

Literature review of impact assessment in governments

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The views expressed in this report are those of the researcher and do not necessarily represent those of the Scottish Government or Scottish Ministers.

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Abbreviations

EIA	Environmental impact assessment (of projects)
EqIA	Equality impact assessment
EU	European Union
HIA	Health impact assessment
IA	Impact assessment
PAFT	Policy Appraisal and Fair Treatment (Northern Ireland)
PSB	Public Service Body (Wales)
RIA	Regulatory impact assessment
SEA	Strategic environmental assessment
US	United States of America

Key messages from this review

This literature review was commissioned by the Scottish Government to inform their approach to impact assessment. We reviewed the literature regarding five types of policy level impact assessments (environment, equity, health, regulatory, rural) in five countries (Ireland, Netherlands, New Zealand, Sweden and Wales). These countries were most likely to require regulatory impact assessment, and least likely to require rural proofing.

More than 1000 potentially useful documents were identified using search engines. Of these, more than 110 plus legislation and guidance informed this report. Much of the literature is somewhat dated; relies on a limited number of case studies; and is carried out by academics who may be testing a hypothesis rather than presenting a balanced view. As such, the findings of this research need to be taken with caution.

What types of assessments are carried out? Scotland has more different types of impact assessment than any other countries studied. New Zealand has climate impact assessment and Wales has wellbeing of future generations assessment, neither of which is carried out in Scotland. Several countries have integrated impact assessments (e.g. Ireland's RIA, Wales' wellbeing assessment).

What assessment systems are particularly interesting? Welsh wellbeing assessment is interesting because it covers a wide range of impacts, is clearly future-looking, and seems to have strong government support. US 'environmental justice' assessment brings together environmental, health and equality dimensions, and seems effective at leading to changes. These assessment systems apply at the programme or plan level, rather than at policy level.

Are assessments actually carried out? Legally-required assessments are generally carried out, but based on evidence from this review many seem to be a formality, carried out late and/or with little influence on policy-making. However, gaps in the literature were identified relating to the timing of actual assessments and how their findings are used in policy-making.

How effective are the assessments that are carried out? In terms of:

- changes to policies – assessment effectiveness is mixed/limited
- public participation – this is very important for transparency and policy improvement. In practice public engagement is limited, but stakeholder engagement is more common.
- knowledge and learning – there is often learning by policy-makers, with consequent long-term organisational change
- costs v. benefits – not enough information exists to be able to come to a conclusion

In particular, even where an impact assessment does not lead to changes in a policy, it can have benefits in terms of improved transparency and accountability of decision-making, increased awareness of the public, and increased trust between stakeholders.

Is integration of impact assessments advisable? Integration of impact assessments – for instance bringing together environmental, social and economic impact assessment into a 'sustainability assessment' - may promote a more holistic approach to assessment, but care needs to be taken in terms of which elements get

the most emphasis. Integration is not just a matter of new legal requirements and guidance: it involves issues of data availability, the number of indicators to use, terminology and frames of reference, build-up of expertise, and intersectoral cooperation. The level of integration depends on issues like what minimum standards or thresholds must be achieved and what trade-offs are permitted.

There is also the 'detail paradox', which states that the power of each objective diminishes with the addition of other objectives: in other words, the more detailed the assessment is, the less significance, on average, is attached to each detail.

What are preconditions for effective assessment? In rough order of importance:

- High-level commitment and supportive organisations
- Policy-makers' willingness to learn and change in response to the assessment findings
- Legal requirement for the impact assessment to be carried out
- Oversight and quality review of the assessments
- Fitting the assessment to the decision in terms of timing, types of alternatives considered, recommendations etc.
- Involvement of the public/stakeholders
- Starting the impact assessment early in the policy-making process
- Adequate funding
- Adequate data and expertise
- Collaboration and information sharing between assessors and government departments
- Follow up to check whether the policy incorporated the assessment recommendations, whether the assessment adequately identified impacts, and how the assessment process can be improved

1. Introduction

Scottish policies are currently subject to:

1. Equality Impact Assessment (EqIA), assessing impacts on people with 'protected characteristics'
2. Fairer Scotland Duty assessment, aiming to reduce socio-economic inequality
3. Island Communities Impact Assessment, assessing unequal impacts on island communities
4. Child Rights and Wellbeing Impact Assessment, assessing impacts on children's human rights and wellbeing
5. Strategic Environmental Assessment (SEA), assessing impacts on the environment
6. Business and Regulatory Impact Assessment, assessing costs, benefits and risks
7. Data Protection Impact Assessment for projects involving personal data and privacy

This is in addition to Habitats Regulations Assessment, which has very different legal requirements and testing criteria. Each form of assessment applies to different actions; has a different focus; and has different underlying legislation.

1.1 Aims

This report presents the findings of a literature review of the impact assessment systems of five countries, to inform a review of Scotland's impact assessment system. The review aims to:

- provide the Scottish Government with timely, robust information on approaches to assessing policy impacts in other countries;
- critically appraise the effectiveness, efficiency and transparency of these approaches and any particular strengths or problems;
- consider how individual assessments operate within a wider system of impact assessments;
- identify gaps in the literature; and
- suggest how learning from this review might be applied to enhance the system of impact assessments in the Scottish Government.

The study assumes that the reader is familiar with the aims and main steps of the various types of assessment discussed.

1.2 Methodology

Countries analysed: Five countries were analysed in this literature review: Ireland, Netherlands, New Zealand, Sweden and Wales. They were chosen because they represent a range of different approaches to impact assessment; and have broadly similar areas and populations. They each also exemplify good or interesting practice in one or more forms of assessment:

- Ireland has wide-ranging regulatory impact assessment (RIA) requirements, and a supportive institutional context;

- The Netherlands has traditionally been a strong SEA champion, but this has been subject to ‘streamlining’ over the years. It has a well-developed system of gender impact assessment, and a robust system of RIA;
- New Zealand’s impact assessments are so well-integrated into its policy-making processes that they are difficult to distinguish as separate entities, and it has a new requirement for climate impact assessment;
- Sweden is exemplary in its promotion of gender equality, although it seems less strong in terms of other forms of impact assessment; and
- Wales has a strong equality impact assessment process, and its wellbeing assessments are a model of integrated, future-looking assessments.

Appendix A summarises the impact assessment legislation and guidance available for each country and type of impact assessment.

In all, more than 1000 items of literature were reviewed, and more than 110 (plus web-links to legislation and guidance) are included here.

Search terms used: The literature review involved searching for the terms ‘equality impact assessment’, ‘health impact assessment’, ‘impact assessment’, ‘policy appraisal’, ‘policy assessment’, ‘poverty proofing’, ‘regulatory impact assessment’, ‘rural proofing’, and ‘strategic environmental assessment’ AND the country name, using the search engines Academic Search Complete, Science Direct, Google Scholar and Google. Where this information suggested that additional search terms were needed, these were used. Other literature suggested by this first trawl was also analysed. Where appropriate, other countries’ impact assessment systems – environmental justice for the United States, equality impact assessment and rural proofing for Northern Ireland – were also reviewed. In the case of some authors (e.g. Nykvist, Radaelli) who wrote particularly informative articles more than ten years ago, a search for more recent literature by those authors was also carried out.

Policy level assessment: The literature review focused on assessments at the policy level (rather than plan/programme or project) level, as this is the Scottish Government’s area of concern. For the academic literature in particular, this meant that many articles were rejected from further analysis, because they focused on other levels.

Timeframe: Literature dating pre-2000 was generally excluded, except where it added something significant. Even then, much of the available literature is more than ten years old. If literature dating pre-2010 was excluded, this would eliminate more than one-quarter of the references.

Topics for analysis: The topics for analysis in this report were suggested after an initial literature review, and were discussed and fine-tuned with the steering group. The subsequent chapters review these topics in turn.

Report structure: The original research aims and objectives were discussed with the project steering group at a meeting of 22 September 2020, and a draft structure for this report was agreed with the team on 21 October 2020. Although the structure differs slightly from that originally envisaged by the Invitation to Tender, it now more clearly focuses on issues of interest to the Scottish Government, including a longer discussion of integration of impact assessments, and of preconditions for effective impact assessment.

Peer review: A draft of this report was peer reviewed. Comments were taken on board and the report has been changed in response.

1.3 Quality of information

This literature review considers five types of impact assessment (environmental, equality, health, regulatory and rural) in five countries, plus other good practice where available: more than 25 combinations of country and assessment type. We have only been able to find limited information about some of these forms of assessment. In some cases the information is more than ten years old, but we have been unable to find more recent information to determine whether the original information is still valid.

For New Zealand, where the literature on impact assessment is limited except on health impact assessment, we contacted an expert who suggested further reading. However the timing and resources available for this research precluded other similar 'in person' requests.

Appendix B summarises the information sources that supports this report, focusing on 'critiques': literature that analyses the effectiveness of an impact assessment system, rather than setting out requirements, guidelines or suggested good practice.

The main data gaps identified in this research were information on:

- rural proofing
- how conflicts between the findings of different types of assessment can be dealt with
- best practice for any of the assessment types
- the process of setting up integrated assessment systems
- timing of actual assessments (as opposed to preferred/ideal timing)
- how impact assessment findings are used in policy-making

Further interviews of impact assessment practitioners or government officials in the countries analysed here would help to explore the issues raised in this report, and update the information available from this literature review.

1.4 Structure of this report

Section 2 summarises the legislation and guidance on impact assessment for each country; and whether/how the impact assessments are integrated.

Section 3 discusses whether impact assessments are carried out as expected: whether they are carried out at all, their timing, and whether they are more than a formality.

Section 4 discusses the effectiveness of the impact assessments in terms of whether they lead to changes to policies, increase public participation or improve knowledge and learning, and data available about the costs and benefits of impact assessments.

Section 5 considers integration of impact assessments, and how tensions between different forms of assessments are handled in practice.

Section 6 discusses preconditions for effective assessment, and lessons for future assessments.

2. What impact assessments are required?

This section considers what forms of impact assessments are *required* at the *policy level* in the different countries; whether and how the different countries' impact assessment systems are integrated; and what topics are covered by equality impact assessments¹.

2.1 Assessment required at policy level

Tables 2.1-2.5 summarise the policy-level impact assessments required in each country². Strategic environmental assessment (SEA) is broadly limited to plans and programmes, in keeping with the remit of the European SEA Directive. SEA of policies is also carried out in Canada and possibly still some EU countries; these are therefore included in Table 2.1.

Table 2.1 Requirements for strategic environmental assessment (SEA)

Ireland	Policy-level SEA via RIA
Netherlands	Previously assessed via an 'e-test' (Sadler 1995). Current practice limited at best.
New Zealand	SEA indirectly required through Resource Management Act 1991 . Climate change impact required for all Cabinet processes.
Sweden	No legal requirement for strategic environmental assessment
Wales	Assessment of impact on climate change generally required for policies
Canada	SEA carried out for policies submitted to Cabinet or subject to ministerial decision
Denmark, Finland	Applied SEA to some policies prior to the SEA Directive. Unclear whether this still takes place, or whether their assessment is now limited to plans and programmes (Sadler, 2005 ; European Commission n/d ; Danish Ministry of Environment and Energy 1995)

Ireland, New Zealand and Wales are the only countries reviewed here that carry out equality impact assessments (EqIA) of their policies. In all three countries, and in the US, this is done as part of a wider impact assessment (regulatory, well-being, environmental). Northern Ireland is a leader in EqIA, due in part to its history of sectarian conflict, with concern that Protestants were getting better treatment than Catholics (Equality Coalition, 2013).

