Interest Groups in Civil Society Representativeness and Social Control of the SUAS – Brazil

Grupos de Interesse na Representatividade da Sociedade Civil e no Controle Social do SUAS – Brasil

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ABSTRACT: This article intends to carry out a theoretical reflection on the possible role of interest groups in spaces of discussion and deliberation that make up the social control of the Sistema Único de Assistência Social (SUAS)[2]. To help us in this discussion, we rescued some regulations that deal with the practice of social control in SUAS, placing them in dialogue with bibliographic references that help identify action opportunities by interest groups based on these legal prerogatives. In conclusion, it is possible to suppose that interest groups act directly or indirectly in the social control of SUAS, defending their own causes that can compromise the interests of the broader Brazilian population or even the part of the civil society they claim to represent.

KEYWORDS: Unified Social Assistance System, social control; interest groups.

RESUMO: Este artigo pretende realizar uma reflexão teórica a respeito da possível atuação de grupos de interesse em espaços de discussão e deliberação que compõem o controle social do Sistema Único de Assistência Social (SUAS). Para auxiliar nessa discussão, foram resgatadas algumas normativas que regulam a prática do controle social no SUAS, colocadas em diálogo com referências bibliográficas que auxiliam a identificar oportunidades de atuação de grupos de interesse a partir dessas prerrogativas legais. Como conclusão, percebe-se que grupos de interesse agem direta ou indiretamente no controle social do SUAS, defendendo causas próprias que podem comprometer os interesses da população brasileira mais ampla, ou mesmo da parcela da sociedade civil que dizem representar.

PALAVRAS-CHAVE: Sistema Único de Assistência Social, controle social; grupos de interesse.

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2 Social   Assistence   Unified   System

METHODOLOGICAL CONSIDERATIONS

In order to make these theoretical considerations, we have consulted bibliographical sources that could be useful for understanding the functioning of the social control of SUAS, and also those that deal with the performance of interest groups in different areas of political activity. Researchers in the field suggested classical texts on this topic[3]. These materials offered further references to books, articles, dissertations and theses that could help us think about the theme. All these referenceswere available in both virtual and physical databases. Examples of physical databases used are the libraries of the University of São Paulo (Brazil). For virtual databases, we consulted national and international websites, such as Scientific Electronic Library Online (SciELO) and Web of Science, using search descriptors such as "social control" and "interest groups".

Laws, regulations, decrees, resolutions and other official Brazilian documents were consulted to better understand social control in SUAS. The normative documents mentioned are widely accessible on virtual platforms, as they are all publicly available. Therefore, the search for these materials focused mainly on platforms such as the Brazilian Chamber of Deputies portal (which allows searching its database, which contains a collection of materials published by the national legislature).

For this article, we selected references that are directly related to the aim of this work: to carry out a theoretical reflection on the possible role of interest groups in the discussion and deliberation spaces of the SUAS. Many other materials could contribute to the understanding of this topic, but we have prioritized those that offer a general understanding of the theme and are also helpful in the general reflections proposed here.

We make it clear that the text does not address the actions of particular interest groups. We preferred to emphasize the performance of interest groups in general, as collectives acting for a common goal. For this purpose, it will be used the comprehensive definition of interest groups, offered by Thomas (2004, p. 03): "An interest group is an association of individuals or organizations or a public or private institution that, on the basis of one or more shared concerns, attempts to influence public policy in its favor".

The arena of interest for these groups that will be under analysis is the Sistema Único de Assistência Social, which materializes the public policy of Social Assistance in the Brazilian reality since 2004, when this System was implanted.

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3 Special thanks to Professor Wagner Pralon Mancuso, from the Department of Political Science at the University of São Paulo, for his suggestions on many of the texts cited here.

WHAT IS SOCIAL CONTROL IN SUAS?

Brazilian Social Assistance was instituted as a public policy in the 1988 Constitution, challenging the welfare, philanthropic and clientelistic logic that permeated social assistance actions in Brazil until then (CRUZ; GUARESCHI, 2013). It is part of the social security system and health and social security. As a public policy, the 1988 Constitution establishes Social Assistance as a duty of the State and a right of every citizen, on a non-contributory basis (not demanding a counterpart from people beneficiated). In 1993, Brazilian government publishes the Lei Orgânica da Assistência Social (LOAS)[4], detailing the principles and guidelines of the Social Assistance Policy, as well as its organizational aspects - financing, management, division between different levels of protection, etc.

