

Introduction

The First Minister and deputy First Minister launched its consultation on a revised Racial Equality Strategy on 19 June 2014. The proposals contained in the Consultation Document had been developed with minority ethnic representative groups and representatives of the wider community through our Racial Equality Panel.

The Strategy aims to establish a framework for Government departments and others:

- to tackle racial inequalities and to open up opportunity for all;
- to eradicate racism and hate crime; and
- along with Together: Building a United Community, to promote good race relations and social cohesion.

The Consultation Document also proposed six strategic aims that the Executive will pursue in eradicating racism and tackling racial inequalities.

- Elimination of Racial Inequality
- Combating racism and hate crime
- Equality of Service Provision
- Participation
- Social Cohesion
- Capacity Building

The consultation process

The consultation exercise sought views from interested individuals and organisations. The consultation period started on 19 June 2014 and closed on 10 October 2014 – a longer consultation period was given to take account of the summer months. However, a number of requests were received to submit late applications, which the Department accepted.

Respondents could complete an online questionnaire, submit a written response or attend one of the 6 public consultation events that were held in September 2014 or any combination of these ways of making their voices heard.

Written responses

The Department received 97 written responses. Most respondents did not comment directly on the questions asked in the consultation document and many commented on only some of the questions. This has made the analysis slightly more complicated and time consuming.

In addition to the 97 written responses, 303 'round-robin' responses were received from respondents signing a letter from the Traveller and Gypsy Network NI and 92 were received from the Roma Community. All of these responses called for both a distinct Traveller/Gypsy Strategy and a Roma Strategy. None of these responses commented on any other aspect of the consultation document.

Key views emerging from the consultation

Consultation on the strategy was welcomed. A number of main issues were identified through the responses, these are detailed below. Figures may not add to 100% due to rounding. Some examples of comments received are also detailed.

Responses from umbrella organisations or arrangements

24.7% (24) of respondents endorsed the Common Platform response and 15.5% (15) endorsed the Northern Ireland Council for Ethnic Minorities (NICEM) response.

Legislative reform

The issue that was most frequently commented on was the need for legislative reform. 51.5% (50) agreed that reform of the Race Relations (Northern Ireland) Order 1997 was a priority. None of the responses disagreed. All of those responses that agreed legislative reform was a priority also agreed with the Equality Commission's proposals for reform.

Some respondents believed there should not just be a commitment to legislative reform in the final Strategy, but there should be a timetabled commitment to reform with a deadline of 2017 for full implementation.

However, one response urged caution with regard to the Equality Commission's proposals to "remove or modify exceptions including those relating to immigration and the employment of foreign national in the civil, diplomatic, armed or security and intelligence services and by certain public bodies". They argued that such restrictions are commonplace in many countries, mainly for security reasons and "should not be removed without very careful thought".

Another comment was that "the absence of a Bill of Rights for Northern Ireland constitutes a significant gap in legislative and enforcement mechanisms."

One respondent wanted to see the final RES commit "to considering the merits of defining racism within domestic law".

Baseline assessment / Research

A number of the responses asked for a chapter to be included on the 'scale of the challenge' or for some sort of baseline assessment to be carried out. 37.1% (36) explicitly called for a baseline assessment to be included in the final strategy. 24.7% (24) said this assessment should consist of using existing research and 17.5% (17) said that new research is required.

Some responses called for Chapters 2 ("Racism and racial inequalities: the scale of the challenge") and 5 ("The evidence of racial inequalities and ethnic monitoring") of the consultation document to be rewritten to provide a rigorous review of the available evidence on racial inequalities.

One respondent called for a scoping exercise to collate all existing research and to initiate further research on the "extent and contours of current race inequalities".

Another comment was that an "evaluation must be conducted into actions taken as a result of the previous strategy and that the first chapter should provide detail of activity carried out by departments between 2005 and the present."

A recommendation was that "further consideration be given to the evidence available and that a full list of the evidence considered is given as an Annex." There was

concern that there was little information available on the experiences of people with disabilities from minority ethnic groups.

