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**DEPARTMENT for COMMUNITIES  
PROPOSED CLOSURE OF BALLYNAHINCH, COOKSTOWN  
AND NEWCASTLE SOCIAL SECURITY OFFICES AND  
JOBCENTRES**

**RURAL IMPACT ASSESSMENT**

<b>DOCUMENT</b>	<b>VERSION</b>	<b>DATES</b>
Rural Impact Assessment	During Consultation	September – November 2016
Rural Impact Assessment update	Post-Consultation	

# **RURAL IMPACT ASSESSMENT ON THE DEPARTMENT FOR COMMUNITIES PROPOSED CLOSURE OF BALLYNAHINCH, COOKSTOWN AND NEWCASTLE SOCIAL SECURITY OFFICES AND JOBCENTRES**

## **Introduction**

1. Rural Proofing should be introduced at an early stage when developing or reviewing a policy which affects a geographical area or region.
2. The lead role in the rural proofing of a policy should be taken by the policy decision-maker who has the authority to make changes to that policy and should involve in the proofing process:
  - other relevant team members;
  - those who implement the policy;
  - staff members from other relevant work areas; and
  - key stakeholders.
3. Rural proofing is the process by which all major policies and strategies 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. It is important that policy makers set out to develop a policy instrument considering its potential impact on rural areas and rural dwellers. This must be done in the context of considering both intended and unintended outcomes.
4. Effective rural proofing ensures that rural communities can receive maximum benefit from government policies.
5. Rural areas will differ from urban areas due to their greater geographical isolation, population dispersal, longer distances from key services like health, education or leisure facilities and limited local employment opportunities. The following guidance has been taken from DAERA's 'Essential Guide to Rural proofing'.

## **What is rural proofing?**

6. Rural proofing is part of the policy making process and rigorously scrutinises proposed policies. It should ensure fair and equitable treatment of rural communities and that a policy does not indirectly have a detrimental impact on rural dwellers and rural communities.
7. Another way of describing it is:
  - a: identifying the potential direct or indirect impacts a new or revised policy might have on a rural area (This may require data analysis on a rural-urban basis).
  - b: making a proper assessment of those impacts if they are likely to be significant; and
  - c: adjusting that policy (where appropriate) to ensure that it meets the needs of rural areas.
8. Rural proofing must consider policy implementation so that services will be delivered to rural areas in an equitable manner. The process should also involve monitoring the implementation of the policy to ensure that this is achieved.

## **About the Policy**

9. The primary objective of the policy is to ensure that the Department for Communities can continue to provide an effective, responsive and resilient, quality face to face service to claimants in the Ballynahinch, Cookstown and Newcastle areas that meets their needs and is able to support the new service delivery model resulting from the changes to the welfare system and the introduction of Universal Credit.
10. In addition, there is a need to ensure that Working Age service provision is efficient, maximising the delivery of value for money taking into account the

pressure on public finances and the Department's challenging financial position during the current year and going forward.

11. Given the scale and scope of future changes facing the Department, an assessment of whether the individual offices could adapt to the changes that will arise as a consequence of the implementation of Universal Credit and other reform programmes was conducted.
12. The principle conclusions from this assessment are that:
  - the offices are amongst the smallest in the network in terms of the number of claimants served by the offices and level of advice and business being conducted;
  - the current building configurations will not enable the Department to deliver the modern high quality service to claimants going forward, including the new digital services;
  - claimants will be able to access the full range of services from alternative offices; and
  - given the funding position, no viable alternative value for money accommodation has been identified in any of the three areas.
13. Based on these conclusions and in order that claimants can access the enhanced service provided by the Jobs & Benefits offices and in preparation for the introduction of Universal Credit, the proposal is to close the Ballynahinch Social Security Office & JobCentre, the Cookstown Social Security Office and Cookstown JobCentre and the Newcastle Social Security Office & JobCentre.
14. On 20 September 2016, the Department for Communities published consultation documents seeking views on proposals to close the four offices. In summary the consultation seeks views on:

- current and future service provision;
  - value for money;
  - impact of the proposed closure on claimants; and
  - wider concerns
15. The consultation documents set out the challenges facing the Department in terms of its commitment to being a regional organisation which is taking forward a significant programme of change including the implementation of changes to the welfare system as a result of the Welfare Reform (Northern Ireland) Order 2015 and the subsequent publication of the Evason Report, which will have significant impact on the way that the Department for Communities delivers its service to claimants. This change programme is being delivered against a background of continued pressure on public finances and reducing Departmental budgets. The Department therefore needs to ensure that service provision is efficient, maximising the delivery of value for money
16. The consultation, which centres on a number of key questions, will run for an 8-week period between 20 September 2016 and 15 November 2016 and provides an opportunity for interested stakeholders to inform the Department's decisions on the delivery of services to claimants currently served by the Newcastle, Ballynahinch and Cookstown offices.

