



Rural proofing in Northern Ireland:

An overview and recommendations on guidance, implementation and governance



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implementation and governance

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Appendix A: The Rural Needs Act (Northern Ireland) 2016

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Appendix C: A guide to the Rural Needs Act (NI) 2016 for public authorities

Rural policy background and the development of rural proofing

In the late 1980s, the European Union began to question the singular focus of its Common Agricultural Policy (CAP) on the agricultural industry. While the belief had been that a thriving agriculture would lead to thriving rural areas, this in fact had not happened and instead a dysfunctional and market distorting agricultural industry had developed while rural areas declined (Bryden, 2009; Bryden et al, 2010; Shucksmith et al, 2005; Shortall, 1996; Copus et al, 2006; Shortall and Alston, 2016). The EU broadened the CAP to include a rural development programme (European Commission, 1998). This programme had an area based focus and acknowledged that many social, cultural and economic activities unrelated to agriculture take place in many rural parts of Europe. The rural development programme was designed in a flexible way to allow local action groups in different parts of Europe to pursue activities tailored to the needs of their local areas. Tripartite funding between the EU, Member States and local areas financed initiatives, with the EU the largest contributor. Considerable research has assessed the merits and demerits of this policy development (Shortall and Shucksmith, 2001; Bock, 2004; Special Issue of Sociologia Ruralis, 2000). One unintended consequence of this European shift was that Member States also began to scrutinise their own rural policies, and a shift emerged where Ministries began to consider rural policy more generally beyond the EU rural development programme (Shortall, 2012;

2013). England in particular led the way and since 2000, and has developed concepts and policies relating to rural proofing, rural mainstreaming and rural champions (Shortall and Alston, 2016; Atterton, 2008).

Rural mainstreaming involves a review of all policies, not only rural ones, to ensure that all people receive comparable policy treatment by government. The OECD (2011) noted that England is unique in OECD countries in the way in which it has developed rural proofing and mainstreaming. It is not the norm. Rural proofing is the method used to ensure that rural mainstreaming is correctly carried out and the Department of Environment, Food and Rural Areas (Defra) is charged with being the 'rural champion', and ensuring that other government departments have fulfilled their rural mainstreaming duties.

Some other countries have toyed with the idea of rural proofing, mainly Commonwealth countries. New Zealand has copied the English model of rural proofing. In the UK only Northern Ireland has fully adopted rural proofing and had, until recently, almost entirely aped the English approach. Northern Ireland has now gone further than any other country or region by passing into legislation the Rural Needs Act (Northern Ireland) 2016. The act is structured around the premise that the way to address rural needs is through rural proofing (DAERA, 2017).

What is rural proofing?

As the OECD (2011) notes, rural proofing is a policy approach unique to England in the OECD countries, although the devolved government of Northern Ireland has closely followed England's rural proofing policies since 2002 (DARD, 2015). The OECD also notes that it is a much more complex idea than it initially seems.

Rural proofing is a broad term often used to incorporate rural mainstreaming, championing rural policies, and auditing to ensure mainstreaming has occurred. Mainstreaming is meant to ensure that people in all

parts of a country, rural and urban, receive comparable policy treatment by government. The policy becomes one of 'rural mainstreaming'. The idea is not to develop specific rural policies, but rather to review existing and new policies to ensure that urban and rural residents receive equitable access to a common set of policies and programmes. While it is recognised that there are some distinctive aspects to the delivery of policy objectives in rural areas, and indeed the policy is premised on some notion of rural disadvantage, it is believed that these issues can be addressed during the

What is rural proofing?

design and development of general policies (see OECD, 2011; 21/22).

In order to ensure rural mainstreaming and rural proofing, a 'Rural Champion' is needed. In both England and Northern Ireland this is the relevant Government Department, or Ministry; Defra in England, and the Department of Agriculture, Environment and Rural Affairs (DAERA) in Northern Ireland. As part of its role as rural champion, the Ministries provide expertise to other government departments and train civil servants to think rural and how to assess policies to determine if they will have a differential impact in rural areas. Civil servants must complete an Impact Assessment for policies assessing how they may have a differential impact in rural areas and how this will be addressed. The rural champion produces an annual audit of the rural proofing process across government. Rural proofing sounds positive for rural areas, or at the very worst, innocuous. We turn now to a more critical analysis of this policy concept.

Similar to gender mainstreaming, rural proofing very much focuses on training, procedures and auditing (see for example, DARD 2015; Defra 2015). Nowhere are goals of rural proofing identified, targets set, or the desired outcomes spelt out. When civil servants are asked what it is that rural proofing will 'fix', they cannot answer the question¹. How a single check-list can deal with the diverse issues faced by rural areas has been raised, and who informs the checking of this list – civil servants tick boxes about rural needs and issues, but there is no rural voice. As previous research has shown, rural communities are not consulted (Atterton, 2008).

Numerous studies and reviews show myriad problems with the implementation of rural proofing. In England, there is a patchy understanding of the rural dimension of policy and confusion about responsibilities for proofing. The OECD (2011; 25) identified four recurring unaddressed policy problems with its implementation. First, there is a lack of systematic application across government departments; second, it becomes the responsibility of junior staff – thus senior staff are unaware of the need to carry out rural proofing; third,

there is a lack of consistent leadership to champion the needs of rural areas across government; and fourth, there is a lack of effective monitoring of the delivery of policies. More recently Defra (2015; 14) undertook a review of Impact Assessments across government and notes that over half showed no consideration of rural proofing or rural issues even though policy would impact on rural areas; over a third described rural issues but did not analyse the policy impact; and only eleven percent provided any robust evidence on rural proofing or how it had been used to inform policy design. Few incentives to undertake rural proofing exist. Defra's review also observes that an emphasis on rural proofing was lacking, and it was evident that a 'tick box' mentality prevailed in some government departments. Similarly in Northern Ireland (DARD, 2015; 11) problems with implementing rural proofing were identified. They found the application of rural proofing 'disappointing', in particular its ability to influence policy making. They also found difficulties with the mechanics of undertaking rural proofing and using it as part of policy development.

Despite reviews that regularly highlight the shortcomings of rural proofing, the policy tendency is to reinvigorate it, slightly revise the training and impact assessments that have been found not to be effective, and restate the rural champion role which has also been found wanting. Interestingly both England and Northern Ireland recently revised and reinvigorated rural proofing, discussed below. It is the history of rural proofing in Northern Ireland that is now considered.

'Few incentives to undertake rural proofing exist.'

Rural proofing in Northern Ireland

Rural proofing appeared in Northern Ireland as part of the first Programme for Government in which departments commit to 'ensure that the rural dimension is routinely considered as part of the making and implementation of policy by the new process of "rural proofing"' (Northern Ireland Executive, 2001, p.48). The Department of Agriculture and Rural Development (DARD) published 'A guide to rural proofing: considering the needs of rural areas and communities' (DARD, 2002). The document describes DARD's responsibilities as developing the initiative and providing adequate guidance. The Minister of Agriculture and Rural Development chaired the Rural Proofing Steering Group with a representative from each department to provide guidance, and also to review the effectiveness of rural proofing. This is defined as gathering information on the number and nature of policies subject to rural proofing, specific provisions to meet rural service delivery, and examples of best practice, to contribute to publishing an annual report. The Inter-departmental steering group was supported by a dedicated unit within DARD.

In 2009 a legislative research paper was produced to consider how the emphasis of rural proofing could move from processes to outcomes (Northern Ireland Assembly Research and Library Services, 2009). The notion of 'rural champion' is also discussed, and it is pointed out that in the Northern Ireland approach, both advisory and watchdog functions are housed within one body (the Inter-departmental Rural Proofing Steering Group) while in the English model, Defra had, up to that time, designated responsibility for monitoring and reporting to an independent public body (the Commission for Rural Communities). The next iteration of rural proofing did not address this issue, in fact there is greater devolution and internalisation of quality assurance and monitoring.

Revised guidance, 'Thinking Rural: The Essential Guide to Rural Proofing' was issued by DARD, including a new 'Rural Issues Statement' pro-forma, replacing the existing rural impact assessment as part of the

standard policymaking 'toolkit' (DARD, 2011). The 2011 guidance explains that an "enhanced" rural proofing had been agreed, and that DARD would provide guidance, training, and an advisory service on their website. The incorporation of rural proofing earlier on in the policymaking process is encouraged and the responsibility of rural proofing activities of non-departmental public bodies (NDPBs) is declared to fall to the sponsor Department. There is no mention of the previous steering group, and no clear indication of how Rural Impact Statements should be quality assured and signed off within Departments. There is an expectation that Rural Impact Statements will be made available as part of public consultations, offering the only potential avenue for review and challenge. While no watchdog is identified in the guidance, two organisations are listed as representing the 'needs of rural stakeholders': the Rural Development Council and Rural Community Network. In the guidance 'equitable' is defined as proportionate to the need in rural areas – however, what constitutes specifically 'rural needs' is not defined.

An interesting difference between the two versions is the characterisation of rural proofing itself. In the original version it is defined as examining policies 'carefully and objectively to determine whether or not they have a different impact in rural areas' (DARD, 2002, p.2). In the next version of guidance, instead of 'carefully and objectively' determining if there is a 'different' impact, a 'proper assessment' should be used to find the 'direct and indirect impact' of a policy on rural areas (DARD, 2011, p.3). The change in tone and approach between the two versions can be further explored. For example, the original guidance document fully accepts the fact that characteristics of rural areas can lead to a higher unit cost to deliver a service, providing readers with a specific 'rural need' to consider. Compensating for the greater difficulty to achieve economies of scale is suggested as a potential 'adaptation' to apply to policies in response to identified differential impacts (DARD, 2002). A very different attitude towards the issue comes through in the 2011 guidance. The Aide memoire uses the more

emotive term 'rural premium' to describe the additional unit costs of delivering a service with lower economies of scale – and suggest it is something to be avoided if possible (DARD, 2011).

A FAQ from the 2011 guidance asking 'Who is responsible for monitoring the quality of rural proofing?' reveals that 'An independent evaluation will look at the revised guidance and training and how it has translated into effective rural proofing across government. The evaluation will also examine if there is a need for legislation.' While an independent review of rural proofing in Northern Ireland was not realised, a decision was taken to pursue a legislative route. The Minister of Agriculture and Rural Development introduced legislation to the Northern Ireland Assembly in November 2015 to put rural proofing on a statutory footing, and further devolve responsibility to include

non-departmental public bodies themselves, and also local governments. The resulting Rural Needs Act (Northern Ireland) 2016 was granted Royal Assent on 9 May 2016ⁱⁱ. While the newly formed Department of Agriculture, Environment and Rural Affairs (DAERA) maintains an advisory role, continuing the historical approach of issuing guidance and training, it also takes on responsibility for compiling information about rural proofing across public bodies into an annual report. While the minister is tasked with laying the report before the assembly and making a statement, there is no clear indication of how, if any, formal 'watchdog' will be part of the monitoring and evaluation process. The DAERA guidance to public bodies on how to interpret and fulfil their obligations under the Rural Needs Act (RNA) is discussed in more detail below.

'Who is responsible for monitoring the quality of rural proofing?'



Most recent NI guidance (DAERA, 2017) and The Rural Needs Act

Legislation to formalise rural proofing in Northern Ireland was initiated in November 2015 by the Minister of Agriculture and Rural Development in order to put rural proofing on a statutory footing. The resulting Rural Needs Act (Northern Ireland) 2016 was granted Royal Assent on 9 May 2016ⁱⁱⁱ. The act places both facilitative (providing advice, commissioning research) and limited watchdog (reviewing the bodies to which the Act applies, collating and publishing an annual monitoring report, a Ministerial statement to the Assembly and making arrangements to secure co-operation and exchange of information between public authorities) with DAERA (DAERA, 2017). There is no framework laid out within the legislation for how non-compliance will be challenged, or the existence or nature of resulting sanctions. The Act is provided as Appendix A.

Research was commissioned by DAERA through the Evidence and Innovation Programme to investigate 'developing more effective rural proofing and rural champion models' (Project E&I-15/2/05). Researchers from the Agri-Food and Biosciences Institute in Northern Ireland and the Centre for Rural Economy at Newcastle University carried out focus groups and interviews from late October through early December 2016 with representatives from government departments, arms-length bodies, local government,

rural organisations, and other stakeholders. Participants were asked about their previous and current experience with rural proofing, as well as their understanding and interpretation of the new legislation. The research report now offers evidence-based recommendations on developing guidance materials to assist public authorities in complying with the Act, as well as on implementing the monitoring and reporting obligations. The sections offering recommendations on guidance and implementation were published early in 2017 at the request of DAERA. The interim report has been included as Appendix B. This was because they wished to use this material to inform the development of 'A guide to the Rural Needs Act (NI) 2016 for public authorities' (DAERA, 2017). The resulting guide relies heavily on our recommendations (see Shortall and Sherry, 2017) and is included for reference as Appendix C.

The next section states the main findings from the qualitative data collected. These are supported by illustrative quotes. Recommendations stemming from these findings are provided related to guidance, monitoring and governance surrounding the implementation of the RNA.

