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Commentary No. 46 | December 2020

Does Ontario need a Northern Lens?

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NPI would like to acknowledge the First Peoples on whose traditional territories we live and work. NPI is grateful for the opportunity to have our offices located on these lands and thank all the generations of people who have taken care of this land.

Our main offices:

- Thunder Bay on Robinson-Superior Treaty territory and the land is the traditional territory of the Anishnaabeg and Fort William First Nation.
- Sudbury is on the Robinson-Huron Treaty territory and the land is the traditional territory of the Atikameksheng Anishnaabeg as well as Wahnapiet First Nation.
- Both are home to many diverse First Nations, Inuit and Métis peoples.

We recognize and appreciate the historic connection that Indigenous people have to these territories. We recognize the contributions that they have made in shaping and strengthening these communities, the province and the country as a whole.

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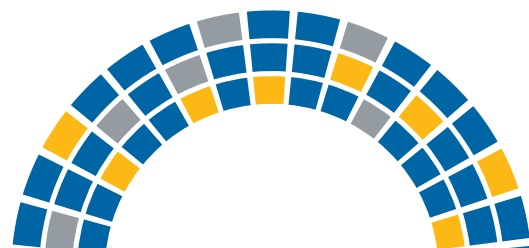
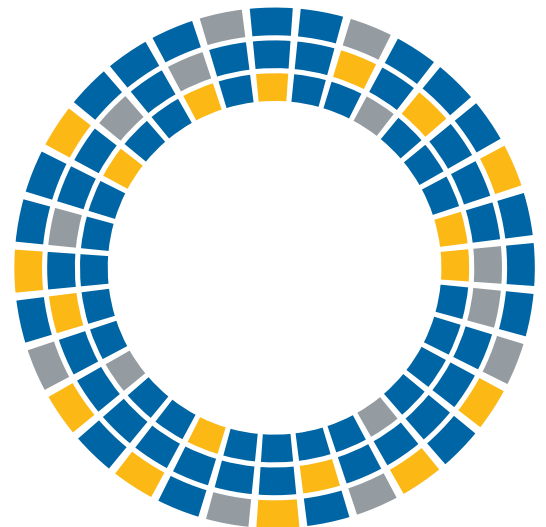
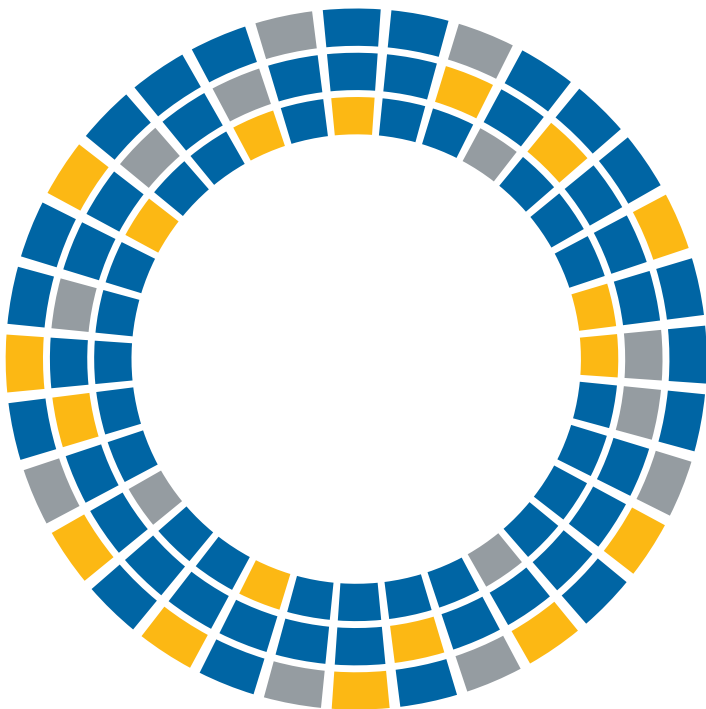


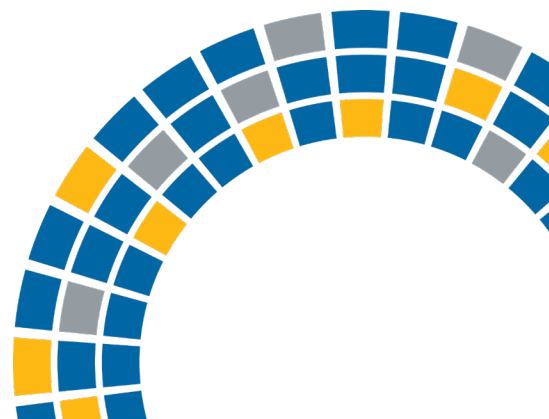
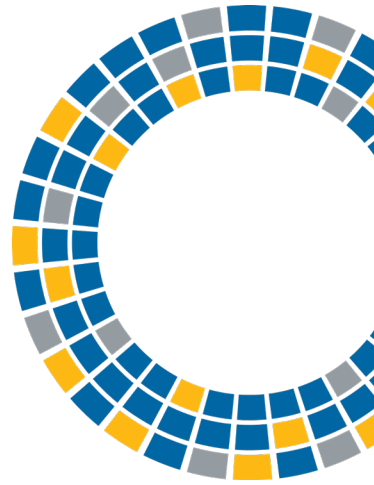
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Executive Summary

