

Raising Concerns Policy

ARMAGH CITY BANBRIDGE CRAIGAVON BOROUGH COUNCIL		
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Sent out by:		Mark Parkinson
Approved by:		Mark Parkinson
Review Date:		February 2024

AMENDMENT RECORD SHEET

Remove and destroy old pages. Insert new pages as indicated.

Revision Number	Page Number	Date Revised	Description of Revision
		January 2022	Revised to take account of new organisational structure and changes in job titles and/or roles and responsibilities. Also includes reference to new protocol in relation to composition of the Fraud

			Investigation Team/Incident Investigation Team.
		January 2021	Policy revised to take account of the NIAO raising concern guidance that was published in June 2020. The main changes relates to a change in terminology from Whistleblowing to Raising Concerns, application of the policy to the wider public and appointment of raising concern champions.

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1. Introduction

- 1.1 Armagh City, Banbridge and Craigavon Borough Council is committed to the highest possible standards of openness, probity and accountability and will not tolerate malpractice or wrongdoing. In line with that commitment, the Council encourages workers and third parties with serious concerns about any aspect of the Council's work to come forward and voice those concerns without fear of reprisals. This policy document makes it clear that you can do so without the fear of victimisation, subsequent discrimination or disadvantage.
- 1.2 The Public Interest Disclosure (NI) Order 1998 (PIDO) came into operation in Northern Ireland in October 1999. The Order offers a framework of protection against victimisation or dismissal for workers within an organisation who 'blow the whistle' on criminal behaviour or wrongdoing. In accordance with the PIDO, workers must not suffer any detrimental treatment as a result of raising a concern.
- 1.3 As a result of legislation passed under the Employment Act (Northern Ireland) 2016 there has been an amendment to whistleblowing legislation which came into force at the start of October 2017. The main change is removal of the requirement for a disclosure to be made in good faith. Rather a disclosure must now be made in the public interest i.e. it must affect others such as the general public.
- 1.4 This Raising Concerns Policy is intended to encourage and enable workers and third parties to raise serious concerns within the Council rather than overlooking a problem. Raising Concerns is therefore essential to:
 - Safeguard the integrity of the organisation;
 - Safeguard worker's;
 - Safeguard the wider public; and
 - Prevent damage.

2. What the Policy Covers

- 2.1 This policy is intended to cover concerns which fall outside the scope of other procedures and included in or covered by other policies – **see Appendix 1** which shows the relationship between these policies. If your concern is about a possible fraud, you may also wish to refer to Council's Fraud Policy & Fraud Response Plan. Raising concerns differs from a grievance, which is a personal complaint regarding an employee's own employment situation. This Raising Concerns Policy is primarily for concerns where the interests of others or the Council itself is at risk. The individual raising the concern is usually not personally affected by the danger, wrongdoing or illegality. Consequently, the individual rarely has a personal interest in the outcome of the investigation into their concern - they are simply trying to alert others.
- 2.2 The policy covers both "workers" and other "third parties". A **worker** is considered to be anybody working for, with or on behalf of the Council. This includes full and part-time employees, temporary and casual staff, agency staff and contractors who are appointed to provide a service on behalf of Council. It also includes Council suppliers and those providing services via a contract to Council. **Third parties** can include service users, members of the public or volunteers. The process of considering and investigating the concern should be largely the same as if the issue was raised by a worker. However workers have a legal remedy if they suffer detriment as a result of raising a concern in the public interest but a third party will not have a legal remedy under employment law if they suffer detriment as a result of raising a concern.