¹ There are many instances of one-off assessments or pilots, and of assessments that are legally required at the plan/programme level: these are not covered in this report.

² New Zealand embeds impact assessment in a number of its decision-making processes. Policy or budgetary decisions of any significance are considered by Cabinet and must include an analysis that includes impact assessment including, specifically, [Climate implications assessment](#); [Population implications assessment](#) (distributional impacts for different population groups including rural communities); and assessment of [human rights implications](#), along with cost/benefit and other impact analysis. Proposals for legislation or regulation must also have a Regulatory Impact Assessment which is provided to Parliament.

Table 2.2 Requirements for equality impact assessment (EqIA)

Ireland	Carried out as part of regulatory impact assessment or equivalent: considers socially excluded or vulnerable groups (gender, poverty, disabilities, rural communities), North-South and East-West relations (Cabinet Handbook, 2006 , App. III). Some 'equality budgeting' carried out (OECD, 2019)
Netherlands	Some gender mainstreaming
New Zealand	Population implications assessment required for each Cabinet proposal
Sweden	Some gender mainstreaming
Wales	EqIAs are one way – but not the only way – for a public authority to demonstrate compliance with the Public Sector Equality Duty (House of Commons, 2020). Equality is one of seven well-being goals in the Well-Being of Future Generations (Wales) Act 2015.
Northern Ireland	Northern Ireland was an early leader in EqIA with its 1993 'Policy Appraisal and Fair Treatment' (PAFT) initiative. Sec. 75 of the Northern Ireland Act 1998 requires the preparation of EqIAs where policies could have an adverse impact on nine equality groups. Completed EqIAs are made public by the Northern Ireland Assembly .
United States	National Environmental Policy Act includes requirement to assess 'environmental justice' implications of federal 'actions'. Environmental Protection Agency (2016) published recommendations on doing this.

All of the countries have health impact assessment guidance for the policy level, but only Wales has something approaching a requirement.

Table 2.3 Requirements for health impact assessment

Ireland	Guidance by Institute of Public Health in Ireland (2009) , but no requirement and area of application (policy v plan) unclear.
Netherlands	Unable to find requirement or guidance for policy level
New Zealand	Guidance by Public Health Advisory Committee (2005) aims "to ensure that health and wellbeing are considered as part of policy development in all sectors", but no requirement.
Sweden	Berensson and Tillgren, (2017) state that "Central agencies and all of Sweden's county administrative boards have been directed by the government to implement HIA within their own remits", but the Sweden National Institute for Public Health Advice (2005) guidance states that HIA "may relate to new legislation, economic instruments or the focus of a particular policy area" (our emphasis).
Wales	HIA is required through the Public Health (Wales) Act 2017. Two of the well-being goals in the Well-Being of Future Generations (Wales) Act 2015 concern health (Green et al. 2020), but it is not clear if policies require well-being assessment.

Regulatory impact assessment (RIA) is the form of assessment most frequently applied to policies, with all of the countries requiring some form of RIA. The breadth of RIA varies: for instance, Sweden’s RIAs are limited to financial impacts on various stakeholders; and Irish RIAs are expected to also consider socially excluded and vulnerable groups, rural communities etc. Dutch RIAs previously considered environmental impacts (Sadler 1995), but a ‘streamlining’ of the RIA system in 2011 means that RIA in the Netherlands is now mostly limited to impacts on businesses (OECD, 2020). The UK and US are unusual in using cost-benefit techniques for their RIAs (Radaelli, 2009a).

Table 2.4 Requirements for regulatory impact assessment

Ireland	RIA required by the Cabinet Handbook, 2006 , Appendix III). Applies to <ul style="list-style-type: none"> • proposals for primary legislation involving changes to the regulatory framework • significant Statutory Instruments • proposals for EU Directives and significant EU Regulations when they are published by the European Commission Policy Review Groups bringing forward proposals for legislation are also expected to carry out RIAs
Netherlands	RIA applies to ministries’ new proposals for regulations through the Integraal Afwegingskader (IAK) 2011
New Zealand	Regulatory Impact Statement required for any proposals that involve potential introduction of new legislation. Guidance on RIA exists and “government expects that government regulatory agencies... will have regard to, and give appropriate effect to, these good regulation principles” (New Zealand Government, 2017).
Sweden	Ordinance on Regulatory Impact Assessment applies to government and agencies, for (binding) regulations and (non-binding) general guidelines, i.e. soft law (Van der Sluijs, 2017)
Wales	Regulatory Impact Code 2009 requires RIA for ‘subordinate legislation’, i.e. “made by Welsh Ministers, the First Minister or the Counsel General and the statutory instrument (or a draft of the statutory instrument) containing it is required to be laid before the Assembly”

Ireland, New Zealand and Northern Ireland (not one of the five case study countries included within this review but at least having something like rural impact assessment) require ‘rural proofing’.

Table 2.5 Requirements for rural/islands impact assessment

Ireland	Cabinet Handbook (2006) requires analysis of impacts on “the physical, economic and social conditions of people living in the open countryside, in “coastal” areas, towns and villages and in smaller urban centres outside of the five major urban areas (i.e. Cork, Dublin, Galway, Limerick and Waterford).” The 2016 Programme for Partnership Government also notes that “The new impact assessment guidelines will have to take account of impacts on rural Ireland as well as other socio-economic factors”.
Netherlands	No requirement
New Zealand	Population implications assessment includes impacts on rural communities
Sweden	No requirement
Wales	No requirement
Northern Ireland	Government must have ‘due regard to rural needs’ when: <ul style="list-style-type: none"> • Developing a policy, strategy or plan • Adopting a policy, strategy or plan • Implementing a policy, strategy or plan • Revising a policy, strategy or plan • Designing a public service • Delivering a public service

Other forms of impact assessment used in other countries include:

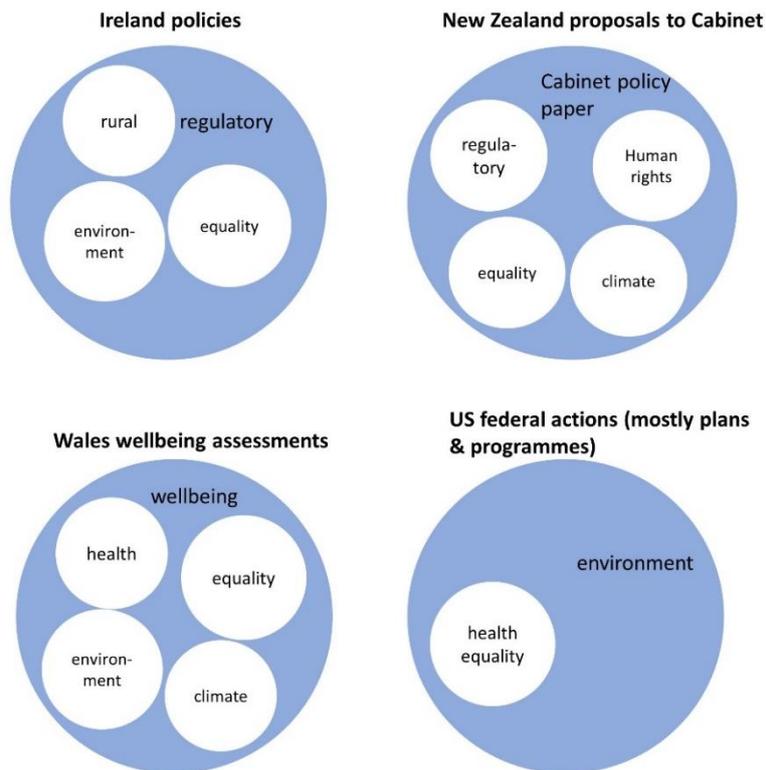
- The United States’ long-established system of assessing ‘environmental justice’ through its EIA/SEA process. This requires federal agencies to identify and address “disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations”, including Indian tribes ([EPA, 1994](#)).
- The Welsh [Well-being of Future Generations Act 2015](#) which requires regional Public Service Bodies to prepare free-standing ‘well-being assessments’ of their areas.
- Welsh language impact assessments carried out in response to the [Welsh Language Standards](#).
- New Zealand’s [Climate Implications of Policy Assessment Requirements 2020](#), which apply to “policy options or proposals where:
 - decreasing greenhouse gas emissions has been identified as a key policy objective; or
 - the direct impact on greenhouse gas emissions is likely to be equal to or above 0.5 million tonnes CO₂-e within the first ten years of the proposal period; or
 - the direct impact on greenhouse gas emissions is likely to be equal to or above 3 million tonnes of CO₂-e within the first 30 years of the proposal period for forestry related proposals³.

³ Interestingly, in May 2019 New Zealand reinstated the purpose of local government to be “to promote the social, economic, environmental, and cultural well-being of communities” through its [Local Government](#)

2.2 Integration of impact assessments

Although many of the countries' impact assessments are free-standing – for instance health impact assessments tend to consider only health – in a few cases one form of assessment encompasses several topics. Figure 2.1 summarises these cases.

Figure 2.1. Integration of assessment types (where this exists)



Environment and health or equality: In EU countries, SEA is not required at the policy level, but the consideration of health and climate issues within SEA is an obvious potential form of integrated assessment. The US concept of 'environmental justice' brings together environmental, quality and health issues. Executive Order 12989 provides that "each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations". The [Council on Environmental Quality \(1997\)](#) provides further information on how this should be done. Bhatia and Wernham (2008) found that integrated environmental and health assessments can result in new policies and regulatory measures that promote health. Examples of

[\(Community Well-Being\) Amendment Act](#). This was the original purpose set out in 2002 legislation, which was changed in 2012 to provide for "local authorities to play a broad role in meeting the current and future needs of their communities for good-quality local infrastructure, local public services, and performance of regulatory functions". The 2019 act reinstates the 2002 version.

analyses of environmental justice – not necessarily examples that had an impact on the ground, but that show the kinds of issues involved – include:

- Plans for the growth of Oklahoma City, which would most likely worsen the African American population’s relative access to community parks (Comer and Skraastad-Jurney, 2008);
- Hispanic residents being disproportionately subject to high levels of nitrates in drinking waters (Shaider et al., 2019).

A range of academics have called for stronger links between SEA and HIA (e.g. Iglesias-Merchan and Dominguez-Ares 2020). In France, a guide has been developed to better link health and environmental assessment at an urban planning level, focusing on determinants of health (e.g. social cohesion, democracy, safety/security) (Roué Le Gall et al. 2018; [EHESP 2016](#))⁴.

Regulatory, environment and equality: Irish regulatory impact assessments include a consideration of equality and environmental assessment of policies. The [Irish Cabinet Handbook 2006](#) states that:

“A full RIA involves a detailed and rigorous analysis of costs and benefits and their distribution. It should examine and measure costs, benefits and other impacts of the options being considered under the following headings:

- a) national competitiveness including employment;
- b) the socially excluded or vulnerable groups including gender equality, poverty, people with disabilities and rural communities;
- c) the environment;
- d) whether the proposal involves a significant policy change in an economic market including impacts on competition and consumers;
- e) North-South, East-West relations;
- f) the rights of citizens/human rights;
- g) compliance burden on third parties e.g. citizens and business.”