### **Evidence Base**

17. During the development of the proposals and consultation document internal workload monitoring and claimant information was used. This management information is sourced monthly from each of the offices in the Working Age Network and includes claimant live loads, footfall and telephony statistics.
18. Additional information from public sources regarding population density, staff and claimant travel distances, local government districts and public transport

routes was also used. Spatial Mapping (GIS) data was used in the analysis of geographical distribution of claimants.

19. In line with good practice, evidence gathering will continue throughout the consultation period and the additional data will be used to inform the final decisions.

20. **Screening Questions**

<b>Does the policy apply in rural areas and communities?</b>
Yes.  The Department has completed an Initial Rural Impact Assessment and whilst Ballynahinch and Cookstown and Newcastle are not classified as rural, as defined in the NISRA Review of the Statistical Classification and Delineation of Settlements (Northern Ireland Statistics & Research Agency, 2015), the Department does recognise that the Social Security Offices and JobCentres do provide a service to claimants who live within the immediate rural hinterland
<b>If NO: set out the reasons why.</b>
.

<b>If YES:</b>  a. Does the policy have the potential to have a negative impact on rural areas and communities?  b. Does the policy have the potential to have a positive impact on rural areas and communities?
See information in the Justification & Key Issues section below

## 21. Justification & Key Issues

The Department of Agriculture, Environment and Rural Affairs (DAERA) guidance indicates that a policy should treat rural areas in a fair and reasonable way and not inequitably in comparison with urban areas. The distinction between 'urban' and 'rural' is not clear-cut and within government there is an absence of any generally accepted definition of 'urban' and 'rural'.

As stated at point 19 above, the Department has completed an Initial Rural Impact Assessment for the settlements of Ballynahinch, Cookstown and Newcastle and whilst they are not classified as rural as defined in the NISRA Review of the Statistical Classification and Delineation of Settlements, the Department does recognise that the Social Security Offices and JobCentres do provide a service to claimants who live within the immediate rural hinterland.

The review defines a rural area as a settlement with a population of fewer than 5,000 (Bands F, G and H) **See Annex A.**

The Northern Ireland Statistics and Research Agency (NISRA) estimates, updated for 2015, indicate that the populations for each area are in excess of that figure as follows.

Settlement	2011 Census Population	Classification Band
Ballynahinch	5,703	E
Cookstown	11,599	D
Newcastle	7,672	E

### Urban/Rural Analysis

The Department has carried out GIS mapping analysis in respect of those claimants currently accessing services for each office likely to be affected by these proposals. The number (and percentage) of claimants considered to be rural or urban is as follows:

Office	Urban	Rural	% living in rural hinterland
Ballynahinch	323	118	27%
Cookstown	284	123	30%
Newcastle	357	72	17%

The maps at **Annex B** show the breakdown of the number of claimants who live within the rural hinterlands and those who live in the urban centres.

Having considered the relevant criteria, the Department considers that as the proposals impact claimants living in the immediate rural hinterland that a rural impact assessment is required.

### **Mitigation Measures**

The Department recognises the importance of local access to its services and therefore the proposed closures are premised on the basis that a strong network of public offices delivering frontline services will continue to exist and that appropriate measures can be put in place to mitigate any potential impacts on claimants.

In recognising that the closure of the offices will have an impact for claimants currently accessing services, consideration has been given as to what options are available from which claimants can continue to access the necessary services.

### **Alternative Offices**

**Ballynahinch** lies in East Down and is 10 miles from Downpatrick and 10 miles from Lisburn. Under this proposal it is proposed that claimants impacted by the proposed closures will be able to access services from the Downpatrick, Lisburn and Knockbreda Jobs & Benefits offices where a full service will be provided. These offices can also accommodate the changes required for the introduction of Universal Credit and the new ways of working. These offices are in closest proximity to the Ballynahinch Social Security Office & JobCentre.