Guidance: Recommendations^{iv}

Considerable confusion was expressed about the terminology used in the Rural Needs Act. The Act places a duty on public authorities to 'have due regard to rural needs' when carrying out their activities. People are unclear how to define 'rural', 'need', and 'due regard'.

And that's why I say, go back again to these communities and say, okay, well what are the needs? And they're exactly the same as they are in east Belfast. Okay, the delivery mechanism may be different... are somehow rural communities from a different planet? Do they have completely different needs? And they may, don't get me wrong. But it seems to me we often exaggerate these differences, not for any objective reasons but for often hidden, sometimes in economic terms, these axioms, these axiomatic assumptions built in that are smuggled in, that somehow justify it. Well let's unpick all of those and say, okay let's start from scratch. (Interview#3)

We recommend that in the guidance DAERA addresses this confusion by offering the following definitions:

- Defining rural: There is no single definition of rural that is universally accepted or relevant for all purposes. Most formal definitions refer to population density, settlement sizes, land-use patterns involving agriculture and forestry, and distance from major urban centres; these criteria may be applied singly or in combination. NISRA have advised that for Northern Ireland the default definition is that areas with a population density of 5,000 or less are rural, although different definitions are used in different policy contexts as appropriate.
- Defining need: Need is to require (something) because it is essential or very important rather than just desirable.
- Defining due regard: To 'have due regard' means that in making decisions and in its other day-to-day activities a body subject to the duty must consciously consider the need to do the things set out in the Rural Needs Act: Public authorities must consider if policies will have an adverse impact on the social and economic needs of persons in rural areas.



People are unclear why a Rural Needs Act was introduced and how it is different to rural proofing. We recommend that the following is made clear:

- Going forward, with the strength of the Rural Needs Act behind it, rural proofing will require a much more robust evidence base. This is the case for all stages of the process.
- As outlined in the Act, DAERA will take steps, as deemed appropriate, to undertake, commission or support research relating to rural need.
- The Rural Needs Act now puts a responsibility on DAERA to collate and monitor all responses to how rural needs were addressed by public bodies and report on these to the Assembly on an annual basis. DAERA has an increased role and oversight on rural proofing following the Act.
- We recommend that MLAs and Councillors are trained in rural proofing. As people who will be lobbied around rural services it is important that they are trained in the difference between desirable and essential and understand the fiscal constraints within which rural proofing takes place.

People are unclear about what additional requirements the Rural Needs Act imposes on public authorities. We recommend the following:

- DAERA acknowledges that public authorities have previously engaged with rural proofing in good faith and anticipates this will continue. The Rural Needs Act brings evidence more centre stage to inform better practice. It also makes DAERA more accountable for oversight which will allow it and the Agriculture Environment and Rural Affairs Committee to advise on best practice.
- It is also acknowledged that rural proofing does not apply to every policy. DAERA accepts that having given due regard to rural needs when developing, adopting, implementing or revising policies, strategies and plans, and designing and delivering public services, that public authorities may rightfully conclude that the policy does not impact on rural need.
- DAERA also recognises that 'rural needs' does not mean that every individual in rural areas has economic and social needs'. It recognises that some general policies affecting rural dwellers need ongoing attention (for example, infrastructure) and some specific policies may be necessary to address more regionally specific issues (for example, needs of migrant workers in the Mid Ulster Council area).

People are unclear how to apply the Rural Needs Act in different contexts. They are unclear how to rural proof high-level strategies and plans because these set targets for broad outcomes instead of specific actions.

I suppose that's something I've learned as well from the equality side of things. It's so important that it's the relevant policies that we focus on, and that we don't establish a process where you have this 'whatever is to go through' whenever you develop any policy. We've learnt -- we've paid the price, in relation to equality in doing that, when it turned into nothing other than process. (NDPB#1)

We recommend the following:

- DAERA support public authorities to develop rural proofing guidance that is appropriate for the activities of their organisations. For example it might be appropriate to develop a 'governance-focused' approach to strategy, a 'consultation-focused' approach to policy, and a 'spatial analysis - focused' approach to services.
- A 'governance-focused' approach to rural proofing establishes and utilises existing governance structures to help public authorities consider rural needs. For example, cross-body advisory groups to facilitate dialogue and identify common interests on an on-going basis. The structures should cut across public authorities horizontally and vertically to help identify inconsistencies amongst strategies and plans that impact rural needs.
- Using formal and informal feedback from stakeholders on a specific action or policy, a 'consultation-focused' approach, combines evidential review, pre-consultation and public consultation. An impact-assessment-platform is used to facilitate stakeholder participation in the policy design/review process by providing a malleable 'workspace' where various stakeholders can become involved in interrogating the evidence, identifying problems, and generating solutions^{vi}.
- Geographical accessibility is a 'spatial analysis - focused' method to engage in rural proofing. Mapping tools, such as ArcGIS, are used to 'layer' different types of information such as the patterns of how individuals access a particular service, infrastructure (both physical and digital), and demographics. Sufficiently disaggregated spatial analysis to investigate geographical issues more generally can identify accessibility problems in rural areas.

There is confusion about ‘need’ and how it will be interpreted. There is concern that it will be used to construct unrealistic wish lists, regardless of practical and fiscal constraints.

We recommend:

- See above: Defining need: Need is to require (something) because it is essential or very important rather than just desirable. So for example, the closure of a rural school may be in line with the Rural Needs Act. A local school is desirable, but the best possible education for rural children is essential. The optimal way to provide this may be through an amalgamated or larger school. Evidence is available to support this argument.
- The existing guide to rural proofing clearly explains that ‘equitable’ cannot mean the same level of provision as urban areas.
- The ‘Aide Memoire’ component of the current Guide to Rural Proofing should be revised or omitted. If revised, it needs to more clearly distinguish between desirable and essential requirements.

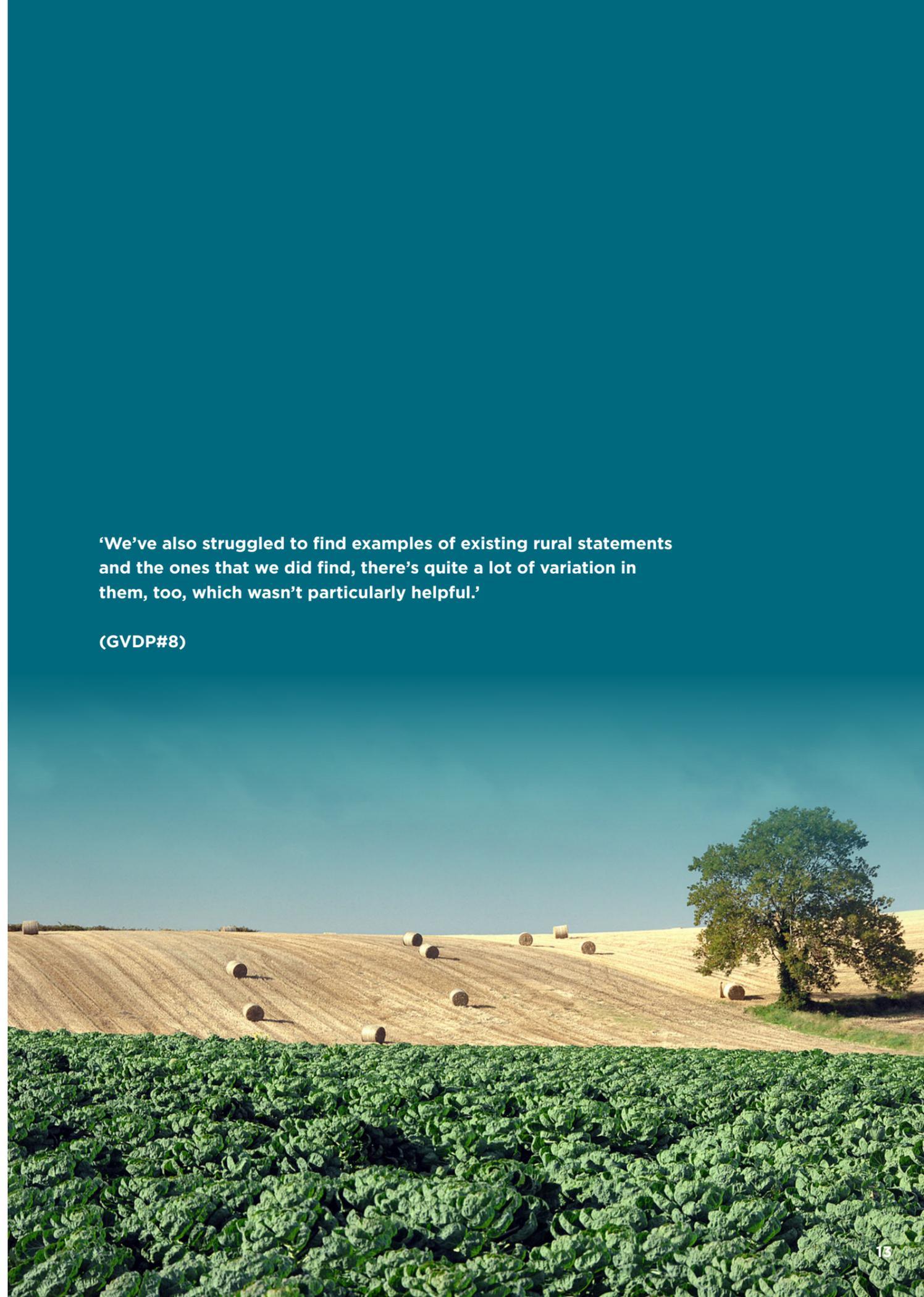
There is confusion about the Rural Issues Statement. People are not sure what to do. They would like a standard template. Some people were unsure where to find evidence, or who to consult. People wanted examples of best practice.

We recommend:

- The name ‘Rural Issues Statement’ should be changed to ‘Rural Impact Assessment’.
- The current format should be retained: design, evidence, consult, monitoring and evaluation.
- A fictional case study example of what a Rural Impact Assessment might look like should be provided in the rural proofing training.
- A list of potential sources of evidence should be made available on the DAERA website such as from the Evidence and Innovation Programme^{vii} with further advice given if sought.
- A broad-ranging list of potential stakeholders should be made available on the DAERA website, with further advice given if sought.
- An example of very good practice is Northern Ireland Courts and Tribunals Service’s rural proofing of the rationalisation of the Court estate^{viii}. It is not expected that all examples of rural proofing will be this detailed. DAERA will seek out more examples of good practice going forward.

‘We’ve also struggled to find examples of existing rural statements and the ones that we did find, there’s quite a lot of variation in them, too, which wasn’t particularly helpful.’

(GVDP#8)

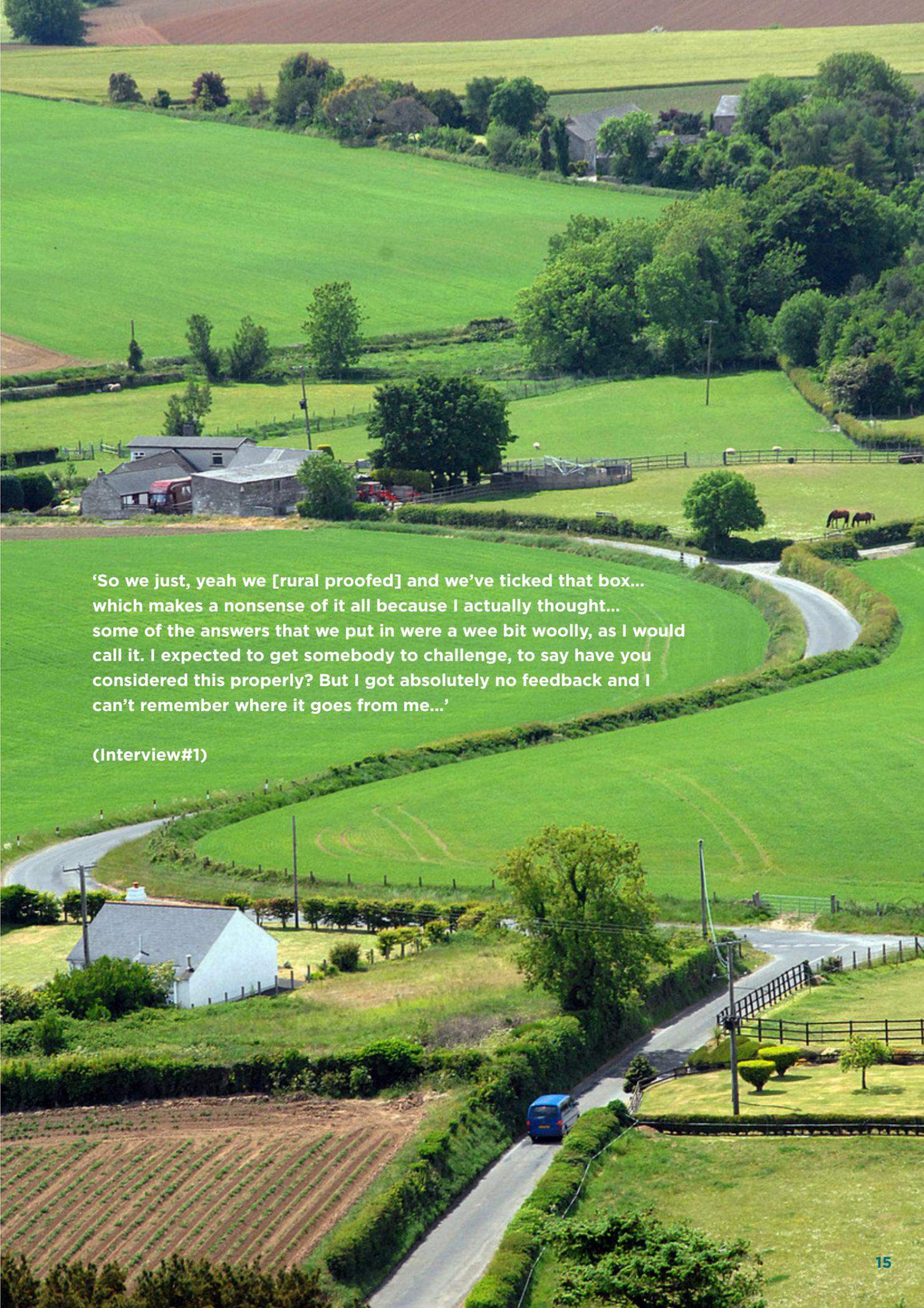


Monitoring: Recommendations

There was confusion about who is responsible for monitoring rural proofing, and what the sanctions are if it does not occur. Frustration was expressed that the point of rural proofing was not clear.