Well-being of future generations: The Welsh concept of the wellbeing of future generations is the most overarching form of impact assessment integration found in this study. The [Well-being of Future Generations \(Wales\) Act 2015](#) does not require a wellbeing assessment of policies. However it requires (amongst other things) public bodies to set well-being objectives, and requires public service boards for each Welsh local authority to assess well-being in their area. The well-being goals listed in the Act incorporate several other dimensions:

1. A prosperous Wales: An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change)...
2. A resilient Wales: A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).

⁴ The link between SEA/EIA, health and equality is particularly pertinent at the moment, with COVID-19. The disease arose from human-wildlife interactions, minority populations have been disproportionately affected by the disease, and measures to control the disease have shown the importance of green spaces.

3. A healthier Wales: A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.
4. A more equal Wales: A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio economic background and circumstances).
5. A Wales of cohesive communities: Attractive, viable, safe and well-connected communities.
6. A Wales of vibrant culture and thriving Welsh language...
7. A globally responsible Wales: A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being.

The Act specifically aims to articulate and translate the 17 UN sustainable development goals into goals for Wales ([Welsh Government 2019](#)). This is consistent with other calls for greater integration of sustainable development goals into SEA/EIA (Morrison-Saunders et al. 2020).

Other forms of impact assessment integration include:

- SEA widened to cover social and economic issues as “sustainability appraisal” in England and Wales ([UK Government 2015](#));
- ecosystem services assessment integrated into SEA and economic analyses ([Partidario and Gomes 2013](#); [Kumar et al. 2013](#); [Therivel and Gonzalez 2020](#));
- privacy impact assessment (e.g. protection of personal data and privacy) and ethical impact assessment (e.g. prevention of bias in algorithms, ethics of replacing humans with machines) when considering the impacts of emerging technologies (Wright and Friedewald 2013);
- social impact assessment and human rights assessment (right to health, education, work etc. as set out in the [International Bill of Human Rights](#) and labour conventions of the [International Labour Organisation](#)) (Götzmann et al. 2015). This is already partly done in Irish regulatory impact assessments which require consideration of “the rights of citizens/human rights”; and
- equality assessment and poverty proofing, recommended for Ireland by the [OECD \(2019\)](#).

The academic literature (e.g. Martens, 2017, 2020; Vanoutrive and Cooper, 2019) also includes an interesting discussion around the topic of ‘transport justice’ – which encompasses poverty and access to services, and which brings together concepts of free exchange (market principles) and justice (insurance against bad brute luck).

2.3 Coverage of equality and health impact assessments

The different countries' equality assessment requirements vary. The Dutch and Swedish assessments relate only to gender. Information on gender impact assessment in Sweden is limited, but in the Netherlands Roggeband and Verloo (2006) argue that gender impact assessment has been restricted to considering women as vulnerable victims, without considering the more contentious issues of the division of labour, sexuality, intimacy and reproduction.

New Zealand's [population implications assessment requirements](#) refer to “Māori (as individuals, iwi, hapū, and whanau), children, seniors, disabled people, women, people who are gender diverse, Pacific peoples, veterans, rural communities, and ethnic communities”. The [Irish Cabinet Handbook 2006](#) refers to “the socially excluded or vulnerable groups including gender equality, poverty, people with disabilities and rural communities”.

The [Welsh Equality Act](#) includes a (non-statutory) public sector equality duty, including assessment of the impact of proposed policies on nine ‘protected characteristic groups’: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. Section 75 of the [Northern Ireland Act 1998](#) refers to nine slightly different equality categories: religious belief, political opinion, racial group, age, marital status, sexual orientation, gender, disability and dependency.

In Ireland, an earlier focus on the impacts of policies on poverty has been replaced with ‘social impact assessments’ of the main welfare measures and direct tax measures in the annual budget. Reasons for this transition include the use of social impact assessment in Europe for mainstreaming social inclusion in public policy; the extension of poverty impact assessment to other dimensions of social inequality such as age and gender; and facilitation of greater policy coordination (Johnson 2017). Ireland’s annual assessment of the distributional impact of the tax and welfare policies in the budget uses the tax/welfare microsimulation model SWITCH, which takes account of expenditure on public services, and compares the distributional impact of changes to various types of public services and the implications for household incomes (Johnson 2017). An excellent analysis of economic inequality in Ireland (though not an impact assessment of a policy) considers the interrelated factors of income, wealth, public services, tax, capacities, family composition and the costs of goods and services (TASC, 2017).

In terms of HIA, Morgan (2008) and Mahoney and Morgan (2001) distinguish between HIA as a tool for assessing the environmental health implications (primarily of projects) and as a way of promoting health in a wider social and economic context, particularly at the policy level. In Wales, these two approaches are referred to as the ‘tight’ and ‘broad’ models of HIA.

3. Are impact assessments carried out as expected?

The assessments discussed in this report are all ‘required’, but are they actually carried out? Are they carried out at a time that still allows them to inform and influence the policy? And are they more than just a formality? This section considers these points in turn.

It has been difficult to find much material for this section, and particularly difficult to find balanced views: it is much easier to criticise things than to praise them, with academics being particular culprits.

3.1 Are the assessments carried out at all?

The limited literature on this topic suggests that, although plenty of assessments are being carried out, many are limited at best, or not carried out for those policies that need it the most. However, much of the academic literature on the use of impact assessments is quite dated meaning that it is difficult to get an up-to-date impression of levels of compliance.

In Ireland, over 200 bills were published between March 2011 and December 2015. RIAs were prepared for nearly half of those bills and more than 93% of those RIAs were published on government websites, although it was not always easy to find them (Ferris, 2016). In the UK, between 2002 and 2004, compliance with the RIA process ranged between 92% and 100% (Sadler, 2005). In the Netherlands, Roggeband and Verloo (2006) describe the application of gender impact assessments as random and their success as relative: at least 22 policies were subject to gender impact assessment between 1994 and 2004, but this was only a small proportion of the hundreds of policies that were developed each year⁵.

In Sweden, almost 10,000 RIAs were carried out over five years in the mid-2000s, but in only a few cases were these presented as separate and discernible documents, and the overwhelming majority were just a few sentences long (Erlandsson, 2008). The EOHSP (2007) also found that not all HIAs are documented, especially in countries such as Sweden and Finland, where HIA are integrated in regular decision-making at the local level. More recently, Nerhagen and Forsstedt (2016) noted that, in Sweden, several agencies are responsible for policy-making, leading to a fragmented RIA system with unclear requirements for cost-benefit assessment; and that institutional and organisational changes over time disrupt policy development and RIA. In New Zealand and Quebec, government departments other than for health were reluctant to have a health-sector vision imposed on them, nor were they willing to internalise an HIA process by developing in-house skills (Morgan, 2008; Molnar et al., 2016). Morgan (2008) postulates that this might be because the departments saw HIA as the start of an invidious trend, with other social policy areas potentially following on to also demand a say in policy development. More positively, in Ireland a combination of legal challenges against

⁵ We have not found literature that refers to stakeholders’ responses to impact assessments not being carried out, i.e. whether policy-makers are ‘getting away’ with not carrying out impact assessments. It is likely that this is because policy development is not as keenly scrutinised by the public as (say) the preparation of local development plans which have a more readily identifiable bearing on individuals’ quality of life. At the plan and project level, there have certainly been many legal challenges against poor and missing SEAs and EIAs (e.g. EPA, 2020).

poor SEAs and an effective 'SEA champion' in the form of the Environmental Protection Agency has led to an increase in the sectors engaged in SEA and a greater openness to the process (EPA, 2020).

In Ireland, there was a "high level of formal compliance" with poverty proofing procedures (Office of Social Inclusion, 2006), but Johnston and O'Brien (2000) found that poverty proofing seemed to be applied primarily to policies that were themselves designed to reduce poverty, whereas the point of the exercise is to assess those policies that might not have an obvious impact on poverty. The EOHSP (2007) also noted that "HIAs conducted on an ad hoc basis may sometimes be affected by opportunistic politics. It may be argued that the HIA was only initiated because the expected outcome would support the pending decision." Johnston and O'Brien (2000) found that some reports simply stated that 'the impact on those in poverty would be positive', but that this is not a clear indication of poverty proofing as legally required.

In Ireland, no regular list of regulations and RIAs is published (Ferris, 2017), and the same seems to hold true for most other countries and impact assessment types. A few notable exceptions are Scotland's SEA Gateway which publishes a comprehensive list of SEA reports⁶ and the US Environmental Protection Agency's environmental impact statement database⁷.

3.2 Are the assessments carried out at a time when they can inform the policy development?

The late timing of impact assessment, after key policy decisions had been made, was highlighted as a problem in a number of studies, although reference to the actual timing of impact assessments (as opposed to the time when impact assessments should be carried out) was sparse.

Dunlop et al. (2012) suggest that a combination of RIA starting early and the use of outside consultants is particularly important in improving the understanding of cause-and-effect mechanisms that underpin policy issues. EOHSP (2007) found that some HIA results were not conveyed to the decision-makers because the assessment was not completed on time, and so did not inform the decision. Radaelli (2009a) noted that, for UK RIAs carried out 2005-2007, "systematic analysis of alternative options is often lacking giving the impression that most RIAs started at a late stage, with one option already chosen outside the RIA". Turnpenny et al. (2009) found that RIAs in the EU, Germany, Sweden and the UK tended to be started late in policy formulation, and the timing of SEAs in the Netherlands is an 'area for improvement' (van Dreumel, 2005). The OECD (2020) found that the Dutch RIA template tends to be completed late in policy process, and that there is little room to consider alternatives (OECD, 2020)

⁶ [Further information on the Scottish Government's Strategic Environmental Assessment](#)

⁷ [US Environmental Protection Agency's environmental impact statement database](#)

3.3 Are the assessments more than a formality?

The literature – much of it in (the more critical) peer-reviewed academic journals – suggests that impact assessments are often carried out in a minimal fashion, and are not achieving their aims. Both OECD (2009, 2011) for RIA and Monteiro et al. (2018) for SEA describe this as a ‘gap’ between the ideals of the impact assessment and what it actually does.

For instance, the EOHSP (2007) identified four types of effectiveness when assessing the effectiveness of HIAs, based on whether either or both of two outcomes was achieved: 1. plan changes as a result of the HIA information, and 2. explicit acknowledgement of the HIA in the planning decision (see Figure 3.1). HIA is only clearly effective when both of these occur (direct effectiveness). Of the 54 policy HIAs the EOHSP reviewed, only half were reported to decision-makers.

Radaelli (2009a) is also cynical about international RIA practice, distinguishing between impact assessments that

- improve the efficiency and effectiveness of policy in the way intended
- are used to increase policy legitimacy, but not to improve the policy
- are used to ‘stack the deck’ (increase core executive control on the regulators), tweaked to support broad existing policy trajectories, or stripped down and used as a symbolic signal.