2.3 Concerns can be raised about any issue relating to suspected malpractice, risk, abuse or wrongdoing. Individuals need only have a reasonable belief that the issue has occurred, is occurring or is likely to occur in the future. It is best to raise the concern as early as possible, even if it is only a suspicion, to allow the matter to be looked into promptly. The Council encourages workers and third parties to raise concerns internally. The following list illustrates the types of issues that may be raised:

- The abuse of children and/or vulnerable adults (physical or psychological);
- Health and Safety risks, either to the public or other employees;
- Any unlawful act (e.g. theft);
- The unauthorised use of public funds;
- A breach of the Employee Code of Conduct;
- Failing to safeguard personal and/or sensitive information (data protection);
- Damage to the environment;
- Fraud and corruption;
- Abuse of power;
- Poor value for money;
- Other unethical conduct; and
- Any deliberate concealment of information tending to show any of the above.

2.4 In the UK, the Bribery Act creates a corporate offence of failing to prevent bribery. In order to defend a charge of failing to prevent bribery an organisation must be able to demonstrate that it had adequate procedures in place. The provision of effective raising concern facilities is widely considered to be a key element of adequate procedures for most organisations.

2.5 This policy aims to:

- Encourage workers and third parties to raise concerns with Council as soon as possible, in the knowledge that their concerns will be taken seriously and may be investigated as appropriate, and that their confidentiality will be respected;
- Make workers and third parties feel confident to raise concerns within the Council rather than overlooking a problem or highlighting the issue to the media or other public bodies;
- Give workers and third parties avenues to raise concerns and receive feedback on any action taken;
- Inform workers and third parties on how to take the matter further if they are dissatisfied with the response; and
- Reassure workers that they will be protected from reprisal or victimisation for raising the concern if they believe that it is in the public interest.

Openness/Confidentiality and Anonymity

2.6 A concern can be raised openly, confidentially or anonymously. In most cases, the best way to raise a concern is to do so openly.

2.7 Openness makes it easier to address the issue, work out how to investigate the matter, understand the reasons for concern and get more information. This policy encourages individuals to put their name to the allegation. Whilst it is possible to raise such matters anonymously, individuals should not feel inhibited in identifying themselves. If an individual requests that their identity should not be disclosed, the Council will not disclose it without consent unless required by law. If the situation arises where a concern cannot be investigated or resolved without revealing the individual's identity, or if there is a legal imperative to disclose the identity, the Council will discuss this with the individual and decide how the issue will be progressed.

2.8 Where confidentiality is not possible or cannot be maintained, we will not tolerate detriment or harassment. We will take action to protect the individual when they raise a concern and

will treat any detriment or harassment as a serious disciplinary offence to be treated under the Council's Disciplinary Policy and Procedure.

2.9 Concerns expressed anonymously are more difficult to investigate and harder to substantiate as further liaison with the individual is not possible. Anyone thinking of making a disclosure should bear in mind that anonymity does not stop others from speculating about who raised the concern and it will not be possible to provide details of the outcome of any investigation into an anonymous disclosure. A number of disadvantages to raising concerns anonymously, include:

- Detailed investigations may be more difficult, or even impossible, to progress if an individual chooses to remain anonymous and cannot be contacted for further information.
- The information and documentation provided may not easily be understood and may need clarification or further explanation.
- There is a chance that the documents provided might reveal your identity.
- It may not be possible to remain anonymous throughout an in-depth investigation.
- It may be difficult to demonstrate to a tribunal that any detriment suffered is as a result of raising a concern.

2.10 Given these inherent difficulties, the Council will exercise discretion in deciding whether or not to investigate anonymous allegations. The factors to be taken into account include:

- The seriousness of the issue(s) raised;
- The credibility of the allegations;
- The likelihood of confirming the allegation from attributable sources; and
- Whether the allegations have been investigated before.

Malicious and vexatious allegations

2.11 While encouraging individuals to bring forward matters of concern, the Council must guard against claims which are untrue. There is a risk of claims made to deliberately damage the reputation of other individuals or the Council.

2.12 If an individual makes an allegation, but it is not confirmed by the investigation, no action will be considered or taken against them. It will always be assumed that concerns have been raised in good faith unless there is evidence to the contrary. However if an allegation is made for an ulterior and undesirable purpose, it will be deemed not to have been made in the public interest. Therefore if the investigation concludes that an individual who is employed by Council makes malicious or vexatious allegations this will be treated as a serious disciplinary offence and disciplinary action will be taken under the Council's Disciplinary Policy.