A one-size-fits-all approach to public policy formation is not adequate in addressing the diverse needs and interests of Ontarians, especially those in the northern areas of the province. As such, this commentary explores domestic and international examples of rural and/or northern policy lenses, as well as how these lenses have operated in practice. Based on these cases, the author dives into lessons that Northern Ontario ought to consider should a northern lens be implemented. Lessons include:

- A policy lens needs a champion;
- Where the policy lens is 'housed' matters;
- A policy lens without authority becomes a 'tick-box' exercise;
- A policy lens unit without appropriate resources is a recipe for limited success;
- A policy lens should require engagement with impacted communities;
- A policy lens should be 'seen in action';
- A policy lens requires a 'watchdog'.



Introduction

There is a longstanding frustration in Northern Ontario that Queen's Park does not 'think North' when developing policies and programs. For example, in public opinion polls respondents have rated their satisfaction with the provincial government's management of Northern Ontario affairs and issues as very poor or poor (Robinson 2016). While Geoffrey Weller (1990, 228), a distinguished Northern scholar, once argued that "there appears to be a lack of vision concerning how to deal with the north and a lack of political will to do anything more than that which is sufficient to prevent really serious political dissent." More recently, economist Livio Di Matteo and colleagues (Di Matteo, Emery, and English 2006, 174) have suggested that "Ontario's north is much like the attic of a house – generally ignored and paid attention to only when it makes strange noises or sends down a burst of cold air."

Northern Ontario is a huge geographic area encompassing nearly 90 per cent of the provincial landmass. The region is so large that communities like Dryden, Ignace, and Kenora are geographically closer to Winnipeg than they are to Queen's Park in Toronto. Despite its size, the population of Northern Ontario is also smaller (approximately 5.8 per cent of the provincial population) and more dispersed (see Moazzami 2019a; 2019b) than that of Southern Ontario. Economically, most of the province's mining and forestry operations are in Northern Ontario and these industries have dominated the economies of many communities across the region. Northern Ontario is also home to the majority (78 per cent) of Indigenous communities in the province (Ministry of Indigenous Affairs Ontario 2019). And Northern communities face different realities when compared to communities in Southern Ontario. For example, larger distances between communities, no all-season roads in many remote communities, limited access to broadband and other services (e.g., health care, quality education, clean drinking water, affordable and nutritious food) in some communities, a declining and/or slowly growing tax base, and boom-bust economies (Hall 2019). Put simply, Northern Ontario is distinct from the rest of Ontario, which means a one-size-fits-all approach to policy decision-making will not work.

Over the past 50 years, many ideas have been advanced to address these differences. They include the creation of a standalone ministry for Northern Ontario and more focused regional policies as well as the creation of a new province of Northern Ontario (Deibel 1976) and the devolution of governance and legislative authority to a regional entity (Robinson 2016). Some of these ideas have been acted on; others have been 'strange noises' that have been ignored or addressed through a funding announcement or visit from a premier or minister to ease feelings of discontent (Hall 2012). One approach that has received limited formal discussion and debate in Northern Ontario is the creation and implementation of a northern policy lens.



What is a policy lens?

A policy lens is a tool that is used to develop or review existing policies, programs, legislation, and/or other government practices based on a particular theme. Typically, it is a set of questions that serves as a checklist to guide and evaluate policy decisions. For example, Canada's federal government recently renewed its commitment to implementing a gender-based analysis, or GBA+ lens, across all federal departments (Status of Women Canada 2020). When used effectively, and coupled with the proper authority and oversight to ensure action, policy lenses can counteract the shortcomings of one-size-fits-all policies and programs.



¹ For results of GBA+ see <https://www.ctvnews.ca/politics/what-is-gender-based-analysis-anyway-how-the-policy-tool-is-changing-government-1.4734810>

Insights from the rural lens

Over the past few decades, several countries have implemented a rural lens or, what others may call, rural proofing and mainstreaming.² They include England, Northern Ireland, New Zealand, Norway, Sweden, Finland, and Canada (Sherry and Shortall 2019; Walker 2019; Hall and Gibson 2016). More recently, the European Union committed to 'rural proofing' its policies in the Cork 2.0 Declaration: A Better Life in Rural Areas (European Commission 2016) and expressed further commitment to a rural-proofing mechanism, including a rural lens, in their Communication on the Future of Food and Farming (European Commission 2017). In most cases, a rural lens is used to review all new and existing policies to ensure that urban and rural residents receive equitable treatment versus designing distinct rural policies (Shortall and Alston 2016).