Figure 3.1 HIA effectiveness (EOHSP, 2007)

		<i>Modification of pending decisions according to health/equity/community aspects and inputs</i>	
		<i>Yes</i>	<i>No</i>
<i>Health/equity/community adequately acknowledged</i>	<i>Yes</i>	<i>Direct effectiveness</i> <ul style="list-style-type: none"> • HIA-related changes in the decision • due to the HIA, the decision was dropped • decision was postponed 	<i>General effectiveness</i> <ul style="list-style-type: none"> • reasons provided for not following HIA recommendations • health consequences are negligible or positive • HIA has raised awareness among policy makers
	<i>No</i>	<i>Opportunistic effectiveness</i> <ul style="list-style-type: none"> • the decision would have been made anyway 	<i>No effectiveness</i> <ul style="list-style-type: none"> • the HIA was ignored • the HIA was dismissed

Although Radaelli (2009a) does not discuss the proportion of RIAs that fall into each category, Dunlop et al. (2012) do. Analysing 31 RIAs from the EU and UK, they distinguished between ‘instrumental’ use of RIA to enhance understanding of mechanisms that underpin the policy issue; ‘communicative’ use to provide consultees with information on the impact of the policy proposal; ‘political’ use to control bureaucracy or handle conflict; and ‘perfunctory’ use to water down or not implement RIA. Of 31 RIAs that they analysed, 13 exhibited instrumental uses, 5 exhibited communicative uses, 13 exhibited political use, and 16 exhibited perfunctory use. Turnpenny et al. (2009) also suggest that the knowledge produced by impact assessments is often little used in policy-making and, when it is, it is often used to bolster political positions or justify decisions already taken

In the Netherlands, interviews of civil servants showed that, although some felt that gender impact assessments were an ‘eye-opener’ and improved their policy proposal, more often the assessment results caused resentment, irritation and resistance. Gender mainstreaming was felt not to be a policy priority (Roggeband and Verloo, 2006). In Sweden, the ministry in charge of a given issue frames the problem, and sets the policy directions and key priorities in advance, and there is heavy emphasis on gaining political consensus, meaning that knowledge from RIAs has difficulty ‘creeping in’ (Hertin et al., 2009). Turnpenny et al. (2009) suggest that RIA is viewed across all jurisdictions as a ‘largely irrelevant formality’.

An analysis of 47 HIAs in Australia and New Zealand (Harris et al., 2013) found that many HIAs led to real changes on the ground (see Sec. 4), but some exhibited ‘opportunistic effectiveness’ in that they were carried out with the intention that they should support a decision already substantively taken, or that only elements of the HIA that supported the decision were taken up while other more challenging recommendations were ignored. In other cases, HIA recommendations were not accepted or ignored, or the HIA recommendations were ineffective. Owens et al. (2004) also note that the output of assessments can be invoked or even manipulated in order to rationalise decisions already taken on the ground: “The problem – well rehearsed – is that ethical and political choices masquerade as technical judgments, reinforcing prevailing norms and existing structures of power”.

The OECD (2009) also found that officials’ analyses of the economic costs and benefits of their regulatory proposals tended to be incomplete, “a ‘check the box’ approach that does not seriously influence policy development”. They concluded that “The lack of full analysis in RIA appears sufficiently widespread to be a fundamental constraint on realising the full benefits of RIA”. An analysis of rural proofing practice in Ireland (Sherry and Shortall, 2019) also suggests that much of it involves ‘box ticking’. Hilding-Rydevik et al. (2011) suggest that mixed messages from government might be a key factor in this: on the one hand, government suggests that impact assessment will result in major benefits, but on the other hand it expects no significant change to existing practice and no increased cost. Roggeband and Verloo (2006) note a similar tension in gender mainstreaming, where states have an official commitment to gender equality as a political goal, but also are de facto agents of gender inequality.

Based on Swedish and Dutch practice, Monteiro et al. (2018) blame the lack of SEA effectiveness on the SEA process itself: the capacity gap between how SEA is intended to work and how it works in practice “reflects the lack of adjustment of formal SEA model requirements in relation to the need to fit for purpose in specific governance contexts...”. In particular, Monteiro et al. (2018) note that the ‘capacity gap’ seems to occur where countries – for instance China and Vietnam – have imported impact assessment models without having the underlying base of experts, tradition of public participation, up-to-date data, or government flexibility and transparency.

In Wales, the absence of data about future trends has meant that “the majority of [wellbeing] assessments provided little insight into future trends or multi-generational policy challenges. Some [assessors] questioned the validity and value of focusing on the future, describing it as an ‘inexact science’ whereas others were very vague about their approach to long-term planning and forecasting” (Future Generations Commissioner for Wales, 2017).

3.4 Conclusion

It is much easier to refute an argument than to make it: making an argument means showing that the argument works in all cases, whilst refuting it requires only one example of the argument not working. The fact that many impact assessments are not carried out, are carried out too late, or are superficial does not mean that they should not be carried out. Rather, as Monteiro et al. (2018) note, it begs the question of whether the impact assessment process is fit for purpose: whether policy makers understand what the purpose of impact assessment is, whether they have the capacity and resources to carry out assessments, etc.

Other reasons for limited impact assessment effectiveness include an emphasis on political consensus, the perception that impact assessments reduce a ministry's flexibility and control, concern about 'assessment creep', and late timing of the assessment.

Unfortunately, missing or poor quality impact assessments can have broader repercussions than simply the policy not being improved: it can send out the message that the topic is not important enough to be adequately considered. For instance, Osborne et al. (1999) note, about a poorly done Policy Appraisal and Fair Treatment assessment (PAFT) in Northern Ireland:

“Protestant mistrust is now added to Catholic mistrust. A PAFT initiative, which is only partly adopted, is likely to be particularly damaging politically. It is in danger of being seen by both sides of the community as a gesture and not a fully incorporated dimension of policy.”

4. How effective are impact assessments?

This section considers how impact assessments have changed policies, improved participation and transparency in policy-making, and improved learning and knowledge by policy makers. It also discusses whether impacts assessment are 'worth it' in terms of the costs/resources required.

4.1 Changes to policies

This sub-section is divided by type of impact assessment, since considerable literature exists on how different kinds of impact assessment have changed policies.

Environmental (SEA): Almost all of the literature on the effectiveness of SEA relates to plans and programmes, and is not covered here. The former Dutch 'E-test' of policies was

“used primarily for instrumental purposes and limited in its effectiveness. During the first five years, the E-test has led mainly to the inclusion and highlighting of environment-related information in explanatory memoranda to draft bills. However, this information played only a limited role in policy-making and contributed little to the environmental improvement of draft laws and regulations or to the transparency of this process” (van Dreumel, 2005).

Similarly, focusing on impact assessment to promote sustainable development, Owens et al. (2004) suggest that assessment procedures in general – at least as they were 16 years ago - had failed to live up to widespread expectations of becoming a vehicle for bridging knowledge from different sectors and integrating it into policy-making.

Equality: An Irish 'equality budgeting' pilot programme led to a wide range of changes, including the provision of grants to increase participation of women in sporting activities, a review of apprenticeship programmes with a view to increasing female participation, a gender initiative in awarding Science Foundation Ireland research grants, targeting smoking reduction amongst the less well-off, and support for refugees (Howard, 2019). However, more widely, the OECD (2019) was relatively critical of Ireland's lack of overarching equality strategy, lack of mandatory equality budgeting, lack of consideration of equality issues other than gender, and limited communication of its equality vision to departments and wider stakeholders.

In Northern Ireland, the Policy Appraisal and Fair Treatment initiative was used in the late 1990s as a basis for formal investigations into equality practices, and at least one judicial review relating to religious imbalance in college admissions (CCRU, 1999). A review of 50 cases of US 'environmental justice' analyses, primarily related to projects rather than policies, found that 33 of the 50 cases led to some kind of 'remediation': stopping construction of a proposed project, closing an existing site, achieving a substantial cleanup, substantial financial compensation for damages etc. (Hess and Satcher, 2013).

Health: Gray et al. (2011) analysed 135 HIAs internationally, and overall found little evidence that health issues were incorporated into plans or subsequently implemented. Harris-Roxas et al. (2012) also note that "HIAs are frequently rushed and often conducted after other impact assessment processes, with limited scope for

the collection of new data upon which to base an assessment... HIA lacks evidence to demonstrate that it is effective in changing decisions and the implementation of policies”.

In contrast, Haigh et al. (2013) and Harris et al. (2013) found that, of 47 New Zealand and Australian HIAs, all demonstrated some evidence of effectiveness, 65% directly led to changes in the policy, and 94% of 45 HIA authors felt that the HIAs had made a difference. Changes made as a result of HIAs included:

- Decisions being changed
- Elements of the HIA being integrated into the proposal
- HIA being used to enforce agreement on monitoring conditions
- HIA being used as a baseline assessment and framework against which progress of the policy is judged
- HIA findings being adopted in principle but needing amendment in order to be enforceable/ implementable (Harris et al., 2013).

The EOHSP (2007) found that all but one of 17 HIA case studies it analysed were in some way effective, either directly, generally or in an opportunistic manner. The report argues that the fact that none of the HIAs resulted in the cancellation of the proposed plan shows that HIA is not intended to hinder policy-making, but rather to help inform decisions with regard to their health effects.

Based on an in-depth analysis of four Dutch HIAs, Bekkers (2007) concluded that because health problems (e.g. obesity at the population level) have many causes and data are lacking about many problems, policy-makers are faced with inconclusive analyses, leading them to question the HIA problem definition and methodology. “HIA is only to a limited extent effective in reframing public policy to integrate health. HIA practices in all cases remain the primary responsibility of the public health sector with limited or hardly no involvement of the other policy sectors addressed” (Bekkers, 2007).

However, like Monteiro et al. (2018), she suggests that this is at least partly the fault of the HIAs themselves rather than of the decision-makers: “there is limited consideration [in HIAs] for ‘usefulness’ of knowledge to the policymakers addressed, nor for the feasibility of policy alternatives to make problems ‘doable’” (Bekkers, 2007).

Interestingly, analysing four Irish HIAs, O’Mullane and Quinlivan (2012) suggest that HIAs are likely to be more effective at the local than the national level, in part because they claim that there is greater transparency and accountability and more consultation at the local level.

Regulatory: Of the RIA literature analysed for this study, that on Ireland seemed to be the most positive, though in a qualified manner:

“The RIA process has succeeded in moving Government Departments away from the traditional ‘regulate first’ approach and towards having evaluations of different options done before regulatory decisions are made. However, this may not always be the situation. If Departments are merely ‘ticking boxes’, after legislative solutions have been chosen, it amounts to a little more than a waste of resources – unless the RIA impacts on the evolving legislation” (Ferris, 2017).

Radaelli (2009a) takes a more critical stance, noting that there is limited evidence of RIA informing policy in countries such as the Netherlands, Sweden and the UK. He suggests that RIA is often used as a symbol rather than as a tool for improving policy.

The Netherlands is the only country for which we have found an up-to-date and detailed analysis of its RIA system, although the OECD (2020) suggests that its strengths and weaknesses are replicated in other countries. The Dutch government introduced an integrated assessment framework ('IAK') in 2011, which was a clear improvement on the previous panoply of uncoordinated assessments, but this still has problems:

“The OECD team could find little clear evidence that the IAK is having an impact on decision making within government... Parts of the [IAK] framework are well structured and strongly overseen, in particular the requirement to calculate regulatory costs on business. Furthermore, the political will continues to exist at Cabinet-level and throughout the ministries for an evidence based and transparent decision-making process... However, the current IAK has not become an integral part of governmental decision making process in the manner intended and tends to be produced late in the policy process. Nor is it driving sufficient transparency for stakeholders... it also lacks strong regulatory oversight to ensure regulatory quality and the integration of horizontal objectives” (OECD, 2020).

