services and coalface services, one criterion being used for two functions;
- The inconsistent operation of the appeal system, with appellants not given sufficient information on which to base an appeal and appeal decisions based on grounds different from their original rejection;
- Vital decisions on 'added value' and 'disadvantaged' being uninformed by reference to well-established literature and reference sources: a poor knowledge base;
- The crowding out of the scheme by health-related organizations, as a result of the 1994 health strategy which discontinued core funding for groups in that field;
- A departure from the principles of the white paper in marking down organizations concerned with advocacy.

As a result, the objectives of the scheme may not have been well served. Some of these outcomes were highlighted by a number of high-profile organizations, but may also be seen in many numerous cases of uneven outcomes which, as noted, reached bizarre extremes. There is time to address these problem areas in time for the next, fourth round of the scheme through the following:

- A collegial approach within the department to review, assessment and appeal;
- A structured, strategic consultation with voluntary and community organizations;
- An improvement in the knowledge base, with a requirement that assessment and appeal officials familiarize themselves with key governmental, academic and research texts on the profile, typography and MO of the voluntary and community sector;
- Introduction of guidelines for assessing 'disadvantage', 'key services', 'coalface services', 'added value' and the number and type of organizations to support per subsector or any subsequent terminology, scoring one function at a time;
- The need to address the problem of poor applications, through such mechanisms as a technical assistance facility and/or a screening round;
- The inviting of external advisors to assist in the assessment process, as was the case in the first, original scheme;
- Application of the principles of administrative justice to the assessment and appeals system with:
 - Appellants given the original assessment sheets as a basis for appeal;
 - The exclusion of reasons for rejecting an appeal reasons that are different from those original given in the original decision;
 - An independent system of quality control to verify both the assessment and appeals process;
- The re-opening of the decision in *Shaping a healthier future* about the core funding of voluntary organizations working in the health field, following by the opening of a dialogue of the Department of the Environment, Community and Local Government;

the Department of Health; and the voluntary and community sector with a view to the Department of Health re-accepting its responsibilities for funding voluntary organizations and with the Department of Social Protection about a scheme that will effectively fund national anti-poverty networks;

- The restatement of 'advocacy' as a factor for upmarking voluntary organizations in the next scheme.