3. Raising Concerns

How to raise a concern

3.1 Once an individual has decided to raise a concern, it can be expressed either verbally or in writing. Concerns are better raised in writing. The concern should set out the background and history of the concern giving names, dates and places where possible, and the reason why the individual is particularly concerned about the situation.

Option 1 – Manager

3.2 As a worker you should initially raise your concerns with your line manager or the relevant contract manager/contact point within Council if appropriate. This can be done either verbally

or in writing. The Manager concerned should then report the concern to the Head/Senior Manager within the Human Resources & Organisational Development Department or the Internal Audit Manager.

Option 2 – Senior, Designated Officers

- 3.3 If, for whatever reason, you feel that raising it with your line manager or relevant contract manager/point of contact in Council is not appropriate please raise the matter with the Internal Audit Manager or the Head/Senior Manager within the Human Resources & Organisational Development Department.
- 3.4 If the above channels have been followed and you still have concerns, or if you feel that the matter is so serious that you cannot discuss it with any of the above, you can raise your concern directly with the Chief Executive or Chair of the Performance & Audit Committee.

Option 3 – Raise your concerns with a Regulator

- 3.5 It is recognised that there may be circumstances where you may wish to raise a concern to an outside body such as a regulator. You can seek independent advice from an experienced organisation before reporting the concern. *Protect* is an independent, charitable organisation that runs a free, confidential advice line. They can advise you on how to safely and effectively raise a concern and can be contacted on 020 31172520 or you can email their helpline whistle@protect-advice.org.uk.
- 3.6 The Local Government Auditors (including the NIAO) have been prescribed as persons to whom protected disclosures can be made under the Public Interest Disclosure (NI) Order 1998. Prescribed persons are responsible for investigations of allegations that fall under their jurisdiction and protecting whistleblowers and their interests. More information can be obtained from the Northern Ireland Audit Office (NIAO) on 028 90251000 or at niauditoffice.gov.uk

Third Parties

- 3.7 Third Parties such as a member of the public can raise concerns directly with the Council. The nature of the issue raised will determine the policy under which the Council will consider the matter. Concerns will be treated seriously and be dealt with in the same way as concerns raised by workers of the Council. It is the issue being raised which is important, not the person raising it.

Third parties can email their concerns to complaints@armaghbanbridgecraigavon.gov.uk or telephone the Internal Audit Section on 0300 0300 900.

4. Council Response Plan

- 4.1 When a formal concern has been raised, there will be a prompt, swift, proportionate, investigation to establish the facts. The Council will (so long as you have not submitted your concern anonymously) write or email to you detailing:-
- Acknowledgement that the concern has been received (where possible);
 - How the Council proposes to deal with the matter; and the policy under which it will be investigated;
 - Offer the individual the opportunity to meet with a representative of the Council to fully discuss the issue and provide any evidence;
 - Contact details for the officer handling the investigation;
 - Arrangements for confidentiality;

- An estimate of how long it will take to provide a response on the outcome;
- Any initial enquiries which may have been made;
- If no action is planned, why not.

4.2 If you have any personal interest in the matter, please tell us at the outset. If your concerns fall more properly within the Grievance Procedure you will be advised by Human Resources. While the purpose of this policy is to enable us to investigate possible malpractice and take appropriate steps to deal with it, we will give you as much feedback as possible. Please note, however, that we may not be able to tell you the precise action we take where this would infringe a duty of confidence owed by us to someone else.

Initial Enquiries

4.3 In order to protect individuals and the Council, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Concerns or allegations which fall within the scope of other existing policies/procedures will normally be referred for consideration under those policies/procedures (refer to Appendix 1). It may not be necessary to carry out a formal investigation in every case, for example:

- Explaining the context of an issue to the person raising the concern may be enough to alleviate their concerns;
- Minor concerns may be dealt with straight away by line management;
- A review by Internal Audit as part of planned audit work might be sufficient to address the issue.