4.2 Participation and transparency

Even where an impact assessment does not lead to changes in a policy, it can have benefits in terms of improved transparency and accountability of decision-making, increased awareness of the public, and increased trust between stakeholders. These can “go beyond individual processes (and also strictly environmental issues) and can be related to... the broader process of 'democratisation of decision-making'" (Rega and Baldizzone, 2015). This transparency has both benefits and constraints: it helps to ensure that the policy is as 'good' as possible, but it can be used – or, in the ministry's views, abused – to oppose the policy (Turnpenny, 2009). Radaelli (2009b) uses a similar description for Dutch RIAs for which there is no clear output/report: “‘Good’ for consensus politics in an executive with a skinny majority, electoral volatility and coalition pacts... ‘bad’ for researchers wanting to score the Dutch RIAs”.

Most of the literature on participation in impact assessment relates to plans and projects. The only references to participation in policy assessments we could find were for Ireland. The 2016 [Programme for a Partnership Government](#) (2016) promotes public consultations as an important opportunity for the public to have direct input into policy-making, although it does not clearly link this consultation to impact assessment. Early poverty proofing exercises in Ireland were criticised by community and voluntary groups because those who were potentially impacted by a policy were not involved in its proofing. This led to the current approach to poverty impact assessment having consultation as its first step (Johnston, 2017). Ferris (2017) suggests that “consultation is a crucial part of the RIA process” in Ireland and

the website <https://www.gov.ie/en/consultations/> gives details of consultations carried out by Irish government departments and local authorities.

At the policy level, the same short list of organisations may regularly be consulted, on the assumption that they represent the public interest. These organisations tend to be well resourced, with well-established channels of communication with policy-makers. Smaller groups and individuals may consequently be sidelined (Turnpenny et al., 2009). For US ‘environmental justice’ cases, Konisky and Reenock (2018) found that state regulatory agencies gave more attention to those communities in which environmental justice advocacy organisations operated, suggesting that such organisations play an important role in ensuring a positive outcome for impact assessments.

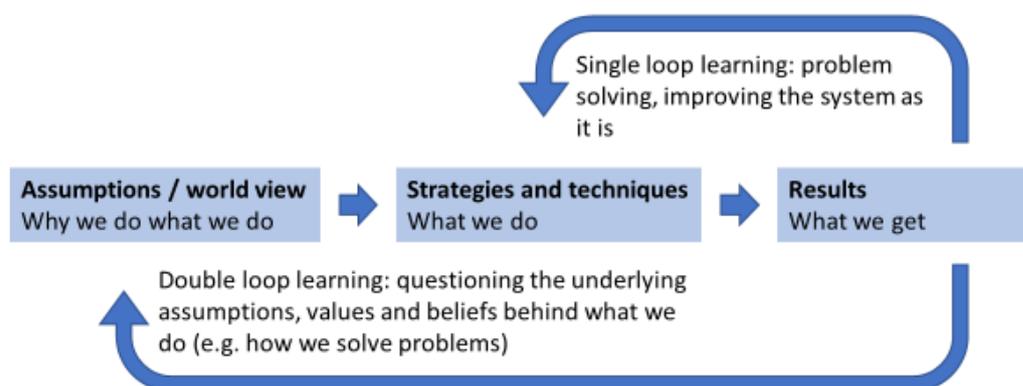
4.3 Knowledge and learning

Knowledge and learning is the dimension of impact assessment effectiveness that is most often cited in the literature as working well. Many of the benefits of impact assessment do not accrue to the policy being appraised, but rather through longer-term, indirect changes of beliefs and policy frames (Radaelli, 2009b). Hertin et al. (2009) distinguish between three types of knowledge that can emerge from impact assessment processes:

- Conceptual learning, where the knowledge ‘enlightens’ policy-makers by providing new information, ideas and perspectives, including challenging existing beliefs and opening opportunities for policy change
- Instrumental learning, where the knowledge is put to use in practice, for instance in the design of policies
- Political use, where the knowledge is put forward to attain political objectives, for instance to provide justification for decisions already taken or disarming an opponent’s viewpoint.

In this case, ‘instrumental rationality’ represents single loop learning (e.g. how do we reduce a policy’s health impacts?), whereas ‘challenging existing beliefs’ represents double loop learning (is this the right approach to policy formulation?) – see Figure 4.1.

Figure 4.1 Single and double loop learning (based on Argyris and Schön, 1978)



Haigh et al. (2013) and Harris et al. (2013) refer to three types of single-loop learning resulting from HIA in New Zealand and Australia: increased knowledge about health and the social determinants of health, better technical skills and knowledge (e.g. use of data, assessment of evidence), and social learning (e.g. new relationships, engagement with other sectors and stakeholders, negotiation skills).

Much of the effectiveness of impact assessment, if carried out well, also involves double-loop learning:

“in order to truly integrate sustainability concerns in policy-making, the underlying challenge is in fact not the quest for instrumental rationality but rather one of policy learning and reframing. For... any new values to become prioritised, a reframing of values and priorities as such is needed. Such a change requires a conceptual learning process modifying existing beliefs and priorities” (Nykvist and Nilsson, 2009).

Harris-Roxas et al. (2012) give an intriguing example of how HIA can lead to consideration of completely new approaches (double-loop learning):

“The opportunity exists to improve HIA through paying greater attention to other forms of alternatives... Knowledge alternatives involve looking at different ways of understanding the issue or problem. For example, where malaria is endemic, the problem can be viewed as being environmental (standing water), social (barrier to use of preventive schemes like bed-nets), economic (lack of access to treatment), or cultural (agricultural practices leading to standing water, or cultural practice leading to proximity to standing water), among many others. Institutional alternatives involve new partnerships or different ways of working at an organisational level, while goal alternatives involve consideration of what is trying to be achieved and whether alternative approaches could be used to achieve those overall goals.”

Comparable issues in the countries investigated as part of this research could include responses to childhood obesity or pandemics. In other words, simply looking at a problem from several points of view – a legal requirement of some forms of impact assessment – involves learning.

In the Netherlands, “knowledge on how to calculate regulatory burden is now quite firmly embedded across ministries” (OECD, 2020). In Ireland, poverty proofing has sensitised policy-makers across government about social inclusion and the need to consider the impact of their policies on people living in poverty (Office of Social Inclusion, 2006; Johnston, 2017). Interviewees in England, the Netherlands and Northern Ireland stated that HIA had created stronger health consciousness in decision-makers (EOHSP, 2007), and this is confirmed by Gray et al. (2011), Haigh et al. (2013) and Ward (2006). The EOHSP (2007) also notes that participation in HIA will increase a community’s knowledge and ability to control things that influence their health.

Hertin et al. (2009) found few examples of conceptual learning where the assessment fundamentally challenged the problem definition or policy approaches. In contrast in Wales, the Future Generations Commissioner (2017) is explicitly aiming to do this, by challenging the Public Service Bodies (PSBs) that carry out wellbeing assessments to think outside the box: “Despite the evidence in the assessments showing a range of alarming trends, PSBs are only engaging in safe

and non-contentious territory. PSBs need to evidence how they are identifying and exploring tensions between different policy issues and priorities to enable an honest discussion about new approaches that need to be taken". In Ireland, the Environmental Protection Agency is taking a similarly proactive stance towards SEA practice.

The literature also highlights the long-term nature of learning. The EOHSP (2007) found that the learning brought about by HIA would have a "lasting effect which will contribute to healthy decision-making in the future". Dunlop and Radaelli (2015) found that RIA's merit over time "is most likely to lay out arguments and evidence that can be used after the decision is taken... and go back to the same issues years later in the context of another [impact assessment]".

Knowledge and learning, in turn, can lead to better impact assessments. A relatively damning WHO (2018) survey of 64 HIA practitioners found that more of them considered HIA to be ineffective than effective (with no clear definition of 'effective'). However, "respondents from countries with a higher experience in HIA, for example, Lithuania and the United Kingdom, rated more in favour of HIA effectiveness than respondents from countries with less experience in HIA".

Some of the learning involved in impact assessment is formal: policy-makers may be required or encouraged to attend courses on impact assessment or related issues. Meetings with stakeholders can increase policy-makers' and the public's knowledge of the policy, impact assessment, and the likely impacts of the policy; and being involved in impact assessment will increase the public's understanding of policy-making and the impacts of policies (OECD, 2007). More informally, discussions between stakeholders can help participants to broaden their view and gain expertise. However, longer-term learning can be limited by staff changes and the consequent loss of institutional memory (Roggeband and Verloo, 2006; Therivel and Gonzalez, 2019).

4.4 Costs v. Benefits of Impact Assessments

Information on the costs v. benefits of policy impact assessments was so patchy and often so dated that we did not feel that it was possible to write cogently about the issue here. That said, some high-profile discussions about 'streamlining' or 'simplifying' assessments (e.g. White House, 2020; MHCLG, 2020) do make this issue pertinent.

EOHSP (2007) lists the costs of some HIAs dated 1994-2004; and Radaelli (2009a) noted that "The UK has been the only country in Europe to insist that benefits of regulatory proposals justify the costs [of RIA]". Key limitations are that policy-level impact assessments are often carried out in-house, and it is difficult to cost this; and policy-makers do not regularly revisit their policies and impact assessments. Furthermore, the costs of impact assessment fall on the policy-maker whereas the benefits are felt more widely. This means surveys of decision-makers probably understate the long-term benefits of policy changes resulting from impact assessments (Therivel and Gonzalez, 2020).

4.5 Conclusion

Impact assessments can lead to improved policies, greater participation and transparency, and particularly improved long-term knowledge and learning. The latter can go well beyond the policy in question and have longer-term benefits for other policies.

However, simply requiring impact assessments to be carried out does not mean that they will be carried out well or, indeed, at all. ‘Tactics’ are also needed. Berensson and Tillgren (2017) suggest that the use of HIA in Sweden to influence public policy “requires practitioners to be both tactical and technical... HIA must be tactical by taking into account procedural policy-making constraints and focusing on policy actors’ values, interests and learning, and ultimately, institutional rules, procedures and mandates”. In the context of US environmental justice, Hess and Satcher (2013) similarly suggest that effective assessment requires the judicious use of strategies and coalitions, and that impact assessment research needs to focus on what facilitates successful outcomes on the ground. Section 6 further discusses preconditions for effective impact assessment.

