



**EQUALITY IMPACT ASSESSMENT ON THE PROPOSAL TO USE
ONLINE AS THE PRIMARY CHANNEL FOR COMMUNICATING AND
TRANSACTIONING WITH CUSTOMERS**

CONSULTATION SUMMARY REPORT

NOVEMBER 2016

1. INTRODUCTION

1.1. This report summarises the comments we have received during consultation on our policy to make online the primary channel for communicating and transacting with customers of Common Agricultural Policy (CAP) EU area-based schemes.

1.2. This report sets out:

- background information on the policy;
- the number of comments received;
- who the comments were from;
- the issues raised by individuals and organisations; and
- our response to the issues raised.

2. BACKGROUND

2.1 In 2014 we undertook an equality screening exercise on our proposal to make online the primary channel for communicating and transacting with customers. A copy of the screening exercise can be found at: <https://www.dardni.gov.uk/consultations/consultation-adopting-online-primary-channel-communicating-and-transacting-between>.

2.2 The equality screening identified that the proposal could have negative equality impacts for a number of different groups, for example, older people and people with disabilities. It was therefore necessary to carry out a more detailed EQIA and to consult with our customers, staff and other interested parties on the proposal.

2.3 We undertook pre-consultation with a number of organisations with expert knowledge to help inform the EQIA. A public consultation was held from November 2015 to February 2016 on our proposal.

2.4 We want to do more of our work online to:

- give our customers a better service;
- keep more accurate information; and

- provide our services in a more cost effective way.

Better customer service

2.5 We believe that there are significant benefits for our customers by going online. Online services can be used securely at a time and location convenient for customers, rather than having to travel to an office during opening hours. When completing applications online, information can be automatically checked to ensure that it is consistent and correct, reducing the risk of mistakes that can sometimes result in financial penalties for customers. Customers can also be provided with all the guidance and information that they need online.

Improve accuracy of information

2.6 The European Commission requires us to administer CAP in a particular way. If we fail to meet all of the rules, money that would have been reimbursed to our budget can be withheld (this is called 'disallowance'). Total disallowance imposed on us since 2008 came to €78 million (or €59 million net of over-payments which were recovered from customers). We have worked hard to reduce this from €21.1 million (€18.7 million, net) in 2008 to €5.7 million (€1.5 million, net) in 2012, the latest year available. One of the main ways we have done this is by improving the accuracy of the information we hold on our customer's businesses, and in particular by keeping it up-to-date. Online, the information being supplied by customers can be cross-checked before submission. This is not possible with paper applications. Online also means that application information is immediately available for analysis once the application period has ended. Paper application information must be manually entered onto our systems by staff before this is possible.

Reduce the cost of administration

2.7 In common with all public organisations, we continue to face financial pressures and are required to find ways to continue providing our services at reduced cost. This has included a significant reduction in the number of staff working within the department. Printing, posting and processing large volumes of paper (applications, leaflets, guidance booklets etc) is expensive and requires many

staff to administer. Online transactions are much less resource intensive to manage.

Other reasons for promoting online

- 2.8 The European Commission has introduced a new requirement for the application process for CAP area-based schemes, to begin in 2016. This requires us to issue application forms and associated information (for example, field maps) through a 'Geographic Information System-based interface'. This means online. Customers are expected to complete their application through this interface, unless they are 'not in a position to do so'. The Commission has set targets to achieve 25% of land area for which CAP payments are claimed using this interface in 2016; 75% in 2017; and 100% in 2018.
- 2.9 'Digitalisation' of government services and the promotion of online is an overarching objective of the Executive and the department.