In 2004, the Sistema Único de Assistência Social (SUAS) was created, through the Política Nacional de Assistência Social (PNAS)[5], which details how Assistance should be materialized in its different levels of responsibility (federal, state and municipal). The 1988 Constitution, the LOAS and the PNAS are the main normative frameworks that shape Social Assistance in the ways we know it today, through the SUAS. In all these norms, the social control of politics appears as a premise.

In SUAS, the PNAS describes social control as a characteristic of the democratic dynamic that "provides the participation of the population and society in the formulation and control of actions"[6] (MDS, 2005, p. 86). It already appears in the Constitution of 1988, which establishes as one of the guidelines of social assistance the "participation of the population, through representative organizations, in the formulation of policies and in the control of actions at all levels" (Art. 204). The LOAS ratifies this same guideline, which includes the participation of social assistance entities (non-governmental and other non-profit organizations) as executors of the assistance policy, and also as part of civil society entities that must act in the social control of the Assistance policy.

The LOAS also creates the Conselho Nacional de Assistência Social (CNAS)[7], comprised of eighteen members: nine government representatives and nine civil society representatives. This normative describes civil society as "representatives of users or user organizations, social assistance entities and organizations and workers in the sector, chosen

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4 Organic Law of Social Assistence

5 National Social Assistance Policy

6 All quotes of laws, public regulations, and Brazilian texts in this text have originals in Portuguese, translated into English by the author herself. Some terms were translated from Portuguese to English in the footnotes to facilitate the understanding to English readers.

7 National Social Assistance Council

in a separate forum under the supervision of the Federal Public Ministry (BRASIL, 1993, Art. 17, § 1). The CNAS has an advisory and deliberative character, and it is incumbent upon it to "ensure the effectiveness of the decentralized and participatory system of Social Assistance" (BRASIL, 1993, Art. 18, V). In addition, it is one of the public agents responsible for managing the federal resources transferred to states and municipalities for the implementation of the Social Assistance Policy. Additionally, the LOAS legalizes the existence of State and Municipal Social Assistance Councils - also with equal composition between the State and civil society and with duties similar to those mentioned for the National Council, but with activities restricted to their respective territories. The Councilsare subdivided by areas of coverage and by themes, depending on the specificities of the groups they represent in the Assistance policy: Council for Children and Adolescents, Council for the Elderly, Council for Persons with Disabilities, among others.

The PNAS also highlights social control as one of the main components of SUAS. Some of the structuring axes it mentions for managing the system are "strengthening the democratic relationship between the state and civil society", "valuing the presence of social control" and "popular participation/citizen user" (MDS, 2005, p. 87). This publication details the organizational principles of SUAS, anchored especially in popular participation, representativeness and social control, through:

> a) Social Assistance Councils and Conferences held every two years, organized and supported by the respective sphere of government; b) the publication of data and information regarding demands and needs, location and standard of coverage of Social Assistance services; c) information and decision-making channels with partner social organizations, subject to social control, through public hearings; d) audience mechanisms for society, users, social workers; e) joint monitoring councils for socio-assistance rights; f) services management councils. (MDS, 2005, p. 88, our translation)

About the financial management of SUAS, the PNAS emphasizes that it is the responsibility of the respective sphere of government, with the respective council (municipal, state, federal) "guiding, controlling and supervising this management, through its management at the preparation of the budget proposal that deals with the allocation of resources, sharing criteria, the application plan and budget and financial execution" (MDS, 2005, p. 88). The Councils also deliberate on the criteria for sharing resources destined to Assistance in the three spheres of government.

The PNAS also emphasizes the main spheres where social control is effective in SUAS: Councils and Conferences. Both of them have the

role of assessing the situation of Social Assistance, defining guidelines for the policy, and verifying the advances obtained in a given period (BRASIL, 1993, Art. 18, § 4; MDS, 2005). Among the evaluation of the policy and verification of advances, it is possible to mention, for example, the evaluation of the fulfillment of the goals established in the multiannual Social Assistance Plans, detailed in the Budgetary Guidelines Law and the Annual Budgetary Law of the states, municipalities, and the federal government. In the case of Assistance policy, budget planning (multi-annual and annual) must be presented by the policy manager in each specific sphere for analysis and approval by the Councils; only after that, they are sent for the approval of the legislative power (City Councils or Chamber of Deputies) (MDS, 2006).