We recommend:

- As clearly spelt out in the Rural Needs Act, each public authority must compile information on how it has paid due regard to rural need. Public authorities must include this information in its annual report. It must send this information to DAERA. DAERA must publish an annual report containing this information. DAERA must lay a copy of the report before the Assembly. The Minister must make a statement to the Assembly about the content of the report.
- We recommend that the timeline for these activities should be developed as soon as possible.
- We recommend that DAERA's role is one of monitoring and reporting progress on rural proofing, but not one of imposing sanctions. It is unrealistic to expect one public authority to sanction others.
- When the Minister presents the annual report on rural proofing, it will be an opportunity to highlight any examples of good practice or any weaknesses. We recommend that if a public authority has not followed best practice they should receive feedback and guidance from DAERA.
- We recommend that it is accepted that evidence of good rural proofing is that it is 'invisible'. In other words, we can accept that equality legislation works well in Northern Ireland because there are few cases taken of discrimination. If few concerns are raised about the need to address rural proofing of policies, then we can accept this as evidence that rural proofing is working well.
- We recommend that DAERA consider the Equality Commission for examples of good practice.
- We recommend that one designated person with responsibility for rural proofing is identified in each public authority. This person will be responsible for monitoring rural proofing in their public authority. These people can then become part of the 'Rural Proofing Expert Group' that meet twice a year. This group can reflect and share best practice and provide a network of support.
- We recommend that consideration is given to taking the rural champion function outside of DAERA and combining it with a 'rural watchdog' role. Consideration should be given to whether an existing committee could undertake this role such as the Agriculture Environment and Rural Affairs Committee or the Monitoring Committee of the Rural Development Programme.
- We recommend that DAERA advises other public authorities about the future plans for a unit/ individuals within the Department to have overall responsibility for the delivery and monitoring of rural proofing.



'So we just, yeah we [rural proofed] and we've ticked that box... which makes a nonsense of it all because I actually thought... some of the answers that we put in were a wee bit woolly, as I would call it. I expected to get somebody to challenge, to say have you considered this properly? But I got absolutely no feedback and I can't remember where it goes from me...'

(Interview#1)

Governance: Recommendations

There was considerable confusion about DAERA's role in governance of rural proofing.

But it's hard to believe that DAERA wouldn't have a role... to assess the quality of [rural impact assessments]. It's hard to imagine that our audit people... it could be done without DAERA having some kind of a role in it, in the quality assurance of these things. (Interview#1)

I think the ethos of it was that everybody will have responsibility for [rural proofing], but if everybody has responsibility for it, it's diluted then. (LGD#6)

There should be something with [public consultation materials] that sets out your rural screening and what you've considered, and give people an opportunity to reflect on, or feedback as to whether you have adequately considered rural needs or not. But then there is the whole question of who looks at [the rural screening assessment], if they're even...who polices it. (LGD#7)

A guide to the Rural Needs Act (NI) 2016 for public authorities (DAERA, 2017) states that 'Public authorities are responsible for ensuring they comply with their statutory responsibilities under the Rural Needs Act. This includes ensuring that any Rural Needs Impact Assessments are completed to a satisfactory standard. DAERA does not have an approval or quality assurance role but is happy to provide advice and guidance, as appropriate' (p.28).

We recommend:

- That DAERA show clear ownership of the Rural Needs Act and the subsequent rural proofing to implement the Act.
- That DAERA provide guidance on what is the appropriate grade to be responsible for rural proofing.
- That DAERA reviews and makes publicly available Rural Impact Assessments as well as the monitoring returns.

There was concern that DAERA will not own the Rural Needs Act sufficiently to govern it in the way that is needed.

My fear will be that [DAERA] will hide behind the Act as their requirement to deliver for rural development...that we're responsible for the Rural Needs Act, you know we're making sure everybody else is doing something for rural but us as a Department [we] don't actually have to deliver anything for rural because everyone else is doing it. (Interview#5)

We recommend

- That DAERA leads by example. The guidance states that policies, strategies, plans and services that only have positive impacts on rural areas must complete a Rural Needs Impact Assessment. This means that all of DAERA's policies and strategies must complete Rural Needs Impact Assessments. We recommend that DAERA start undertaking this as soon as possible and make them widely available as examples of best practice.
- That DAERA form a governance body to implement the Rural Needs Act formed of responsible people in public authorities.
- That DAERA appoint an individual to function as a rural champion: providing independent feedback on how the Act is being implemented and on-going recommendations. The time commitment and re-numeration could be structured similar to membership on an advisory board for the public sector to minimise the resource requirement.



Conclusion

The evolution of rural development policy in the EU has contributed to the rise of rural mainstreaming policy more generally within parts of the UK, and, to a lesser extent in some other countries with similar political institutions and historical links. The concept of rural proofing has been present within Northern Ireland from the earliest stages of self-governance. Although weaknesses in implementing the concept have been openly recognized, no formal independent review has been carried out, and no substantive reforms put in place, prior to, or as part of the institution of the RNA. This has led to numerous issues of confusion and concern amongst public authorities subject to the Act, as well as those representing rural, agricultural and environmental interests. These issues include: the ambiguity surrounding the core concepts of the Act; the tangible differences between previous iterations of rural proofing initiatives; how to apply the Act within different contexts; standards of best practice; the usefulness of monitoring given there are no sanctions for non-compliance; the role of DAERA and how the Act relates to specifically 'rural' policy; and gaps in terms of how efforts to comply with the Act will be quality assured. Several recommendations have been provided above on how to address each of these concerns. Some of these have already been acted on, but many still require consideration, and where appropriate, attention - most importantly those recommendations related to quality assurance and governance. In order to benefit and learn from the pilot round of monitoring, it will be essential that some form of independent watchdog, either through an independent body or individual rural champion, be established urgently to be able to comment on best practice and areas for future improvement.

ⁱ Rural Proofing Bill Consultation, Belfast, Northern Ireland, December 2014.

ⁱⁱ <http://www.niassembly.gov.uk/assembly-business/legislation/2011-2016-mandate/primary-legislation-current-bills/rural-needs-bill3/>

ⁱⁱⁱ <http://www.niassembly.gov.uk/assembly-business/legislation/2011-2016-mandate/primary-legislation-current-bills/rural-needs-bill3/>

^{iv} In general we recommend that the existing guidance 'Thinking Rural: The Essential Guide to Rural Proofing' provides the starting point for guidance.

^v See for example AFBI (2010) Rural Northern Ireland: Context, Challenges and Opportunities: Chapter Prepared for Forthcoming Rural White Paper by The Agricultural and Food Economics Division of AFBI (Agri-Food and Biosciences Institute)

^{vi} The Open Policymaking toolkit provides additional source material for guidance on productively engaging with stakeholders during the policy design and review process (<https://www.gov.uk/guidance/open-policy-making-toolkit>).

^{vii} For example, relevant findings from the Evidence and Innovation Programme on rural services not currently in the public domain: Jack, C.G., Patten, N. (2014). The contribution of key basic services to rural dwellers quality of life in Northern Ireland. Policy Briefing Report DARD, 2014; and also Jack, C. G., Anderson, D., Connolly, N. (2012). Rural Household's Experience of Accessing Public Services in Northern Ireland; Policy Briefing Document submitted to DARD, 2012.

^{viii} https://www.google.co.uk/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&cad=rja&uact=8&ved=0a-hUKEwirnJfxw7LRAhXBJCYKHWXHDz4QFggaMAA&url=https%3A%2F%2Fwww.courtsni.gov.uk%2Fen-GB%2FPublications%2FPublic_Consultation%2FDocuments%2FResponse%2520and%2520recom-mendations%2520on%2520proposals%2520for%2520the%2520rationalisation%2520of%2520the%2520court-%2520estate%2520Final%2520Rural%2520Proofing%2520Document%2520March%252016.doc&usq=AFQjCNHLO-SlzFEKbfu2YP8osujilPc7efg&sig2=jyP36iwtTlPRRUDBp2MmBw&bvm=bv.142059868,d.d24



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Appendix A

The Rural Needs Act (Northern Ireland) 2016



Rural Needs Act (Northern Ireland) 2016

CHAPTER 19

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Rural Needs Act (Northern Ireland) 2016

CHAPTER 19

CONTENTS

1. Duty of public authorities to have due regard to rural needs
2. Guidance, advice and information, etc.
3. Monitoring and reporting
4. Co-operation with other bodies
5. Commencement
6. Interpretation
7. Short title

Schedule Public authorities



Rural Needs Act (Northern Ireland) 2016

2016 CHAPTER 19

An Act to impose a duty on public authorities to have due regard to rural needs; and for connected purposes. [9th May 2016]

BE IT ENACTED by being passed by the Northern Ireland Assembly and assented to by Her Majesty as follows:

Duty of public authorities to have due regard to rural needs

1.—(1) A public authority must have due regard to rural needs when—

- (a) developing, adopting, implementing or revising policies, strategies and plans, and
- (b) designing and delivering public services.

(2) For the purposes of this Act, “public authority” means any body or person listed in the Schedule.

(3) The Department must, at least every three years from the coming into operation of this section, review the list of bodies and persons set out in the Schedule and, if it thinks it appropriate, by order amend the Schedule to—

- (a) add a body or person to the Schedule;
- (b) remove a body or person from the Schedule; or
- (c) modify any entry in the Schedule.

(4) An order under subsection (3) may provide for a body or person to be a public authority for all or any of the purposes of this Act.

(5) The Department must not exercise the power conferred by subsection (3) so that a body or person becomes a public authority for any of the purposes of this Act unless the body or person is a body or person appearing to the Department to exercise functions of a public nature.

(6) An order under subsection (3) may contain such transitional provision as the Department thinks appropriate.

(7) An order under subsection (3) must not be made unless a draft of the order has been laid before, and approved by a resolution of, the Assembly.

Guidance, advice and information, etc.

2. The Department may take such steps as appear to it to be appropriate to—
- (a) provide any person with guidance, advice and information about issues connected with rural needs or ways of meeting those needs;
 - (b) undertake, commission or support (by financial means or otherwise) research into any matter relating to rural needs.

Monitoring and reporting

3.—(1) A public authority must, in such manner as may be directed by the Department—

- (a) compile information on the exercise of its functions under section 1;
 - (b) include that information in its annual report; and
 - (c) send that information to the Department.
- (2) The Department must publish an annual report containing—
- (a) the information sent to it under subsection (1)(c); and
 - (b) information on the exercise by the Department of its functions under this Act,

and lay a copy of the report before the Assembly.

(3) The Minister of Agriculture and Rural Development must, on or after the day on which the report is laid before the Assembly, make a statement to the Assembly about the content of the report.

Co-operation with other bodies

4. The Department must make arrangements with public authorities with a view to securing co-operation and the exchange of information between public authorities.

Commencement

5. Sections 1 to 4 come into operation on such day or days (not being later than 1 June 2018) as the Department may by order appoint.

Interpretation

6. In this Act—
- “the Department” means the Department of Agriculture and Rural Development;
 - “rural needs” means the social and economic needs of persons in rural areas.

Short title

7. This Act may be cited as the Rural Needs Act (Northern Ireland) 2016.

SCHEDULE

Section 1(2).