4.4 The action taken by Council will depend on the nature of the concern. The matters raised may be:

- Investigated internally;
- Referred to the police or other statutory agencies; or
- Referred to the Local Government Auditor (Northern Ireland Audit Office).

The course of action will normally be agreed by the Fraud Investigation Team (FIT) or Incident Investigation Team in consultation with senior departmental management as appropriate in line with the FIT protocol.

Monitoring of concerns raised

4.5 Where a concern involves a serious issue or incident or where there is a disagreement about the seriousness of the concern Council has a formal mechanism for logging it, processing it and monitoring how it is being handled. Internal Audit will maintain a log and this will provide a clear trail for future reference and avoidance of dispute, and also helps to identify trends, common issues and patterns to enhance organisational learning.

Detailed Investigation

4.6 The amount of contact between the person raising the concern and the investigating officer considering the issues will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, the investigating officer will seek further information from the person raising the concern. Where any meeting is arranged, this can be off-site if you wish and you can be accompanied by a trade union or fellow employee.

4.7 The Council accepts that the person raising the concern needs to be assured that the matter has been properly addressed. Subject to legal constraints, Council will inform the individual of the outcomes of any investigation indicating:

- The Council's findings in relation to the investigation; and
- The action the Council proposes to take.

5. How the Matter Can be Taken Further

5.1 While we cannot always guarantee the outcome that you may be seeking as a result of raising the matter with us, we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this. The Council hopes that individuals will be satisfied with any action taken. If they are not, and they feel it is right to take the matter outside the Council, the following are possible contact points:

- The Commissioner of Complaints;
- The Northern Ireland Audit Office (NIAO);
- Relevant professional bodies or regulatory organisations;
- Your solicitor;
- The Police Service Northern Ireland; or
- Trade Union in relation to workers.

5.2 One possibility is that you may wish to rely on your rights under the Public Interest Disclosure (NI) Order 1998. This Act gives you protection from victimisation if you make certain disclosures of information in the public interest. The provisions are quite complex and include a list of prescribed people outside of the Council who can be contacted in certain circumstances. You should seek advice from your solicitor, your local Citizens Advice Bureau, the Ombudsman or Protect (Raising Concern Charity).

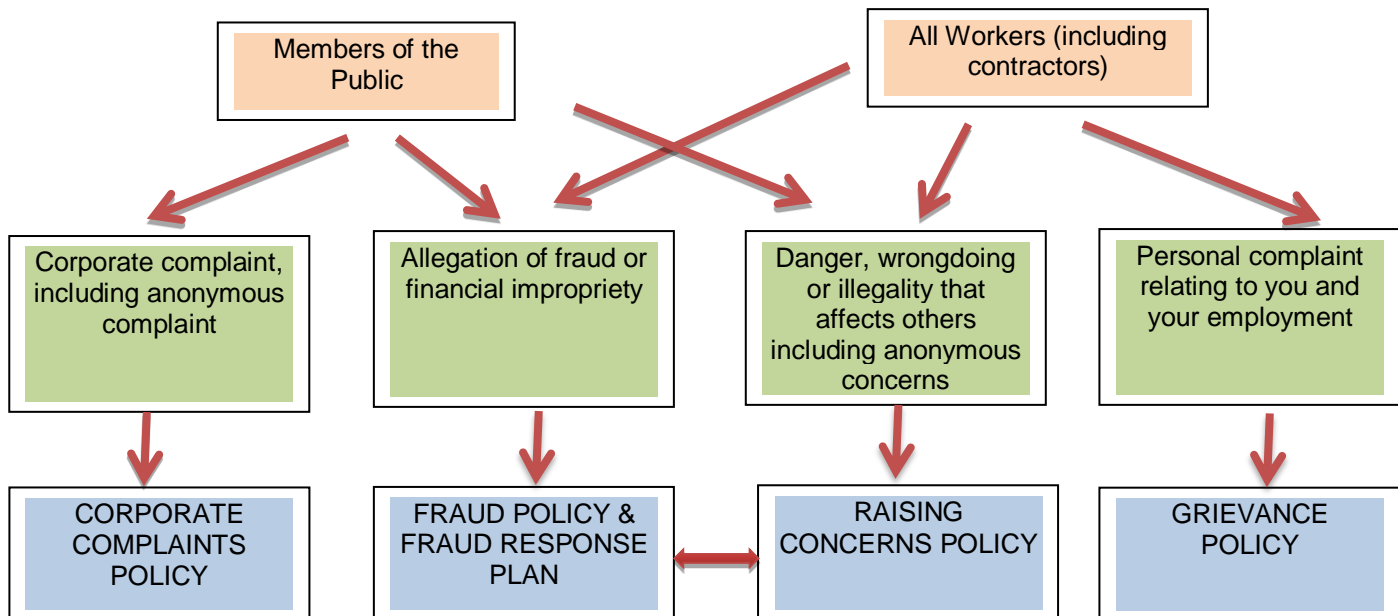
5.3 If you take the matter outside Council, you should make sure that you do not disclose confidential information or that disclosure would be privileged.

