

RDP Management Branch
Department of Agriculture and Rural Development
Room 407
Dundonald House
Ballymiscaw
Upper Newtownards Road
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21st October 2013

To whom it may concern

Re: Consultation Equality Impact Assessment on the Northern Ireland Rural Development Programme 2014 - 2020

Thank you for forwarding a copy of the above consultation document to the Equality Commission for Northern Ireland (the Commission). We welcome the opportunity to comment on this draft equality impact assessment.

The Commission notes and welcomes the fact that the structure of the document follows that of Commission Equality Impact Assessment (EQIA) guidance. The document clearly sets out some very useful and comprehensive information and data that should be of assistance to the Department in considering the equality impacts of the Rural Development Programme.

In terms of the Commission's guidance on conducting an EQIA, the Commission sets out below some areas that we advise should be more thoroughly explored/developed in the final EQIA report and to contribute to the decision making on the Rural Development Programme (RDP).

Data and monitoring

The Commission is particularly concerned about the lack of RDP specific monitoring data, which is frequently referred to throughout the consultation document. The Rural Development programme has been in operation, to date, for over twenty years and it is of concern that so many gaps in Section 75 monitoring information have been identified in this EQIA consultation report. Previous EQIA's, undertaken on previous RDP programmes, should have set in place monitoring mechanisms to address any previous gaps in data. Robust monitoring data from previous RDP's is crucial to inform the implementation of the current proposed programme.

The Commission advises that whilst it may not be possible to collect data retrospectively, the final EQIA report should have robust commitments to establishing specific monitoring arrangements and developing the proposals

set out in Section 7.2 of the EQIA consultation document i.e. '*ideas on how DARD could monitor progress on equality of opportunity in the RDP in the future*'. It is vital that moving forward with the 2014-2020 RDP, that effective and efficient monitoring systems are in place for the commencement of the programme, in order that this lack of direct Departmental monitoring data does not reoccur in the future. It is important that the Department ensures that it's approved equality scheme commitments, in relation to monitoring adverse impacts of policies and monitoring more broadly, across the Section 75 categories, are implemented.

Assessment of potential equality impacts

In the absence of programme specific monitoring data of any impacts the Commission notes there is a range of general information/ data presented in Chapter 4 of the consultation EQIA. However the Commission is concerned that this data does not lend itself to a clear assessment of equality impacts of the policy aims.

A clear assessment of the equality impacts is especially important when the policy consulted upon "*represents one of the largest ever investments in rural communities in Northern Ireland*", with aims that include "*improving competitiveness in the agriculture and forestry sector, fostering competitive and sustainable rural businesses and thriving rural communities*".

Chapter 4 of the EQIA contains a fairly comprehensive amount of information, on equality issues, across the Section 75 categories, and sets out some actions to address some of the inequalities identified.

However, this remains largely a self-contained chapter with few links being made to the Rural Development Programme and its impacts on those the policy aims to impact upon. Despite all of the information presented in Chapter 4, Chapter 5 - assessment of potential impacts repeatedly states that there is no evidence to suggest that the RDP's schemes will result in significant differential impacts. It is unclear to the Commission the linkage between the data gathered and the assessment conclusion drawn.

Chapter 5, in identifying equality impacts on Section 75 categories, concludes on a number of occasions that the RDP is "*open to all*" which in effect appears to suggest neutral impacts across the Section 75 categories. However, as Chapter 4 sets out, inequalities and barriers do exist across the range of section 75 groups. These barriers could mean that certain groups may in actual fact not be able to enjoy equality of opportunity in relation to aspects of the policy proposals.

The Commission advises that the potential impacts should be more thoroughly assessed in the final EQIA report and the equality issues contained in Chapter 4 should be linked more closely to the RDP's target audience in order to establish their equality profile and what the policy is aiming to do.

Mitigation

Chapter 6 sets out a large number of '*mitigation strategies*' and it is positive that this is an area that has been given some thought, within this Chapter.

However, a number of the mitigating measures are quite general and vague and oftentimes they are not linked to a specific RDP action or linked to a potential adverse impact (s) /inequality (ies) identified, that the mitigation is aiming to address. In the absence of these clear linkages, it is difficult to see how these mitigating actions contribute to the overarching consideration of the equality impacts.

The Commission also notes mitigating actions such as DARD's commitment to on-going training for staff or making information available in alternative formats. However, these are action measures that DARD has already committed to doing, for example under its equality scheme. In addition a number of mitigating measures are actions that would be required to comply with antidiscrimination legislation.

The Commission notes and welcomes at 6.2.2 of the report i.e. '*Mitigating Strategies: Delivery methods*', the Department's intention to address membership of the LAG's (Local Action Group's) and ensure representation from across the Section 75 groups. Such groups provides the Department with an opportunity to increase participation in public life from under-represented groups, such as women and disabled people. The Department should ensure that it considers and explores all opportunities by which it can increase representation in public life positions, from under-represented groups, for example, the RDP Monitoring Committee.

The Commission advises that in the final EQIA report and when reaching final decisions relating to the policy, further consideration is given to the EQIA recommended step of identifying mitigation and alternative policies.

The Commission is happy to meet to discuss our response and provide further advice and assistance, if required. Please do not hesitate to contact Christine Stoll (cstoll@equalityni.org; Tel 90 500 692) who is the Commission's liaison officer for DARD, should you require any further information.

This response is made without prejudice to any consideration or determination which the Commission might make in performance of its statutory function to investigate individual complaints under Schedule 9 of the 1998 or conduct any other investigation under that Schedule.

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