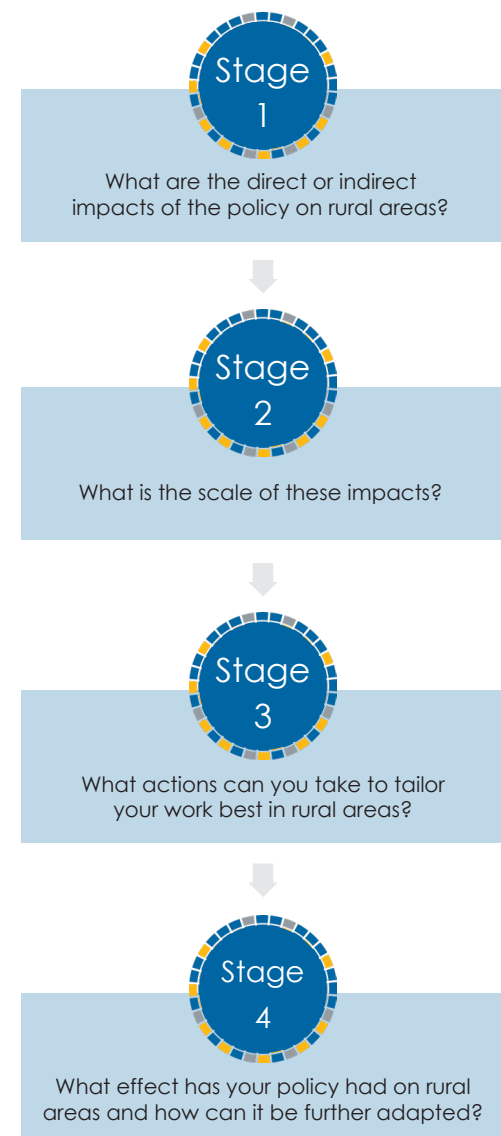
Rural proofing in England

In 2000, England made a commitment to rural proof or 'think rural' when developing and implementing domestic policies (Atterton 2008). According to Shortall and Alston (2016, 37), the approach includes:

- Rural mainstreaming: a review of all policies to ensure that all parts of England receive comparable policy treatment;
- Rural proofing: the method to ensure that rural mainstreaming is carried out; and
- A rural champion: a government department tasked with ensuring other government departments have fulfilled their rural mainstreaming duties.

As seen in Figure 1, there are four stages to the rural proofing process. In Stage 1, policymakers should consider a variety of direct and indirect impacts (e.g. economic, environmental, and social) that could result from implementing a policy or program. For example, policymakers could consider access to services and infrastructure, living and working conditions, the environment, and funding. In Stage 2, policymakers are asked to measure the scale of these impacts on rural communities and in Stage 3 policymakers decide how they can rethink their approach, if needed. In Stage 4, policymakers reflect on the policy outcomes and determine if further changes are needed. The Department for Environment, Food and Rural Affairs acts as the rural champion and provides training and guidance across government on rural proofing. This includes a publicly available guidance document and other resources (Department for Environment, Food and Rural Affairs 2017).

Figure 1: Rural proofing process in England



² Rural lens and rural proofing/mainstreaming are terms that are used interchangeably.

How to assess the rural impacts

Stage	Key questions to consider	How can this question be answered?
1	What are the direct or indirect impacts of the policy on rural areas?	To identify if a policy intervention is likely to have an impact on rural areas, you should review available evidence and, where necessary, consult rural stakeholders.
2	What is the scale of these impacts?	The focus of this assessment should be on the change that occurs as a result of the policy intervention. Your analysis should help you understand if the impact in rural areas is different to urban areas and the scale of the impact.
3	What actions can you take to tailor your policy to work best in rural areas?	Where you have identified rural impacts that are different to urban impacts and are large enough to warrant mitigation, you should look to tailor the policy to ensure that it is delivered in a way that addresses the needs of rural areas.
4	What effect has your policy had on rural areas and how can it be further adapted?	Rural proofing should be applied at all stages of the policy cycle, including after the policy has been implemented. Where you find rural issues to be significant, this should be considered as part of the monitoring and evaluation phase and included in the Post Implementation Review or evaluation plan.

Source: Department for Environment, Food and Rural Affairs 2017, 4.



