



30 September 2011

Open Public Services White Paper

Comments from the Commission for Rural Communities

1. The Commission for Rural Communities

- 1.1 The Commission for Rural Communities (CRC) is an independent public body with a statutory responsibility to act as an advocate for rural communities and businesses and provide independent advice to government and others to help ensure that policies and programmes reflect the needs of people living, working and doing business in rural England. We have a particular focus on tackling disadvantage and economic under-performance.
- 1.2 The CRC welcomes this white paper, and the opportunity to provide comments in the interests of rural communities. With those interests in mind, this response picks up a number of themes of the white paper rather than attempting to answer the specific questions in the consultation document.

2. Outcomes

- 2.1 The CRC welcomes the focus on outcomes within the white paper, and the commitments in various places to reducing inequalities, including the comment that 'more open public services have the potential to narrow the gap between outcomes for different social groups'. In many rural communities, pockets of significant disadvantage are not picked up in statistical information that is aggregated to the level of the ward or the super output area. It can follow that rural disadvantage is given less priority than, for example, the needs of deprived urban areas. We hope that the Government will recognise this when planning and working with services providers, so that a high level of service can be provided in rural areas, to meet the needs of a disadvantaged sector of the population.

3. Funding

- 3.1 The Government will be aware that the per capita cost of providing services in rural areas exceeds that in urban areas, because of the costs of travel over a more sparsely populated area, and the reduced opportunities that exist to achieve economies of scale. Analysis of the Government's published figures relating to Local Authority revenue account budgets indicates that despite this rural premium, the amounts allocated to rural authorities for services are lower, per head of population, than to urban authorities. For social care services for the over 65s, for example, predominantly urban unitary authorities are receiving £952 per resident aged over 65 compared to £698 for predominantly rural unitary authorities. Looking at extremes, rather than averages, the differences between allocations to some rural Authorities and some urban ones can be of a much higher order, despite levels of per capita need being much more similar. A recent report by Local Government Futures for the Rural Services Network indicates that discrepancies of this order prevail across the range of Local Government services. We call for the Government to review such discrepancies, as implied by the message within the white paper that 'the state needs to provide extra help to those who have previously been left behind and to target resources in their favour'. These serious anomalies should be addressed as a matter of importance.

4. Rural Proofing

- 4.1 The CRC has long argued that services should be rural-proofed, to ensure that fair, high quality services are delivered to people living in rural communities. We welcome a number of commitments within the white paper that appear to endorse this, such as the statement that 'the NHS is a universal service, and will always remain so'. The commitment to minimum standards is also to be welcomed, and we assume that the good intentions around quality (section 3.4) and non-selection of 'easy groups' (3.5) apply to the group of people living in disadvantaged rural communities group as much as they might to other disadvantaged groups within the population. The Government's intention to publish a Rural Statement (p18) is warmly welcomed. The CRC has for some years had the statutory function to act as an

independent watchdog and as such we hope to be fully involved in the development of that statement, and have already had useful early discussions with Defra to that end. It is unfortunate, however, that the publication of the Rural Statement appears to have been delayed for some months yet, and we profoundly hope that this will not lead to a situation where new proposals, due from November, and possible legislation, do not take rural needs adequately into account. We would ask Ministers and officials within Government Departments to seek the views of the CRC when developing such proposals, so that the needs of rural communities are integral to new methods of service delivery, rather than being 'bolted on' afterwards or worse, ignored.

5. Local Determination

- 5.1 The CRC welcomes the focus on local determination of public services, cognisant that in rural areas communities have often played a more active part in the development and delivery of services than in urban areas. Clearly, it is important that services are devolved to a practicable low geographical level, and as the white paper implies, this will vary from one service to another. Part of the reason why rural communities have tended to be in the vanguard for this type of working has been that many services have been less well provided for in rural areas, as a result of the distance from service centres and failure of the market to bridge this disparity. We have welcomed the proposals in the National Planning Policy Framework for neighbourhood plans, for example, and we are keen to hear the results of the JobCentrePlus Local Autonomy Trailblazers, especially that operating in rural south-west Wales. We would be interested in helping the Government and others to develop further rural-specific initiatives.