Another point the PNAS highlights is the importance of articulation in the execution of popular participation and social control activities. The national, state and municipal Councils must act in an integrated manner, having a common agenda, with the National Council responsible for organizing agendas and convergent actions between them (considering regional peculiarities).

Although the Constitution, the LOAS and the PNAS highlight popular participation as fundamental for the construction, revision and control of the Social Assistance policy, they also present challenges for its consolidation. Some of these challenges are mentioned in the PNAS (MDS, 2005): (a) the creation of mechanisms that guarantee the participation and protagonism of users in Councils, Forums, Conferences, etc., "as subjects that are no longer underrepresented" (p. 53); (b) the decentralization of these spaces and events in regional instances; and (c) the articulation and integration of the actions of the Councils at the regional level, "since the exchange of experience enables the exercise of social control" (p.53).

An additional challenge defended by the present article is to ensure that the instances of social control in the SUAS in fact are composed of groups representing the interests of civil society that they claim to represent. As we can see, the spaces for popular participation in SUAS (especially in the Social Assistance Councils) play a central role in implementing the actions of this public policy, serving as instances of consultation and deliberation on what should be implemented in the policy in each sphere of the government where they are. Additionally, these consultative and deliberative instances are involved in the transfer of budgets to carry out specific actions in the Assistance policy in the three spheres of the government.

We can see that the cited norms describe "civil society" as a diversity of different actors (assistance policy workers, users and representatives

of non-profit organizations that execute the policy). These actors may have diverging interests, which is especially relevant considering that the Assistance Councils deliberate on the budgetary allocation of public resources. Some socio-assistance entities and organizations, for example, need this amount of money to keep their functioning; it can generate a bias in decisions involving such a budget. Likewise, Assistance users and workers may participate in these spaces based on specific interests, aimed at benefiting the groups they represent (syndicates, political parties, etc.).

Considering the diversity of actors who work in social control at SUAS, and also trying to question their representativeness regarding the interests of broader civil society, this article intends to explore the arenas of the practice of social control at SUAS as places where can happens influence and action of interest groups. The next section retrieves some useful bibliographies to help us think about the topic. The aim is to establish a critical reflection about it, possibly encouraging research and new debates that propose to investigate this topic in the Brazilian context.

BENEFITS AND CHALLENGES OF POPULAR PARTICIPATION IN THE CONSTRUCTION OF PUBLIC POLICIES

The performance of interest groups in different spaces of popular representation is an exploratory theme in political science. Schmitter (1974) and Thomas (2004), evaluating the phenomenon in the context of the United States, conclude that there is not always a clear limit between the claims of social movements – which, in theory, should fight for the interests of the population, community or group that they represent – and those carried out by interest groups with a corporatist bias. The theoretical model of Thomas (2001a, 2001b, 2004) considers that the more numerous interest groups are in a society, the more blurred the boundaries between them, social movements and political parties.

Thinking about interest groups (which can constitute social movements or use them as a tool to achieve their purposes), the author emphasizes that they act in favour of given advantages (social, economic, political, etc.) that benefit specific people or groups (THOMAS, 2004). Although the benefit of society as a whole is not one of its objectives, this can occur as a secondary effect of its pressure for the elaboration of public policies. In this case, an individual benefit (direct objective of the interest group) becomes a collective benefit (secondary effect of its action). If political parties act this way, we also can classify them as interest groups (THOMAS, 2001a).

Thomas (2004) also states that the formalization/legitimation of the action of interest groups by the State is common in democratic countries, especially in those where there is an incentive for the expansion of the third sector – and its use by the government. Translating this idea to the Brazilian case, we see it materialized in SUAS, where the government summons socio-assistance entities to perform assistance policy services. As other civil society groups, these entities have institutionalized spaces for participation in controlling the Assistance policy: Conferences, Councils, Assistance Forums, and others.

To help us to think about the performance of organized civil society in broad spaces of participation and control of public policies, we turn to the contributions of Archon Fung and Erik Olin Wright (FUNG; WRIGHT, 2001; FUNG, 2002, 2003). The authors highlight the importance of the participation of associations of civil actors in public governance. They call "Empowered Deliberative Democracy" (EDD) the democratic process through which ordinary citizens have spaces institutionalized by the government to participate actively in public policy deliberations. The EDD composes a style of governance that the author calls "Empowered Participatory Governance" (EPG). In this type of governance, individuals act together in civil society associations and are responsible for making rational decisions aimed at the common good. The authors describe some advantages and challenges of this type of governance.