6. Support and Advice

6.1 Advice and guidance on how matters of concern may be pursued can be obtained from the Human Resources Operations Manager or the Internal Audit Manager. You can get confidential, independent advice from the charity Protect on 020 31172520. You can also email them for advice at the following address: whistle@protect-advice-org.uk.

Appendix 1 –Route Map

The diagram below provides an overview of the relationship between corporate complaints, fraud and raising concerns policies/procedure and the grievance policy. Note that only employees and workers are protected by whistleblowing legislation.



Policy Screening Form

Policy Scoping**Policy Title: Raising Concerns Policy****Brief Description of Policy (please attach copy if available). Please state if it is a new, existing or amended policy.**

Workers in NI now enjoy the protection of the Public Interest Disclosure (NI) Order 1998. The policy describes the protection that individuals who make certain disclosures in the public interest now have. The policy seeks to promote better accountability and more efficient regulatory oversight.

Intended aims/outcomes. What is the policy trying to achieve?

Compliance with up to date legislation.

Policy Framework

Has the policy been developed in response to statutory requirements, legal advice or on the basis of any other professional advice? Does this affect the discretion available to Council to amend the policy?

Following the Mid Staffordshire NHS Foundation Trust Public Inquiry the resulting Francis Report recommended adopting constructive attitudes toward whistle-blowers and as a result there has been a change in regard to Whistleblowing legislation in Northern Ireland to bring it into line with the rest of the UK. As a result of the legislation passed under the Employment Act (Northern Ireland) 2016, amendment to Whistleblowing legislation came into force at the start of October 2017.

Are there any Section 75 categories which might be expected to benefit from the policy? If so, please outline.

This policy will affect all stakeholders equally regardless of what equality group they fall within

Who initiated or wrote the policy (if Council decision, please state). Who is responsible for implementing the policy?

Who initiated or wrote policy? Internal Audit/HR &OD Department	Who is responsible for implementation? Chief Executive and Executive Management Team.
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Are there any factors which might contribute to or detract from the implementation of the policy (e.g. financial, legislative, other)?

None foreseen.

Main stakeholders in relation to the policy

Please list main stakeholders affected by the policy (e.g. staff, service users, other statutory bodies, community or voluntary sector, private sector)

All Council workers and third parties.

Are there any other policies with a bearing on this policy? If so, please identify them and how they impact on this policy.

Code of Conduct for employees
Disciplinary Policy
Fraud Policy

Available Evidence

Council should ensure that its screening decisions are informed by relevant data. What evidence/information (both qualitative and quantitative) have you gathered to inform this policy? Specify details for each of the Section 75 categories.