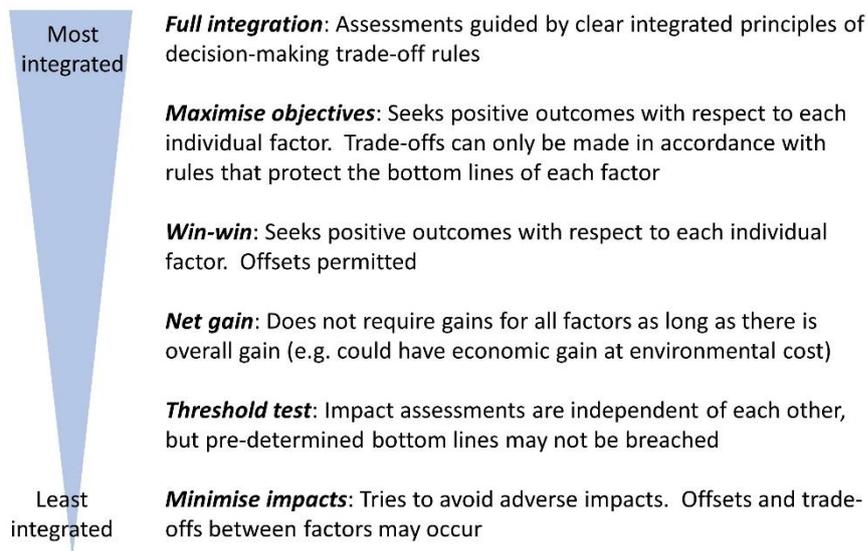
5. How is integration of impact assessments handled?

Section 2.2 noted that Ireland and Wales have ‘integrated’ policy impact assessment requirements. In Ireland, RIA includes an assessment of impacts on equality, the environment, and rural communities; and in Wales the wellbeing assessments cover include health, equality, the environment, and climate. But how does ‘integration’ occur? What happens if there are tensions within these ‘integrated’ assessments? And what happens if different types of assessment (e.g. RIA, HIA) of the same policy lead to different conclusions about the best direction for the policy?

5.1 What is integration?

‘Integration’ is not one unique state, but covers a continuum from full integration through to minimisation of impacts (Figure 5.1).

Figure 5.1 Hierarchy of impact integration (adapted from Morrison-Saunders and Therivel, 2006)

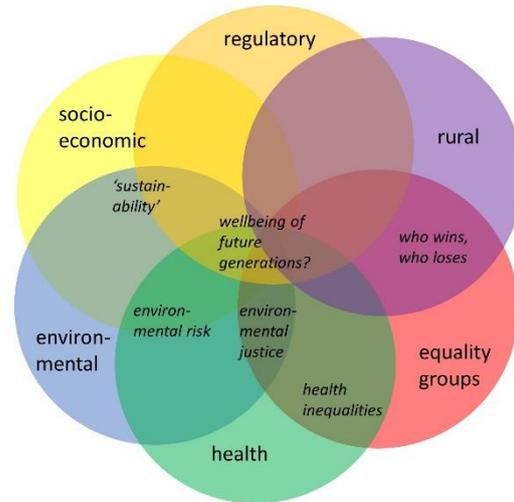


5.2 Integration within impact assessment processes

The literature identifies a wide range of impact assessment types that can be integrated, with some groupings of impact assessment being more obvious than others (Figure 5.2):

- Environmental + health (environmental risk)
- Health + equality (health inequalities)
- Environmental + health + equality (US 'environmental justice')
- Poverty + rural + 'equality groups' (who wins, who loses)
- Environmental + social (England and Wales 'sustainability appraisal')
- Within equality assessment, consideration of different groups (men/women, people with and without disabilities etc.)

Figure 5.2 Groupings of impact assessments



Integrated assessments can reflect broader political priorities beyond the policy relevance of individual policies or regulations. This increases the relevance of the assessment, making it more tailored to political demands (OECD, 2011). However, both Jacob et al. (2011) and Adelle and Weiland (2012) found that, in practice, integrated impact assessments tended to focus more on regulatory burdens and economic competitiveness than on other dimensions such as equity and the environment.

There is little literature on the *process of* integrating impact assessments, and particularly none that link this with the hierarchy of integration shown at Figure 5.1. Johnston (2017) describes Irish attempts to integrate different types of assessment, which concluded that integration was too difficult in the short term:

“A particular consideration at the time of the early reviews [of poverty-proofing in Ireland] was how to develop a more integrated system of proofing, including, for example, poverty, gender and equality, and possibly rural and environmental issues as a more encompassing tool for policy proofing, rather than carrying out a number of parallel exercises. A number of groups and studies considered these issues... but found certain limitations to the development of such an integrated system... [It was] concluded that an integrated process of policy proofing should be developed when the existing parallel processes were fully operational, and should incorporate a screening mechanism and greater coordination of guidelines and advisory functions” (Johnston, 2017).

Kearns and Pursell (2011) also noted that key stakeholders in the environmental, health and local government divisions of the Irish public sector appeared to be working in parallel rather than collaboratively with respect to HIA.

The literature does identify factors that affect how well different forms of assessment can be integrated. In turn this gives an indication of what should be considered when considering how to integrate different forms of assessment into one process:

Data availability: Data may be more easily available for some forms of impact assessment than others. For instance, data on gender equality is comparatively easy to find and present. In contrast, disability data relies on self-disclosure and there is substantial variation in the range and nature of disabilities (OECD, 2019).

Quantification: Impact assessments typically focus on monetisable, or at least quantifiable impacts of policy proposals, and neglect those social and environmental aspects that are not monetisable or easily comparable (Turnpenny et al., 2009). Some RIA systems that use cost-benefit analysis aim to quantify/monetise as many impacts as possible, and to conclude with a single indicator (money). However Adelle and Weiland (2012) note that this does not allow trade-offs to be sufficiently acknowledged.

Single v. multiple indicators: Impact assessment is easier when fewer dimensions/indicators are involved. For instance, the OECD (2019) has suggested that moving from 'gender budgeting' to 'equality budgeting' in Ireland has meant moving from a single dimension (gender) to multiple dimensions (gender, poverty, people with disabilities, rural communities), making it more complex for departments to implement. However even the gender-as-one-dimension approach is countered by the National Women's Council of Ireland (2017), which perceives gender as only one facet of the much more complex problem of poverty, equality, fairness, social rights and economic resilience:

“Successful gender budgeting requires understanding of the dynamics of gender and inequality... [The International Monetary Foundation] has concluded that the issues of growth and equality can't be separated, rather there's a strong case for thinking about inequality and inability to sustain economic growth as two sides of the same coin”.

Assessments involving long time scales (e.g. sustainability, future generations) are also difficult for policy-makers to handle (Nykivist and Nilssen, 2009).

There is also the 'detail paradox', which states that the power of each objective diminishes with the addition of other objectives: in other words, the more detailed the assessment is, the less significance, on average, is attached to each detail. Bondemark et al. (2020) note, for instance, that Swedish transport plans have so many goals and subgoals that cannot be summed to a single indicator, that this diminishes the governing power of each subgoal.

Mutual understanding of terminology and frames of analysis: Assessment terms must be explicitly stated and understood (WHO, 2008; Johnston, 2017). Verloo (2007) gives a Dutch example of government departments increasingly having 'gender blind policy frames', in contrast with the 'feminist frames' of equality officials and gender experts⁸. EPA (2015) research found that Irish government and private

⁸ Verloo (2007) does not explain this further, but subsequent co-authored work suggests that 'gender blind' policies apply equally to men and women, but may have indirect gender-related impacts. For instance, welfare policies that differentiate between employed and non-employed people, or that penalise interruptions in participation in the labour market, tend to perpetuate a male breadwinner – female caregiver model that

industry stakeholders had at least four different interpretations of what health means in terms of the environment-planning interface, from health impacts being adequately assessed using only environmental limit values through to HIA being a tool to appraise both physical and social determinants of health. Sherry and Shortall (2019) similarly found that there was ‘ambiguity, or lack of practicable understanding’ of the key terms and concepts related to rural proofing. Their interviewees – staff from three categories of public bodies subject to the Rural Needs Act (Northern Ireland Government Departments, Local Government Districts and Non-Departmental Public Bodies) and key informants - expressed confusion regarding the relationship between equality, equity and rights.

When trying to integrate HIA into SEA in France, “From the very first exchanges between [working group] members, it became clear that work was required on finding definitions that suited everyone for the main concepts: Health, determinants of health, environmental health...” (Roué Le Gall et al., 2018). Molnar et al. (2016) refer to the need for a ‘shared language’, and suggest that this can only be achieved after time spent aligning conceptual understandings to bridge the sectoral cultural divides.

Intersectoral cooperation: The WHO (2018) suggests that lack of intersectoral cooperation poses one of the main barriers to HIA-SEA integration. This is due cultural differences between the sectors and the different ‘languages’ they use, different governance arrangements, and a lack of trust between the different stakeholders (Molnar et al., 2016; WHO, 2018)⁹. Turnpenny et al. (2009) note that the ‘silo’ culture of policy making is still a significant constraint on integrated policy assessment. Roué Le Gall et al. (2018) also note that partnerships between regional health authorities and urban planning teams to integrate health issues into SEA requires a ‘shared culture’ to be established. Molnar et al. (2016) suggest that some of this shared culture can come from piggybacking the assessment aims onto pre-existing and well-understood principles like sustainable development.

Expertise: ‘Integrated’ assessment may be carried out by experts in one type of assessment, who may know little about the other types of assessment, but is this a problem? Dauvin (2005) argues that decision-makers and planners need to draw on those most knowledgeable when conducting environmental impact assessments. In contrast, EOHSP (2007) claims that HIA is neither difficult nor overly scientific, with common sense and persuasive powers being more important than health specialisations: “We should be persuading many people that they are capable of performing HIA, promoting confidence by helping them to acquire extra skills”.

Focus on win-win: Pinto et al. (2015) and Molnar et al. (2016) note that policy goals that are framed as providing ‘win-win’ health and economic benefits have a high degree of buy-in¹⁰. Similarly, gender budgeting gains more traction where it is reframed as being central to economic policy and inclusive growth (National Women’s Council of Ireland, 2017). Molnar et al. (2016) suggest that non-health

promotes the feminisation of poverty (Lombardo et al., 2016). A ‘feminist frame’ would consider these indirect impacts whereas a ‘gender blind’ frame would not.

⁹ An Australian example is “the high level of democratization in the health sector, and the infrequent use of consultations more characteristic of sectors strongly influenced by engineering, such as transportation” (Molnar et al, 2016).

¹⁰ An intriguing win-win identified during the literature review (not related to the countries analysed) was between gender equality and land degradation neutrality (Collantes et al., 2018)

sector buy-in can also be achieved by health impact assessment experts working with policy-makers on their own agendas (e.g. improving educational outcomes for vulnerable students rather than improving healthy eating behaviour) rather than vice-versa. They developed a framework for achieving win-win solutions, which incorporates many of the additional points raised at Section 6.

5.3 Integration of impact assessment findings into policy

The types of impact assessment discussed in this report, with the exception of RIA, are all likely to go counter to short-term economic optimisation: they involve adding environmental and health safeguards, focusing on the longer term (climate change, wellbeing of future generations, sustainability) and rebalancing policy to take account of the needs of disadvantaged groups. Turnpenny et al. (2009) note that RIAs tend to be dominated by an economic growth paradigm which constrains the issues covered in assessments and focus on economic costs rather than environmental impacts. Molnar et al. (2016) note that, in Sweden, the business sector is particularly resistant to HIA awareness-raising “as there was no apparent profit to be made from intersectoral work”.