**Table 1: Proximity to Downpatrick, Lisburn and Knockbreda Jobs & Benefits offices, journey times and associated cost**

Office	Distance from Ballynahinch	Direct Transport Links	Journey to and From (By car/private transport)	Journey Time to and From (Public Transport)	Public Transport Cost (Return Journey)
Downpatrick Social Security Office	10.4	Approximately every 2 hours.	23 minutes	40 minutes	£6.80
Lisburn Jobs & Benefits office	10.2	Infrequent bus service to and from. Approximately every 3 hours. (more frequent in mornings and afternoons in alignment with schools)	23 minutes	35 minutes	£6.80
Knockbreda Jobs & Benefits office	10.8	Regular bus service to and from. Approximately every 40 mins.	21 minutes	30-35 minutes	£6.80

**Cookstown** lies in Mid Ulster and is 11 miles from Dungannon and 10 miles from Magherafelt. Under this proposal it is proposed that claimants impacted by the proposed closures will be able to access services from the Dungannon and Magherafelt Jobs & Benefits offices where a full service is currently provided. These offices can also accommodate the changes required for the introduction of Universal Credit and the new ways of working. These offices are in closest proximity to the Cookstown Social Security Office and Cookstown JobCentre.

**Table 2: Proximity to Dungannon Magherafelt Jobs & Benefits offices, journey times and associated cost**

Office	Distance from Cookstown	Direct Transport Links	Journey to and From (By car/private transport)	Journey Time to and From (Public Transport)	Public Transport Cost (Return Journey)
Magherafelt Jobs & Benefit office	10.4 miles	<ul style="list-style-type: none"> <li>Regular bus service to and from Cookstown and Magherafelt.</li> <li>Service runs approximately every hour.</li> </ul>	23 minutes	30 minutes	£6.30
Dungannon Jobs & Benefit office	10.1 miles	<ul style="list-style-type: none"> <li>Regular bus service to and from Cookstown and Dungannon.</li> <li>Service runs approximately every hour.</li> </ul>	18 minutes	25-40 minutes (dependent on bus service)	£6.80

**Newcastle** lies in South Down and is 13 miles from Kilkeel and 13 miles from Downpatrick. Under this proposal it is proposed that claimants impacted by the proposed closures will be able to access services from the Kilkeel and Downpatrick Jobs & Benefits offices where a full service will be provided. These offices can also accommodate the changes required for the introduction of Universal Credit and the new ways of working. These offices are in closest proximity to the Newcastle Social Security Office & JobCentre.

**Table 3: Proximity to Kilkeel & Downpatrick Jobs & Benefits offices, journey times and associated cost**

Office	Distance from Newcastle	Direct Transport Links	Journey to and From (By car/private transport)	Journey Time to and From (Public Transport)	Public Transport Cost (Return Journey)
Kilkeel Jobs & Benefit office	13.2 miles	<ul style="list-style-type: none"> <li>Fairly regular bus service to and from Newcastle and Kilkeel.</li> <li>Service runs approximately every hour.</li> </ul>	31 minutes	35 minutes	£7.90
Downpatrick Jobs & Benefit office	12.9 miles	<ul style="list-style-type: none"> <li>Fairly regular bus service to and from Newcastle and Downpatrick.</li> <li>Service runs approximately every hour.</li> </ul>	20 Minutes	20-35 minutes (dependent on bus service)	£6.80

While the frequency of transport between locations varies, there are direct transport links which means that claimants will not have to interchange on their journey.

The Department has also carried out GIS mapping analysis in respect of those claimants likely to be affected by these proposals. The current and additional average travel based on this data for each office location is:

Office	Current office average distance	Alternative office average distance
Ballynahinch	4.62 miles	8.8 miles
Cookstown	3.43 miles	9.65 miles
Newcastle	3.07 miles	12.95 miles

The maps at **Annex C** illustrate the geographical distribution of Jobseeker's

Allowance claimants using the current and alternative office locations and claimant home addresses.

### **Additional Mitigation Measures**

If a claimant has specific needs these may be accommodated by changing signing times, reviewing the need for postal signing or through the use of enhanced telephony and digital services (see below).

**Postal Signing:** Jobseekers usually have to maintain their claim for Jobseeker's Allowance (JSA) by attending a Jobs & Benefits office every fortnight. Some however are permitted to attend less frequently and are known as 'postal' Jobseekers.

A Jobseeker can be considered for postal status by virtue of:

- risk to their personal security; or
- distance required to travel and time away from home.

A Jobseeker who meets the eligibility conditions detailed below will be offered the option of becoming a 'postal Jobseeker'.