PUBLIC AUTHORITIES

A Northern Ireland department
A district council
The Chief Constable of the Police Service of Northern Ireland
The Council for Catholic Maintained Schools
The Education Authority
A Health and Social Care Trust
Invest Northern Ireland
The Northern Ireland Fire and Rescue Service Board
The Northern Ireland Housing Executive
The Northern Ireland Library Authority
The Northern Ireland Tourist Board
The Regional Agency for Public Health and Social Well-Being
The Regional Health and Social Care Board
The Sports Council for Northern Ireland

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Appendix B

Preliminary recommendations to assist with the development of a guidance framework and monitoring framework for rural proofing related to the Rural Needs Act



Briefing Paper One:

Preliminary recommendations to assist with the development
of a guidance framework and monitoring framework for
rural proofing related to the Rural Needs Act

Professor Sally Shortall, Newcastle University
Dr Erin Sherry, Agri-Food and Biosciences Institute

Introduction

The Northern Ireland Executive has committed and re-committed to rural proofing policy starting from 2002. Legislation was initiated in November 2015 by the Minister of Agriculture and Rural Development in order to put rural proofing on a statutory footing. The resulting Rural Needs Act (Northern Ireland) 2016 was granted Royal Assent on 9 May 2016¹. Research was commissioned by the Department of Agriculture, Environment and Rural Affairs (DAERA) through the Evidence and Innovation Programme to investigate 'developing more effective rural proofing and rural champion models' (Project E&I-15/2/05). Researchers from the Agri-Food and Biosciences Institute in Northern Ireland and the Centre for Rural Economy at Newcastle University carried out focus groups and interviews from late October through early December with representatives from government departments, arms-length bodies, local government, rural organisations, and other stakeholders. Participants were asked about their previous and current experience with rural proofing, as well as their understanding and interpretation of the new legislation. This brief has been prepared to provide evidence-based recommendations on developing guidance materials to assist public authorities in complying with the Act, as well as on implementing the monitoring and reporting obligations².

Guidance: Recommendations³

Considerable confusion was expressed about the terminology used in the Rural Needs Act. People are unclear how to define 'rural', 'need', and 'due regard'. We recommend that in the guidance DAERA addresses this confusion by offering the following definitions:

- Defining rural: There is no single definition of rural that is universally accepted or relevant for all purposes. Most formal definitions refer to population density, settlement sizes, land-use patterns involving agriculture and forestry, and distance from major urban centres; these criteria may be applied singly or in combination. NISRA have advised that for Northern Ireland the default definition is that areas with a population density of 5,000 or less are rural, although different definitions are used in different policy contexts as appropriate.
- Defining need: Need is to require (something) because it is essential or very important rather than just desirable.
- Defining due regard: To 'have due regard' means that in making decisions and in its other day-to-day activities a body subject to the duty must consciously consider the need to do the things set out in the Rural Needs Act: Public authorities must consider

¹ <http://www.niassembly.gov.uk/assembly-business/legislation/2011-2016-mandate/primary-legislation-current-bills/rural-needs-bill3/>

² The authors may be contacted at sally.shortall@newcastle.ac.uk and erin.sherry@afbini.gov.uk.

³ In general we recommend that the existing guidance³ 'Thinking Rural: The Essential Guide to Rural Proofing' provides the starting point for guidance.

if policies will have an adverse impact on the social and economic needs of persons in rural areas.

People are unclear why a Rural Needs Act was introduced and how it is different to rural proofing. We recommend that the following is made clear:

- Going forward, with the strength of the Rural Needs Act behind it, rural proofing will require a much more robust evidence base. This is the case for all stages of the process.
- As outlined in the Act, DAERA will take steps, as deemed appropriate, to undertake, commission or support research relating to rural need.
- The Rural Needs Act now puts a responsibility on DAERA to collate and monitor all responses to how rural needs were addressed by public bodies and report on these to the Assembly on an annual basis. DAERA has an increased role and oversight on rural proofing following the Act.
- We recommend that MLAs and Councillors are trained in rural proofing. As people who will be lobbied around rural services it is important that they are trained in the difference between desirable and essential and understand the fiscal constraints within which rural proofing takes place.

People are unclear about what additional requirements the Rural Needs Act imposes on public authorities. We recommend the following:

- DAERA acknowledges that public authorities have previously engaged with rural proofing in good faith and anticipates this will continue. The Rural Needs Act brings evidence more centre stage to inform better practice. It also makes DAERA more accountable for oversight which will allow it and the Agriculture Environment and Rural Affairs Committee to advise on best practice.
- It is also acknowledged that rural proofing does not apply to every policy. DAERA accepts that having given due regard to rural needs when developing, adopting, implementing or revising policies, strategies and plans, and designing and delivering public services, that public authorities may rightfully conclude that the policy does not impact on rural need.
- DAERA also recognises that 'rural needs' does not mean that every individual in rural areas has economic and social needs⁴. It recognises that some general policies affecting rural dwellers need ongoing attention (for example, infrastructure) and some specific policies may be necessary to address more regionally specific issues (for example, needs of migrant workers in the Mid Ulster Council area).

⁴ See for example AFBI (2010) Rural Northern Ireland: Context, Challenges and Opportunities: Chapter Prepared for Forthcoming Rural White Paper by The Agricultural and Food Economics Division of AFBI (Agri-Food and Biosciences Institute)

People are unclear how to apply the Rural Needs Act in different contexts. They are unclear how to rural proof high-level strategies and plans because these set targets for broad outcomes instead of specific actions. We recommend the following:

- DAERA support public authorities to develop rural proofing guidance that is appropriate for the activities of their organisations. For example it might be appropriate to develop a ‘governance-focused’ approach to strategy, a ‘consultation-focused’ approach to policy, and a ‘spatial analysis – focused’ approach to services.
- A ‘governance-focused’ approach to rural proofing establishes and utilises existing governance structures to help public authorities consider rural needs. For example, cross-body advisory groups to facilitate dialogue and identify common interests on an on-going basis. The structures should cut across public authorities horizontally and vertically to help identify inconsistencies amongst strategies and plans that impact rural needs.
- Using formal and informal feedback from stakeholders on a specific action or policy, a ‘consultation-focused’ approach, combines evidential review, pre-consultation and public consultation. An impact-assessment-platform is used to facilitate stakeholder participation in the policy design/review process by providing a malleable ‘workspace’ where various stakeholders can become involved in interrogating the evidence, identifying problems, and generating solutions⁵.
- Geographical accessibility is a ‘spatial analysis – focused’ method to engage in rural proofing. Mapping tools, such as ArcGIS, are used to ‘layer’ different types of information such as the patterns of how individuals access a particular service, infrastructure (both physical and digital), and demographics. Sufficiently disaggregated spatial analysis to investigate geographical issues more generally can identify accessibility problems in rural areas.

There is confusion about ‘need’ and how it will be interpreted. There is concern that it will be used to construct unrealistic wish lists, regardless of practical and fiscal constraints. We recommend:

- See above: Defining need: Need is to require (something) because it is essential or very important rather than just desirable. So for example, the closure of a rural school may be in line with the Rural Needs Act. A local school is desirable, but the best possible education for rural children is essential. The optimal way to provide this may be through an amalgamated or larger school. Evidence is available to support this argument.
- The existing guide to rural proofing clearly explains that ‘equitable’ cannot mean the same level of provision as urban areas.

⁵ The Open Policymaking toolkit provides additional source material for guidance on productively engaging with stakeholders during the policy design and review process (<https://www.gov.uk/guidance/open-policy-making-toolkit>).

- The 'Aide Memoire' component of the current Guide to Rural Proofing should be revised or omitted. If revised, it needs to more clearly distinguish between desirable and essential requirements.

There is confusion about the Rural Issues Statement. People are not sure what to do. They would like a standard template. Some people were unsure where to find evidence, or who to consult. People wanted examples of best practice. We recommend:

- The name 'Rural Issues Statement' should be changed to 'Rural Impact Assessment'.
- The current format should be retained: design, evidence, consult, monitoring and evaluation.
- A fictional case study example of what a Rural Impact Assessment might look like should be provided in the rural proofing training.
- A list of potential sources of evidence should be made available on the DAERA website such as from the Evidence and Innovation Programme⁶ with further advice given if sought.
- A broad-ranging list of potential stakeholders should be made available on the DAERA website, with further advice given if sought.
- An example of very good practice is Northern Ireland Courts and Tribunals Service's rural proofing of the rationalisation of the Court estate⁷. It is not expected that all examples of rural proofing will be this detailed. DAERA will seek out more examples of good practice going forward.

Monitoring: Recommendations

There was confusion about who is responsible for monitoring rural proofing, and what the sanctions are if it does not occur. Frustration was expressed that the point of rural proofing was not clear. We recommend:

- As clearly spelt out in the Rural Needs Act, each public authority must compile information on how it has paid due regard to rural need. Public authorities must include this information in its annual report. It must send this information to DAERA. DAERA must publish an annual report containing this information. DAERA must lay a

⁶ For example, relevant findings from the Evidence and Innovation Programme on rural services not currently in the public domain: Jack, C.G., Patten, N. (2014). The contribution of key basic services to rural dwellers quality of life in Northern Ireland. Policy Briefing Report DARD, 2014; and also Jack, C. G., Anderson, D., Connolly, N. (2012). Rural Household's Experience of Accessing Public Services in Northern Ireland; Policy Briefing Document submitted to DARD, 2012.

⁷ https://www.google.co.uk/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&cad=rja&uact=8&ved=0OahUKEwirnJfxw7LRAhXBJCYKHWHdZ4QFggaMAA&url=https%3A%2F%2Fwww.courtsni.gov.uk%2Fen-GB%2FPublications%2FPublic_Consultation%2FDocuments%2FResponse%2520and%2520recommendations%2520on%2520proposals%2520for%2520the%2520rationalisation%2520of%2520the%2520court%2520estate%2520Final%2520Rural%2520Proofing%2520Document%2520March%25202016.doc&usq=AFQjCNHLOSizFEKbfu2YP8osujiIPc7efg&sig2=jyP36iwtTlPRRUDBp2MmBw&bvm=bv.142059868,d.d24

copy of the report before the Assembly. The Minister must make a statement to the Assembly about the content of the report.

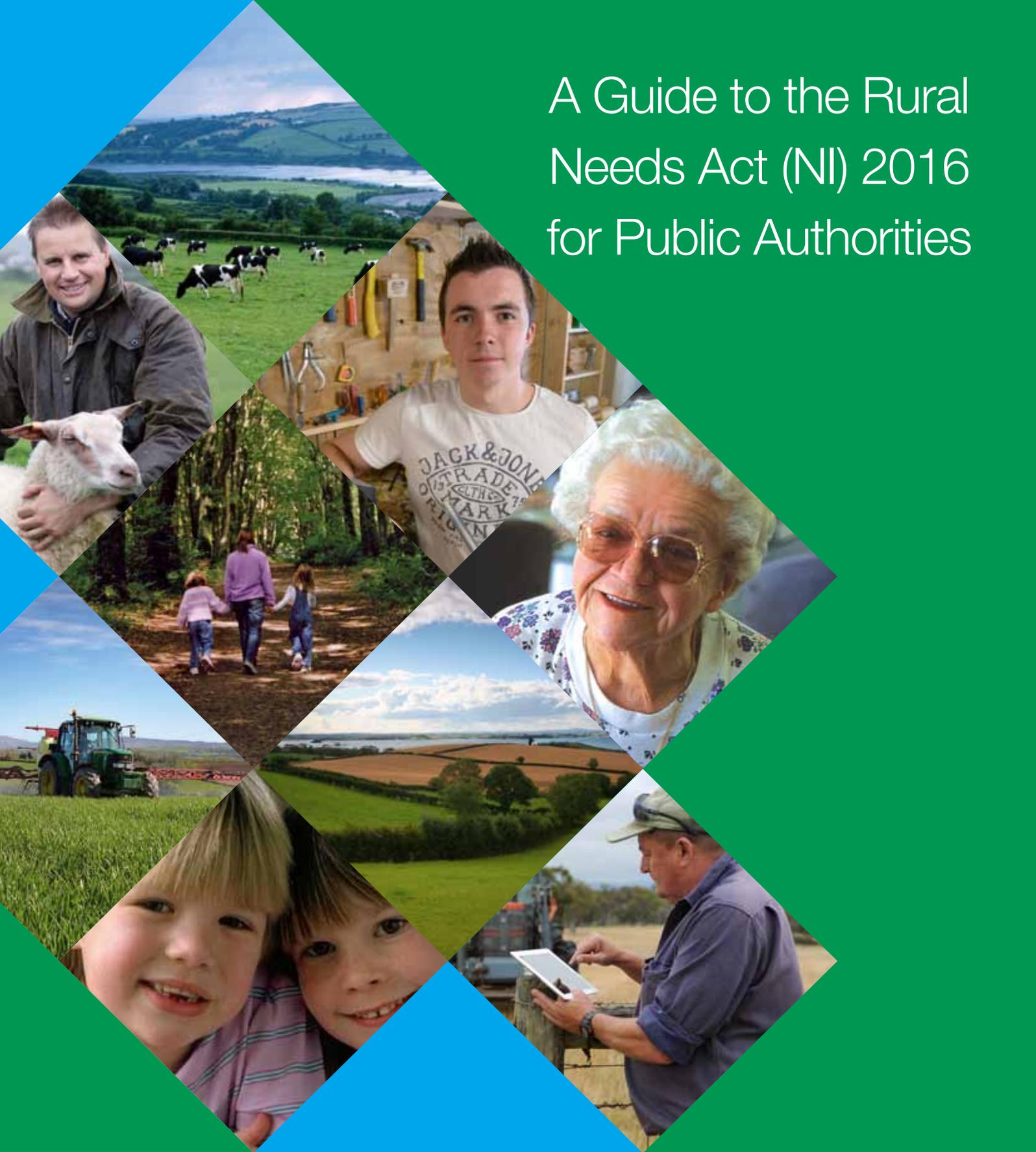
- We recommend that the timeline for these activities should be developed as soon as possible.
- We recommend that DAERA's role is one of monitoring and reporting progress on rural proofing, but not one of imposing sanctions. It is unrealistic to expect one public authority to sanction others.
- When the Minister presents the annual report on rural proofing, it will be an opportunity to highlight any examples of good practice or any weaknesses. We recommend that if a public authority has not followed best practice they should receive feedback and guidance from DAERA.
- We recommend that it is accepted that evidence of good rural proofing is that it is 'invisible'. In other words, we can accept that equality legislation works well in Northern Ireland because there are few cases taken of discrimination. If few concerns are raised about the need to address rural proofing of policies, then we can accept this as evidence that rural proofing is working well.
- We recommend that DAERA consider the Equality Commission for examples of good practice.
- We recommend that one designated person with responsibility for rural proofing is identified in each public authority. This person will be responsible for monitoring rural proofing in their public authority. These people can then become part of the 'Rural Proofing Expert Group' that meet twice a year. This group can reflect and share best practice and provide a network of support.
- We recommend that consideration is given to taking the rural champion function outside of DAERA and combining it with a 'rural watchdog' role. Consideration should be given to whether an existing committee could undertake this role such as the Agriculture Environment and Rural Affairs Committee or the Monitoring Committee of the Rural Development Programme.
- We recommend that DAERA advises other public authorities about the future plans for a unit/ individuals within the Department to have overall responsibility for the delivery and monitoring of rural proofing.