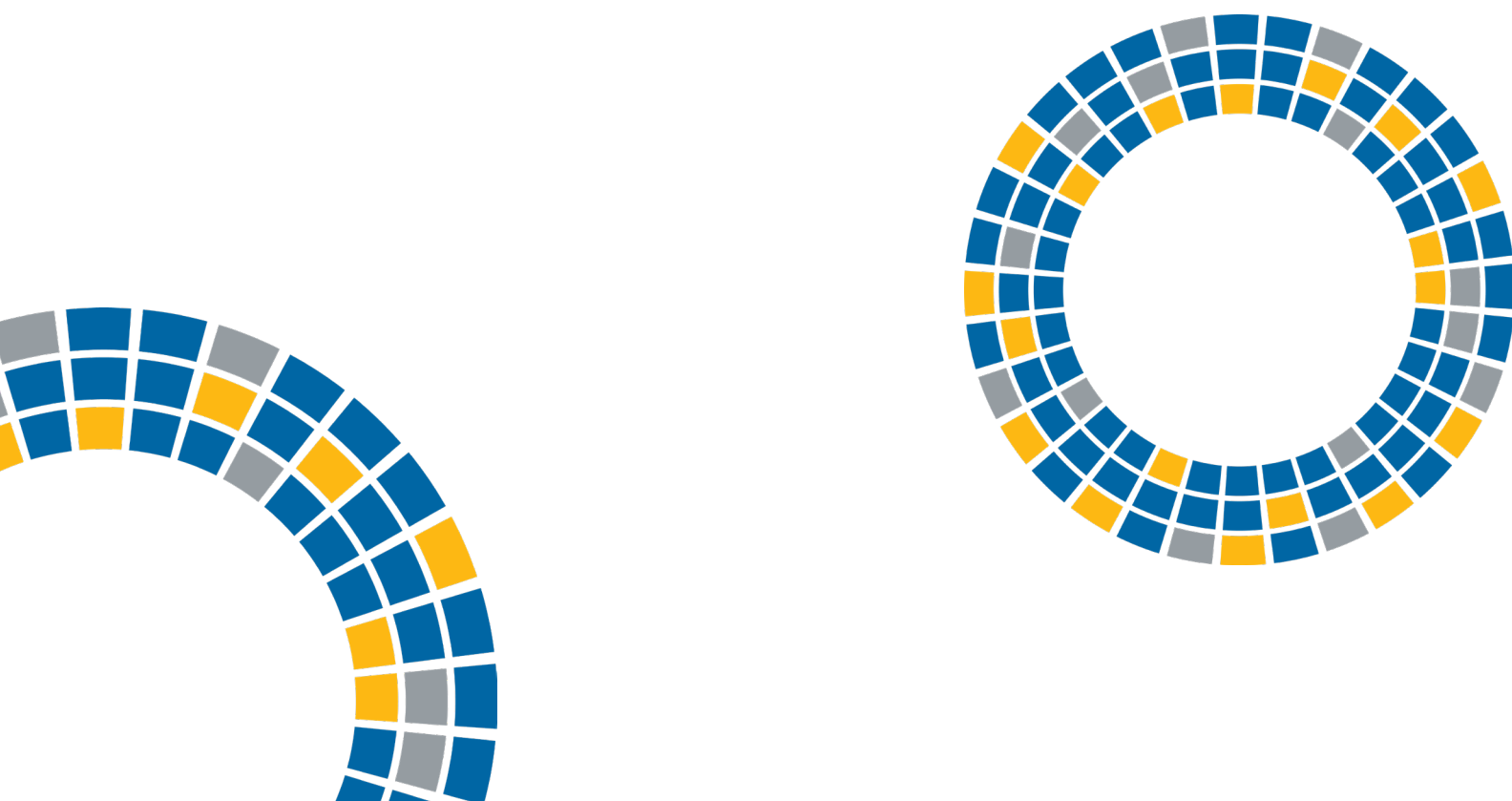
Rural proofing & the Rural Needs Act in Northern Ireland

Rural proofing has also been conducted in Northern Ireland since the early 2000s. However, in 2016 the Rural Needs Act was granted Royal Assent, which “places a duty on public authorities to have ‘due regard to rural needs’ when ‘developing, adopting, implementing or revising policies, strategies and plans, and, designing and delivering public services’” (Sherry and Shortall 2019, 339). Public authorities include government departments, local government, and several non-departmental public bodies. The Department of Agriculture, Environment and Rural Affairs provides guidance and training on rural proofing. It is also responsible for collecting information about rural proofing by public bodies, and this information is included in an annual report presented to the legislative assembly (Sherry and Shortall 2019; Department of Agriculture, Environment and Rural Affairs 2018; 2019). As part of the process, a comprehensive Rural Needs Impact Assessment tool was created (see Table 1 for broad themes in the assessment). Some of the impacts that should be considered when developing or revising programs or policies include: rural businesses, rural tourism, rural housing, jobs or employment, education or training, broadband or mobile communications, transport services or infrastructure, health or social care services, poverty in rural areas, deprivation, rural crime or community safety, rural development, and agri-environment (see Department of Agriculture, Environment and Rural Affairs 2017, Appendix 1).

Table 1: Rural needs impact assessment section themes

Section 1	Defining the activity subject to Section 1(1) of the Rural Needs Act (NI) 2016
Section 2	Understanding the impact of the Policy, Strategy, Plan or Public Service
Section 3	Identifying the Social and Economic Needs of Persons in Rural Areas
Section 4	Considering the Social and Economic Needs of Persons in Rural Areas
Section 5	Influencing the Policy, Strategy, Plan or Public Service

Source: Department of Agriculture, Environment and Rural Affairs 2017: Appendix 1.