Unsurprisingly, most of the examples in the literature are of impact assessments failing to affect policy (Figure 5.1):

- In the Netherlands, an HIA for a national approach to reducing obesity suggested analysing the effects of food advertisement restrictions and food labelling. However these topics were excluded from further consideration because the stakeholders devising the approach – who included food, drink, and catering industries - were committed to self-regulation and cooperation rather than legal measures. Indeed, the public health policy-makers themselves ended up by rejecting the HIA, arguing that it lacked rigour (Bekkers, 2007) = *minimise impacts*
- A study of HIA in Sweden, Quebec and South Australia (Pinto et al., 2015) found that health issues alone ‘count for nothing’ for ministries whose primary goal is economic. An interviewee within that study noted that when a policy has an impact on business outcomes, it creates ‘incredible tension’ between economic and social deliverables, for instance between increasing employment and improving health outcomes = *minimise impacts*
- An HIA was carried out at the instigation of a Traveller community in Ireland, who wanted to change the local authority’s policy stance on Traveller accommodation. However, this led to little political action, and “the HIA was subsumed in a policy discourse marred with prejudicial legacies against the community group and cross-institutional negativity” (O’Mullane and Quinlivan, 2012) = *less than minimise impacts*
- In Swedish transport planning, cost-benefit analysis results (e.g. from RIA) influence investment decisions, with the most profitable or least unprofitable option usually being the chosen one. However negative non-valued environmental effects also have an effect, making it less likely that an investment will be included in a plan (Bondemark et al., 2020) = *minimise impacts*

5.4 Conclusion

We had assumed that the literature would come out in favour of integrated impact assessment, but instead a more nuanced picture has emerged. Morrison-Saunders et al. (2014), from an academic perspective, argue in favour of integration that different impact assessment types generate diversity at the expense of value, and create silos and confusion. However, some of the issues raised by the literature suggest that integration is not as simple as putting all of the impact assessment types in one document, or broadening out one impact assessment to encompass others. The integration process needs to address issues of terminology, culture and potential conflicts between the conclusions of different types of assessment. That said, many of the case study countries have moved to an integrated model fairly recently, and it will be important to continue to monitor and learn from the experiences of these countries as they work through the challenges of adopting a more integrated approach to impact assessment.

6. Preconditions for effective impact assessment

6.1 Literature findings

The literature provides much information about the preconditions for effective assessment. They are listed here in roughly the order of importance suggested by the literature.

Supportive organisations, high-level commitment: This is key, and is cited in a range of studies (e.g. National Women’s Council of Ireland, 2017; OECD, 2012, 2019; Pinto et al., 2015). Supportive organisations for SEA include the Netherlands Commission for Environmental Assessment which reviews SEAs and prepares advisory reports; the Irish Environmental Protection Agency whose SEA division is led by a strong, vocal and effective ‘SEA champion’; the Scottish Government’s SEA Gateway; and the Future Generations Commissioner for Wales. For HIA, the Welsh HIA support unit, the London Health Observatory, the Institute for Public Health in Ireland and the Intersectoral Policy Office in the Netherlands are all cited (Pinto et al., 2015; Walpita and Green, 2000).

Harris et al. (2013) note that

“The individuals involved in the [HIA] process had a significant influence on both the process and outcomes of the HIA. There were two main facets to this: direct involvement of the right people and at the right level... The right people often have the power to either make or influence decisions. Interestingly the right level is generally not the highest level of decision-making [but] are often at senior management level. They have some, but not ultimate, power, understand the system well, often have pre-existing relationships that they can utilise, and are often in a position to influence the implementation of recommendations”.

In the Netherlands as well, Verloo (2007) noted that gender impact assessment has “commitment of the political top ‘in theory’, but lack of commitment of civil servants”. As long as civil servants fail to see how impact assessment enhances the quality or status of their work, “they remain more a part of the gender problem than its solution”. In its early days, gender impact assessment was supported by a pioneering equality officer, but when that officer left, not much more progress was made (Roggeband and Verloo, 2006).

Expectation that impact assessment will lead to change, willingness to learn and experiment:

Kearns and Pursell (2011), writing about HIA in Ireland, highlight how organisational culture inhibits radical, strategic, and long-term change through a complex arrangement of beliefs, paradigms, cultural codes and knowledge. “In the absence of addressing the unique cultures and sub-cultures within organisations, the ‘deep structure’ of basic values and beliefs inhibit anything but marginal change from occurring” (Kearns and Pursell, 2011). Nykvist and Nilssen (2009) also refer to ‘institutional lock-in’ and inertia for Swedish sustainability appraisals: “Doing things out of custom constitutes not only an important meso level constraint (through existing cultures, most commonly included consultants and agencies, and advice from other colleagues etc.) but also a micro level institutional constraint (on a

personal level due to previous experience, professional background etc.)” (Nykqvist and Nilssen, 2009).

In the Netherlands, gender impact assessment was perceived as a threat to policy-makers’ position and vision. In response, the Department for the Coordination of Equality Policy aimed to make gender impact assessment look less ‘dangerous and threatening’ by simplifying the process. This was criticised by academics who felt that this nuanced approach did not challenge the prevailing culture enough: “In a certain way, this could also mean that the DCE officials did not have a deep understanding of the complexities of their own position and the position of their bureaucrat colleagues, and were trying to dismantle the master’s house with the agreement of the master” (Roggeband and Verloo, 2006).

In contrast, the Welsh Audit Office (2018) clearly noticed this inertia after the first round of well-being assessments, and challenged it:

“Are we going to rely too much on the past and not think through what we need to do to radically change, to develop new ways of approaching the aims and goals of the legislation?... Don’t expect from the auditor, or from Sophie¹¹, a clear ‘this is how to do it’ - so you can go away and tick the boxes. It’s not like that. It is, however, a journey in which I’m engaged, you’re engaged and Sophie is engaged... This Act is just what was needed to unsettle the status quo, ruffle a few feathers, and bring public services back to the purpose they were set up for in the first place – to improve the lives and well-being of people here in Wales, today, and for every tomorrow to come”¹².

The Future Generations Commissioner for Wales (2017) echoed this: “it appears that [Public Service Boards] are ‘playing safe’ in how they are approaching well-being, and not yet taking the opportunity to challenge ‘business as usual’ approaches. This level of challenge will be essential to combat entrenched mind-sets and ways of working, and to enable new approaches and perspectives to be developed”.

Oversight, quality assessment: An OECD (2020) review of the Dutch RIA system noted that “An effective oversight function is critical to ensuring high quality evidence based decision making and enhancing the impact of RIA frameworks”. The Dutch Regulatory Reform Group essentially acts as a mechanism of oversight based on anticipated reactions: knowing that their proposals will be scrutinised at a high level, departments do not send in draft policies unless there is confidence in the quality of RIA, since they do not want to be named and shamed by a negative opinion (Radaelli, 2009a).

In Ireland, Ferris (2016) calls for a RIA ‘gatekeeper’ who can assess the quality of individual RIAs and challenge proposals that are not accompanied by satisfactory assessments. He cites the EU’s Regulatory Scrutiny Board as a good model for this.

In New Zealand, where there are no similar procedures for ensuring accountability, Kupiec et al. (2015) recommend that a quality assessment should be prepared for each RIA, preferably by external experts rather than internally by the agencies. At the project and plan level, in some countries (e.g. Ireland, the UK) the potential for the public to legally challenge an inadequate impact assessment plays an oversight-type role, by putting strong financial and reputational pressure on planners and

¹¹ Sophie Howe (the Future Generations Commissioner for Wales)

¹² The message is made more powerful by its personal tone – the auditor *cares*.

consultants to prepare an adequate assessment (Gonzalez and Therivel, 2020). However we found no similar evidence at the policy level.

Timing: Starting an impact assessment early in policy-making is not a guarantee of effectiveness, but starting it late in policy-making is an almost-guarantee of ineffectiveness. This has been stated by multiple sources, including Gray et al. (2011) for HIA in multiple countries, EOHSP (2007) for HIA in Wales, Ward (2006) for HIA in New Zealand, Roggeband and Verloo (2006) for gender impact assessment in the Netherlands, Ferria (2016) for RIA in Ireland; and van Buren and Nooteboom (2009) for SEA in the Netherlands.

Fitting the assessment results to the decision: Impact assessments cannot influence policy if they are a separate process, not fitted and adapted to the relevant policy decision. Monteiro et al. (2018) and Mahoney and Morgan (2001) argue that impact assessment processes cannot be adopted from elsewhere – or indeed from a different ‘scale’ (plan v. policy, national v. local) without adapting them to the context where they will be applied. Bekkers (2007) notes, in the context of Dutch HIAs, that impact assessments have to be useful to policy-makers: “policy-makers’ frames of the usefulness, feasibility and acceptability of the proposed alternatives are the main conditions for policy change”. After interviewing 14 chairs and/or secretaries of Swedish Committees of Inquiry, which have a key role in policy formulation, Nykvist and Nilssen (2009) conclude that the message of the impact assessment must be carefully framed. Two of their interviewees observed that:

“A large proportion is a pedagogic presentation. If you could make the results understandable to a common politician or official...” (Interviewee Case D)

“I feel that the academic community, for as long as I can remember, when the dissertation is completed, they never move to the next phase, that is, to market this new knowledge...” (Interviewee Case C)”.

Nykvist and Nilssen (2009) note that the use of impact assessments to inform policy “is inevitably a role of advocacy”: impact assessment faces a delicate balance between providing objective knowledge and making acceptable and applicable recommendations. “No matter how broad and evenly weighted assessment between economic, environmental, and social impacts a method or framework for appraisal of sustainable development is designed—it will still be viewed as advocacy, rather than an objective decision support system” (Nykvist and Nilssen, 2009). Turnpenny et al. (2009) and Owens et al. (2004) similarly describe impact assessment as an inherently political exercise rather than an objective activity, and suggest that coercion (e.g. legal requirements and increasingly prescriptive guidance on impact assessment) is unlikely to make policy assessment more integrated into policy making¹³.

Public/stakeholder involvement: Participation of a wide group of stakeholders has been cited by multiple sources as being key to impact assessment effectiveness: “the HIA, the participatory elements involved, and the communication strategies were

¹³ Owens et al. (2004) subsequently argue that appraisal practices should not seek to depoliticise policy controversies, as this is practically impossible, but rather to improve opportunities for deliberation in which open dialogue about difficult choices can occur. However they acknowledge that this can lead to a “morass of system complexity and issue intractability... Deliberative and inclusive processes... seem difficult, expensive, time consuming and (to the discomfort of decisionmakers) potentially inconclusive.”

a precondition to move out of a situation of long-standing political stalemate” (EOHSP, 2017). EPA (2016) suggests the same for US environmental justice work; and Hess and Satcher (2019) found that factors other than impact assessment – for instance alliances between local residents and local/state agencies and civil disobedience - were likely to be more effective in providing remediation from high-impact large-scale development projects than the impact assessments themselves (Hess and Satcher, 2019).

Gray et al. (2011) and Mahoney and Morgan (2001) note that community engagement – not just the engagement of key stakeholders and powerful sections of the community - is critical in the success of HIA. However, Helbig et al. (2015), based on five international case studies, noted that effective stakeholder engagement requires a nuanced understanding of who the relevant stakeholders are, and a judgement about which stakeholders represent particular aspects of or viewpoints on a complex problem:

“Despite the common rhetoric of ‘citizen’ participation, the cases show how it is often impractical to engage members of the public or representatives of the full range of relevant stakeholders. In these situations, policy modelers and policy makers needed to appreciate the limitations of stakeholder engagement and aim for results that take advantage of less-than-complete stakeholder participation”.

