

Response to Scottish Government consultation: Island Communities Impact Assessments Guidance and Toolkit – closes 9 Nov 2020

Response from Audit Scotland and the Accounts Commission, November 2020

1. Audit Scotland and the Accounts Commission welcome the opportunity to respond to the consultation paper. Both have a dual interest in the Islands (Scotland) Act 2018. They are both named as relevant authorities and therefore have duties under the Act including the preparation of the Island Communities Impact Assessments (ICIAs). The Accounts Commission holds councils to account and helps them to improve and is responsible for coordinating and facilitating scrutiny in local government. Audit Scotland audits most of the other public authorities with duties under the Act, including health boards, integration joint boards (IJBs), councils, regional colleges, and regional transport partnerships. This includes publishing annual audit reports of each of these relevant authorities for the Commission and the Auditor General. Best Value Assurance Reports (BVARs) are published on each council over a five-year period.

2. Audit Scotland carries out performance audits covering a wide range of topics and public bodies for the Commission and the Auditor General, who is responsible for the audit of all public bodies except local authorities. We also carry out annual performance and financial reviews of local government, the NHS, and colleges in Scotland. Audit Scotland is currently reviewing its performance audit work programme in light of the Covid-19 pandemic to take account of its impact on its own priorities and resources and on its audited bodies.

3. Within Audit Scotland we have set up an Islands forum consisting of staff involved in performance audits, BVARs, and annual audits of public bodies. The forum has been set up to facilitate cross-organisation working, discussion, understanding and development of intelligence on the Islands (Scotland) Act 2018 and other relevant islands audit issues. This includes assisting Audit Scotland and the Commission meet the requirements of the Act; raising awareness and providing guidance to appointed auditors; enhancing public awareness of the specific challenges faced by islands and making recommendations for improvement; and engaging with the Scottish Government Islands Team and other external stakeholders. As highlighted in our previous consultation response in July 2020, Audit Scotland is independent and would not report directly to Scottish Ministers, this would include in relation to publishing an ICIA. Audit Scotland remains respectful and supportive of the Islands Act and will follow the guidance on ICIAs and publish them on our website.

4. In preparing this response Audit Scotland has considered how useful it would find the guidance in preparing ICIAs on behalf of the Accounts Commission and the Auditor General, as well as how useful it may be for the range of relevant authorities listed under the Act. We find the guidance generally clear and helpful and think it should equip authorities to prepare their ICIAs. The flowchart, when accompanied by the full guidance, is useful and the steps to follow are clear. The guidance also clearly explains the legislative background and purpose of ICIAs. The ICIA and ARR templates are likely to prove useful for many of the relevant authorities. For some authorities, including Audit Scotland, it might make sense to follow a different approach based on how ICIAs apply to their work. Throughout the guidance it would be helpful to emphasise the purpose of ICIAs in relation to improving outcomes for island communities to avoid a 'box-ticking' approach and so that evidence is provided in ICIAs that will help inform whether the Act is being delivered.

5. There is scope to simplify the guidance and focus on risks. We have identified some points to consider for the guidance to be more effective and manageable across all relevant authorities. These are outlined below:

- In general, the guidance is clear but could benefit from more detail in certain places. Specifically, there needs to be more clarity on the circumstances in which an ICIA needs to be carried out, and timescales for undertaking the work. There must be clear definitions of what is meant by a strategy, policy or service in the context of ICIA, and examples of those that should be prioritised. These terms could be subject to varied interpretations and could potentially lead to authorities undertaking unnecessary or onerous work. In the context of Audit Scotland, depending on how we interpret these terms, we could potentially prepare ICIA for our work programme, for individual audits and for corporate policies. The associated workload would vary significantly depending on how we interpret and apply the guidance. The inclusion of case studies highlighting how island communities can be unfairly disadvantaged by a policy, strategy or service would be helpful in this respect. We have included references to a few case studies from audit reports on the next page.
- Alongside this, a degree of proportionality and flexibility of guidance application will be required to ensure the workload associated with ICIA does not become too burdensome for some authorities. The relevant authorities listed in the Act vary considerably in size and capacity. There could be clearer guidance on the expectations placed on different authorities. It is important that the ICIA process takes into consideration the resources available to relevant authorities and their capacity to carry out the work. There may also be merit in considering how and where the recommended processes could link to pre-existing processes of island-proofing that some relevant authorities may already have in place.
- There is quite a lot of emphasis on carrying out analysis and recognising the uniqueness of different islands. There could be more signposting or provision of the information, analysis and data available to support relevant authorities in carrying out their impact assessments, particularly around key issues and differences to consider across the islands. This could save unnecessary duplication of work across the relevant authorities. We have included a graphic in [Appendix 1](#) of this document that we developed to think about similarities and differences among island communities. This may be helpful for considering how to support relevant authorities and the types of intelligence that would be required.
- The ICIA template for publication includes all the steps in the process, which could be onerous. We consider that publishing what is included in steps 4-6 would be sufficient, with little added value in publishing steps 1-3. However, we recognise that these steps describe background work necessary for the preparation of an ICIA. The guidance could provide more clarity on why including steps in the publication 1-3 is necessary.
- In terms of step 3 (consultation), there is a risk that island communities could be subject to consultation fatigue if they receive multiple consultations from multiple relevant authorities unless this is co-ordinated. Consideration also needs to be given to the resources available within relevant authorities to undertake extensive consultation with island communities, particularly if they need to consult on multiple policies/strategies/services. We have identified these issues through some of our Best Value Assurance Reports (BVARs) on local authorities, for example:
 - [Orkney Islands Council BVAR](#): “The council consults and involves the community councils on a wide range of issues, from local service needs and priorities to funding for local initiatives. The success of the arrangement means that there is a risk of overburdening the community councillors with multiple and detailed consultations and, as a result, diminish the quality of response. The council should consider how it can