As an advantage of EPG, Fung and Wright mention that it strengthens democracy. It allows for popular participation based on an equal right to participate – since the decision-making process can be based on "reasonable discussions" (FUNG; WRIGHT, 2001, p. 38), not on power, status, money or number of participants. Such a democratic model would express more the popular interest than the vote itself, transmitting society's needs and preferences to the government qualitatively and more deeply. In addition, according to the author (FUNG, 2003), participationin associations stimulates the development of civic skills in its membersto act in public life, offer resistance to domination and anti-democratic power (especially in fragile democracies), facilitate public deliberation (by promoting debate and open communication between different audiences), and helps direct civil society governance over decisions that affect their lives.

However, associative does not always contribute to the improvement of democracy. Among other factors, it depends on the quality of participation and interaction between actors. Fung and Wright (2001) point out that deliberative democracy is vulnerable to serious problems of power and domination by "powerful factions and elites" (p. 48) within deliberative arenas. Fung (2002) warns that political parties and

other groups interested only in obtaining their own benefits can use these arenas as spaces for state capture. In addition, the participatory democratic process requires high levels of popular participation, something that can be difficult to achieve. In general, the author reiterates, an asymmetry prevails between the participation of different groups:

> Formal institutions of participatory collaboration are usually characterized by large asymmetries in prior organization, knowledge, intensity of interest, and capabilities. These asymmetries create temptations for advantaged parties to exclude and subject others, and so fair collaborations frequently difficult to achieve. (FUNG, 2002, p. 19)

In short, we can notice that popular participation is an inseparable part of the democratic process, contributing to strengthening it. In addition to consolidating the partnership between civil society and the State in deliberations involving public policies, it also strengthens a sense of belonging of citizens to their society, contributing to the formation of active political identities within the scope of decision-making processes (LAVALLE; VERA, 2015). Popular participation emerges as opposedto authoritarianism or clientelism (where a society passively accepts the "benefits" granted by the State), however, it is not free of components of control and domination. These occur through the asymmetry of power and influence of individuals and groups that act in participatory spaces, advocating their own interests rather than the interests of the people and groups they claim to represent (LAVALLE; ZAREMBERG, 2014).

In the next section, we will see how these mechanisms work in the Brazilian case when it comes to the social control of SUAS. This text considers that the spaces for discussion, consultation and deliberation involving this policy are fertile fields for popular participation. To this end, it is important that they guarantee an effective representation, one that aims to "give voice" to the interests of civil society, and not be its "spokesperson" - in the latter case, using the right to participate in spaces for discussion and deliberation in favour of advantages sought by interest groups (LAVELLE; HOUTZAGER; CASTELLO, 2006).

POSSIBLE ACTION BY INTEREST GROUPS IN THE SOCIAL CONTROL OF SUAS

In the Brazilian case, the population's participation in deliberation processes involving social policies has changed over time (SILVA; JACCOUD; BEGHIN, 2005). Between 1930 and 1960, this participation took place mainly in the field of social security, assuming an advisory nature; it included an expert opinion, as well as some workers and

employers. From the 1980s onwards, Non-Governmental Organizations (NGOs) and civil society associations proliferated, fighting to expand the boundaries of spaces for participation and popular representation to include them. From the 1990s onwards, these groups increased claims for popular participation in an advisory and deliberative manner - something legitimized in social control strategies in the Unified Health System and the Unified Social Assistance System.

The articulation and negotiation channels between civil society and the State improves the technical mechanisms of governance (VIEIRA, 1999), being essential in a democratic State. These spaces for claiming, participating and representing different groups in civil society are spaces for dialogue and negotiation par excellence. However, they are also spaces of continuous conflict – between government and civil society, and also within each of these spheres (FAQUIN; PAULILO, 2010). According to Bravo and Correia (2012), there are divergent opinions in the current debate on changing social control – especially in Councils and Conferences:

> that [opinion] which considers that these spaces should be abandoned by social movements, as they are totally captured by the State; that one which defends the Councils as the only spaces of the struggle for the conquest of more power within the State; and the position which judges that such spaces should be tensioned and also occupied by social movements, despite recognizing their limits in a situation of reflux and co-option of many of these. (p. 134-5, translated)

In any case, the authors highlight that Councils and Conferences are not neutral and they do not have a homogeneous composition. They also vary according to social dynamics. They express the conflict of interests and forces present in these dynamics, including the co-option of actors and the clash of divergent proposals in the struggle for specific policy decisions that benefit the interests of the classes they represent.

