

Public Consultation on 'the use of 'online' as the primary channel of communicating and transacting between DARD and its customers.'

[Department for Agriculture and Rural Development]

Consultation Response from Fermanagh and Omagh District Council.

Fermanagh and Omagh District Council (Council) welcomes the opportunity to respond to the Department for Agriculture and Rural Development's (DARD) public consultation on 'the use of 'online' as the primary channel of communicating and transacting between DARD and its customers'.

Brief Background for Fermanagh and Omagh District Council

The District Council area is home to 114,992 people (as of 30 June 2014). The District Council area is Northern Ireland's largest region in terms of land mass - approximately 3,000km², or 20% of NI - and the smallest in terms of population. As a result, the population density of approximately 41 people per km² is the sparsest in NI. This is a feature of the region which also provides challenges to service delivery.

Consultation Feedback

Fermanagh and Omagh District Council (Council) welcomes this consultation and in general the pursuit of DARD to streamline its services in order to meet budgetary requirements, as well as providing a quicker more efficient service for its customers - both the general public, farmers and other organisations.

The Council, in recent times, has also encouraged residents to interact with it via online communication channels; however in rural areas, such as the Fermanagh and Omagh District, there is unique challenges that must be overcome.

The Fermanagh and Omagh District Council area is predominantly rural, and many areas within the district being classed as significantly rural and isolated. For example, 14 Wards within the District appear within the 'Top 50' most deprived areas within Northern Ireland with regards to 'Proximity to Services', including 5 in the 'Top 10' [all statistics provided by NISRA].

Online vs Traditional Communication

In relation to DARD's statements:

- Online communication will be the primary channel of communication.
- Use of paper communication will be secondary.

Council believes that the inclusion of 'paper communication' or 'traditional communication' is vital, and must continue to be accepted, not only in the short term but also in the long term. There are many reasons why this acceptance of 'paper

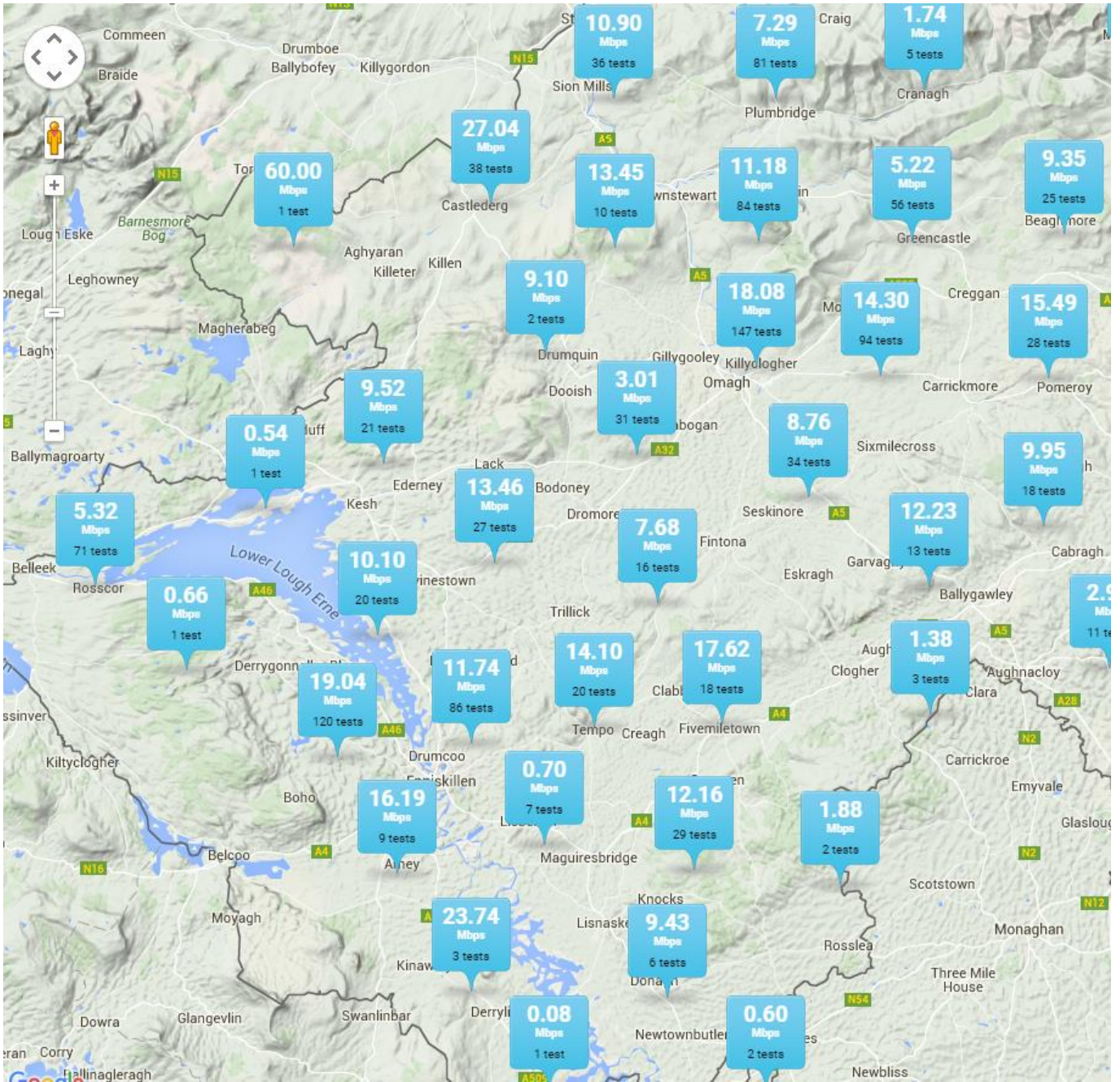
communication' should be accepted and this will be explored throughout this Consultation Response.