Section 75 category	Evidence
Religious belief	N/A
Political opinion	N/A
Racial group	N/A
Age	N/A
Marital status	N/A
Sexual orientation	N/A
Men and women generally	N/A
Disability	N/A
Dependants	N/A

Needs, experiences and priorities

Taking into account the information gathered above, what are the different needs, experiences and priorities of each of the following categories in relation to this particular policy/decision?

Section 75 category	Needs, experiences and priorities
Religious belief	N/A
Political opinion	N/A
Racial group	N/A
Age	N/A
Marital status	N/A

Sexual orientation	N/A
Men and women generally	N/A
Disability	N/A
Dependants	N/A

Screening Questions

1. What is the likely impact on equality of opportunity for those affected by this policy for each of the Section 75 categories?

Category	Policy Impact	Level of impact (Major/minor/none)
Religious belief	None	
Political opinion	None	
Racial group	None	
Age	None	
Marital status	None	
Sexual orientation	None	
Men and women generally	None	
Disability	None	
Dependents	None	

2. Are there opportunities to better promote equality of opportunity for people within the Section 75 categories?

Category	If yes, provide details	If no, provide reasons
Religious belief	None	N/A
Political opinion	None	N/A
Racial group	None	N/A
Age	None	N/A
Marital status	None	N/A
Sexual orientation	None	N/A
Men and women generally	None	N/A
Disability	None	N/A
Dependents	None	N/A

3. To what extent is the policy likely to impact on good relations between people of different religious belief, political opinion, or racial group?

Category	Details of Policy Impact	Level of impact (major/minor/none)
Religious belief	None	None
Political opinion	None	None
Racial group	None	None

4. Are there opportunities to better promote good relations between people of different religious belief, political opinion or racial group?

Category	If yes, provide details	If no, provide reasons
Religious belief	None	N/A

Political opinion	None	N/A
Racial group	None	N/A

Multiple Identity

Generally speaking, people fall into more than one Section 75 category (for example: disabled minority ethnic people; disabled women; young Protestant men; young lesbian, gay and bisexual people). Provide details of data on the impact of the policy on people with multiple identities. Specify relevant s75 categories concerned.

This policy will affect all stakeholders equally regardless of what equality category they fall within.

Disability Discrimination (NI) Order 2006

Is there an opportunity for the policy to promote positive attitudes towards disabled people?

N/A

Is there an opportunity for the policy to encourage participation by disabled people in public life?

N/A

Screening Decision

A: NO IMPACT IDENTIFIED ON ANY CATEGORY – EQIA UNNECESSARY

Please identify reasons for this below

This is a technical policy with no bearing in terms of its likely impact on equality of opportunity or good relations for people within the equality and good relations categories.

B: MINOR IMPACT IDENTIFIED – EQIA NOT CONSIDERED NECESSARY AS IMPACT CAN BE ELIMINATED OR MITIGATED

Where the impact is likely to be minor, you should consider if the policy can be mitigated or an alternative policy introduced. If so, EQIA may not be considered necessary. You must indicate the reasons for this decision below, together with details of measures to mitigate the adverse impact or the alternative policy proposed.

C: MAJOR IMPACT IDENTIFIED – EQIA REQUIRED

If the decision is to conduct an equality impact assessment, please provide details of the reasons.

Timetabling and Prioritising

If the policy has been screened in for equality impact assessment, please answer the following questions to determine its priority for timetabling the equality impact assessment.

On a scale of 1-3 with 1 being the lowest priority and 3 being the highest, assess the policy in terms of its priority for equality impact assessment.

Priority criterion	Rating (1-3)
Effect on equality of opportunity and good relations	
Social need	
Effect on people's daily lives	

The total rating score should be used to prioritise the policy in rank order with other policies screened in for equality impact assessment. This list of priorities will assist the council in timetabling its EQIAs.

Is the policy affected by timetables established by other relevant public authorities? If yes, please give details.