In a Booklet published by the extinct Ministry of Social Development and Fight against Hunger (MDS, 2006), some guidelines are offered for participation in Councils and in the social control of the Assistance policy. Among them, the principle of parity stands out, according to which the Councils must have the same number of councilors from government and civil society (users, service providers and policy workers). With regard to representatives of civil society, the Booklet highlights that they "must have full conditions to be the legitimate defenders of the segments they represent" (p. 20). There is also an underlying concern regarding the possible role of interest groups as representatives of civil society in the SUAS Councils:

> As for civil society advisors, it is expected that they do not use the Council to defend the interests of the entities they represent, but it is expected they can be capable of bringing contributions from the segments they represent in favour of the public policy, contributions fueled by debates and discussions typicalof civil society, such as forums, social movements, etc. With strong participation from both - government and civil society -, Councils can indeed share information and decisions [between their members]. Only then, the numerical parity will have the force that gave rise to them. (MDS, 2006, p. 21)

It is interesting to note that the publication recognizes the risk of the possible involvement of interest groups in the Councils, but it emphasizes, even so, that the principle of parity must be preserved. With the diversity of groups that form what is called "civil society" and considering the different results that these groups seek to achieve in the spaces of social control of politics, we need to question whether there is, indeed, parity in this participation. Is it possible to describe "civil society" as a single group?

In the case of Councils, what exists is 50% of the participation quota reserved for the Government and 50% reserved for different actors, part of distinct social/political arenas - with varying levels of relationship with SUAS, and different interests from each other. Considering a situation where these differences exist, the 50% participation of civil society is diluted into smaller percentages for each group present on the Council in question. This encourages the desirable open debates inside the Councils, but also the presence of a political game that the MDS Booklet predicts and warns about. This game may involve the co-option of actors and other strategies – a situation through interests not always explicit of each specific group substitute civil representativeness. In the end, the "winning group" is the one with a greater economic influence, persuasion or power.

The regulation of social control in SUAS itself creates traps that may reinforce or hide the action of interest groups (SILVA et al., 2008). The tripartite division of "civil society" (policy professionals, service providers and users) can often threaten the interests of policy users. As we will see, it is possible that the precept of popular participation be fulfilled without an effective participation of these users in the decision-making processes.

Corroborating this argument, a survey developed by the Instituto de Pesquisa Econômica Aplicada[8] (IPEA, 2013) mapped the profile of counsellors who work on National Councils in different public policies, including Social Assistance Councils. The survey reveals that, mostly, counsellors are male, white, highly educated, from a middle or

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[8] Institute of Applied Economic Research

upper socioeconomic class and over 40 years old. In contrast, the MDS developed a study in the same period (MDS, 2014a), describing the sociodemographic data of people enrolled in the federal government's Cadastro Único (a register for being beneficiaries of social programs in the country). Its finds show that most of these people are female, brown, with low education (67% have not even completed elementary school), live in extreme poverty and are young (most are up to 15 years old). Studies like this show the disparity between people who benefited from social policies and those who effectively participate in their control, evaluation and reformulation of that same policy. As we can see, there is a problem of representativeness of civil society in the social control in SUAS, with the group of users remaining underrepresented.

Still, in this study developed by IPEA (1993), some of these councilors were asked if they had "bases of support", defined in the questionnaire as "the main group of people represented by the Council". Taking the people who offered their responses to this question (71% of them), the majority (82%) declared having a support base, classified by the survey as being: civil society entities; collegiate bodies, social movements; governments or public bodies; companies and private groups; specific groups; and support bases. It is worth mentioning the presence of companies and private groups - not provided as participants in the Assistance Councils in the case of SUAS regulations, for example.

It is possible to imagine some reasons for the low representation of users in Social Assistance Councils. First, the policy establishes a percentage of about 17% of user participation (one-third of the 50%) reserved for civil society participation. In addition to this low percentage expected for participation, users may also not adhere to participation in the policy's social control spaces. This is even more likely to happen at the municipal level, since not all municipalities have a system of social control organized through Councils, for example, and when they do, the population does not always know these spaces as open spaces for their participation (BRAVO; CORREIA, 2012).

