

Series on Integrated Impact Assessment (IIA) 5-Example of the Practice of IIA in Northern Ireland

July 2014

This briefing note is the fifth in a series of six focused on the state of the practice of integrated impact assessment (IIA). These documents focus, respectively, on:

1. Overall situation and clarification of concepts
2. Example of the practice of IIA at the European Commission
3. Example of the practice of IIA in France
4. Example of the practice of IIA in the United Kingdom
5. **Example of the practice of IIA in Northern Ireland**
6. Main challenges and issues tied to IIA

Foreword

Integrated Impact Assessment (IIA) is a decision-support mechanism increasingly being considered by public administrations in industrialized countries. The movement toward the adoption of evidence-based policy has given rise to many forms of impact assessment, reflective of governmental priorities. The need to combine the various impact assessment tools which have multiplied over the years within governments arises from the desire to reduce the administrative burden associated with assessments and to ensure governmental coherence (Achtnicht, Rennings, & Hertin, 2009; Radaelli & Meuwese, 2009).

The integration of impact assessment tools is also relevant to the public health sector. Indeed, at a time when the institutionalization of health impact assessment (HIA) within government apparatus is being promoted as a way to improve the health of Canadians (Keon & Pépin, 2008; Health Council of Canada, 2010; Canadian Nurses Association, 2012), it is essential that this new form of impact assessment be positioned within the context of government decision-making processes.

*IIA is a prospective assessment aimed at integrating within a **single conceptual framework** all the intended and unintended effects (usually on the economy, society and the environment) of a new government intervention. Its goal is to combine the various existing impact assessments within a single procedure.*

The series on IIA follows from a study conducted during the summer of 2012 at the request of the Government of Québec, which is exploring this issue. The objective of the study, carried out by the National Collaborating Centre for Healthy Public Policy (NCCHPP) on behalf of Québec's Ministère de la Santé et des Services sociaux (MSSS – the Ministry of Health and Social Services), was twofold: to examine the current state of the practice of IIA in Western countries, along with key issues, and to gather practical examples.

The research methodology was based on two strategies: reviewing the literature and examining case studies. The review focused on scientific articles and the grey literature. This allowed us to identify government initiatives that could shed light on modes of governance and tools used to conduct IIAs, which could be relevant to the Canadian context. Four government initiatives in particular were examined: those of the European Commission, France, the United Kingdom and Northern Ireland. For each of these, a literature review and semi-structured interviews (13 in total) were conducted.

This paper describes the case of Northern Ireland, along with its history, objectives, procedures and the tools used. In addition, the evaluation of the practice is discussed. Particular attention is also focused on the manner in which impact assessments with a single focus were included in the integrated analysis.



History and scope

The practice of *ex ante* (prospective) evaluations in Northern Ireland began in the 1970s, but the legal basis for such analyses emerged in 2000 with the study of the effects of policies on equal opportunity, known as “Equality Impact Assessment” (EQIA). This was made mandatory for all policies and programs established by public authorities (Equality Commission for Northern Ireland, 2005). Other specific types of impact assessment are also required. Some have a legal footing, such as the assessment of impacts on regional development and on sustainable development. Whether others are required is determined by administrative guidelines, as is the case for the assessment of impacts on health, social needs and rural areas. Finally, other forms of impact assessment are also required by virtue of agreements with the European Union (human rights and strategic environmental assessments). The proliferation of *ex ante* analyses prompted the government to group these together, in 2004, in a non-mandatory IIA referred to as “Integrated Impact Assessment.” This IIA, which became known as “Impact Assessment” in 2007, was incorporated into *A Practical Guide to Policy Making*, developed for policy makers and senior public officials, to ensure greater consistency across government (Office of the First Minister and Deputy First Minister, 2012a). The process is recommended for all public policies and encompasses all the types of impact assessment mentioned above, including those subject to a legal requirement.

Objectives and principles

The Government of Northern Ireland introduced a form of IIA whose practice is based, to some degree, on the voluntary participation of various departments. Furthermore, the procedure governing the practice of IIA in Northern Ireland is not as formalized as those discussed in the three other examples upon which we focus in this series on IIA (see note 2 on the European Commission,¹ note 3 on France² and note 4 on the United Kingdom³). This case was selected because it provides an example of a government’s desire to integrate the various impact assessment

mechanisms into the broader framework of public policy development. As with the European Commission, the practice of integrated impact assessment in Northern Ireland is not rooted in the practice of regulatory impact assessment (RIA), as is often the case in industrialized countries that have adopted IIA. Instead, it is integrated into a process governed by a holistic vision that attempts to take into account the government’s wider policy objectives (cross-cutting issues, such as equity and sustainable development), as well as sectoral objectives. The practice of IIA is predicated on the need for social, economic and environmental impacts to be given equal consideration.

