**DAERA Audit of Inequalities & Action Plan 2021-2025:**

**Consultation Outcomes Report**

July 2022

A hard copy of this document, or a copy in a different format, can be provided on request by contacting:

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1. **Introduction and background**

The Department for Agriculture, Environment and Rural Affairs (DAERA) has concluded a public consultation on its draft Audit of Inequalities and Action Plan 2021-2025. The plan sets out the actions it proposes to take forward over the next four years. The consultation ran from 30 November 2021 to 08 March 2022 and this report has been produced to highlight the comments received during the consultation period and the Department’s response to those comments.

The Department would like to take this opportunity to thank all those who participated in the consultation. This invaluable input and expertise has helped to shape the Audit of Inequalities and Action Plan.

1. **Development of Audit of Inequalities and Action Plan 2021-2025**

An **internal review** of the previous Audit of Inequalities and Action Plan (2011-2016) was completed with the help of the DAERA business areas. This internal review started on 02 August 2021 for return of updates by 06 September 2021.

This coincided with **external engagement** with the members on the DAERA Section 75 Consultee List. All members were contacted, via email on 02 August 2021, and offered an opportunity to meet with the DAERA Equality team, and/or to submit any information and data that they thought would be useful to the development of the new Audit of Inequalities and Action Plan for 2021-2025. The target date for completion of this task was 06 September 2021.

In addition to these two engagement processes, we continued to make every effort to undertake detailed and robust research into new or emerging inequalities.

No individual or organisation took up the offer to meet with the DAERA Equality team and this is understandable due to the Covid pandemic. However, we did receive a number of relevant reports and links from three organisations, directing us to related information. This information was submitted by the following organisations:

* **Women’s Resource and Development Agency (WRDA)**

This included two reports:

* + The Women’s Policy Group COVID-19 Feminist Recovery Plan: One Year On; and
  + The Women’s Policy Group Feminist Recovery Plan Supplementary Report: Putting Women’s Voices at the Core.
* **RNID (Royal National Institute For The Deaf)**

This included a link to related information:

* Further information on the equalities of hearing loss and deafness in the workplace, [Working for Change - Campaign page](https://rnid.org.uk/get-involved/campaign-with-us/working-for-change/)
* **NICCY (Northern Ireland Commissioner for Children and Young People)**

This included two reports:

* [Statement on Children's Rights in Northern Ireland 2, November 2020](https://www.niccy.org/media/3691/niccy-socrni-2-main-report-web-nov-20.pdf)
* [A New and Better Normal - Children and Young People's Experiences of the Covid-19 Pandemic, August 2021](https://www.niccy.org/media/3882/niccy-covid-report-main-report-final-aug-21.pdf)

Prior to these two engagement processes, the DAERA Equality team started to draft the new Audit of Inequalities and Action Plan 2021-2025. The information and input received from the two processes were then incorporated within the new draft Audit and Action Plan. This resulted in information and data being updated within the audit and a new action plan being developed. By mid-September and on this basis, the DAERA business areas were requested to review the new draft version of the Audit of Inequalities and Action Plan 2021-2025 with the date for completion of this task being 23 September 2021.

The **Equality and Diversity Steering Group (EDSG)** was presented with the Audit of Inequalities and Action Plan 2021-2025 and provided with a summary of the work on 06 October 2021. The EDSG membership is made up of the senior management team within DAERA.

A pre-consultation notification letter, including the related consultation papers, was sent to the Clerk to the Committee for Agriculture, Environment and Rural Affairs (**AERA Committee**) on 29 November 2021.

1. **Consultation**

A full public consultation was launched on 30 November 2021 and closed on 08 March 2022. All consultees on the Department’s consultation list were emailed directly, attaching a letter informing them of the consultation arrangements. The consultation documents were also made available on the Department’s website and the NI Direct website. The option to complete the consultation was also available on Citizen Space.

A copy of the proposed consultation papers: Audit of Inequalities 2021-2025; related Action Plan; Consultation Document; Consultation Questionnaire; Easy Read; and Rural Needs Impact Assessment were attached for information. The Department consulted using the Departmental Section 75 Consultee List.

1. **Responses received**

A total of two written responses were received and these were from the following organisations:

* Commissioner for Older People for Northern Ireland (COPNI); and
* Ulster Farmers Union (UFU).

The issues raised about the draft Audit of Inequalities and Action Plan 2021-2025 and the Department’s responses are set out below. The full consultation responses are included in Annex A for information.