**Eligibility conditions:** Jobseekers will be offered postal status if:

- they live more than one hours travel by public transport, door to door (in either direction), from the nearest office; or
- attendance would result in an absence from home in excess of four hours; or
- they have a mental or physical disability that restricts their mobility; or (this may apply to one member of a joint claim whose partner has to attend to make their declarations);
- they are considered to be at risk by virtue of their personal security; or
- they have caring responsibilities for a child and are unable to make arrangements for short-term childcare to cover their attendance e.g. during school holidays.

Improvements have also been identified as a result of the Department's significant investment in modernising and improving access to our services through the use of technology: electronic communication, web-based systems, telephony and access at alternative offices. These are:

**Telephony:** The use of modern Automated Call Distribution (ACD) telephony equipment manned by highly skilled staff trained in the use of technology and who are benefit experts. Low/fixed rate calls from landlines with Interactive Voice Response system which is customer friendly, simple and straightforward to operate with a default system which always allows the caller to speak to a person. Ensuring that the Department's telephony teams have the right customer service skills and benefit knowledge.

The Department anticipates that many claimants may migrate through choice to the telephony service instead of visiting an alternative office. The telephony service will provide real benefits for many claimants in terms of increased privacy and convenience, savings in travel time and waiting time and cost savings in bus fares and car parking.

However, it is also accepted that telephony may be unsuitable for some claimants including those:

- with hearing difficulties, although the Telephony Support Units are equipped to handle calls from textphones;
- whose first language is not English, although Telephony Support Units have access to translation services;
- with concentration, mental health or learning difficulties;
- older claimants, although very few pensioners tend to ring or visit local offices other than the occasional Social Fund enquiry; and
- claimants who do not have a telephone, although our services are available from mobiles and public telephone kiosks.

**Face to Face service delivery:** a face to face service will continue to be available, by appointment, at the alternative locations for all of the above claimants and to any

claimant who needs it.

**Appointment System for Callers (footfall):** the local office network currently receives around 710,000 callers through its doors every year and already uses appointments very effectively for claimants wishing to make new claims to Jobseeker's Allowance and Income Support as well as those customers seeking to apply for a National Insurance number. The existing appointment based system will be available for claimants in the proposed alternative locations.

**Access to Department's Website:** Access to the Department's website will be freely available to claimants in all modernised front offices with the introduction of Universal Credit. This will allow those claimants to source information such as benefit rates, check qualifying conditions for specific benefits and print leaflets and forms.

Claimants impacted by the proposed closure of the offices will therefore continue to have a choice over how they access our services.

Existing services provided by the Department to local business including job vacancy management, advertising vacancies on JobCentre Online and submitting potential applicants for vacancies will continue to be provided at the alternative offices.

### **Wider concerns**

The Department is aware of wider concerns regarding the impact of the proposed office closures on job opportunities and the local economy.

Previous analysis of these issues indicates that the overall impact is marginal due to the travelling distances involved and the fact that the Department will maintain a dispersed organisation committed to the delivery of face to face services through a network of local offices. This was supported by advice from independent economists who concluded that although there will be economic impacts, these are likely to prove extremely modest given the numbers of staff involved.

### **Conclusion**

The primary objective of the policy is to ensure that the Department for Communities can continue to provide an effective, responsive and resilient, quality face to face

service to claimants in the Ballynahinch, Cookstown and Newcastle areas that meets their needs and is able to support the new service delivery model resulting from the changes to the welfare system and the introduction of Universal Credit.

Whilst these proposals will have an impact for a number of rural users in each of the locations, the priority for the Department has been to ensure that we can mitigate these impacts, as set out in this Rural Impact Assessment, by providing a quality, enhanced service through alternative service delivery channels and alternative offices.