The federal rural lens in Canada

In Canada, the federal Rural Secretariat created a rural lens in 1998 to review policies and programs from the perspectives of people living in rural and remote regions. A checklist of rural considerations was developed that included the following questions:

- How is this initiative relevant to rural and remote Canada?
- Is the impact specific to a selected rural or remote environment or region?
- Have the most likely positive and negative effects on rural Canadians been identified and, where relevant, addressed?
- Is the initiative designed to respond to the priorities identified by rural Canadians?
- Have rural Canadians been consulted during the development or modification of the initiative?
- How is the benefit to rural Canadians maximized (e.g., co-operation with other partners, development of local solutions for local challenges, flexibility for decision making)? (OECD, 2006).

The Rural Secretariat also created a Guide to Using the Rural Lens in 2001 to facilitate the adoption of the rural lens by federal government departments (see Table 2). As Hall and Gibson (2016) explain, the rural lens was designed to be applied by any department in the early stages of program or policy development. A Rural Lens Unit was also created within the Rural Secretariat. It was responsible for reviewing draft policies/programs and memorandums based on the key questions in the rural lens and the Guide to Using the Rural Lens. After completing each review, the Rural Lens Unit would submit a report to the sponsoring government department on how the policy or program in question could be improved to better reflect rural and remote realities.



Table 2: A Guide to Using the Rural Lens

Stage 1	Concept <ul style="list-style-type: none"> • Define the initiative (policy or program)
Stage 2	Environmental Scan and Impact Assessment <ul style="list-style-type: none"> • How is this initiative relevant to rural and remote Canada? • Is it specific to a particular rural or remote region? • What are the potential financial and economic impacts on rural and remote regions? • What are the potential social impacts on rural and remote regions? • What are the potential environmental impacts on rural and remote regions? • What are the potential cultural impacts on rural and remote regions? • How can the effects on rural and remote regions be measured?
Stage 3	Identify people and organizations that need to be involved or require consultation
Stage 4	Development and design
Stage 5	Communication through appropriate media avenues to reach rural and remote regions
Stage 6	Validation and consultations (if needed) <ul style="list-style-type: none"> • Identify who is involved, who needs to be consulted and when and identify their concerns
Stage 7	Refine initiative <ul style="list-style-type: none"> • Include results from the consultation if needed • Identify resources including funding, human and organizational
Stage 8	Approval
Stage 9	Deliver program
Stage 10	Monitoring and evaluation

Source: Rural Secretariat, 2001b.

The rural lens did facilitate several new initiatives targeted for rural communities. They included: funding dedicated for rural infrastructure (more than \$427 million CAD); the creation of an Office of Rural Health within the Department of Health; and increased Service Canada locations in rural communities across the country. In addition, the Community Futures program received additional investment and the number of Community Futures Development Corporations increased to include more rural communities (Rural Secretariat, 2001a). The Rural Secretariat and the rural lens were also instrumental in facilitating the creation of Industry Canada's Broadband for Rural and Northern Development pilot program and the National Satellite Initiative (Rural Secretariat, 2003). In 2013, the federal government did not renew the mandate of the Rural Secretariat, which ultimately led to the formal demise of the rural lens.



The ROMA - Rural and Northern Lens

In 2006, the Northern and Rural Working Group of the Association of Municipalities of Ontario (AMO) developed the Rural and Northern Lens to address what they identified as “a lack of forethought about the consequences of applying a one-size-fits-all [policy] approach” (ROMA 2015: 3). The lens was established to guide provincial ministries through the development of new policies and programs, or changes to existing ones, including necessary considerations; delivery options; communications; and measuring and reporting. It was designed to be used in advance of all policy decisions and legislation to ensure that the needs and realities of rural and northern communities were considered and addressed.

The lens was updated in 2011 and 2015, and the Rural Ontario Municipal Association (ROMA) championed it as a policy tool (ROMA 2015, 2). It includes the following questions.