Broadband Speeds

Broadband within Northern Ireland has been widely debated topic, with many believing we are not as well equipped as other parts of the UK. Indeed, it is widely believed that rural parts of Northern Ireland are discriminated against with regards to broadband speeds and availability.

The average broadband speed within the UK is estimated to be **22.8 MBps** as stated by OFCOM in February 2015, which is a substantial increase from the average 18.7 MBps which was estimated in May 2014.

Clearly, broadband speeds across the UK are increasing. However, this provides quite a worrying issue for Northern Ireland, in particular rural areas such as much of the Fermanagh and Omagh District. The below image (Image 1) shows the estimated broadband speeds for the Fermanagh and Omagh District. It is clear to see from Image 1, that no area within the District is averaging broadband speeds anywhere close to the UK average. The only two areas on the image which are averaging 'higher than the UK' average are outside of the Fermanagh and Omagh Council District, and are located in the Derry City and Strabane District Council area.



(Image 1 – Average Broadband Speeds)

[Source: Think Broadband]

Therefore, evidence shows that rural areas of the District are extremely disadvantaged when it comes to broadband provision and speed, with some areas of the Erne West, Erne North and Erne East Wards having almost no broadband coverage whatsoever.

With regards to DARD trying to primarily communicate with their customers via online methods, this is an issue that will have to be considered and explored. Perhaps one way that DARD could counter this would be to work with other organisations in an attempt to obtain a greater investment in broadband for rural areas.

it does not automatically mean that they are regularly online. Many farmers use the services of agents, neighbours or family members in order to complete on-line documentation. The very fact, outlined above, that broadband speeds and availability are poor may mean that this person may only check their online accounts (email and so forth) on an irregular basis. Therefore, if all DARD correspondence is sent to their email accounts they may miss the information or key deadlines which will ultimately have a detrimental impact on the farmer.

Council recommends that the Department could counter by asking the customer when they are submitting information online, how they wish to be contacted going forward - online, telephone or via traditional post. This would then allow the individual to make a personal choice about receiving information in the way they feel is most suitable for them, even if they continue to submit their applications (or other) online.

De-localisation of the CAP Single Applications

Council notes with concern the proposal that all 'posted' Application Forms will have to be posted to Orchard House in Derry/Londonderry. No longer will these Forms be accepted in local DARD Direct Offices, for example in Inishkeen House (Enniskillen) or Sperrin House (Omagh). Many local farmers call into their local DARD offices for information/assistance and this 'personal' touch will be lost. For some farmers, who may live on their own in a rural/isolated area, this may have been one of the few instances during the week when they had face-to-face contact with other people. This service, or opportunity, will be lost if the proposals in the Consultation Document are achieved.

One of the core aims of the Department (as outlined in the Consultation Documents) is to 'provide customers with a better service'. The Council believes that this 'de-localisation' will not provide **all** customers with a better service and recommends further consideration of this proposal.

Targets

Within the document, the Department continually mentions using online as a 'primary means of communication' and other phrases such as getting '...most of our customers to apply for their farm payments and update their livestock records online by 2018...'. However, there no clarity about performance targets; what percentage does the Department believe it will achieve by 2018? Will 'most of our customers' be 51%, or will it be a higher percentage for example 75%?

The Council believes that for the Department to achieve a high percentage of customers using online communication, it is necessary for other measures to be explored and put in place, for example the previously mentioned improvements in broadband speeds/availability, possible training, as well as assistance/guidance being made available for customers when filling out the online forms.

The Council believes that it is essential that the Department sets SMART targets going forward with regards to 'Online Communication'. It is not practicable to simply state a 'majority of customers by 2018'. The Department should put forward a set number/percentage as a target which would give the Department's staff and departments an idea of what sort of reduction in paper applications / communication they should expect to receive over the next number of years.

Department of Agriculture and Rural Development Jobs

Council also has particular concerns in relation to paragraph 4.10.

'...there will be a large degree of change in how individual staff, perform their duties and eventually there could be the potential of some job losses but this cannot be determined until systems are fully developed and processes changed.'

Potential job losses within the DARD Direct Offices such as those based in Inishkeen House or Sperrin House would have a significant impact on the local community as well as the local economy within rural areas, with significant impacts on spending within local economies, services and amenities.

Council strongly recommends that further consultation on any proposal to reduce jobs in the future must be undertaken, and that ongoing dialogue is maintained with both staff and the Trades Unions involved.

Customers of Various Ages

It is clear from the information on the Consultation Documents, that although DARD's farmers vary in age, background, and marital status quite a substantial number would be over 57 years of age and therefore considered "older people".

Council would highlight the implications of the court cases involving HMRC where the judges held that mandatory online filing without providing any exemptions for older people, people with a disability or those living in parts of the country too remote for broadband access was unlawful.

The Council also feels it is worth noting that not all of DARD's customers (i.e. farmers) are from a background which would necessitate knowledge of computers and/or online communication, and this is something the Department must consider in the implementation phase.

Assistance / Guidance Available

The Council is supportive of the level of assistance and guidance which it is making available for its customers, including: training, telephone assistance/helpline, face-to-face assistance, and so forth. This will provide customers/farmers an opportunity to increase their skills and to partake in a much quicker and more effective online service.

The Council also urges the Department to continue this level of service assistance going forward indefinitely. There is the distinct possibility that each year, especially with ongoing promotion and an improvement in broadband provision, that more customers will make use of online communication methods.

Conclusion

To conclude, Fermanagh and Omagh District Council welcomes the Public Consultation Process as well as the Department's efforts to streamline its services to meet budgetary constraints and recommends that the Department gives further consideration to the issues raised in this consultation response document in an effort to improve future service provision.