

Audit of Inequalities 2021- 2025 and Action Plan

Response from the Commissioner for Older People for Northern
Ireland

March 2022



Department of Agriculture, Environment and
Rural Affairs (DAERA)

Audit of Inequalities 2021-2025

and

Action Plan

Consultation Response Questionnaire

Responses must be received no later than midnight on
08 March 2022

BACKGROUND

Audit of Inequalities 2021-2025 and Action Plan

Section 75 of the Northern Ireland Act 1998 requires public bodies when carrying out their work to have due regard to the need to promote equality of opportunity between nine categories of persons:

- Between persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation;
- Between men and women generally;
- Between persons with a disability and persons without; and
- Between persons with dependants and persons without.

Public authorities must also have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.

In April 2010 the Equality Commission for Northern Ireland published new statutory guidance, 'Section 75 of the Northern Ireland Act 1998: A guide for Public Authorities'. The guidance recommends that public authorities should undertake an audit of inequalities by examining their functions and how these relate to the promotion of equality and good relations. Specific actions to address the inequalities identified should then be set out in an action plan, and these actions linked to the authority's corporate planning cycle.

The audit of inequalities is additional and complementary to the development of an equality scheme. It is intended to produce a more strategic picture of inequalities that a public authority may be in a position to influence, rather than examining inequalities on a policy by policy basis. It should be similar to other approaches undertaken by organisations to review and evaluate their

performance, to make decisions about the way forward and to prioritise actions over time.

It is a review and evaluation of existing reliable and verifiable data, both qualitative and quantitative, for each of the Section 75 equality and good relations categories.

The action plan is also intended as a basis for monitoring performance on equality measures, and for annual reporting to the Equality Commission.

Purpose

The attached questionnaire seeks your views on the draft Audit of Inequalities and related Action Plan.

Freedom of Information and UK GDPR

If you have indicated that you would be interested in contributing to this consultation then we might process your contact details to get in touch with you about your response.

We will process any other personal data provided in the responses for the purpose of informing the development of our policy, guidance or other regulatory work in the subject area of the request for views. In the case of consultations, we will publish a summary of the consultation responses and, in some cases, the responses themselves but these will not contain any personal data.

The lawful basis we are relying on to process your personal data is article 6(1)(e) of the UK GDPR, which allows us to process personal data when this is necessary for the performance of our public tasks in our capacity as a regulator.

Before you submit your response, please read Appendix 1 about the effect of the Freedom of Information Act 2000 on the confidentiality of responses to public consultation exercises.

DEPARTMENT OF AGRICULTURE, ENVIRONMENT AND RURAL AFFAIRS

DRAFT AUDIT OF INEQUALITIES 2021-2025 AND ACTION PLAN

CONSULTATION QUESTIONNAIRE

The questionnaire can be completed by individual stakeholders, members of the public, or on behalf of a group or organisation.

Your Details

Name:	Robert Dempster
Job Title:	Policy & Research Officer
Organisation:	Commissioner for Older People Northern Ireland (COPNI)
Address:	Equality House, 7-9 Shaftesbury Square, Belfast, BT2 7DP
Tel:	028 9089 0892
E-mail:	info@copni.org

May we contact you should clarification be required on your response?

Yes

This Consultation Response Questionnaire has been provided to assist in the process, or you may submit a response in any format. Responses should be returned by email to equality@daera-ni.gov.uk or by posting to:

Staff Engagement, Equality, and Diversity Branch
Department of Agriculture, Environment and Rural Affairs

Ballykelly House
111 Ballykelly Road
Limavady
BT49 9HP

Responses must be received no later than midnight on
08 March 2022

Responses received after this date will only be considered in exceptional circumstances and with prior agreement from the Department.

Questions

1. Do you broadly agree that the draft AUDIT OF INEQUALITIES 2021-2025 identifies appropriate inequalities in relation to the functions of DAERA?

NO

If not, please explain why not, and add any further comments.