Procedure, methods and tools

The practical guide to policy making proposes the following steps:

1. Justification of the need for a new policy;
2. Gathering of factual evidence and agreement on aims and objectives;
3. Identification and appraisal of potential options;
4. Consideration of direct and indirect impacts, including consistency of policy with overarching government objectives, and in-depth analyses of significant impacts (integrated impact assessment);
5. External consultation and decision making (Policy Innovation Unit, 2012).

The department spearheading a project is responsible for carrying out the impact assessment. It can rely on several guides and tools, as well as the support of a unit of the Office of the First Minister and Deputy First Minister, which oversees the entire process. Those responsible for developing a policy must themselves make the necessary tradeoffs among different types of consequences and find alternative solutions (Office of the First Minister and the Deputy First Minister, 2012b).

The Equality Commission, a largely independent authoritative body, holds significant power over the part of the assessment pertaining to equity (Equality Commission for Northern Ireland, 2005).

¹ Available at: http://www.ncchpp.ca/docs/2014_GovInt_IIANote2_En.pdf

² Available at: http://www.ncchpp.ca/docs/2014_GovInt_IIANote3_En.pdf

³ Available at: http://www.ncchpp.ca/docs/2014_GovInt_IIANote4_En.pdf

All government departments are subject to the principles of sustainable development and must therefore act in such a way as to take these principles into account (Northern Ireland, 2012). The section of the practical guide focused on IIA is structured around the three pillars of sustainable development: the social, economic and environmental dimensions. The assessment of impacts on equality of opportunity and on health are included under the social dimension, whereas regulatory impact assessment is included under the economic dimension.⁴

An impact assessment should contain the following elements:

1. Objective setting: Define the aims of the intervention;
2. Screening: Evaluate which areas should be the subject of a more in-depth impact assessment;
3. Assessment of impacts: Locate evidence, qualify and quantify impacts;
4. Consultation: Consult the actors affected by the intervention;
5. Prioritization of impacts: Classify impacts based on the results of consultations;
6. Decision and publication: Come to a decision and publish findings;
7. Monitoring and evaluation: Implement intervention and carry out *ex post* evaluation (Policy Innovation Unit, 2012).

The assessment guide is structured around a series of broad questions aimed at helping policy makers consider a wide spectrum of possible effects. Highly accessible analysis grids allow policy makers to conduct an initial, very summary, analysis of all potential impacts on the three pillars of sustainable development. The guide proposes both qualitative and quantitative methods. As is seen with the central government of the United Kingdom, the principle of proportionality is applied here: the more numerous and significant the expected consequences, the more rigorous the assessment process should be. For economic analyses (cost-benefit), the tools developed by the central government of the United Kingdom, such as those included in the *Green Book* (HM Government, 2011), are among the references provided to policy makers in Northern Ireland. In

addition, depending on the nature of the effects to be analyzed, policy makers may have access to several other support mechanisms, either internal or external to the government (Office of the First Minister and the Deputy First Minister, 2012a). For example, agreements have been made with the Institute of Public Health in Ireland, where a unit is mandated to assist HIA practitioners both within the government and at the regional level (Institute of Public Health in Ireland, 2012).

Transition from sectoral impacts

The transition from sectoral impact assessments to IIA was carried out with an eye to ensuring consistency throughout the government, but without any real restructuring. Thus, the established process for assessing the impact on equality of opportunity (requiring departments to answer the three screening questions and provide justification for the absence of a thorough analysis, if applicable; supervised by the Equality Commission) remains unchanged, but has been integrated into an inclusive process that includes all impact assessments. Environmental impact assessment, which is required by law, has also been included in the overall process. For this type of assessment, the transition was facilitated by the fact that the content of the practical guide to IIA is structured around the three pillars of sustainable development.

As can be observed, the legislative or regulatory constraints requiring departments to initiate integrated impact assessments are less stringent in Northern Ireland than in the other European examples analyzed in this study (see note 3 on France and note 4 on the United Kingdom). A practitioner within the central government, while pointing out that discussions are underway to strengthen these requirements, nevertheless issued this warning:

Ideally, people should be doing [IIA] really for almost all policies. The danger I think is that IIA could make other impact assessments, such as human rights [impact assessment] or equality [impact assessment], look less important. My worry would be that people would start to see it [impact

⁴ The practical guides provided to policy analysts in Northern Ireland can be accessed here: <https://www.executiveoffice-ni.gov.uk/articles/policy-making>. Workbook 4 is particularly instructive.

assessment on equality of opportunity] as something that is only part of something bigger.