One request was for “in-depth research to be conducted to examine the relationship between sectarianism and racism, its impact on BME people here and their sense of belonging.”

Another suggestion was that the Strategy should “update commentary on the demographic makeup of Northern Ireland to reflect 2011 census data in relation to ethnicity and country of origin.”

One respondent also wanted to see additional research commissioned “to determine attitudes and experience within and across the various BME communities”.

One suggestion was for the RES to include an annex of all currently available research reports. Along the same lines, another respondent believed that all current research reports of racial inequality and social exclusion, including the Audit of Inequality Reports and Action Plans of each Department and their next step agencies should be annexed to the Strategy.

Some responses commented on the need to “evaluate the outcomes and impact of the previous strategy in terms of the elimination of racial inequality. On the basis of this evaluation, clear measurable priorities areas should be determined by where the greatest inequality exists and the greatest impact can be made.”

A recommendation was to “re-frame the draft RES into goals, objectives and actions” and that in order to develop these “it is important that a comprehensive and accurate baseline study that clearly describes the current situation of racial discrimination is first undertaken.”

Racial Equality Champions

21.6% (21) believed there should be a commitment to appoint Departmental Racial Equality Champions, as had been the case with the previous strategy. Some viewed

the absence of Racial Equality Champions as a “diminished accountability mechanism” and believed Champions would be “useful in both overseeing Departmental implementation and in ensuring Departmental accountability”.

One suggestion was that “Racial Equality Champions should provide annual reports on implementation to the Racial Equality Panel.”

Sense of Belonging

Of those that mentioned the title of the Strategy in their response 14.4% (14) agreed with the title, while 22.7% (22) disagreed with ‘A Sense of Belonging’ as the title. It was suggested the title should go no further than ‘A Racial Equality Strategy for Northern Ireland’.

One respondent commented “a sense of belonging means to be controlled, to be mistreated and for a woman to be owned by someone who would be at his discretion to do as he pleases with you.”

They suggested that, if the Strategy needed to have a title, it could be ‘Equality and Diversity Strategy for Northern Ireland’.

Another response detailed that, although they were sympathetic to the term ‘A sense of belonging’ and what it seeks to convey, they did not like the term and recommended its removal. They said being ‘settled’ struck more of a chord with the Chinese community and suggested ‘A Home from Home’ as a possible alternative.

Other suggestions for a revised title were “Belonging and Participation for All”, an “Anti-Racism Strategy” or for the title to be expanded to “A sense of belonging and participation”.

One respondent believed that ‘a sense of belonging’ puts the onus on the individual to fit in to society rather than placing the onus on Government to protect the rights of every individual.

Another called the title “contentious and inappropriate.”

One comment was that the proposed title was ‘unhelpful’ and open to various interpretations – there was a risk it might have negative connotations of ‘them and us’. It could also be felt to underestimate the challenges facing minority ethnic people and “minimise the overall goals of the strategy”.

Another view was that ‘A Sense of belonging’ was unnecessary in the title, but should be included under the aim of increasing participation.

A comment around the concept was that “Specifically in identities such as the African community where is a global history of slavery the concept of ‘belonging’ is interpreted very differently than in Western European culture. The community identity in particular feels alienated by a heading that in their cultural identity implies they ‘belong’ to something or someone in a negative sense.”

One response detailed that “ ‘a sense of belonging’ does not reflect the vision of the society which the Polish community is part of and would recommend to have the vision statement changed.”

An additional view was that “some BME members we consulted felt that this phrase, especially used as a title was patronising, as they were born here so there is no question of their ‘belonging’ here.”

Similarly, one response referenced second, third and fourth generation minority ethnic communities and that for this group of people “it is not appropriate to use a language of ‘welcoming’. These people.....do not appreciate being told that they are welcome.”

Ministerial Foreword

Although the Ministerial Foreword was only intended to be an invitation to contribute to the consultation process and not an indication of the foreword that would be in the

final document, 20.6% (20) called for a stronger Ministerial foreword to be included in the final strategy.