6. Choice

- 6.1 In general terms, the CRC endorses the Government's approach to ensuring that people have a choice of service providers, and that there is a healthy mix of services provided by the private, public and voluntary and community sectors. That said, we are conscious that stimulating a market for services in rural areas can be problematic. There are some rural areas where the extent of service provision is very limited, and the extent of choice less so. It is well known that services such as shops, post offices and banks are reducing in number, and it is also the case that the provision of some state-led services such as public transport, or care, can have less than comprehensive geographical coverage. We welcome the emphasis on community-led services, as communities are often best-placed to understand the services they need, and how best to deliver them. We would ask that the Government gives consideration to how best to ensure that community groups, and individuals, have the necessary leadership skills to ensure that community-led services are well provided, and that those managing the services are able to cope with those demands, and can develop strategies for delegation and continuity of service in the longer term. The Government should also consider the extent to which there is real additional capacity for services being provided by the voluntary and community sectors (there have been difficulties in recruiting retained firefighters, for example).
- 6.2 We understand the Government's commitment to personalised budgets, as a means to ensuring that individuals receive services which are efficiently and best tailored to their needs. We ask the Government to take into account the likely lower level of choice in rural areas, and would hope that it will give sufficient consideration to finding ways to ensure that quality does not suffer where there is a lack of competition; and we also ask that providers of services take into account the fact that some members of society, for example those with mental health problems, are not well-placed to make their own decisions relating to services.
- 6.3 We would also be interested in knowing more about the Government's intentions for regulating and inspecting providers of services under a regime of personalised budgets. A greater mix of providers, and a higher number, would seem to imply greater overall costs in these areas. We would be concerned if one implication of that were to be inequality between per-capita personalised budgets in rural compared to urban areas.
- 6.4 It is important that the Government gives acknowledgment to the important role that the public sector has to play in stimulating community and social enterprise. If the Government sees community activity and social enterprise as the key to future local service delivery, there needs to be an acknowledgment that the state will for example need to provide small initial capital investments to help social enterprises get off the ground. This is particularly the case in rural areas where the private sector cannot be relied upon to deliver services due to the premium attached to the delivery of rural services. Furthermore the public sector will need to provide assistance to social and community enterprises to manage start up processes, as well as underwriting the risks associated with start up costs. There are also real concerns in rural areas over the erosion of previously universal services, and the capacity of the private and voluntary sector to fill this void. Moreover, it is important that the Government ensures that the Localism and Big Society agendas provide the sufficient safeguards necessary to protect and maintain service provision,

particularly for vulnerable people.

- 6.5 We also have misgivings about the provision for services by electronic means in rural communities. There are many people who would benefit from the extra range of services which electronic service delivery can provide, but there are also some people who are not comfortable using IT and who will always require a more personal mode of service delivery. We would hope that the provision of electronic services does not have the effect of reducing the market for services provided by other means in rural communities to the point where they become unviable; if that were to happen, we would expect that, in the spirit of fair and comprehensive service provision, the state would find a way of ensuring that such people continue to receive the services they require.

7. Data

- 7.1 There are a number of commitments within the white paper to making good quality data available about the provision and quality of services. CRC welcomes this. As noted earlier, we are aware that often, the issues faced by disadvantaged rural communities are not adequately reflected in data that relates to wards, super output areas, local authority districts and so on. This is because rural areas tend to be sparsely populated and often a ward (for example) can be an area of several square miles and containing a very diverse population whose nuances are lost in an aggregated statistic. We ask that data is made available for the smallest possible geographical units, and that where appropriate a rural/urban split in datasets is made available. We would also remind the Government that when making policy targeted at areas of deprivation, the Index of Multiple Deprivation is less useful for identifying deprivation in rural areas, as it only identifies areas of concentrated deprivation. The CRC has published a report¹ to help fill gaps in the evidence base on rural deprivation. It estimates the overall rural share of deprivation at a national, regional and output area level, and identifies very small area 'hotspots', highlighting the existence of rural deprivation even in areas which are relatively prosperous.
- 7.2 The Government will be aware of the importance of publishing rates which express issues accurately. There is sometimes a tendency to use an inappropriate denominator – by, for example, showing the number of over-65s with a health problem as a proportion of the whole population, rather than as a proportion of over-65s.

As mentioned earlier, the CRC is pleased to have the opportunity to respond to this consultation, and would be very pleased to work with those who deliver services to help plan and facilitate the provision of services to rural communities.

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¹ Deprivation in Rural Areas: Quantitative analysis and socio-economic classification
www.ruralcommunities.gov.uk/files/OCSI%20RuralDeprivationAnalysis%20exec%20summary.pdf