Appendix C

A guide to the Rural Needs Act (NI) 2016 for public authorities

A Guide to the Rural Needs Act (NI) 2016 for Public Authorities



Department of
**Agriculture, Environment
and Rural Affairs**

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Tel: 028 9052 4107

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Email: rural.proofing@daera-ni.gov.uk



Section 1: Introduction and Background

- 1.1 Rural proofing is the process by which policies, strategies and plans are assessed to determine whether they have a differential impact on rural areas and, where appropriate, adjustments are made to take account of particular rural circumstances.
- 1.2 Rural Proofing has been a requirement for all Government Departments in Northern Ireland since 2002 and has been an integral part of the policy development process. In 2016, this commitment to rural proofing was strengthened with the introduction of the Rural Needs Act (Northern Ireland) 2016¹ ('the Act').
- 1.3 This guide is designed to assist public authorities in understanding their statutory responsibilities under the Act and to provide advice on rural proofing as a mechanism for ensuring rural needs are appropriately taken into account. The guide sets out the steps required for completing a Rural Needs Impact Assessment and the associated monitoring and reporting requirements. An e-learning course ('Rural Proofing') has been produced to supplement this guidance and is available from the Centre for Applied Learning's course catalogue on HR Connect for NICS Departments or from the Rural Development Council for other public authorities.
- 1.4 Each public authority is responsible for ensuring it fulfils its duties under the Rural Needs Act. This guidance sets out a framework which can help support this and which can be incorporated into existing policy development and impact assessment structures and processes.

¹<http://www.legislation.gov.uk/nia/2016/19/contents>

Section 2: The Rural Needs Act (Northern Ireland) 2016

Application of the Rural Needs Act (Northern Ireland) 2016

2.1 The Rural Needs Act (Northern Ireland) 2016 received Royal Assent on 9 May 2016 and comes into operation for Government Departments and District Councils on 1 June 2017 and for the public authorities listed below on 1 June 2018:

- The Police Service of Northern Ireland;
- The Council for Catholic Maintained Schools;
- The Education Authority;
- The Health and Social Care Trusts;
- Invest Northern Ireland;
- The Northern Ireland Fire and Rescue Service;
- The Northern Ireland Housing Executive;
- Libraries NI;
- Tourism NI;
- The Public Health Agency;
- The Regional Health and Social Care Board; and
- Sport NI.

Responsibilities of public authorities under the Act

2.2 There are three main areas of responsibility for public authorities under the Act and these relate to the consideration of rural needs; monitoring and reporting on how the public authority has complied with this requirement; and co-operation and sharing of information with other public authorities.

2.3 Section 1 of the Act places a statutory duty on public authorities to:

“have due regard to rural needs when

- developing, adopting, implementing or revising policies, strategies and plans, and;
- designing and delivering public services.”

2.4 Section 3 of the Act requires public authorities to:

“(a) compile information on the exercise of its functions under section 1;

(b) include that information in its annual report; and

(c) send that information to the Department.”

2.5 Section 4 of the Act requires DAERA to:

“make arrangements with public authorities with a view to securing co-operation and exchange of information between public authorities.”

2.6 Section 3 of this guide, “Steps in Rural Proofing - Completing a Rural Needs Impact Assessment”, provides further information and advice on how public authorities can fulfil their duties under the Act and gives details of the information that public authorities are required to collect and send to DAERA annually.

Responsibilities of DAERA under the Act

2.7 As well as the responsibilities of public authorities set out above, DAERA has a number of additional responsibilities under the Act. These relate to regularly reviewing the bodies to which the Act applies, providing advice, commissioning of research, collating and publishing an annual monitoring report, a Ministerial statement to the Assembly and making arrangements to secure co-operation and exchange of information between public authorities.

2.8 Section 1 of the Act requires DAERA to, at least every 3 years:

“review the list of bodies and persons set out in the Schedule and, if it thinks it appropriate, by order amend the Schedule to:

- a) add a body or person to the Schedule;
- b) remove a body or person to the Schedule; or
- c) modify any entry in the Schedule.”

2.9 Section 2 of the Act provides DAERA with the power to:

“take such steps as appear to it to be appropriate to -

- (a) provide any person with guidance, advice and information about issues connected with rural needs or ways of meeting those needs;
- (b) undertake, commission or support (by financial means or otherwise) research into any matter relating to rural needs.”

2.10 Section 3 of the Act requires DAERA to publish an annual monitoring report containing the information sent to it by public authorities on how they have paid due regard to rural needs and information of the exercise by DAERA of its functions under the Act. It must lay a copy of this report before the Assembly.

2.11 Section 3 of the Act also requires the Minister of Agriculture, Environment and Rural Affairs, on or after the day on which the report is laid to “make a statement to the Assembly about the content of the report.”

2.12 Section 4 of the Act requires DAERA to:

“make arrangements with public authorities with a view to securing co-operation and exchange of information between public authorities.”

Interpretation

'Due regard'

- 2.13 In relation to the Act, to 'have due regard' means that a public authority must consciously consider the needs of people in rural areas when developing or revising policies, strategies and plans and when designing and delivering public services. The level of 'regard' that is 'due' will depend on the circumstances and, in particular, on the relevance of rural needs to the decision or function in question. The greater the relevance and potential impact for people in rural needs, the greater the regard required by the duty.

'Rural needs'

- 2.14 The Act defines 'rural needs' as "the social and economic needs of rural areas". It is important to be clear what this means and to be able to distinguish between a need and something that is desirable. In general terms, a need can be considered to be something that is essential to achieve a standard of living comparable with that of the population in general. For example, it can relate to the ability to access key public services such as health and education, the ability to access suitable employment opportunities, and the ability to enjoy a healthy and active lifestyle.

'Rural'

- 2.15 In order to identify and analyse 'rural needs', a public authority must have a clear understanding of how it classifies whether an area is urban or rural.
- 2.16 The default definition of "rural" used in Northern Ireland is that developed by the Inter-Departmental Urban-Rural Definition Group. Initially proposed in 2005 and amended in 2015, this definition classifies those settlements with fewer than 5,000 residents together with the open countryside as rural. Settlements have been classified into a number of bands (see Table 1), with bands A-E classified as urban and bands F-H classified as rural.
- 2.17 Whilst a default definition is provided, the review also recommended that a prescriptive urban-rural definition should not be given. Rather, it was advised that users should consider defining urban and rural areas in ways which are appropriate for different projects and programmes. In instances that public authorities apply an alternative definition or modified version of this definition, it may be helpful to clearly set out the rationale for doing so as part of the Rural Needs Impact Assessment for the relevant policy, strategy, plan or service.

2.18 The full report of the 2015 review is available on the NISRA website at www.nisra.gov.uk/publications/settlement-2015-documentation.

Table 1: Settlement Development Limit Classification

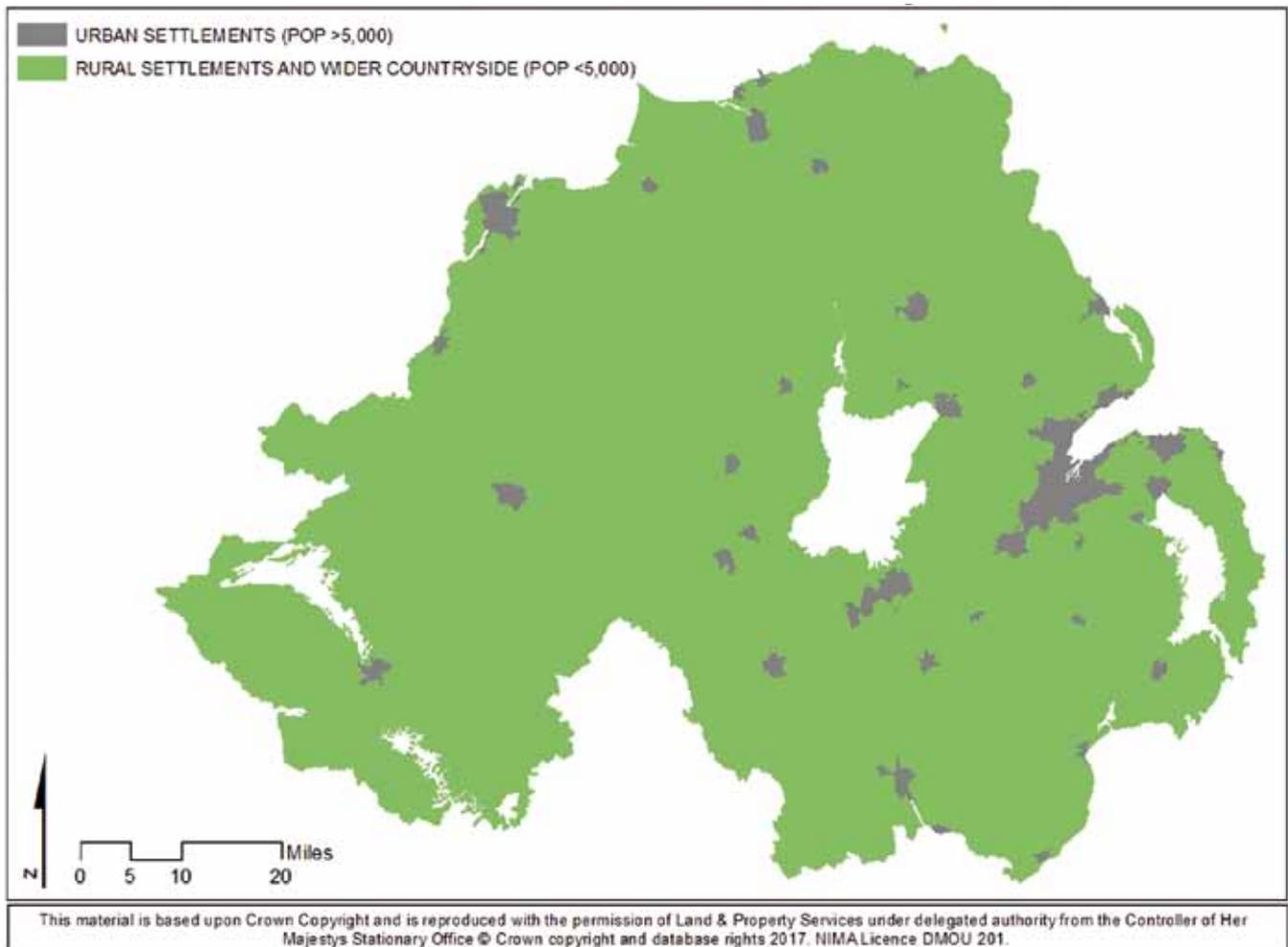
| Classification | Population |
|-----------------------------------|-----------------------------|
| Band A - Belfast | 280,211 (2011 census) |
| Band B - Derry City | 83,125 (2011 census) |
| Band C - Large Town | >18,000 |
| Band D - Medium Town | 10,000 - 17,999 |
| Band E - Small Town | 5,000 - 9,999 |
| DEFAULT URBAN-RURAL SPLIT | |
| Band F - Intermediate Settlements | 2,500 - 4,999 |
| Band G - Village | 1,000 - 2,499 |
| Band H - Open Countryside | <1,000 and open countryside |

Source: Adapted from Table 2 of the Review of the Statistical Classification and Delineation of Settlements.