COPNI welcomes the audit and is encouraged by its identification of many of the issues facing older persons. However, there are a number of policy issues affecting older persons living in rural areas that COPNI would suggest including in the audit. These include:

Food poverty- Food poverty is defined as the inability to consume an adequate quality or enough food for health, in socially acceptable ways, or the uncertainty that one will be able to do so. Recent and ongoing academic studies are showing that this an issue is of particular concern for older people in NI, especially those living in rural areas where 33% of homes are occupied by older people¹.

Ulster University food poverty research carried out in 2019, found that of the 944 respondents reported that:

- One in three (34.4%) experienced at least one measure of food deprivation.
- One in three (35.7%) experienced at least one measure of food deprivation
- One in five (21.2%) reported experiencing at least one food poverty measure.

This research also found that one of the issues experienced by rural customers was access to shops and cheaper sources of food. A recent study in 2018 by the Social Market Foundation looked to identify possible food deserts in the UK. This data was then analysed, and it was found that in Northern Ireland less than 40% of lived people within a twelve-minute walk to a supermarket compared to average of 75% for the rest of the UK².

Digital Exclusion - Northern Ireland continues to have the highest proportion of internet non-users, standing at 14.2% as of 2021. Within Northern Ireland, Fermanagh and Omagh present the highest rates of poor broadband coverage of <2 Mbps, which is below the UK's broadband Universal Service Obligations (USO).

In Northern Ireland there is distinct link with ageing populations, rural areas, and access and ability to use digital services. For the whole of the UK, 80% of those who are offline are aged 50 and above, and 90% of those who cannot perform essential digital skills are over the age of 55. In Northern Ireland, 18% of the rural population are aged 65 and over⁵.

Banking and the move towards a cashless society - The independent Access to Cash Review, was established by UK Government to consider consumer requirements for cash over the next five to fifteen years. In its 2019 report it looked at the move towards a cashless society and the reduction in physical bank branches and the move towards online banking and the use of card payments.

The report found that rural communities are among the slowest to move to digital services and that they have a larger proportion of lower income, older and more vulnerable users, who still prefer or need to use cash. The report also found that earliest closures of ATMs and branches have been in remote and rural areas because activity levels and volumes tend to be lower than in busy urban areas and that these changes will have a range of negative impacts on those living in rural areas with older people being some of the worst affected⁶.

Fuel poverty and rural areas- Whilst reference is made to fuel poverty, greater focus could be given to the greater potential impact in rural areas. Recent research by National Energy Action (NEA) found that there were six common characteristics of rural areas that can exacerbate fuel poverty:

- Lower income levels.
- Limited connectivity (digital, transport, and social).
- Limited access to key services.
- Old, hard-to-treat housing stock.
- Distinct socio-demographics, especially ageing populations.
- The greater prevalence of more extreme weather conditions⁶.

Caring- The audit acknowledges the issues faced by informal carers. COPNI welcomes this, however, would ask that further consideration is given to the additional challenges faced by carers both formal and informal, such as less access to public transport or in some cases having to use private transport with the need to travel further and issues for lone carers working at night.

References:

1. <https://pure.ulster.ac.uk/en/publications/measuring-the-existence-and-extent-of-food-poverty>
2. <http://www.geofutures.com/food/where-are-the-uk-food-deserts/>
3. <https://www.gov.uk/government/collections/national-diet-and-nutrition-survey>
4. <https://www.assemblyresearchmatters.org/2021/11/16/an-overview-of-the-digital-divide-in-northern-ireland/>
5. <https://www.accesstocash.org.uk/media/1087/final-report-final-web.pdf>
6. <https://www.nea.org.uk/wp-content/uploads/2021/10/NEA-Fuel-Poverty-Focus-October-2021-Online-2.pdf>

2. Do you broadly agree that the measures in the draft ACTION PLAN will have a positive impact on the Section 75 groups?

COPNI welcomes the audit and believes that achieving its goals will have a positive impact on S75 groups including older persons.

Note: it would be helpful if commenting on specific items within the draft plan to refer to the particular Measure in question.