3. SUMMARY OF COMMENTS

- 3.1 A total of eight (8) organisations were pre-consulted in development of the EQIA. The pre-consultee organisations were:
- The NI Public Service Alliance (NIPSA);
 - Disability Action (DA);
 - The Committee on the Administration of Justice (CAJ);
 - Children in NI;
 - The Equality Commission for NI (ECNI);
 - Rural Network NI;
 - NI Agricultural Producers Association (NIAPA); and
 - The Commission for Older People NI (COPNI).
- 3.2 A total of two hundred and sixty one (261) comments were received to the public consultation between November 2015 and February 2016. These were provided by a wide range of individuals and organisations, including:

- 148 responses from members of the public, many from farmers or farm family members (one of these responses was signed by two people; one was signed by 17 people, making a total of 165 members of the public);
- 84 responses from DARD members of staff;
- 19 responses from elected representatives; and
- 10 responses from organisations (COPNI, DA, ECNI, Libraries NI, Mid Tyrone Lamb Marketing Group, Northern Ireland Local Government Association, NIPSA, Northern Ireland Rural Woman’s Network, Rural Community Network and the Ulster Farmers Union.)

4. ISSUES THAT WERE RAISED BY CONSULTEES

4.1 The table below lists the main issues raised in the comments and who they were from. Where a similar issue has been raised in more than one response we have grouped these together. In addition to these responses, a number of comments were received on the content and format of the EQIA. We have not included these here but they have been reflected in our Final EQIA Report.

5. MITIGATING POLICIES

5.1 Our Final EQIA Report sets out in detail the mitigating policies that we will introduce to address the negative impacts that we have identified. A summary of these policies is set out below.

5.2 **HELP TO GET ONLINE:** We will take steps to help our customers get access to internet/broadband. This will include working with other parts of government.

5.3 **HELP TO USE ONLINE SERVICES:** We will undertake a range of measures to help our customers use our online services.

5.4 **ALTERNATIVES TO ONLINE:** We will continue to provide alternative ways for customers to access our services.

No.	ISSUE	RAISED BY	RESPONSE
1	<p>EQUALITY CATEGORY: AGE</p> <p>A large number of respondents stated that older farmers were likely to face particular problems in using online services.</p>	<p>NILGA, UFU, Rural Community Network, Disability Action, COPNI, all 19 elected representatives, 35 members of the public and 9 members of staff</p>	<p>Accepted. Our proposal will impact on older customers. Mitigating policies are set out in the Final EQIA Report.</p>
2	<p>EQUALITY CATEGORY: MARITAL STATUS</p> <p>One response highlighted potential negative impacts on widowed customers that were not identified in the original screening exercise.</p>	<p>Disability Action</p>	<p>Accepted. Our proposal will impact on unmarried and widowed customers. Mitigating policies are set out in the Final EQIA Report.</p>
3	<p>EQUALITY CATEGORY: MEN AND WOMEN GENERALLY</p> <p>Several responses outlined the potential impact on women who are farm family members.</p>	<p>NIPSA, Rural Community Network, NI Rural Woman's Network and one member of staff</p>	<p>Accepted. The impact of our proposal is not limited to men.</p>
4	<p>MAINTAIN FACE-TO-FACE CONTACT</p> <p>Many responses highlighted the importance of being able to call into an office to talk to us directly. This was for many reasons ranging from personal preference to the danger for some farmers of social isolation. These responses requested that the option for 'face-to-face' contact be maintained.</p>	<p>COPNI, NILGA, NIRWN, UFU, all 19 elected representatives, 17 staff and 71 members of the public.</p>	<p>The option for face-to-face contact between DAERA staff and customers will be maintained.</p>