From theory to practice

Several of the practitioners interviewed consider the process used in Northern Ireland to be “flexible.” This is seen as a strength, since departments can adapt assessments to their own needs, choose to rely on the expertise of agencies and provide feedback on the guides. On the other hand, this flexibility can also have undesirable effects, since public authorities can occasionally take advantage of it to perform less thorough assessments or involve other departments and the central government too late in the process. One of the participants expressed this view, commenting that,

I sometimes think: why are we getting involved at the stage [of consultation]? The public authority has already defined the objectives of the policy. [...] and there is a whole range of information that have not been taken into consideration. We should be involved right from day one, [...] right from the start.

The practice of IIA in Northern Ireland has not yet been studied extensively.

Conclusion

The practice of IIA, while it elicits a great deal of interest from many governments, ultimately remains little used at present. Several issues and challenges are associated with its institutionalization within governments. The 6th briefing note in this series, entitled *Main Challenges and Issues Tied to IIA*⁵ examines the difficulties as well as the benefits of the practice, based on the feedback collected and the literature consulted for the study conducted by the NCCHPP during the summer of 2012.

The present briefing note has focused particular attention on the case of Northern Ireland. This case was selected because it provides an example of a less formalized approach to IIA. The objective of the Government of Northern Ireland is to achieve greater consistency across government. The quantification of economic impacts is of less central concern here, compared to the other European examples examined in this series on IIA. This approach can be considered an illustration of what is referred to as “weak” integration (see briefing note 1, entitled *Overall Situation and Clarification of Concepts*⁶) because some of the mechanisms that had been established to ensure specific impact assessments were performed remained in place after the establishment of IIA. This was the case, for example, with the Equality Commission, which oversees the practice of equality impact assessment within the government.

Within the broader context of this study, we identified three other European experiences which seemed noteworthy and had been sufficiently studied to enable us to form an account of the effective implementation of such a practice. The table in Appendix 1 provides an overview of the four experiences documented over the course of this study, thus allowing for comparison of the example described in this briefing note with the other situations that were examined.

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⁵ See: http://www.ncchpp.ca/docs/2014_GovInt_IIANote6_En.pdf

⁶ See: http://www.ncchpp.ca/docs/2014_GovInt_IIANote1_En.pdf

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APPENDIX 1

TABLE OF EXPERIENCES WITH INSTITUTIONALIZATION OF IIA

	Northern Ireland	United Kingdom	France	European Commission
Initiation and scope	2004; integrated into the policy development process in 2007 For all policies	Expanded Regulatory Impact Assessment (RIA) in 2005; integrated impact assessment in 2008 Statutes and regulations	Initiated in 2004; mandatory since 2009 (anchored in the constitution) For all proposed legislation and government regulations	Initiated in 2002 Legislative and non-legislative projects
Objectives and principles	Best policy - Consistency with government objectives	Best policy - Reduce regulation	Best policy - Reduce intervention	Sustainable development - Best policy
Degree of institutionalization	Weak IIA not mandatory except for equity and sustainable development Policy development guide that integrates all mechanisms	Strong Sectors are responsible for analysis Responsibility assigned to a department with an economic vocation Independent body for quality assurance	Strong The General Secretariat of the government is at the centre of the mechanism Sectors are responsible for analysis Inter-departmental midway through process Independent body for quality assurance	Strong Sectors are responsible for analysis Support units in each Directorate-General Inter-service steering group from the beginning Central bodies supervising and ensuring quality control
Procedures, methods, tools	Equally quantitative and qualitative No obligation to monetize	Quantitative (monetization) Public documents	Quantitative (monetization) and qualitative Public documents	Quantitative (monetization) and qualitative Public documents
Transition from sectoral impact assessments	Incorporated within a single framework	Integrated into the process with the help of test sheets Sectoral guides	Transition poorly documented	Integrated into a list of questions Sectoral guides provide support
Evaluation	Little documented in the literature	Ongoing improvement Emphasis placed on quality of economic analyses Asymmetry between dimensions assessed	Little documented in the literature	Ongoing improvement Asymmetry between economic aspects and other aspects, but becoming more balanced

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