Additionally, even when policy users participate in social control, they face numerous challenges. Sposati and Lobo (1992) speak of a "co-opted alterity". This type of otherness occurs when policy users do not offer their opinion. The authors defend that it may happen because these people feel they are a minority in that participation environment, or due to a lack of information or argumentative capacity. Added to this, groups with greater power or influence strive to attract the sympathy of popular representatives to their causes, strengthening their power of argument and vote in a deliberative process.

The authors also cite the existence of a "subaltern alterity" and a "guarded alterity" in these spaces. In the first case, a situation dominated by groups with greater argumentative power replaces the opportunity of otherness, "treating popular representatives like pre-primary children. The subjects are reduced, their complexity is removed, the issues are de-problematized because the people would not understand" (p. 373, our translations). Tutored otherness, in turn, would be a variant of subalternity. It occurs when certain segments (policy officials, unions, social organizations, etc.), basing their statements on technical arguments, see themselves as legitimate representatives of broader popular interests, occupying the space for dialogue and participation of policy users.

Even when policy users are active in spaces of social control, they may have dissonant interests with each other. Although this is welcome in a democratic system with social control – which aims at argumentation and negotiation – it creates the opportunity for pre-defined and organized interests of some associations, entities or groups to gain strength and prevail. There are no guarantees that these interests are representative of users of the policy or of "civil society" as a whole, or that they are defended with the primary intent of benefiting them.

By the way, since "civil society" is so diverse, would it be possible to guarantee its representativeness in the face of discrepant interests? Spaces for participation in the social control of SUAS are fertile fields to shape this public policy according to the vision and active participation of different actors, distributed in different Brazilian territories. This contributes to strengthening the principle of territorialization of the SUAS (BRASIL, 1993; MDS, 2005) - which indicates that the Social Assistance policy must be respected in its guidelines but must also materialize through the SUAS, respecting the specificities of the different Brazilian territories. It is a policy implemented through the proliferation of multiple points of command, whose learning capacity of the system as a whole can benefit, since it involves the combination of deliberations of decentralized powers, with centralized coordination at the federal level (FUNG, 2001). However, these benefits exist in an ideal situation, where the representatives of the local civil society are effectively engaged in the defense of such interests and do not act aiming at their benefits – some of them that may favour the local population, others that may even harm it.

This discussion is especially important when dealing with the division of resources between the different programs and social assistance entities that execute the services of SUAS. As we have seen, the Assistance Councils deliberate on budgetary planning and criteria for sharing resources from the policy received by the federal or state government (in the case of municipalities). Social assistance entities are direct beneficiaries of these

resources. They may have an interest in continuing to offer their services, even if such services are not effective in meeting local demands for the Assistance policy. In addition, community associations, social movements, trade unions, political parties, private companies and many other groups can use the prerogative of deliberations on projects and resources to try to benefit a small part of the population they intend to represent. This can be done by looking for immediate or long-term advantages: new memberships, votes in the next elections, search for security and preservation of specific territories where to obey to the detriment of others, etc.

In this discussion, it is also worth considering the possibility that some interest groups act indirectly in spaces of social control of SUAS. It is possible, for example, for private group interests that do not fit into any of the "civil society" categories to co-opt authorized persons and groups to speak on their behalf.

So far, we have evaluated the action of interest groups in the 50% of participation that is up to civil society in instances of social control of SUAS. However, these groups may act in the other 50% - trying to influence directly State actors in favour of decisions that benefit them. Social Assistance policy, like any public policy, is not immune to lobbying practices (legal or illegal). In it, social agents put pressure on public decision-makers in favour of their interests and claims, acting in different spaces and using different strategies to achieve their goals (MANCUSO; GOZETTO, 2018). SUAS is not immune to this. Also in it, interest groups can act directly with the State to ensure benefits.

Although popular participation and political-administrative decentralization are Social Assistance guidelines (BRASIL, 1988, 1993; MDS, 2005), there are several examples of decisions that affect the functioning of the policy and its budgetary resources that do not pass through the evaluation or civil society deliberation. These are "top-down" decisions, with several examples throughout the history of this politics.