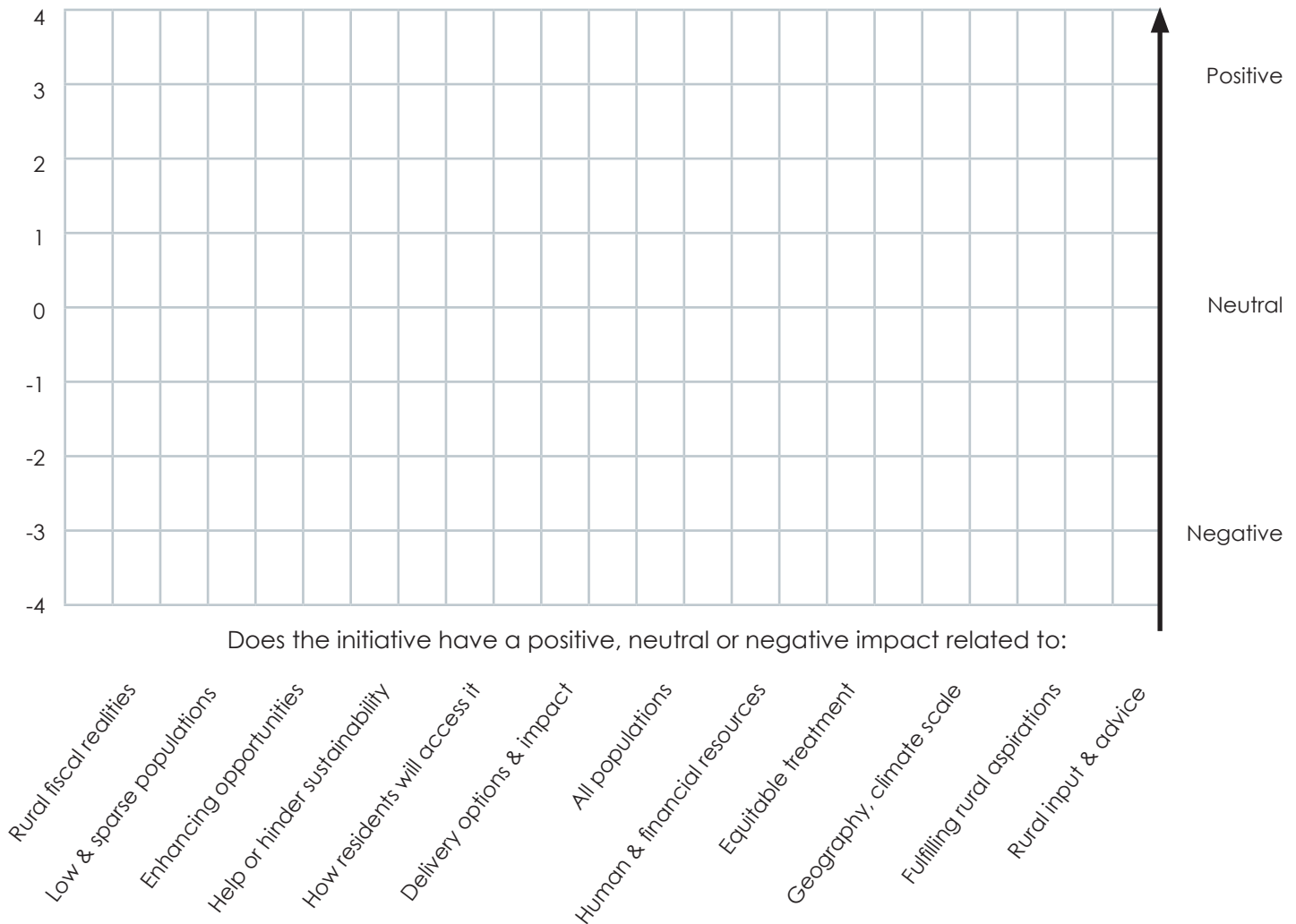
Does the proposed initiative:

1. Benefit or hinder the fiscal realities of Rural and Northern Ontario?
2. Have a business case that accounts for low and sparse populations?
3. Enhance opportunities in Rural and Northern Ontario?
4. Help or hinder goals of sustainability blending environmental, social and economic factors?
5. Consider how and if rural people will be able to access it?
6. Consider all options for delivery, ensuring efficiency, the potential for co-delivery and an acceptable administrative impact on municipalities?
7. Account for the needs of special populations (such as youth, elderly and immigrants)?
8. Have adequate human and financial resources to be effective?
9. Ensure that Rural and Northern communities are receiving equitable treatment or services relative to others in the province?
10. Recognize the geography, weather and scale of Rural and Northern Ontario and include adjusted program criteria to accommodate these realities?
11. Accommodate the aspirations of residents from rural communities and the north?
12. Build upon the input and advice of rural residents, communities and municipalities?



The Rural and Northern Lens also includes a visual metric for ranking answers as positive, neutral, or negative, by assigning each question a score between -4 and +4 (see Figure 2). This provides a quick and effective visual representation of the benefits and shortcomings of an initiative with regards to the needs and realities of rural and Northern Ontario.³

Figure 2: Rural & Northern Lens Visual Tool



Source: recreated by author from ROMA (2015).

³ The Government of Newfoundland and Labrador has also recently implemented a rural lens to identify potential impacts on rural communities. The lens includes the following questions: 1) Will the decision or policy directly impact the economic, demographic, or social circumstances of communities, stakeholders, or people in rural areas? If yes, how? 2) Will the decision or policy indirectly impact the economic, demographic, or social circumstances of communities, stakeholders, or people in rural areas? If yes, how? 3) Will the decision or policy affect rural communities more than urban ones? If so, how? (Government of Newfoundland and Labrador 2019).