One respondent mentioned there should be clear indication of ownership from OFMDFM and “the First Minister and deputy First Minister should have their signatures on the RES as a sign of their commitment”.

Another suggestion was that “the previous Ministerial foreword acknowledged that the presence of ethnic minorities here ‘help us rebuild after many years of civil unrest’, an important message which we believe needs to be reinforced.”

Essential contribution of the BME community

Linked to the Ministerial foreword was the desire for greater emphasis to be placed on the essential contribution of the BME community. 32% (31) believed there needed to be greater detail on this included in the final RES.

One suggestion was that the Strategy could be interspersed with at-a-glance facts and figures to “reinforce the significant contribution that ethnic groups make to the Northern Ireland economy.”

Another comment was that the Strategy should send out a positive message that recognises how sectors, such as health, have benefitted greatly from inward migration both in terms of skills and knowledge base but more broadly in terms of economic contribution.

One respondent wanted an acknowledgement of “the social and cultural contributions of migrants”, not just the positive economic contribution.

Refugee Integration Strategy

21.6% (20) agreed that there was a need for a separate Refugee Integration Strategy. The NICEM response (and those that endorsed that response) argued there was no need to have a separate strategy for a specific vulnerable group. Instead they thought specific programmes of work should be devised and a thematic working group under the Racial Equality Panel should be established to deal with vulnerable groups.

Other respondents also believed that if the “Racial Equality Strategy is robust there is no need for a separate policy” and “As many of the issues are identical, refugees should be included under the Racial Equality Strategy.”

However, others wished to see a separate strategy – one said that “Ireland, and every other region of the UK, has a Refugee Integration Strategy” and therefore believed it was important that one be developed here.

A further comment was that “the lack of strategic direction means that there is no co-ordinated approach at present” and that, while it should be linked to the RES, “it should proceed regardless of the progress of the Racial Equality Strategy.”

Roma/Traveller Strategy

In addition to the 303 ‘round-robin’ responses received from respondents signing a letter from the Traveller and Gypsy Network NI and 92 from the Roma Community which all called for a separate Roma/Traveller Strategy, 23.7% (23) of the written responses agreed there was a need for a separate Roma/Traveller Strategy.

One respondent argued that both Travellers and Refugees are groups that “have complex issues which require additional strategies in order to ensure equity”.

Whereas another response that had interviewed parts of the Roma and Irish Traveller community stated “the respondents do not see a need for a different Racial Equality Strategy to address the issues relating the Roma and Traveller minorities.

However they believe there is a need for specific plans, actions and programmes that would contribute to their integration within the frameworks and values of the current Racial Equality Strategy”.

One respondent called for the Strategy to include a greater focus on Travellers, Gypsies and Roma and would welcome the “introduction of a champion for the Travellers, Gypsy and Roma community within the Racial Equality Panel”.

Adequate/ring-fenced funding for the Strategy

37.1% (36) wanted the Racial Equality Strategy to have ‘adequate’ or ring-fenced funding.

One response said “there should be an actual budget allocated for the strategy rather than the unclear wording ‘to fit’ with the Comprehensive Spending Review”.

A number of responses called for the provision of a crisis fund to “ensure that individuals have access to money when in extreme need”.

Clearer links with Together: Building a United Community (T:BUC) and Delivering Social Change (DCS)

34% (33) said there needed to be clearer links between the Racial Equality Strategy and both T:BUC and DSC.

It was mentioned that the Strategy includes a commitment to ensure that the Racial Equality Panel is ‘listened and responded to’ through DSC bodies but there was no detail provided on the frequency of engagement or “the authority of Racial Equality Panel members in influencing these bodies”.

Some responses called for clearer links between the strategic aims and themes of T:BUC, DSC, the Programme for Government and other equality and anti-discrimination strategies and frameworks.

One suggestion was that “perhaps the RES should be incorporated into T:BUC rather than complement it”.

Another comment was the desire to see strong links between RES and a wide range of other relevant strategies from other government departments in addition to T:BUC and DSC. The respondent was also concerned that “the proposed use of the structures established for DSC and T:BUC as a mechanism for delivering the goals of the Racial Equality Strategy could lead to competing priorities, weakening the power of the strategy to achieve its expected outcomes.”