**DAERA Audit of Inequalities and Action Plan 2021-2025**

**Consultation Comments and Departmental Responses**

**Submission 1 by: COPNI Consultation 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 issue is of particular concern for older people in NI, especially those living in rural areas where 33% of homes are occupied by older people.

Ulster University food poverty research carried out in 2019, found that 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 people lived within a twelve-minute walk to a supermarket compared to average of 75% for the rest of the UK.

**DAERA Response**

DAERA is aware that food poverty is a major issue for many people and that large numbers of older people, among others, are affected by this. The availability of rural services, or lack of these services, is also a significant factor for the rural population.

These are major societal issues that are cross-cutting and for all departments to consider. All public authorities will contribute in their specific way and within the expertise of their responsibilities to the public. DAERA is one part of the full picture and we aim to contribute to the improvement of these issues via the implementation of our Audit of Inequalities Action Plan and by the many policy projects that are on-going and those that may be developed in the future. One example of the work that DAERA is doing is the TRPSI (Tackling Rural Poverty and Social Isolation) initiative.

**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 a 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 over.

**DAERA Response**

Digital exclusion and broadband coverage are issues that DAERA is aware off. The Department has been active in supporting the Project Stratum which aims to improve broadband connectivity by extending Next Generation Access (NGA) broadband infrastructure to approximately 79,000 premises across Northern Ireland that cannot yet access NGA broadband services. The Department for the Economy lead on this initiative and funding for this project comes from the £150m which was allocated to the project as a result of the Confidence and Supply Agreement, along with additional funding of £15m secured through the Department of Agriculture, Environment and Rural Affairs (DAERA) – [Project Stratum - introduction | Department for the Economy (economy-ni.gov.uk)](https://www.economy-ni.gov.uk/articles/project-stratum-introduction)

The Department will continue to support this project and seek other methods to improve such services wherever they can. It is anticipated that issue number 10. Opportunities for older people, will be one such action that will benefit older people and in particular those in rural areas.

**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 affected.

**DAERA Response**

The closure of bank branches and ATMs are well documented within the media and DAERA is aware of the impact that this has caused for various people. Although banking changes are out of our control, the Department should be cognisant of its own customers and stakeholders needs and be flexible wherever it can when dealing with financial issues or the use of cash. Online payments have become much more common across society but this may not always be available for certain customers, especially if they have poor broadband issues, or no broadband at all, and that may be in addition to the issues highlighted above. DAERA is aware of these issues and seek to offer flexibility with its services whenever and wherever it can.

**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 conditions.

**DAERA Response**

DAERA recognises that fuel poverty is a major issue for many people and as you have set out above, it is a multifaceted problem. The characteristics that you list are varied and will require a multidisciplinary approach in trying to overcome such issues. Various public authorities will have to act upon this problem. Other departments will have considered this in their own action plans in a similar way that DAERA has. Among the actions set out in the DAERA action plan are the following two overarching issues: issue 10. Opportunities for older people and issue 12. Access to rural transport services. Other actions within our plan may also contribute in some way to overcome such problems.

**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.

**DAERA Response**

Caring is an important role carried out by thousands of individuals who provide a key service by caring for family members, friends, neighbours or others. The Department of Health has the lead role in providing services for carers and DAERA follow the advice and guidance provided by them. At a minimum DAERA has put in place important actions such as those set out in the action plan at issue number 14. Raise awareness of health and well-being information and rural support services.

**Submission 2 by: UFU Consultation Comments**

The draft measures should have a positive impact on Section 75 groups. Improving inclusion of Section 75 groups is not only beneficial for Section 75 group members but also the wider industry a more inclusive and diverse industry is a more resilient and innovative industry.

**DAERA Response**

Noted.

Whilst the Ulster Farmers’ Union (UFU) are supportive of localised groups to tackle inequality, it is important that DAERA policy be adopted at a senior level and then filter through related government organisations and channels down to DAERA direct office staff, and farmers.

**DAERA Response**

Noted.

UFU are supportive of the potential actions to tackle gender inequalities. Since the first UFU Women in Agriculture conference in 2019, UFU have been working consistently to raise the profile of women in agriculture and the hidden labour they contribute on farms and the wider agri-food sector. As a result, the AERA Committee undertook a survey, Breaking the 'Grass' Ceiling: Barriers for Women in the Agriculture Sector. This is an excellent first step and UFU look forward to the launch of the report and the recommendations for industry. UFU are working to increase the diversity of our committees and membership and would encourage DAERA and other agri-businesses to make the same efforts. Women in agriculture is not about discriminating against men, rather about fully supporting every member of society.