2.19 Map 1 shows the proportion of land mass in Northern Ireland which is categorised as ‘rural’ under the default definition.

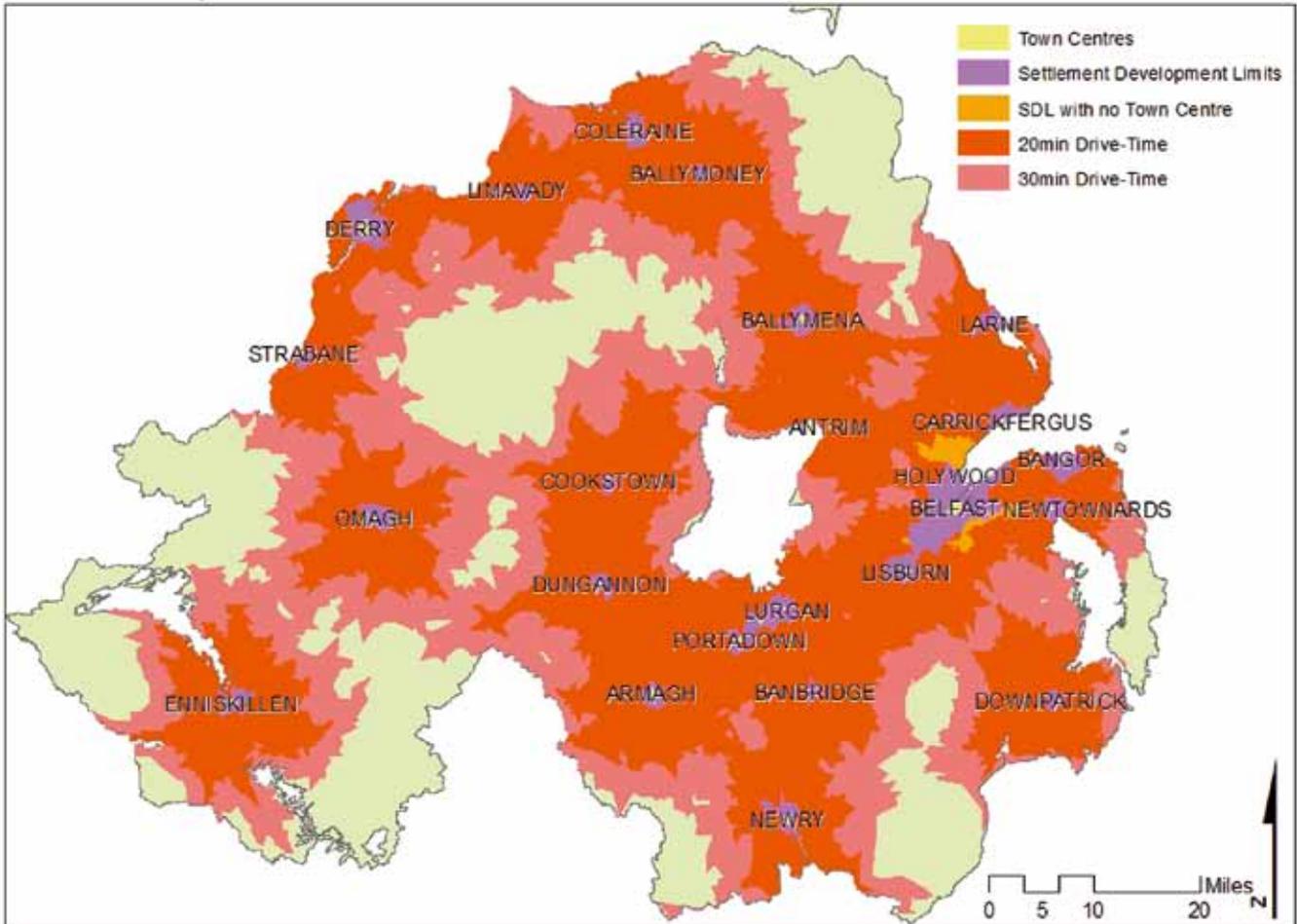
Map 1: Rural settlements and wider countryside



2.20 The 2015 review expanded the classification to include a service provision element by categorising rural areas based on their drive time from a town centre of a settlement with a population of 10,000 or more (a large service centre). Using this approach, areas have been classified as being either “within” or “outside” of 20-minute or 30-minute drive times of their nearest town centre. Approximately 93% of Northern Ireland’s population live within 30 minutes drive-time of the town centre of a settlement containing a population of at least 10,000. Map 2 shows a comparison of 20-minute and 30-minute drive times from those settlements containing a population of at least 10,000.

Map 2 shows a comparison of 20-minute and 30-minute drive times from those settlements containing a population of at least 10,000.

Map 2: Comparison of 20-minute and 30-minute drive-time boundaries



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Section 3: Steps in Rural Proofing - Completing a Rural Needs Impact Assessment

What is rural proofing?

- 3.1 The Rural Needs Act does not explicitly refer to rural proofing or prescribe any specific process to be used by public authorities in having 'due regard to rural needs'. However, rural proofing is a process which is well established in Northern Ireland as a means of identifying rural needs and impacts, based on analysis of evidence; considering the scale and significance of those impacts; and considering potential adjustments or mitigation to address those impacts.

Rural Needs Impact Assessment

- 3.2 This guidance recommends a step-by-step process to follow in order to effectively take rural needs into account. A Rural Needs Impact Assessment is the document produced when rural proofing is carried out. A template for the impact assessment is attached at Appendix A. There are six steps involved in completing a Rural Needs Impact Assessment. The level of analysis undertaken in the impact assessment should be proportionate to both the scale of the potential impact and significance to rural areas.

Step 1: Define the issue

- 3.3 The first stage in completing a Rural Needs Impact Assessment is to develop a clear understanding of the objectives and/or intended outcomes of the proposed policy, strategy, plan or service and then, more specifically, to identify if there are specific rural needs or potential direct or indirect impacts for rural areas.
- 3.4 Where a policy, strategy, plan or service is a regional/area-based one or intended to have the same impact across the region or area, consideration should be given to whether there are potential local impacts which differ from the regional impact or whether there are any barriers in rural areas which may unfairly disadvantage rural dwellers.
- 3.5 For policies, strategies, plans and services which are wholly or mainly aimed at rural communities, consideration should be given to whether there is a need to adapt the policy, strategy, plan or service to account for variations across rural communities. It should be borne in mind that rural areas are not homogenous. There can be a large

degree of variation which will be affected by a number of factors, including proximity to services, transport links and infrastructure.

- 3.6 Where a policy, strategy, plan or service is urban-focused, an analysis should be undertaken to identify if there is a corresponding need in rural areas and how this has been otherwise taken into account or catered for.

Step 2: Understand the Situation

- 3.7 This section of the Rural Needs Impact Assessment is an analysis of the current scenario in rural areas as it relates to the relevant policy, strategy, plan or service. Any available evidence should be considered to identify any differences in how the issue is experienced or provided for in rural areas in contrast to urban areas.
- 3.8 This evidence can include statistics, stakeholder views and other data. Your organisation may have an in-house statistician or a GIS Officer who can conduct analyses and prepare comparative reports to inform your analysis. Your organisation may also hold data relevant to your policy, strategy, plan or service which can be utilised.
- 3.9 DAERA's Rural Statistics pages (<https://www.daera-ni.gov.uk/topics/statistics/rural-statistics>) contain rural/urban comparisons across a range of social and economic issues. These pages host information collected from the census, and from surveys and administrative databases across Government with a rural/urban classification applied to the data. In addition, detailed profiles for specific geographic areas can be accessed using NISRA's Neighbourhood Information Service (NINIS) at www.ninis2.nisra.gov.uk. The website is continually updated and provides valuable information on a range of key public statistics.
- 3.10 These analyses should also be supplemented through direct engagement with rural stakeholders. The most appropriate stakeholders to engage with will vary from case to case but can act as a vital source of information on the likely impact of any policy, strategy, plan or service, as well as adding wider context to available data, e.g. relating to specific issues in certain areas, or affecting certain sections of the community such as older people, young people, or farming families. Such engagement may not only identify and clarify issues, but can offer an opportunity to discuss ideas and options to improve delivery and mitigate against negative impacts.

Step 3: Develop and Appraise Options

- 3.11 Having carried out a detailed analysis of the available evidence, the needs of rural dwellers and the potential impacts of the policy, strategy, plan or service on rural areas should be identified in this section.
- 3.12 It is important to consider what the potential barriers or wider impacts might be given the characteristics presented and to consider options to address, overcome or mitigate these barriers and impacts when developing policies, strategies or plans, and in designing service delivery, whether at a regional level, or specifically in a local area.
- 3.13 Figure 1 below sets out some of the potential barriers to delivering a policy, strategy, plan or service in rural areas.

Figure 1: Potential barriers to delivery in rural areas

Access to services

The dispersed settlement pattern in rural areas can mean that rural dwellers have to travel further to access key services such as health and social care, education, and welfare services. This combined with more infrequent public transport services and reliance on private vehicles for transport can make it more difficult and expensive for rural dwellers to access key services.

Service Infrastructure

Lack of access to broadband and low broadband speeds are becoming an increasing issue both as more and more public services are being delivered online, and as many businesses rely on broadband as a key medium for trading. This is particularly important point for government as we continue to move more and more towards online and digital interaction with citizens. Making services available online does not mean it is universally accessible and does not necessarily mean you are providing for rural citizens.

As with broadband, access to mobile phone services can be variable and limited in areas. This similarly has issues for both personal and business use as more and more day to day activity assumes a level of access to both services.

Demographics

With rural areas exhibiting much higher population growth than urban areas in recent years, this may result in significant variance in future demands on services such as education, health and social care when compared with current provision and capacity.

Economic structure & employment

Businesses in rural areas tend to be small to medium sized, with higher proportions of self-employed people and sole traders. Employment opportunities can be more limited in rural areas and rural dwellers may have to commute longer distances to access employment.

- 3.14 Having analysed the potential barriers and impacts, consideration should be given to whether additional actions are required in order to ensure fair rural outcomes. A range of options should be assessed to identify if the specific rural needs, barriers and impacts can be addressed, overcome or mitigated.
- 3.15 Such an analysis could look at the possible cost implications of associated actions, assessing if the necessary delivery mechanism infrastructure exists or if there are alternative methods of delivery that could be applied.
- 3.16 Engaging stakeholder organisations or beneficiaries may help you in this process, by getting direct input on how differing options for the policy, plan or service might be experienced.
- 3.17 At the district council level, local community planning structures may offer a valuable mechanism to support engagement with local stakeholders and develop potential new methods of delivery by working with those organisations that form the Community Planning Partnership in a local area.

Step 4: Preparing for Delivery

- 3.18 This section of the Rural Needs Impact Assessment should document how the proposed delivery of the policy, strategy, plan or service will ensure that fair rural outcomes are delivered.
- 3.19 It should clearly identify any specific amendments or mitigating actions that have been proposed as a result of the assessment.
- 3.20 Examples of possible delivery mechanisms that could be considered are shown in Figure 2 below. These mitigating actions and delivery mechanisms can be combined as often a 'one size fits all' approach is not appropriate. This list is not exhaustive and in some cases allowing local delivery bodies the flexibility to find the best local solution can work well.

Figure 2: Examples of delivery mechanisms in rural areas

Exemptions or reductions for rural areas: To continue to provide a minimum level of service in rural areas it might be necessary to introduce an exemption or reduction on levies charged e.g. rates relief for rural ATMs.

Mobile, outreach and to the home services: For example, mobile libraries.

Transport timetables: Aligning provision with existing public transport timetables or providing support for community transport.

Joint delivery to achieve economies of scale: Joint delivery with other service providers (shared services) to achieve economies of scale or joint delivery of two different services to achieve economies of scope.

Virtual delivery: This can be more accessible and cost effective especially if the service is the provision of information. However, bear in mind that due to broadband limitations, making services available online does not mean it is universally accessible and does not necessarily mean you are providing for rural citizens.

Local delivery: Working with already established outlets for delivery e.g. post offices/schools.

Step 5: Public Consultation on Preferred Option

3.21 There is no specific requirement within the Rural Needs Act (Northern Ireland) 2016 to consult in relation to rural needs. However, if a public consultation is being undertaken on the overall policy, strategy, plan or service, in line with best practice, then the Rural Needs Impact Assessment should be included within the consultation documentation. If the policy, strategy, plan or service is amended following the public consultation as a result of the responses received, the Rural Needs Impact Assessment should be revisited to ensure that rural needs are fully taken into account in the revised proposals.

Step 6: Monitoring and Reporting

3.22 The appraisal should also set out a mechanism to monitor the rural outcomes of the policy/service delivery that have been identified as part of the process.

3.23 This may be achieved by ongoing monitoring and review of the rural - urban breakdown of the proposed outcomes of the policy or in some cases, may involve setting a rural specific target.

3.24 This should be incorporated within the wider monitoring and evaluation framework for the overall policy or plan and should set out in detail the process and timeframe for review and for making adjustment as necessary, should the outcomes or targets not be achieved as intended.