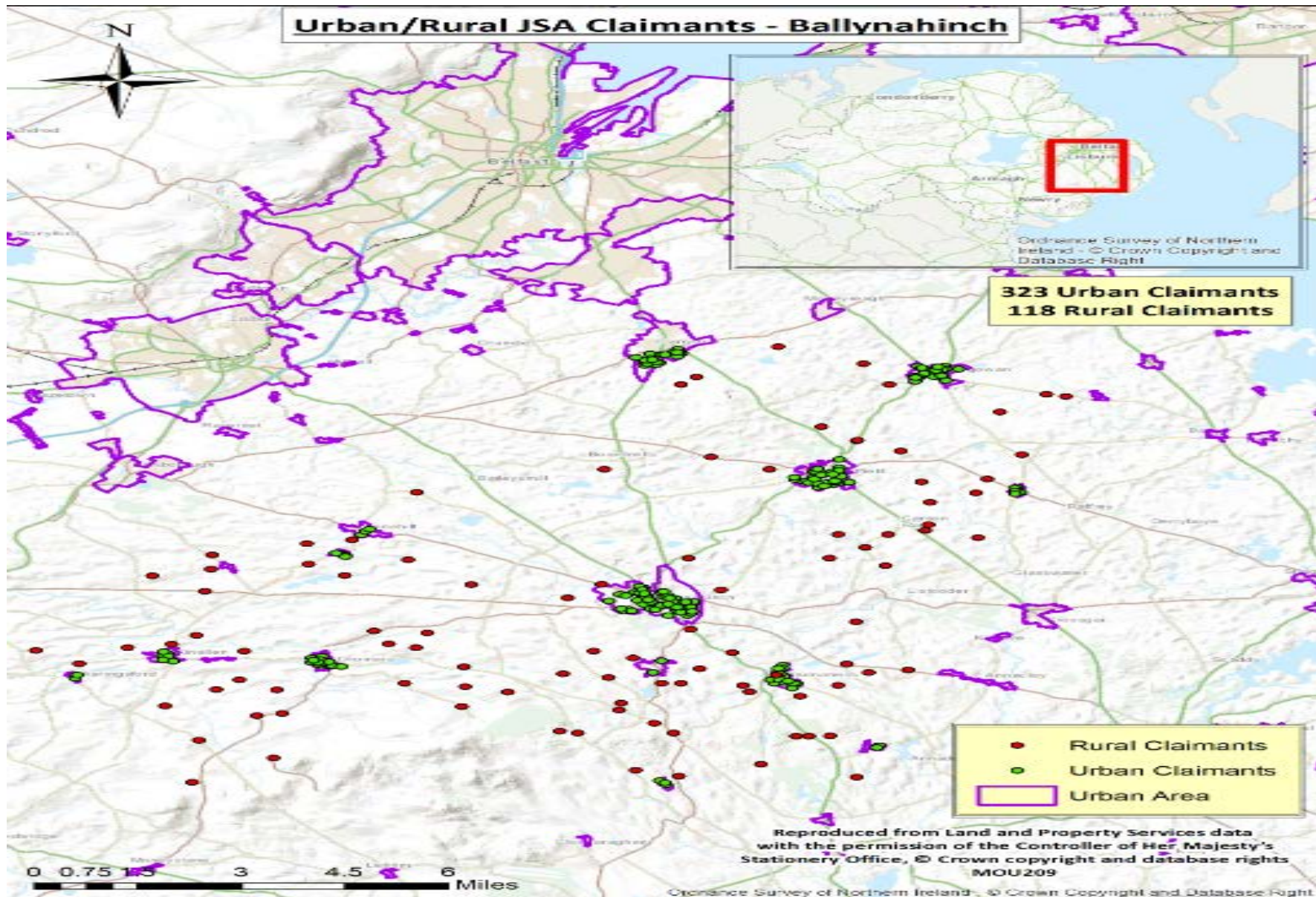
The Department will use any evidence provided in the response to the public consultation to inform further and if necessary review the Rural Impact Assessment.

Statistical classification of settlements

ANNEX A

Label	Name	Settlement Population Size (2001 Census)
Band A:	Belfast Metropolitan Urban Area (BMUA)	c580,000
Band B:	Derry Urban Area (DUA)	c90,000
Band C:	Large Town	18,000 or more and under 75,000 (outside BMUA and DUA)
Band D:	Medium Town	10,000 or more and under 18,000 (outside BMUA and DUA)
Band E:	Small Town	5,000 or more and under 10,000 (outside BMUA and DUA)
Band F:	Intermediate Settlement	2,500 or more and under 5,000 (outside BMUA and DUA)
Band G:	Village	1,000 or more and under 2,500 (outside BMUA and DUA)
Band H:	Small village, hamlet and open countryside	Settlements of less than 1,000 people and open countryside (outside BMUA and DUA)







# Urban/Rural JSA Claimants - Cookstown



**284 Urban Claimants**  
**123 Rural Claimants**

- Rural Claimants
- Urban Claimants
- Urban Area

0 0.75 1.5 3 4.5 6 Miles

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