**DAERA Response**

DAERA is aware of the importance of diversity and has published its Diversity and Inclusion Strategy and Action Plan which has already been shared with all DAERA staff. Furthermore, you will already be aware of the actions we have included within the Audit of Inequalities Action Plan and the need to increase diversity on several of the DAERA Boards and management teams. However, it is good to note that the AFBI Board have already achieved, and surpassed, the gender balance within their Board membership (although this may fluctuate over time). Diversity and inclusion is an on-going topic within the Department and we hope to develop upon the example and the success of the AFBI Board.

DAERA should engage closely with the Young Farmers Clubs of Ulster and other rural youth community groups. It is important that young people, who are the future of the industry, are included in the development of policies and services that will impact on their lives in the future. Connecting young people to NI food and the environment is also important.

**DAERA Response**

DAERA has engaged and supported young farmers clubs and other rural youth community groups in the past and continue to do so. This is important work and we agree that these young people are the future of the industry. One of the issues within our plan is number 9. Development opportunities for young people and in particular, action 9.1 Provide a range of opportunities to develop young people at the DAERA College (CAFRE). Other support for young farmers and youth groups will also be taken forward by DAERA, where possible.

It is vitally important to retain young people in rural communities and create vibrant rural communities that are well connected through broadband and transport etc. In addition, people should be supported as they grow old in their community. Rural Support and other charities do excellent work through projects such as the ‘Plough On’ project, which aims to tackle rural isolation and promote good mental health. Continued access to mental and physical health care in rural communities remains a priority. Removing services from rural communities through centralising services puts rural communities at a disadvantage. Lack of support for older single men is highlighted and is certainly an issue. However, across both genders there is a need for elderly people to feel safe in their homes in rural areas. More can be done to tackle rural crime and anti-social behaviour.

**DAERA Response**

Services for all groups of people are important and the issues listed above are cross-cutting and DAERA will continue to work in partnership with other public sector bodies and other organisations to help in overcoming these issues. Some of these issues relate to health and justice, with the respective departments having the lead with these issue, and DAERA will take forward, where possible, any key work that these departments propose. DAERA will also continue to engage with the various groups listed above to discuss the major issues of concern and consider what work could be taken forward where possible.

Across all groups it is important to engage regularly with Section 75 representatives as needs evolve and change. Efforts should be made to have more representatives from Section 75 groups on boards and committees. In addition, DAERA should be mindful of the images it uses in publications and social media and use images of Section 75 groups rather than the stereotypical male farmer.

**DAERA Response**

As noted above, DAERA is aware of the need for diversity and the representation of the Section 75 groups on boards and committees, etc.

We note your comments on the use of images and we will consider how best to inform staff about this suggestion.

**Q3**

Over the next few years, farmers will need to embrace and utilise a range of digital technologies in their businesses to help them farm more efficiently and productively. The current lack of digital coverage in some parts of NI is a huge barrier and inequality for farm businesses, which puts them at a severe disadvantage. The UFU is calling on government to ensure a roll out of superfast broadband to all farms and growers and their rural communities, alongside complete mobile phone coverage.

**DAERA Response**

Digital exclusion and broadband coverage are issues that DAERA is aware of. The Department has been active in supporting the Project Stratum which aims to improve broadband connectivity by extending Next Generation Access (NGA) broadband infrastructure to approximately 79,000 premises across Northern Ireland that cannot yet access NGA broadband services. The Department for the Economy lead on this initiative and funding for this project comes from the £150m which was allocated to the project as a result of the Confidence and Supply Agreement, along with additional funding of £15m secured through the Department of Agriculture, Environment and Rural Affairs (DAERA) – [Project Stratum - introduction | Department for the Economy (economy-ni.gov.uk)](https://www.economy-ni.gov.uk/articles/project-stratum-introduction)

The Department will continue to support this project and seek other methods to improve such services wherever it can. It is anticipated that issue number 10. Opportunities for older people, will be one such action that will benefit older people and in particular those in rural areas, but the issue of broadband coverage is an issue for many groups in rural areas.

Some senior member[s] of the industry struggle with literacy and numeracy skills. This can be a barrier to engaging with DAERA in terms of understanding the information they receive and applying for funding. Others are affected by dyslexia which also restricts their engagement with DAERA. UFU would ask that communication to the industry be of a reading level that is appropriate for the target audience. It is important not to exclude those who struggle with reading and writing and provide additional help/ other formats where needed.