Section 4: Annual monitoring and reporting requirements

- 4.1 As set out in Section 2, the Rural Needs Act requires each public authority to compile information on how it has paid due regard to rural needs; to include that information in its annual report; and to send that information to DAERA.
- 4.2 An Annual Monitoring Return (see Appendix 2) should be completed by each public authority and included in its annual report. It should then be submitted to DAERA for inclusion in the Rural Needs Act Monitoring Report which will be laid before the Northern Ireland Assembly. This report should include a breakdown of all policies, strategies, plans or services that have been developed, adopted, implemented or revised throughout the reporting period.
- 4.3 A Rural Needs Impact Assessment (or other evidence that rural needs have been taken into account) should be prepared and retained for each policy, strategy, plan or service as evidence that due regard has been paid to rural needs. These documents should be retained in line with the public authority's records management policy.
- 4.4 It is anticipated that the first reporting period will cover 1 June 2017 - 31 March 2018 and that subsequent reporting periods would align with the financial year.
- 4.5 Public authorities are responsible for establishing their own internal system for monitoring and collating relevant information on an ongoing basis. This could take the form of regular returns from business areas across the organisation or collating Rural Needs Impact Assessments as they are completed.
- 4.6 Public authorities are responsible for providing a single annual monitoring return to DAERA for inclusion in the Rural Needs Act Annual Monitoring Report. Public authorities may, therefore, wish to establish a single point of contact in relation to monitoring and reporting on the Rural Needs Act.

Section 5: Additional guidance and support

For additional guidance and support in relation to the rural proofing process, please contact:

Rural Needs Branch
Department of Agriculture, Environment and Rural Affairs
Dundonald House
Upper Newtownards Road
Ballymiscaw
Belfast
BT4 3SB

Tel: 028 9052 4107

Website: www.daera-ni.gov.uk

Email: rural.proofing@daera-ni.gov.uk

For help on statistics and evidence please contact:

Northern Ireland Statistics and Research Agency (NISRA)
Colby House
Stranmillis Court
Belfast
BT9 5RR

Tel: 028 9038 8400

Website: www.nisra.gov.uk

Email: info@nisra.gov.uk

For access to the ‘Rural Proofing’ e-learning package for your organisation, please contact:

Rural Development Council
17 Loy Street
Cookstown
Co Tyrone
BT80 8PZ

Tel: 028 8676 6980

Website: www.rdc.org.uk

Email: info@rdc.org.uk



Appendix 1

Rural Needs Impact Assessment Template

Name of Organisation:

Title of Strategy, Policy, Plan or Public Service:

Step 1: Define the Issue

Key questions to consider:

- *What are the objectives of the strategy, policy plan or service?*
- *What impact do you intend it to have in rural areas?*
- *How is 'rural' defined for the purposes of this policy/strategy/service/plan?*
- *What would constitute a fair rural outcome in this case?*

Step 2: Understand the situation

Key questions to consider:

- *What is the current situation in rural areas?*
- *What evidence (statistics, data, research, stakeholder advice) do you have about the position in rural areas?*
- *If the relevant evidence is not available, can this be sourced?*
- *Do you have access to the views of rural stakeholders about the likely impact of the policy?*
- *Are there existing design features or mitigations already in place to take account of rural needs?*

Step 3: Develop and appraise options

Key questions to consider:

- *Are there barriers to delivery in rural areas?*
- *If so, how can these be overcome or mitigated?*
- *Will it cost more to deliver in rural areas?*
- *What steps can be taken to achieve fair rural outcomes?*

Step 4: Prepare for Delivery

Key questions to consider:

- *Do the necessary delivery mechanisms exist in rural areas?*
- *Have you considered alternative delivery mechanisms?*
- *What action has been taken to ensure fair rural outcomes?*
- *Is there flexibility for local delivery bodies to find local solutions?*
- *Are different solutions required in different areas?*

Step 5: Implementation & Monitoring

Key questions to consider:

- *Have you set any rural specific indicators or targets to monitor?*
- *How will the outcomes be measured in rural areas?*
- *Are there any statistics or data that you will collect to monitor rural needs and impacts?*

Step 6: Evaluation & Review

Key questions to consider:

- *What processes are in place to evaluate and review the implementation of the policy, strategy, plan or service?*
- *Have rural needs been factored into the evaluation process?*
- *How will lessons learned in relation to rural outcomes be used to inform future policy making and delivery?*

| | |
|---|--|
| Rural Needs Impact Assessment undertaken by: | |
| Position: | |
| Signature: | |
| Date completed: | |

| | |
|---|--|
| Rural Needs Impact Assessment approved by: | |
| Position: | |
| Signature: | |
| Date completed: | |

Appendix 2

Annual Monitoring Return Template

(To be completed and included in relevant public authorities' own annual reports and submitted to DAERA for inclusion in annual report on Rural Needs Act to be laid before the Assembly).

Name of Public Authority:

Reporting Period:

1. Describe how your organisation has had due regard to rural needs when

a. developing, adopting, implementing or revising policies, strategies and plans:

b. designing and delivering services:

2. Please provide a list of policies, strategies, plans and/or services for which your organisation has completed a rural needs impact assessment or has otherwise taken rural needs into account:



Appendix 3

Frequently Asked Questions

1. My policy, strategy, plan or service does not have a rural impact; can I 'screen' it out?

The process for completing a Rural Needs Impact Assessment does not include an option to 'screen out'. If you conclude that your policy, strategy, plan or service does not have a rural impact and no specific rural needs are identified, then this should be documented in the Rural Needs Impact Assessment and retained as evidence that rural needs have been considered. The level of detail that should be included in the Rural Needs Impact Assessment should be proportionate to the scale of the policy, strategy, plan or service.

2. My policy, strategy, plan or service has only positive impacts in rural areas; do I need to complete a Rural Needs Impact Assessment?

Yes, if you conclude that your policy, strategy, plan or service has only positive impacts, then this should be documented in the Rural Needs Impact Assessment and retained as evidence that rural needs have been considered. The level of detail that should be included in the Rural Needs Impact Assessment should be proportionate to the scale of the policy, strategy, plan or service.

3. My policy, strategy, plan or service applies throughout Northern Ireland; do I need to complete a Rural Needs Impact Assessment?

Yes, even if your policy, strategy, plan or service is a regional one, then a Rural Needs Impact Assessment should be completed. You may find after you have analysed the evidence that there are differential impacts between urban and rural or that alternative delivery mechanisms in rural areas may better help you to realise your objectives. The level of detail that should be included in the Rural Needs Impact Assessment should be proportionate to the scale of the policy, strategy, plan or service.

4. Delivery of our policy, strategy, plan or service is outsourced, do I need to take account of rural needs?

Yes, the Rural Needs Act places a duty on public authorities. Responsibility for ensuring due regard is paid to rural needs remains with the public authority even where functions are outsourced or contracted out.

5. Can I accept a differential rural impact on rural areas when developing a policy, strategy or plan or designing and delivering a service?

The duty in the Rural Needs Act is to have “due regard to rural needs”. This means that public authorities must consciously consider the needs of people in rural areas. It does not prescribe the outcome of any policy, strategy, plan or service of any public authority. Decisions on policies, strategies, plans and services are for the relevant public authority to take. A Rural Needs Impact Assessment is designed to inform decisions about how services can be delivered in the most appropriate way, within the financial package available.

6. I am developing a cross-cutting strategy involving multiple public authorities; do I need to take account of rural needs?

Yes, each public authority specified in the Act has a duty to have due regard to rural needs. This will apply to any cross-cutting strategy, policy, plan or service your public authority contributes to. If all the participating public authorities are subject to the Act, then a Rural Needs Impact Assessment should be completed for the cross-cutting policy, strategy, plan or service. If not all the participating public authorities are subject to the Act, it is recommended that a Rural Needs Impact Assessment is completed in line with best practice but as a minimum public authorities who are subject to the Act should prepare a Rural Needs Impact Assessment in relation to their contribution.

7. Who is responsible for approving or quality assuring Rural Needs Impact Assessments?

Public authorities are responsible for ensuring they comply with their statutory responsibilities under the Rural Needs Act. This includes ensuring that any Rural Needs Impact Assessments are completed to a satisfactory standard. DAERA does not have an approval or quality assurance role but is happy to provide advice and guidance, as appropriate.

8. Does the Rural Needs Act mean I have to provide the same level of service in rural areas as urban areas?

No, the duty in the Rural Needs Act is to have “due regard to rural needs”. The level of ‘regard’ that is ‘due’ will depend on the circumstances and, in particular, on the relevance of rural needs to the decision or function in question. Rural proofing is aimed at ensuring “equitable” not “equal” treatment of people in rural areas. Levels of service should be proportionate to the level of need.

9. What training is available for staff completing a Rural Needs Impact Assessment?

A 'Rural Proofing' e-learning package has been developed to sit alongside this guidance. For NICS Departments, it is available through the course catalogue on HR Connect. Other public authorities can obtain a copy of the package, at no cost to your organisation, from the Rural Development Council. The package is SCORM compliant and should be able to be integrated into most learning management systems.

10. How detailed does my Rural Needs Impact Assessment need to be?

The Rural Needs Act requires public authorities to have 'due regard' to rural needs. The level of 'regard' that is 'due' will depend on the circumstances and, in particular, on the relevance of rural needs to the decision or function in question. The greater the relevance and potential impact for people in rural needs, the greater the regard required by the duty.

The level of detail that should be included in the Rural Needs Impact Assessment should be proportionate to the scale and potential rural impact of the policy, strategy, plan or service.



Appendix 4

Case Study - Sample Rural Needs Impact Assessment Template

(adapted from Libraries NI Opening Hours Policy - Rural Impact Assessment)

Step 1: Define the Issue

Key questions to consider:

- *What are the objectives of the strategy, policy plan or service?*
- *What impact do you intend it to have in rural areas?*
- *How is 'rural' defined for the purposes of this policy/strategy/service/plan?*
- *What would constitute a fair rural outcome in this case?*

As a result of the draft budget 2015/16, Libraries NI is required to make savings of 7.5% (which equates to £2.385 million) compared with the initial budget for 2014/15. One of the measures being put in place in order to achieve this level of savings is a reduction in the opening hours of libraries (to save on staff costs and premises related costs). In order to ensure a consistent approach to determining the opening hours of libraries a draft policy has been devised, setting out the overall approach that will be used.

The draft policy states, that in determining the opening hours of libraries:

- a consistent approach should be applied across all libraries; exceptions may be made for libraries serving areas of substantial social need.
- opening hours should relate to the historic level of use of a library.
- the allocated hours should be used in a way that best meets customer need.
- the allocated hours in every library should be sufficient to provide a range of opening hours to suit different customer groups and to allow a minimum range of programmes to be delivered in line with Libraries NI's priorities.
- the opening hours should be affordable.
- the opening hours should be sustainable i.e. ad hoc closures due to staffing shortages are avoided other than in exceptional circumstances.

In the context of the draft budget 2015/16 it is proposed that:

- libraries will open for 54, 50, 45, 40, 35, 28, 25 or 18 hours depending on the level of use in 2013/14.
- no library should be open for less than 18 hours per week. If a library is open for less time than this, it is difficult to implement the policy of providing a range of opening hours to suit different customer groups and to allow a minimum range of programmes to be delivered in line with Libraries NI's priorities. Many of the libraries which are currently open for 18 hours per week are located in rural communities.
- no library serving areas of substantial deprivation (as listed in the Libraries NI Draft Business Plan 2015/16) should have its hours reduced by more than 10%.



Step 2: Understand the situation

Key questions to consider:

- *What is the current situation in rural areas?*
- *What evidence (statistics, data, research, stakeholder advice) do you have about the position in rural areas?*
- *If the relevant evidence is not available, can this be sourced?*
- *Do you have access to the views of rural stakeholders about the likely impact of the policy?*
- *Are there existing design features or mitigations already in place to take account of rural needs?*

In developing this draft Rural Impact Assessment, various sources of information have been considered in respect of the rural impact of the proposed policy on opening hours, namely:

- Libraries NI data;
- Delivering Tomorrow's Libraries (DCAL, first published 2006, revised 2014);
- Northern Ireland Multiple Deprivation Measures 2010 (NISRA).

It is recognised that all libraries have a number of users who are rural dwellers (as defined in the Statistical Classification and Delineation of Settlements). This information was confirmed by an analysis undertaken by the Strategic Investment Board (SIB) in conjunction with Libraries NI to map the postcodes of library users to Output Areas . Using this information, an analysis was undertaken of the active borrower details for each of the 96 libraries to determine the percentage of active borrowers in each library who are rural dwellers.

The percentage of library users who are rural dwellers ranges from 0.93% in Chichester Library to 99.08% in Draperstown Library. In 31 libraries, 51% or more of the active borrowers live in rural communities.

Rural areas are served by a combination of mobile library services and library branches in some rural towns and villages. The mobile library service is not impacted by the proposed policy.

The Statistical Classification and Delineation of Settlements defines settlements of less than 4,500 (Bands F, G and H) as rural communities. Using this definition, 28 branch libraries are located in rural communities. In a further three libraries (Ballynahinch, Downpatrick and Magherafelt) 51% or more of the population are rural dwellers.