They also found that, in order to participate in meaningful ways, stakeholders needed to be educated about the purpose of their participation, the processes and tools to be used, and how their input would be taken into account (Helbig et al., 2015).

Funding/resourcing: For impact assessments to be carried out well, they must be adequately resourced, and given enough time to be carried out. Harris et al. (2013) describe the positive influence of a conjunction of factors: “the time was right, time was available, the opportunity was recognised, the right person was available, the HIA fitted into existing work, funding was available”. However, Harris-Roxas et al. (2012) note that the resourcing of HIAs “remains a challenging practical issue... An implied rationale for the application of HIA is often economic – that it is better to invest in preventing health problems now rather than ‘paying a larger bill later’... HIA requires resources and has to be detailed to be credible, but also has to be responsive to decision-making and budgetary requirements” (Harris-Roxas et al., 2012).

Several studies (Hilding-Rydevik and Akerskog, 2011; Knutsson and Linell, 2010; Pinto et al., 2015; Turnpenny et al., 2009; WHO, 2018) suggest that little or no specific funding is allocated for impact assessments: they are done ‘on top of the day job’ and therefore the extent to which planners are able to fully embrace the work is limited. For New Zealand, where SEA is not legally required, “introducing yet another process into what is already a complex regional planning process would not be welcome by an authority with stretched resources” (McGimpsey and Morgan, 2013). In Ireland, “to some civil servants [Policy Appraisal and Fair Treatment] is just another scheme which they have to implement. It was noted that civil servants were suffering from initiative fatigue because of the number of changes that had taken place in the civil service in the last decade” (Osborne et al., 1999).

Adequate data and expertise: Lack of appropriate data (see also ‘follow up’ below) can restrict the effectiveness of impact assessment. For instance, the Irish EPA (2015) noted that HIA alone can require understanding of sampling, analysis, fate and transport of chemicals within the environment; quantitative exposure assessment methods; epidemiology; toxicology; public health; impact assessment techniques; community relations and stakeholder engagement; and regulatory and policy analysis. Example of data and expertise gaps identified in the literature are:

- Information on the rural impact of government policies, for instance policies that impact on micro businesses, health care reform, and energy and planning policies, all of which could have a significant impact on rural groups (Sherry and Shortall, 2019). “This raises the question as to whether sufficient evidence exists for departments to do more ambitious rural proofing. In some cases there just clearly isn’t any evidence” (Rural Community Policy Unit, 2014).
- Information on people’s lived experiences and well-being: “Before well-being plans are set, work should be undertaken to ‘dig deeper’ into data to better understand the causes and effects of key issues and trends, in relation to both community well-being and individual well-being” (Future Generations Commissioner for Wales, 2017).
- Gender expertise in government departments in the Netherlands (Verloo, 2007).

Harris-Roxas et al. (2012), WHO (2018) and Iglesias-Merchan and Dominguez-Ares (2020) all call for a more robust evidence base for HIA, and greater use of health professionals. In contrast, Mahoney and Morgan (2001) suggest that, particularly at the policy level, there may be little quantitative evidence to support HIA, and that the HIA community needs to better legitimise qualitative assessments.

OECD (2020) notes that there is much established RIA expertise across Dutch government departments which could be better drawn on, and that RIA training should be systematically provided to policy officials to encourage the development of expertise in evidence-based policy-making. Roggeband and Verloo (2006) suggest that expertise must constantly be refreshed, as the constant movement of top bureaucrats between ministries leads to a loss of institutional memory.

Collaboration and information sharing: This is particularly important at the start of a new impact assessment requirement, so that organisations responsible for carrying out the assessments can exchange good practice, learn from each other, etc. The WHO (2018) found that 31% of respondents to an online questionnaire about HIA stated that collaborative partnership with other sectors facilitates the further integration of health into SEAs, with only adjustments to HIA guidelines receiving a higher score. Radaelli (2009a) decried the lack of a professional RIA community in the Netherlands and UK, stating that addressing this could improve the nature and content of RIAs.

To this end, the Irish Environmental Protection Agency has set up an SEA Forum which runs quarterly workshops to build capacity and allow information sharing between SEA practitioners. In the Netherlands, interdepartmental forums at different levels of government facilitate cross-government co-ordination and discuss issues and improvements regarding the RIA process (OECD, 2020). The publication of impact assessments by, for example, the Scottish SEA Gateway and US

government departments also allows information sharing, dissemination of good practice and efficiency.

Follow up: Monitoring is needed of the actual impacts of policies, and of how impact assessment findings have been integrated into policies: why were the recommendations of an impact assessment integrated or omitted? what mitigation measures work in practice? why are actual effects different from those that were predicted? (Ferris, 2016; Gonzalez and Therivel, 2020; Iglesias-Marchan and Dominguez-Ares, 2020)

However the literature suggests that minimal monitoring, at best, is carried out across impact assessment types. For instance in Sweden, there is no follow-up of regulations, except as a precursor to changing a law (van der Sluijs, 2017). Irish SEAs must include a statement about monitoring, but there are few or no links of monitoring data back to the next round of SEA (Gonzalez et al., 2019). In New Zealand an RIA should contain a plan of evaluation and monitoring, but there are no procedures of control, reporting and accountability (Kupiec et al. 2015).

6.2 Conclusion

There are good examples of impact assessment practice, such as the Welsh wellbeing assessments, and it is clear the impact assessments increase policy-makers' knowledge and awareness. The preconditions for effective impact assessment highlighted in the literature seem to fall into two categories: process and behaviour/culture:

Process:

- Starting the assessment early in policy formulation
- Providing adequate resources
- Starting the assessment early in the policy-making process
- Quality review
- Follow-up

Behaviour and culture:

- Open-mindedness
- Commitment to considering the assessment findings
- Involving others
- Sharing information
- Orienting the assessment findings to the policy decision

The literature suggests that good process alone cannot lead to effective impact assessment: a change in behaviour and culture is also necessary.

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These references do not include legislation or guidance. Please refer to Appendix A and the main text for links to these.

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Appendix A. Policy-level impact assessment legislation and guidance

Ireland

	Legislation	Guidance
Environment	Integrated in RIA	No guidance for policies, only for plans and programmes
Equality	Requirement for memoranda and orders to include 'poverty proofing' where there is no RIA (Cabinet Handbook 2006)	Poverty impact assessment guidelines (2008)
Health	Integrated with EIA/SEA, not separate requirement	Institute of Public Health in Ireland (2009) Health impact assessment guidance
Regulatory	Cabinet Handbook (2006) requires RIA for legislation	Department of the Taoiseach (2009) Revised RIA guidelines: How to conduct a Regulatory Impact Analysis
Rural/islands	Cabinet Handbook (2006) requires 'rural proofing' as part of RIA	None

Netherlands

	Legislation	Guidance
Environment	Integraal Afwegingskader (IAK) 2011	See 'regulatory' for policies
Equality	Gender & LGBTI equality policy plan 2018-2021 does not require assessment, limited to gender mainstreaming	
Health	No obvious requirements	No obvious guidance
Regulatory	Integraal Afwegingskader (IAK) 2011	Integraal afwegingskader voor beleid en regelgeving Government of the Netherlands (2018) The integrated impact assessment framework for policy and legislation
Rural/islands	No requirement	

New Zealand

	Legislation	Guidance
Environment	Resource Management Act 1991 indirectly promotes SEA	
Equality	Distributional (population) analysis required for every Cabinet proposal	Ministry of Health (2008) The health equity assessment tool: A user's guide (voluntary)
Health	No legal requirement	Public Health Advisory Committee (2005) A guide to health impact assessment Ministry of Health (2020) Resources for health impact assessment
Regulatory	Impact analysis requirements 2020 Government Expectations for Good Regulatory Practice 2017	
Rural/islands	Part of population impacts assessment	Formal 'refresh' of the Rural proofing guide 2018
Climate	Climate implications of policy assessment 2020	Climate change effects and impacts assessment: A guidance manual for local government in New Zealand

Sweden

	Legislation	Guidance
Environment	No legislation for policies, only for plans and programmes	No guidance for policies, only for plans and programmes
Equality	Discrimination Act 2008 does not require assessment, limited to gender mainstreaming	
Health	Health is a component of the national strategy for sustainable development.	Sweden National Institute of Public Health (2005) A guide to health impact assessment
Regulatory	Ordinance on Regulatory Impact Assessment 2007	Review of RIAs by Swedish Better Regulation Council
Rural/islands	No obvious legal requirement	No obvious guidance

Wales

	Legislation	Guidance
Environment	No legal requirement for policies, only for plans and programmes. Climate change impacts of policies generally required	No guidance for policies, only for plans and programmes
Equality	Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011 (SI 2011/1064)	Equality and Human Rights Commission (2014) Guidance on the public sector equality duties in Wales.
Health	Public Health (Wales) Act 2017	WHAISU (2019) training and capacity building framework for health impact assessment
Regulatory	Welsh Ministers' regulatory impact assessment code for subordinate legislation 2009	
Rural/islands	No obvious legal requirement	Rural proofing checklists (example of Planning Wales Bill)
Other	Well-being of Future Generations Act 2015 (separate assessments carried out by Public Services Boards) Welsh Language impact assessment often carried out in response to Welsh Language Standards	Well-being of Future Generations Act 2015: guidance

Appendix B. Information on impact assessment systems: sources of critical analyses

	Ireland	Netherlands	New Zeal.	Sweden	Wales	Other
Environmental		Sadler (2005)	McGimpsey & Morgan (2013); Sadler (2005)	Hilding-Rydevik & Akerskog (2010)	Only information about UK as a whole was identified	Sadler (2005)
Equality	Howard (2019); Johnston (2017); OECD (2019); TASC (2017)	Verloo (2007)	Houghton (2015)	Bonet (2008); McEachrane (2018)	Only information about UK as a whole was identified	US environmental justice: e.g. Comer & Skraastad-Jurney (2008); EPA (2016); Hess & Satcher (2019); Konisky & Reenock (2018)
Health*	EPA (2015); O'Mullane & Quinlivan (2011)	Bekkers (2007); den Broeder et al. (2003); EOHSP (2007); Fehr et al (2014)	Haigh et al.(2013); Harris et al. (2013); Mahoney and Morgan (2001); Morgan (2008); Ward (2006)	Berensson & Tillgren (2017); Knutsson & Linell (2010); Molnar et al. (2016); Pinto et al.(2015)	Green et al (2020); Walpita and Green (2020)	Table 6 of EPA (2015) provides information on a range of international HIA guidelines
Regulatory	Ferris (2016)	OECD (2011); OECD (2020); Radaelli (2009a, b)	Kupiek (2015)	Bondemark et al. (2020); Nerhagen & Forsstedt (2016); Nilsson et al. (2008); OECD (2015); Radaelli (2009b); Van der Sluijs (2107)	No information could be identified	

	Ireland	Netherlands	New Zeal.	Sweden	Wales	Other
Rural / islands	Social Justice Ireland (2020)	Salemink (2019)	No information could be identified	No information could be identified	Rural Community Policy Unit (2014)	Northern Ireland rural: Sherry & Shortall (2019)
Other			Climate change risk assessment requirement but not yet implemented		Wellbeing: Future Generations Commissioner for Wales (2018); Netherwood et al. (2017); Wales Audit Office (2018)	

* The literature tends to cover HIA of plans and policies together



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