**DAERA Response**

The DAERA Equality Scheme ([Annex A DAERA Equality Scheme 2021-2025 Final.PDF (daera-ni.gov.uk)](https://www.daera-ni.gov.uk/sites/default/files/publications/daera/Annex%20A%20DAERA%20Equality%20Scheme%202021-2025%20Final.PDF)) is available on the internet and contains information about alternative formats (page 2). The Equality Scheme sets out the statutory equality requirements that the Department is committed to implementing. We also encourage staff to draft documents and communications so that a child of 12 years old could read it. We are in the process of developing equality awareness sessions for staff and which we intend to roll out later this year. Part of this will be a reminder to continue to draft papers with appropriate language suitable for all.

1. **Next steps**

Following the feedback received during the consultation, the Department has reviewed the draft audit and action plan and have now published the final Audit of Inequalities and Action Plan 2021-2025.

The Audit of Inequalities and Action Plan will be reviewed on an annual basis (an annual report will be submitted to the Equality Commission) and may be added to, or amended over its four-year lifespan, as more information becomes available or priorities change.

**ANNEX A**

**CONSULTATION QUESTIONS AND FULL Responses Received**

**Commissioner for Older People for Northern Ireland (COPNI)**

**Consultation 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 is an issue 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 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;

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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 between 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 but 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. htps://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>
7. **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.

1. **Do you have any other general comments on the draft Audit of Inequalities 2021-2025 and draft Action Plan?**

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, 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.

**Ulster Farmers Union (UFU)**

**Consultation Questions**

1. **Do you broadly agree that the draft Audit of Inequalities 2021-2025 identifies appropriate inequalities in relation to the functions of DAERA?**

Yes

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

1. **Do you broadly agree that the measures in the draft Action Plan will have a positive impact on the Section 75 groups?**

Yes

The draft measures should have a positive impact on Section 75 groups. Improving inclusion of Section 75 groups is not only beneficial for Section 75 group members but also the wider industry as a more inclusive and diverse industry is a more resilient and innovative industry.

Whilst the Ulster Farmers’ Union (UFU) are supportive of localised groups to tackle inequality, it is important that DAERA policy be adopted at a senior level and then filtered through related government organisations and channels down to DAERA direct office staff, and farmers.

UFU are supportive of the potential actions to tackle gender inequalities. Since the first UFU Women in Agriculture conference in 2019, UFU have been working consistently to raise the profile of women in agriculture and the hidden labour they contribute on farms and the wider agri-food sector. As a result the AERA committee undertook at survey, Breaking the 'Grass' Ceiling: Barriers for Women in the Agriculture Sector. This is an excellent first step and UFU look forward to the launch of the report and the recommendations for industry. UFU are working to increase the diversity of our committees and membership and would encourage DAERA and other agri-businesses to make the same efforts. Women in agriculture is not about discriminating against men, rather about fully supporting every member of society.

DAERA should engage closely with the Young Farmers Clubs of Ulster and other rural youth community groups. It is important that young people, who are the future of the industry, are included in the development of policies and services that will impact on their lives in the future. Connecting young people to NI food and the environment is also important.

It is vitally important to retain young people in rural communities and create vibrant rural communities that are well connected through broadband and transport etc. In addition, people should be supported as they grow old in their community. Rural Support and other charities do excellent work through projects such as the ‘Plough On’ project, which aims to tackle rural isolation and promote good mental health. Continued access to mental and physical health care in rural communities remains a priority. Removing services from rural communities through centralising services puts rural communities at a disadvantage. Lack of support for older single men is highlighted and is certainly an issue. However, across both genders there is a need for elderly people to feel safe in their homes in rural areas. More can be done to tackle rural crime and anti-social behaviour.

Across all groups it is important to engage regularly with Section 75 representatives as needs evolve and change. Efforts should be made to have more representatives from Section 75 groups on boards and committees. In addition, DAERA should be mindful of the images they use in publications and social media and use images of Section 75 groups rather than the stereotypical male farmer.

1. **Do you have any other general comments on the draft Audit of Inequalities 2021-2025 and draft Action Plan?**

Over the next few years, farmers will need to embrace and utilise a range of digital technologies in their businesses to help them farm more efficiently and productively. The current lack of digital coverage in some parts of NI is a huge barrier and inequality for farm businesses, which puts them at a severe disadvantage. The UFU is calling on government to ensure a roll out of superfast broadband to all farms and growers and their rural communities, alongside complete mobile phone coverage.

Some senior members of the industry struggle with literacy and numeracy skills. This can be a barrier to engaging with DAERA in terms of understanding the information they receive and applying for funding. Others are affected by dyslexia which also restricts their engagement with DAERA. UFU would ask that communication to the industry be of a reading level that is appropriate for the target audience. It is important to not to exclude those who struggle with reading and writing and provide additional help/ other formats where needed.