The Northern Ireland Multiple Deprivation Measure (NIMDM) 2010 comprises seven domains

of deprivation, each developed to measure a distinct form or type of deprivation: income, employment, health, education, proximity to services, living environment and crime. The domains can be interpreted individually or combined to assess deprivation in more than one domain.

In considering rural deprivation the research would indicate that consideration should be given not only to the overall Multiple Deprivation Measure, but also to the Proximity to Services domain which is particularly relevant in rural areas.

It is mainly Census Output Areas in the west of the province (constituencies of West Tyrone, Fermanagh and South Tyrone and Mid Ulster) which rank as the most deprived in relation to the Proximity to Services domain. Rural libraries in these areas (Castledearg, Draperstown, Dungiven, Irvinestown and Lisnaskea) have a substantial number of active members who reside in one of the top 10% most deprived OAs as measured by the Proximity to Services domain. However other libraries, such as Carnlough, Castlewellan and Rathfriland also have significant numbers of active members from OAs which have low rankings in relation to Proximity to Services.

Libraries NI has carried out previous consultations in relation to policy decisions regarding a strategic review of library provision in Northern Ireland and a review of opening hours due to budget cuts in the 2011 - 2015 Comprehensive Spending Review. On both occasions Rural Impact Assessments were undertaken and consideration was given by the Board to comments received on the impact on rural communities of the proposals.

A summary of comments which may be relevant to this proposed policy on opening hours is included below:

- the costs associated with public transport and the fact that public transport routes and timetables often make it impossible to access the next nearest library, especially in the evenings.
- the public library is one of the few, if not the last, remaining public services in their community and contributes to the social cohesion of the community.
- the public library provides important shared social space, particularly for young mothers and elderly.
- the important role that the public library plays in supporting children and young people and the fact that the library is seen as a safe place for young people to meet in a constructive, educational and leisure environment.
- the important role that the library played in supporting people who were unemployed and seeking work and who used the library, and in particular, the free access to the internet, to access information, look for jobs and build their skills.

- rural poverty manifests itself very differently from poverty in urban areas: - it is not spatially concentrated - it exists amongst relative affluence - people in rural communities are less likely to identify that they are in poverty and there is a culture of “making do”.
- rural dwellers face significant difficulties accessing employment and basic services that other people take for granted.
- rural households must earn significantly more than their urban counterparts to reach a minimum standard of income due to the need to maintain a car and the higher cost of heating a home in rural areas.



Step 3: Develop and appraise options

Key questions to consider:

- *Are there barriers to delivery in rural areas?*
- *If so, how can these be overcome or mitigated?*
- *Will it cost more to deliver in rural areas?*
- *What steps can be taken to achieve fair rural outcomes?*

Policy Proposal One: A consistent approach should be applied across all libraries; exceptions may be made for libraries serving areas of substantial social need.

The proposed policy has been applied consistently across all libraries, with the exception of the following:

- In four libraries (Ardoyne, Creggan, Suffolk and Whiterock) serving areas of substantial deprivation, historic levels of use, as measured by issues, renewals, visits, public access computer sessions, participation in activities and active borrowers, would provide that opening hours should reduce by more than 10%. Accordingly it is proposed, as set out above, that these libraries should not have their opening hours reduced by more than 10% because they serve a number of Super Output Areas with significant social deprivation (i.e. in the top 10% as measured by the NIMDM). This means that these libraries would be in a higher band of opening hours than pure levels of use would suggest. It is recognised that these libraries are located in urban areas and that the vast majority of their active members live in an urban setting. Libraries NI is of the view, however, that these exceptions are justified, given that tackling poverty and social exclusion is a key priority of the Programme for 12 Government and the Department of Culture, Arts and Leisure, our sponsoring body. No library serving rural communities has Super Output Areas within the top 10% most deprived.
- Heritage libraries are primarily reference libraries so it would not be appropriate to use the full range of indicators that apply in branch libraries to determine opening hours. Instead, the number of visits has been taken into account. Libraries NI is of the view that these exceptions are justified, given the nature of these libraries.

Policy Proposal Two: The allocated hours should be used in a way that best meets customer need.

Libraries NI intends to engage with customers at an individual library level in May and June 2015, once the policy and approach have been agreed by the Libraries NI Board, in order to

develop a pattern of opening hours that best meets customer needs. This approach will apply across all libraries, therefore there is no differential impact on rural libraries.

Policy Proposal Three: Opening hours should relate to the historic level of use of a library.

Proposed opening hours of all libraries (with the exception of those noted above) have been determined by totalling the number of issues, renewals, visits, public access computer sessions, participation in activities and active members in 2013/14. All libraries were assigned to a Band depending on the total level of use in that year. A consistent approach has been applied to all libraries, based on historic patterns of use, with the exception of the libraries identified above.

Policy Proposal Four: The allocated hours should be sufficient in every library to provide a range of opening hours to suit different customer groups and to allow a minimum range of programmes to be delivered in line with Libraries NI's priorities.

Based on implementation of the proposed policy in 2015/16, of the 28 libraries located in rural areas (as defined by the Statistical Classification and Delineation of Settlements):

- the opening hours of one library (Moirá) would increase.
- the opening hours of six libraries (Dungiven, Irvinestown, Keady, Lisnaskea, Maghera and Whitehead) would decrease.
- the opening hours of the remaining 21 libraries would remain the same as in April 2014.

Libraries NI is of the view that the proposed opening hours of each of these libraries are sufficient to provide a mix of morning, afternoon, evening and weekend hours to suit different customer groups and to allow a minimum range of programmes to be delivered in line with Libraries NI's priorities. Local consultation will be used to determine the best pattern of hours to meet local needs.

Policy Proposal Five: The opening hours should be affordable.

Based on the draft budget 2015/16 the opening hours are deemed to be affordable.

Policy Proposal Six: The opening hours should be sustainable i.e. ad hoc closures due to staffing shortages are avoided other than in exceptional circumstances.

Libraries NI is of the view that the draft policy should have a positive impact for all library users, including those in rural areas, in that the opening hours at each library will become sustainable so that ad hoc closures, due to staffing shortages will be avoided, except in exceptional circumstances. Certainty about opening hours is particularly important in rural areas, where people may have to travel some distance to access their local library.

Step 4: Prepare for Delivery

Key questions to consider:

- *Do the necessary delivery mechanisms exist in rural areas?*
- *Have you considered alternative delivery mechanisms?*
- *What action has been taken to ensure fair rural outcomes?*
- *Is there flexibility for local delivery bodies to find local solutions?*
- *Are different solutions required in different areas?*

Following a public consultation exercise (receiving over 3,500 responses) and completion of a rural impact appraisal, Libraries NI implemented the following revisions to the policy to mitigate the impacts in rural areas.

No library serving rural communities has Super Output Areas within the top 10% most deprived. However, responses received to the draft Rural Impact Assessment recognised the differences between poverty and disadvantage in rural communities, compared to urban communities and a strong case was made for recognition to be given to rural disadvantage. Accordingly it was agreed, in the context of the 2015/16 budget, that no rural library, as identified in the Review of the Statistical Classification and Delineation of Settlements 16 (2015) should have its opening hours reduced by more than 10%. This would impact on three libraries as identified below.

| Library | April 2014 Hours | Proposed hours (per consultation) | % reduction | Proposed revised opening hours |
|----------------|-------------------------|--|--------------------|---------------------------------------|
| Keady | 33 | 28 | 15.1% | 30 |
| Maghera | 40 | 35 | 12.5% | 38 |
| Strathfoyle | 30 | 25 | 16.7% | 28 |

Two local MLAs made written submissions arguing that it would be inappropriate to base the opening hours of Lisnaskea Library, which opened on 8 April 2015, on the level of use of the old library which had limited facilities and car parking and was in a much poorer location, away from the town centre and up a steep hill. This view was repeated in a number of the questionnaires returned.

Having considered the responses received in relation to the new library in Lisnaskea, it was agreed that an exception should be made also in this case and that the existing opening hours should be retained during 2015/16 and that usage should be monitored.

The consultation report noted that an exception would be made also for Heritage Libraries which are primarily reference libraries on the basis that it would be inappropriate to use the full range of indicators that apply in branch libraries to determine opening hours. The Board agreed this recommendation and that further consideration should be given to the opening hours of the Mellon Centre for Migration Studies, with a report being brought to it, via the Services Committee in due course.



Step 5: Implementation & Monitoring

Key questions to consider:

- *Have you set any rural specific indicators or targets to monitor?*
- *How will the outcomes be measured in rural areas?*
- *Are there any statistics or data that you will collect to monitor rural needs and impacts?*

The impact on the opening hours of rural libraries was as follows:

- the opening hours of one library (Moirá) increased.
- the opening hours of seven libraries (Dungiven, Irvinestown, Keady, Lisnaskea, Maghera, Strathfoyle and Whitehead) decreased.
- the opening hours of the remaining 21 libraries would remain the same as in April 2014.
- No rural libraries were closed.

Step 6: Evaluation & Review

Key questions to consider:

- *What processes are in place to evaluate and review the implementation of the policy, strategy, plan or service?*
- *Have rural needs been factored into the evaluation process?*
- *How will lessons learned in relation to rural outcomes be used to inform future policy making and delivery?*

The impact of the policy decisions on library use, including in rural areas, will continue to be monitored and will be reviewed on an annual basis.

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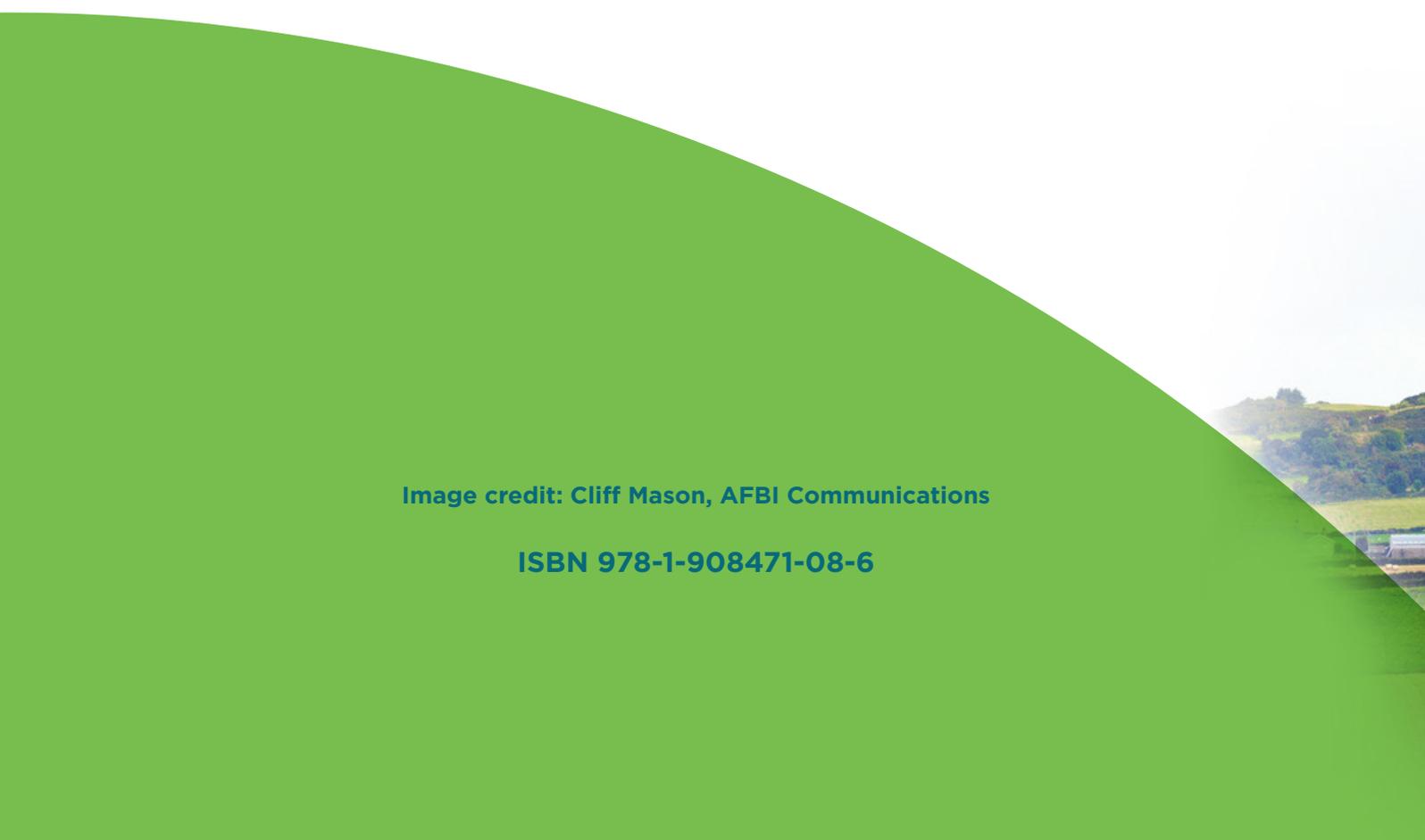


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