No.	ISSUE	RAISED BY	RESPONSE
5	<p>AVAILABILITY OF BROADBAND IN RURAL AREAS</p> <p>Many of those responding to the consultation stated that broadband internet access in rural areas of Northern Ireland is not good enough to be able to do business online. Several of these requested action by DARD to improve broadband before introducing online as the primary channel.</p>	<p>NILGA, NIRWN, UFU, Rural Community Network, Children NI, Disability Action, Rural Network NI, all 19 elected representatives, 15 staff and 33 members of the public</p>	<p>Broadband services are widely available. None-the-less we will continue to take action to promote availability in rural areas.</p>
6	<p>MANY FARMERS LACK IT SKILLS</p> <p>Concerns were raised in a number of responses that many farmers, in particular older farmers, may lack the necessary IT skills to operate a computer and therefore communicate and transact with us online.</p>	<p>NILGA, UFU, Disability Action, 1 elected representative, 9 staff and 48 members of the public</p>	<p>Accepted. We will take steps to help customers improve their IT skills, should they wish to do so.</p>
7	<p>THE COST OF PURCHASING IT EQUIPMENT</p> <p>Some responses felt that moving to online would impose costs on customers for the purchase of IT equipment and internet access. It was pointed out that many farmers would not currently have these installed.</p>	<p>NIRWN, NILGA, 16 members of the public and 6 staff</p>	<p>Accepted. We will take steps to make computers available to customers in our offices. Computers are also available through libraries.</p>
8	<p>NEED FOR STAFF TO BE RETRAINED</p> <p>The need for staff whose jobs have changed to be fully retrained in their new duties was raised.</p>	<p>Children NI, 18 staff</p>	<p>Accepted.</p>

No.	ISSUE	RAISED BY	RESPONSE
9	DISAGREE WITH PROPOSAL A number of responses specifically stated that they disagreed with the proposal without making other comments.	33 members of the public	Noted.
10	EXISTING ONLINE SYSTEMS MUST BE IMPROVED Some responses stated that the current online systems provided by DARD are not good enough and need to be improved.	Rural Community Network, Disability Action, UFU, 1 elected representative, 4 staff and 12 members of the public	We continuously seek to improve our online services through customer engagement and feedback.
11	REDUCE CUSTOMER SERVICE Several responses stated that a move to online would represent a reduction in customer service by DARD.	8 staff, 1 member of the public and 1 elected representative	Not accepted. We consider that better customer service can be provided online. Alternatives to online will be retained.
12	SHARING OFFICE SPACE WITH OTHER PUBLIC SECTOR Three responses suggested placing DARD staff in other public sector organisation's offices to reduce costs.	Libraries NI, Children NI	Noted.
13	SECURITY OF ONLINE SYSTEMS One response questioned the security of our online systems and the personal data held there.	1 member of the public	Noted. Our online systems meet strict industry standards for security.

No.	ISSUE	RAISED BY	RESPONSE
14	<p>POTENTIAL INCREASE IN ERRORS</p> <p>One respondent advised that the number of errors in applications could increase due to the move to online. This would increase the administrative burden on DARD, rather than reduce it.</p>	1 elected representative	Not accepted. Our data shows that online applications include fewer errors than paper applications.
15	<p>PROPOSAL MAY BE DISCRIMINATORY</p> <p>A number of responses stated that the proposal does, or could, discriminate against some groups or individuals, for example the elderly. Some of these responses also raised concerns that the proposal would not be in accordance with related legislation, for example Human Rights Act 1998, Disability Discrimination Act (NI) Order 2006 and others.</p>	Mid Tyrone Lamb Marketing Group, NIPSA, UFU, 18 elected representatives, 1 member of staff, 4 members of the public	Not accepted. We take our equality, human rights and anti-discrimination duties seriously. We ensure that all policies meet our statutory responsibilities.
16	<p>MORE CONSULTATION REQUIRED</p> <p>Three responses stated that consultation on the proposal had not been sufficient.</p>	NIPSA, Mid Tyrone Lamb Marketing Group and 1 member of staff	Not accepted. We have undertaken extensive pre- and public consultation in line with our statutory duties.
17	<p>MULTIPLE IDENTITY</p> <p>One response stated that the issue of multiple identities had not been given sufficient consideration.</p>	Disability Action	Accepted. We have considered multiple identity issues in the Final EQIA Report.
18	<p>CONSULTATION ON OFFICE CLOSURES</p> <p>One response stated that any decision to close DARD offices should be assessed for equality impacts and consulted upon.</p>	NIPSA	This EQIA was not intended to address the design of our regional office structure. Any future decision to do so will be the subject of a separate process.