COPNI welcomes this audit of inequalities and looks forward to the implementation of the measures proposed and the potential benefits for older persons living in rural areas. COPNI would ask that, to further improve upon these positive impacts that the Department takes into consideration the areas highlighted, as recommended in question 1. A summary of these is listed below:

- Food poverty.
- Digital exclusion.
- Banking and the move towards a cashless society.
- Fuel poverty and rural areas- The audit does reference fuel poverty but could give greater focus to the greater potential impact of fuel on rural areas.
- Caring - COPNI would ask that further consideration is given to the specific additional challenges faced by carers both formal and informal in rural areas.

THANK YOU FOR COMPLETING OUR QUESTIONNAIRE.

Appendix 1

FREEDOM OF INFORMATION ACT 2000 – CONFIDENTIALITY OF CONSULTATIONS

A summary of responses to this consultation will be published on the DAERA website at: www.daera-ni.gov.uk

The summary will include a list of organisations who responded but not personal names, addresses or other contact details. Your response, and all other responses to the consultation, may be disclosed on request. The Department can only refuse to disclose information in exceptional circumstances. Before you submit your response, please read the paragraphs below on the confidentiality of consultations and they will give you guidance on the legal position about any information given by you in response to this consultation.

Information provided in response to this consultation, including personal information, maybe made available to the public on request, in accordance with the requirements of the Freedom of Information Act 2000 (FOIA). DAERA may also publish the responses to the FOIA/EIR requests on www.daera-ni.gov.uk/

Section 8(e) of the Data Protection Act 2018 permits processing of personal data when necessary for an activity that supports or promotes democratic engagement. Information provided by respondents to this stakeholder engagement exercise will be held and used for the purposes of the administration of this current exercise and subsequently disposed of in accordance with the provisions of the Data Protection Act 2018 and the UK General Data Protection Regulation. For more information and to view the DAERA Privacy Statement please go to:

<https://www.daera-ni.gov.uk/publications/daera-privacy-statement-document>

The FOI Act gives the public a right of access to any information held by a public authority, namely, the Department in this case. This right of access to information includes information provided in response to a consultation. The Department cannot automatically consider as confidential, information supplied to it in response to a consultation. However, it does have the responsibility to decide whether any information provided by you in response to this consultation, including information about your identity should be made public or be treated as confidential. If you do not wish information about your identity to be made public please include an explanation in your response including any harm you believe such a disclosure might cause.

This means that information provided by you in response to the consultation is unlikely to be treated as confidential, except in very particular circumstances. The Lord Chancellor's Code of Practice on the FOI Act provides that:

- The Department should only accept information from third parties in confidence if it is necessary to obtain that information in connection with the exercise of any of the Department's functions and it would not otherwise be provided;
- The Department should not agree to hold information received from third parties "in confidence" which is not confidential in nature acceptance by the Department of confidentiality provisions must be for good reasons, capable of being justified to the Information Commissioner.

For further information about confidentiality of responses please contact the Information Commissioner's Office, or visit the ICO Website.

DAERA is the data controller in respect of any personal data that you provide, and

DAERA's Privacy Statement document, which gives details of your rights in respect of the handling of your personal data, can be found at:

<https://www.daera-ni.gov.uk/publications/daera-privacy-statement-document>

The consultation is open from 30 November 2021. This is a fourteen-week consultation therefore, responses should be received by mid-night 08 March 2022. Consultation responses may be emailed to equality@daera-ni.gov.uk

Or sent by post to:

Equality Unit
111 Ballykelly Road
Ballykelly
Limavady
BT49 9HF

This consultation is in line with consultation guidelines, which can be found at:

<https://www.nidirect.gov.uk/articles/public-consultations>

If you have any comments or complaints about the consultation process, please address them to the Equality Unit at the address above, or email them to equality@daera-ni.gov.uk

Copies of the consultation document can also be made available, on request, in alternative formats e.g. in large print, Braille, and other languages. Please contact 028 7744 2033 to arrange such copies, or to discuss the consultation more generally. For those with hearing difficulties, you can use the following services:

- Making a call from a textphone: Dial 18001 + 028 7744 2033



Commissioner for **Older People**
for Northern Ireland

- Making a call from a telephone: Dial 18002 + 028 7744 2033

We look forward to receiving your responses.