ensure that it minimises the burden but maximises the value of consultation with the community councils.” (page 42)

- [Argyll and Bute Council BVAR](#): we identified that the council could improve its community engagement by “recognition of, and action to address, volunteer fatigue”. (page 46)
- [Highland Council BVAR](#): “staff have highlighted the capacity challenges in carrying out engagement activity to a high quality due to staff shortages across services, lack of expertise, the large geographical distances to be travelled and the tendency for many events being held outside of normal working hours”. (page 38)






























6. In relation to question 10 about the inclusion of case studies, the following examples may be useful to consider:

- [Superfast broadband for Scotland: Further progress update](#), September 2018. We reported that average broadband speeds experienced had increased across Scotland but continued to be lowest in rural areas. Most of the areas with average speeds less than 24 Mb/s were rural, with around 25 per cent of rural premises unable to receive speeds of at least 10 Mb/s. Community Broadband Scotland (CBS) did not deliver the anticipated benefits for rural community broadband projects. A review of CBS’s role found that a lack of specialist skills, poor communication and complex tendering requirements contributed to lengthy delays and failed procurements. Community groups told us this has affected their confidence in the ability of the Scottish Government and HIE to deliver broadband to rural communities. HIE is now refocusing its efforts on other initiatives to ensure the benefits of broadband are realised.
- [Transport Scotland's Ferry Services](#), October 2017. Every year about nine million passengers and 2.8 million cars travel on the estimated 66 routes connecting mainland Scotland and its islands. Ferries also transport essential goods to remote communities and help export large amounts of island produce, including seafood and whisky, which contribute significantly to Scotland’s economy. We found that the Road Equivalent Tariff (RET) had significantly reduced the price of ferry travel for passengers and cars. Although RET had increased the number of tourists visiting the islands, it has meant that islanders were sometimes unable to travel on certain sailings because they are full. Ferries are essential to the sustainability of many island communities. It is important therefore that these communities are involved in, and are kept aware of, decisions that affect their ferry services.

7. Evaluation – the platform used may suit individuals responding to this consultation, however as an organisation we did not find it easy to access and collate comments from multiple people. It would also exclude people without access to the internet or lacking digital skills.

Appendix 1

Issues specific to Scotland's islands

Core issues	Variable issues	Unique issues
 Population sparsity	 Islands-only or mainland with islands	 Specific employment opportunities (oil, fish farming)
 Reliance on ferries for inter-island and mainland travel	 Some islands seeing population increase (some through in-migration)	 Ferry or causeway connections
 Ageing population coupled with out-migration of youth	 Proximity to mainland and to centres of population	 Who owns the island (e.g. community trust versus private ownership)
 High reliance on public sector employment and tourism	 Opportunities in renewable energy	 Geographical layout of the island
 Seasonality of employment and low wages	 Land ownership types – community ownership creating new opportunities	 Population size
 Impact of EU Withdrawal	 Number/types of facilities and services	 Designated areas
 Sustainability of services for small and disparate populations	 Types of private enterprises (e.g. distilleries, micro-breweries, tweed, fish farming, renewables)	 Availability of further and higher education
 Costs and challenges of accessing limited services	 Connectivity differences – ferries, air, broadband	
 Shortage of affordable housing	 Fertility of the land/soil	
 Poor broadband/mobile coverage	 Whether on mainland of archipelago or outlying island	
 Difficulties of identifying deprivation		
 Fuel poverty		

Source: Audit Scotland