Monitoring

Effective monitoring will help the authority identify any future adverse impact arising from the policy. It is recommended that where a policy has been amended or an alternative policy introduced to mitigate adverse impact, monitoring be undertaken on a broader basis to identify any impact (positive or adverse).

Further information on monitoring is available in the Equality Commission's guidance on monitoring

Identify how the impact of the policy is to be monitored

Approval and Authorisation

A copy of the screening form for each policy screened should be signed off by the senior manager responsible for that policy. The screening recommendation should be reported to the relevant Committee/Council when the policy is submitted for approval.

Screened by	Position/Job title	Date
Carol Rafferty	Internal Audit Manager	November 2021
Approved by	Position/Job Title	Date
Mark Parkinson	Deputy Chief Executive	November 2021

Please forward a copy of the completed form with policy attached to mary.hanna@armaghbanbridgescraigavon.gov.uk who will ensure that screening forms and policies are available on the Council website.

This officer is also responsible for issuing reports on a quarterly basis on those policies “screened out for EQIA”. This allows stakeholders who disagree with this recommendation to submit their views. In the event of any stakeholder disagreeing with the decision to screen out any policy, the screening exercise will be reviewed.

Appendix I - Rural Needs Impact Assessment (RNIA) Template

SECTION 1 - Defining the activity subject to Section 1(1) of the Rural Needs Act (NI) 2016

1A. Name of Public Authority.

Armagh City, Banbridge & Craigavon Borough Council

1B. Please provide a short title which describes the activity being undertaken by the Public Authority that is subject to Section 1(1) of the Rural Needs Act (NI) 2016.

Raising Concerns Policy

1C. Please indicate which category the activity specified in Section 1B above relates to.

Developing a	Policy <input type="checkbox"/>	Strategy <input type="checkbox"/>	Plan <input type="checkbox"/>
Adopting a	Policy <input type="checkbox"/>	Strategy <input type="checkbox"/>	Plan <input type="checkbox"/>
Implementing a	Policy <input type="checkbox"/>	Strategy <input type="checkbox"/>	Plan <input type="checkbox"/>
Revising a	Policy <input checked="" type="checkbox"/>	Strategy <input type="checkbox"/>	Plan <input type="checkbox"/>
Designing a Public Service	<input type="checkbox"/>		
Delivering a Public Service	<input type="checkbox"/>		

1D. Please provide the official title (if any) of the Policy, Strategy, Plan or Public Service document or initiative relating to the category indicated in Section 1C above.

Raising Concerns Policy

1E. Please provide details of the aims and/or objectives of the Policy, Strategy, Plan or Public Service.

Workers in NI now enjoy the protection of the Public Interest Disclosure (NI) Order 1998. The policy describes the protection that individuals who make certain disclosures in the public interest now have. The policy seeks to promote better accountability and more efficient regulatory oversight.

1F. What definition of 'rural' is the Public Authority using in respect of the Policy, Strategy, Plan or Public Service?

Population Settlements of less than 5,000 (Default definition).

Other Definition (Provide details and the rationale below).

A definition of 'rural' is not applicable.

Details of alternative definition of 'rural' used.

N/A

Rationale for using alternative definition of 'rural'.

N/A

Reasons why a definition of 'rural' is not applicable.

No impact on the social and economic needs of people living in rural areas.

SECTION 2 - Understanding the impact of the Policy, Strategy, Plan or Public Service

2A. Is the Policy, Strategy, Plan or Public Service likely to impact on people in rural areas?

Yes No If the response is **NO** GO TO Section **2E**.

2B. Please explain how the Policy, Strategy, Plan or Public Service is likely to impact on people in rural areas.

No impact on the social and economic needs of people living in rural areas.

2C. If the Policy, Strategy, Plan or Public Service is likely to impact on people in rural areas *differently* from people in urban areas, please explain how it is likely to impact on people in rural areas differently.

N/a

2D. Please indicate which of the following rural policy areas the Policy, Strategy, Plan or Public Service is likely to primarily impact on.