The rural lens in practice

Despite some successes, effectively applying a rural lens in practice is challenging. Sherry and Shortall (2019) argue that rural proofing is overly focused on process versus outcomes, and it is simply a 'tick-box' exercise for many government departments in England and Northern Ireland. The OECD (2011, 25) identified four reoccurring policy issues with the rural proofing approach in England: a lack of systematic application across all departments; a lack of awareness among some senior staff of the need to carry out rural proofing; a lack of consistent leadership to champion the needs of rural areas across government; and a lack of effective monitoring of the delivery of policies on rural communities.

More recently, a report by the House of Lords Select Committee (2018) in the United Kingdom highlighted several challenges in applying rural proofing. Most notably, there is patchy evidence of the application of rural proofing across government as well as a lack of monitoring and follow-up. The report also cited limited discussion with rural communities, which is especially concerning when policymakers tend to be from urban areas with little experience living or working in rural communities. One of the major recommendations in the report was to create a rural policy unit and rural proofing mechanism within the Cabinet Office, versus within a government department, which could provide more legitimacy and action across government.

Similar challenges have been identified in Northern Ireland, with one review noting that rural proofing has had "disappointing" results in shaping policy (Sherry and Shortall 2019). Sherry and Shortall (2019) also express concerns that, under the new Rural Needs Act, the government has yet to identify a formal 'watchdog' responsible for monitoring and evaluating the quality of rural proofing.

Likewise, in Canada there was no legislation that required other departments to use the rural lens and no penalties if it was not applied. Hall and Gibson (2016) argue that there is little evidence to suggest that the rural lens was applied in the early development of a program or policy. Instead, it was typically applied as an afterthought to a policy or program upon reaching the Memorandum to Cabinet stage. In addition, government departments had no responsibility to report back to the Rural Lens Unit or to the Rural Secretariat on how they implemented any feedback.

The ROMA Rural and Northern Lens was well received by the provincial government. However, little information has been released publicly about its application within government. It also appears that, as the political and policy landscapes have shifted in the province, interest in applying a rural and/or northern lens has increased or been abandoned at various times. Another challenge with applying the ROMA lens in practice is that rural Ontario and Northern Ontario are not synonymous. The opportunities, challenges, and realities are different based on several factors including remoteness, size (e.g., there are five urban areas in Northern Ontario), metropolitan influence, and industry structure, among others. With any policy lens, these nuances or differences between communities are important and pose a significant challenge to applying a policy lens in practice.



Policy lens lessons

The experiences of applying a rural lens in Canada, England, Northern Ireland, and other jurisdictions offer important insights and raise questions that should be considered in the creation and implementation of a northern lens in Ontario.

A policy lens needs a champion

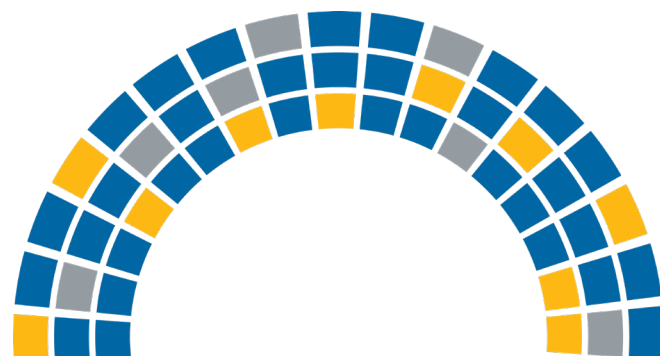
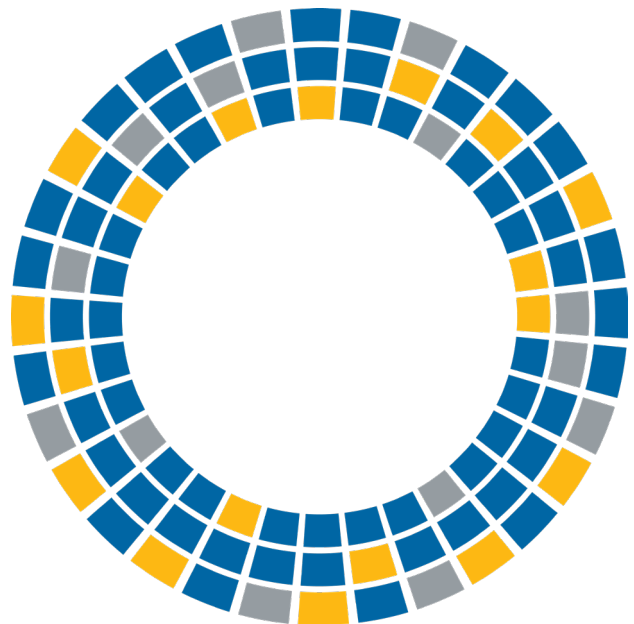
Any policy lens requires a strong champion within government to encourage 'buy-in' across government. In Canada, England, and Northern Ireland, rural departments or secretariats were tasked with being the rural champion. Those tasked with being a champion should provide training and guidance across government on using and implementing the policy lens. Furthermore, a minister or secretary of state should be appointed to ensure support at the cabinet table. The policy lens also needs to be understood and supported by senior government officials across government (e.g., deputy ministers and assistant deputy ministers).