One example is the "Criança Feliz" Program[9] - instituted through Decree No. 8,869, of October 5, 2016, in the Temer government, with First Lady Marcela Temer as its ambassador. Requiring political resources, not involving debate with civil society and based on assumptions that violate principles defended by the Assistance policy, the program received harsh criticism from civil society movements. Let us rescue the note issued by the Conselho Federal de Serviço Social[10] (CFESS) on October 7 of the same year, two days after the launch of the program:

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9 "Happy Child" Program

10 Federal Council of Social Service

> It seeks, mistakenly and purposefully, to dismantle the Unified Social Assistan- ce System (SUAS) and shift social assistance, belatedly recognized as a social right, to the field of clientelism, welfare, mechanical solidarity and, therefore, non-right. (CFESS, available at: http://www.cfess.org.br/visualizar/noticia/cod/1301)

We highlight that social worker are the most numerous professional category working in SUAS (MDS, 2014b). The CFESS manifestation intends to represent them. Still, regarding the Criança Feliz, another written claim admitted on March 7, 2017, states:

> In October 2016, Brazilian society was surprised by Decree No. 8,869, which established the Criança Feliz Program – conceived and coordinated by the Ministério do Desenvolvimento Social e Agrário[11] (MDSA), which is the responsibility of the Secretaria Nacional de Assistência Social[12] (SNAS) and naming the first lady, Marcela Temer, as its ambassador – despite any discussion with the Bo- ards of the Program's intersectoral policies (Social Assistance, Health, Education, Culture, Human Rights, Children's and Adolescents' Rights, among others), as well as with the spaces of agreement. The Management Committee, defined in Article 6, follows the same directive logic of disrespect for spaces of social con- trol instituted from the Federal Constitution of 1988. Comprised essentially of federal management, it leaves the government free to manage public resources; it is the government focusing on itself. Such a program, elaborated, approved and negotiated inside the halls of the illegitimate government, without debate and far from the logic of social law, has been controversial in its entirety. (CFESS, available at: http://www.cfess.org.br/arquivos/2017-NotaPublicaCFESSNao-AoProgramaCriancaFeliz.pdf)

Such criticisms presented by the CFESS are for the Criança Feliz Program, but also at the lack of debate between the government and civil society before establishing it, breaking with the premise of control and social participation in the Assistance policy and in the functioning of the SUAS. Throughout this article, we have discussed the possible action of interest groups in the representation and social control of SUAS; through the cited example, it is possible to realize that the State itself may violate the very principles of "representativeness" and "social control" of politics, constitutionally established.

We reiterate that the State and civil society are groups that, in themselves, are not hegemonic and may get involved in conflicts and disputes, with the interests of more powerful groups prevailing in this game – political, economic, legislative, etc. In this sense, with interest in

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[11] Ministry of Social and Agrarian Development

[12] National Secretariat for Social Development

improving mechanisms of representation and social control – whether in SUAS or other policies – it is urgent, first of all, to

> recognize the disputed projects, which are often neither clearly presented nor logically secure. This requires the critical dismantling of an apparently homogeneous and consensual discourse, which hides rather than reveals present conceptions and positions (RAICHELLIS, 2011, p. 28).

Regarding to civil society, some of their divergent interests are related to the very difference of the groups they represent – political officials, social assistance entities, users; but also people from different territories, genders, races, socioeconomic conditions, etc. Acting in the spaces of evaluation and deliberation about the functioning of SUAS, it is also necessary to consider the possibility of interest groups acting – not necessarily aiming at the benefit of the policy or the population that it claims to represent, but its own benefit.

FINAL CONSIDERATIONS

This text do not intended to question the existence of mechanisms for popular representation and social control of the Social Assistance policy or the SUAS. On the contrary, we argue here that these mechanisms are important conquests, acquired through the struggle of popular movements against the dictatorship and in favour of the process of re-democratization of the country that culminated in the elaboration of the 1988 Constitution. In that regard, popular participation in the construction of public policies is a strong instrument for conquering and strengthening the Brazilian democratic process.

On the contrary, the article sought to discuss the possible use of these democratic spaces by groups interested in guaranteeing particular benefits, sometimes to the detriment of the interests of the "civil society" they claim to represent. This type of practice threatens the effectiveness and scope of the policy itself in benefiting those for whom it is intended - people in poverty and social vulnerability, already deprived of so many other social rights mentioned in the Constitution itself (income, health, housing, security, among others). The population needs representatives who are effectively committed to guaranteeing these rights.

We hope that the debate proposed here will be expanded - either through empirical studies, committed to investigating the presence and performance of interest groups in SUAS; or through the expansion of debates on the subject. The aim is, above all, to strengthen Social Assistanceas a public policy (not assistencialism), as well as to improve and strengthen

the mechanisms of social control in SUAS and defend the guarantee of the rights of its users.

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