Rural Businesses	<input type="checkbox"/>
Rural Tourism	<input type="checkbox"/>
Rural Housing	<input type="checkbox"/>
Jobs or Employment in Rural Areas	<input type="checkbox"/>
Education or Training in Rural Areas	<input type="checkbox"/>
Broadband or Mobile Communications in Rural Areas	<input type="checkbox"/>
Transport Services or Infrastructure in Rural Areas	<input type="checkbox"/>
Health or Social Care Services in Rural Areas	<input type="checkbox"/>
Poverty in Rural Areas	<input type="checkbox"/>
Deprivation in Rural Areas	<input type="checkbox"/>
Rural Crime or Community Safety	<input type="checkbox"/>
Rural Development	<input type="checkbox"/>
Agri-Environment	<input type="checkbox"/>
Other (Please state)	<input type="text"/>

If the response to Section 2A was YES GO TO Section 3A.

2E. Please explain why the Policy, Strategy, Plan or Public Service is NOT likely to impact on people in rural areas.

No impact on the social and economic needs of people living in rural areas.

SECTION 3 - Identifying the Social and Economic Needs of Persons in Rural Areas

3A. Has the Public Authority taken steps to identify the social and economic needs of people in rural areas that are relevant to the Policy, Strategy, Plan or Public Service?

Yes No If the response is **NO** GO TO Section **3E**.

3B. Please indicate which of the following methods or information sources were used by the Public Authority to identify the social and economic needs of people in rural areas.

Consultation with Rural Stakeholders	<input type="checkbox"/>	Published Statistics	<input type="checkbox"/>
Consultation with Other Organisations	<input type="checkbox"/>	Research Papers	<input type="checkbox"/>
Surveys or Questionnaires	<input type="checkbox"/>	Other Publications	<input type="checkbox"/>
Other Methods or Information Sources (include details in Question 3C below).			<input type="checkbox"/>

3C. Please provide details of the methods and information sources used to identify the social and economic needs of people in rural areas including relevant dates, names of organisations, titles of publications, website references, details of surveys or consultations undertaken etc.

3D. Please provide details of the social and economic needs of people in rural areas which have been identified by the Public Authority?

If the response to Section 3A was **YES** GO TO Section 4A.

3E. Please explain why no steps were taken by the Public Authority to identify the social and economic needs of people in rural areas?

No impact on the social and economic needs of people living in rural areas.

SECTION 4 - Considering the Social and Economic Needs of Persons in Rural Areas

4A. Please provide details of the issues considered in relation to the social and economic needs of people in rural areas.

N/A

SECTION 5 - Influencing the Policy, Strategy, Plan or Public Service

5A. Has the development, adoption, implementation or revising of the Policy, Strategy or Plan, or the design or delivery of the Public Service, been influenced by the rural needs identified?

Yes No If the response is **NO** GO TO Section **5C**.

5B. Please explain how the development, adoption, implementation or revising of the Policy, Strategy or Plan, or the design or delivery of the Public Service, has been influenced by the rural needs identified.

If the response to Section **5A** was **YES** GO TO Section **6A**.

5C. Please explain why the development, adoption, implementation or revising of the Policy, Strategy or Plan, or the design or the delivery of the Public Service, has NOT been influenced by the rural needs identified.

No impact on the social and economic needs of people living in rural areas.

SECTION 6 - Documenting and Recording

6A. Please tick below to confirm that the RNIA Template will be retained by the Public Authority and relevant information on the Section 1 activity compiled in accordance with paragraph 6.7 of the guidance.

I confirm that the RNIA Template will be retained and relevant information compiled.

Rural Needs Impact Assessment	Carol Rafferty
undertaken by:	
Position/Grade:	Internal Audit Manager
Division/Branch:	Internal Audit, Chief Executives Office
Date:	November 2021
Rural Needs Impact Assessment approved by:	Mark Parkinson
Position/Grade:	Deputy Chief Executive
Division/Branch:	
Signature:	Mark Parkinson
Date:	November 2021