Where the policy lens is 'housed' matters

Hall and Gibson (2016) argue that a rural lens should be housed within a strong, central, or horizontal unit within government. In the Canadian context, the Rural Secretariat and rural lens were housed within the Department of Agriculture and Agri-Food, a sectoral line department within the federal government. This presented several challenges for implementation. First, rural was often associated with the agricultural sector, which meant departments focused on non-agricultural sectors often saw little need for applying the lens. Second, as a unit within a line department, the Rural Secretariat had no authority to force horizontal coordination despite its mandate. If the rural lens had been housed within a central unit of government, such as the Privy Council, it could have had the authority to promote policy coordination across government and shed the 'agricultural equals rural' perception.

A policy lens without authority becomes a 'tick-box' exercise

Apart from Northern Ireland, most rural policy lenses lack any formal legislation. It is clear from the examples in Canada and England that a rural lens requires legislative authority or it becomes a suggested practice, or a simple tick-box exercise, within government (Hall and Gibson 2016).



A policy lens unit without appropriate resources is a recipe for limited success

Policy lens units are often small and lack the time and resources to manage the number of requests that come in. If the policy lens is to be applied effectively, strong financial and human resources are required. One suggestion is to spread policy lens experts throughout government in each ministry or department to provide in-house guidance and support. A policy lens also requires reliable, accessible, and coordinated data to support its application. One of the strengths of the federal Rural Secretariat in Canada was its partnership with Statistics Canada to create the Rural and Small Town Canada Analysis Bulletin, which provided critical and timely data on rural issues, trends, opportunities, and challenges.

A policy lens should require engagement with impacted communities

In England and Northern Ireland, the lack of consultation with impacted communities during the application of the rural lens was cited as a significant issue. This is especially problematic if policymakers have little to no experience living in or working with impacted communities. Ideally, a policy lens tool and process should be developed in partnership with impacted communities. In addition, an engagement framework should be developed to determine when impacted communities should be engaged during implementation.

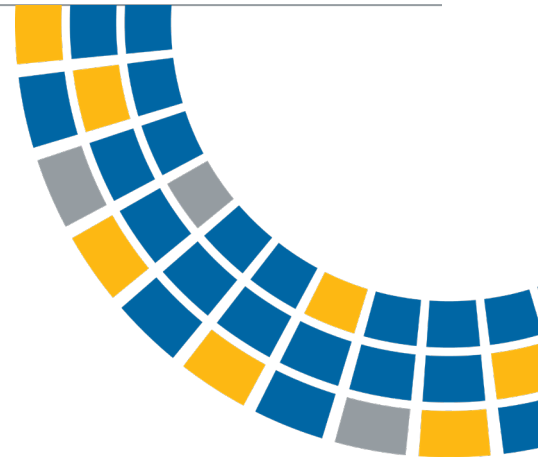
A policy lens should be 'seen in action'

As noted in each of the examples, the work of a policy lens often occurs within government or 'behind the scenes,' with few details made public on operations and outcomes. However, as Hall and Gibson (2016) argue, seeing the lens in action might highlight its importance, both within government and with the public. This could take the form of a publicly available report covering the application of the lens and its outcomes, as well as success stories profiled online and promoted publicly. This is something that is now occurring through annual reports in Northern Ireland.

A policy lens requires a 'watchdog'

As highlighted in the Canada, Northern Ireland, and England examples, a policy lens requires a formal 'watchdog' responsible for monitoring and evaluating⁴ the quality of its application and implementation. This will ensure that the policy lens is being applied consistently and effectively.

⁴ Where there is evaluation happening, it's usually on an annual basis.



Does Ontario need a northern lens?

For a northern lens to work effectively in Ontario, it requires legislative teeth and a strong central or horizontal unit within government that has resources to act. It would require engagement with a diverse range of key community actors across Northern Ontario, both in terms of design and implementation. And any policy lens designed for Northern Ontario would need to recognize the different realities that exist across the region—or the 'multiple norths' (e.g., the Far North, Indigenous communities, urban communities, single-industry towns, remote communities, etc.).

A northern lens has the potential to reshape policymaking in and for Northern Ontario. However, if a northern lens is created without the proper authority and resources, it could become another policy tool with disappointing results. And that is something that Northern Ontario does not need.



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Northern Policy Institute is Northern Ontario's independent think tank. We perform research, collect and disseminate evidence, and identify policy opportunities to support the growth of sustainable Northern Communities. Our operations are located in Thunder Bay and Sudbury. We seek to enhance Northern Ontario's capacity to take the lead position on socio-economic policy that impacts Northern Ontario, Ontario, and Canada as a whole.

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