One respondent argued the RES “cannot be subservient to other strategies and proper clarity on how these strategies will interact is required.” Whereas another comment was that it is “essential that the race strategy is not lost in the hierarchy of T:BUC”.

An additional comment was that RES and T:BUC should be viewed by OFMDFM “as one and the same with regard to the promotion of Good Relations.”

Another respondent agreed that “it would be illogical if the final RES did not include reference to T:BUC or Delivering Social Change” however they wanted OFMDFM to “clearly indicate how these various strategies intersect with each other, and what actions will be developed within their individual policy frameworks to support the vision and objectives of the RES.”

A number of responses made comment on the desire to ensure that the Racial Equality Strategy is “not subsumed – unintentionally or otherwise – by other strategies or policies whose central concern is the relationship between the 2 ‘traditional’ communities.”

Oversight Structure

10.3% (10) believed that the oversight structures detailed for the Racial Equality Strategy were weaker than those for T:BUC.

One respondent wanted to see the RES “have an independent monitoring body, completely separated from government that can hold individual departments to account in meeting clearly defined racial equality targets.”

Action Plan

32% (31) thought that the Strategy needed to be accompanied by a cross-departmental action plan – and that the action plan should not be published at a later stage.

Some respondents wished to see 2 types of action plan in the final strategy. The first type would be based on thematic topics/issues which require inter-departmental actions and a joined up approach. The second type should be a Departmental/next step agencies’ Action Plan and should have no more than two strategic actions.

Another respondent was clear in saying that the revised RES “must be accompanied by action plans.”

One comment was that the Strategy “needs to be much more detailed and include specific actions to be carried out by each government department.”

One respondent wanted to see an action plan that stipulated “targets, resources, timescales, accountability structures and a review period. These ambitious and focused policy outcomes should be inserted into the next iteration of the Programme for Government.” They also wanted to see the action plan outline “actions for a range of structures i.e. central and local government, government agencies, private sector, trade unions, community and voluntary and wider civic society” and that the final action plan “must include approximate budgetary requirements and indicate if

this is currently available for draw down, or if it will need to rely on the reconfiguration of government expenditure.”

Another view was that it would be helpful if the Strategy “set out what contribution each department’s policies should make to the overall targets and activities. It should also give a timetable by which each department and public body will set out their action plan, programme of work and plans for monitoring”.

Multiple Identity

Another main issue in the responses was the desire for the RES to deal more effectively with multiple identity - 36% (35) of responses mentioned this.

Some argued that the Strategy should include a framework to deal with multiple identity, although no further detail was given on this.

One respondent argued there is a particular challenge for second generation ME young people or those of mixed backgrounds as they integrate with their peers – “this should be recognised and multiple identities and mixed cultural backgrounds should be supported”.

Another respondent said that how other relevant government strategies will co-ordinate effectively with the RES should be clarified, “in order to ensure that ethnic minority needs are considered and not marginalised when actions are developed on a wide range of issues”.

A further comment was that there is an urgent need to develop effective ways of measuring multiple discrimination.

One response called for “real, measurable actions to address multiple discrimination” and for the RES to explain how it will interact with key gender-related strategies, including the Gender Equality Strategy and the Domestic and Sexual Violence Strategy.

Another suggestion was that this section would “benefit from the collection and presentation of data which reveals the various layers of identities and how individuals may experience discrimination on a number of grounds.”

One response called for the final RES to include a “commitment to amend domestic legislation to ensure it recognises multiple discrimination”.

Chair of the Racial Equality Panel

10.3% (10) called for the Racial Equality Panel to be chaired jointly by both the Junior Ministers and a minority ethnic community representative. One respondent believed that the Panel should only be chaired by a minority ethnic representative and two respondents thought the Panel should just be chaired by the Junior Ministers.

Another response just noted that OFMDFM should “ensure the arrangements to chair the structure are strong and accountable”.

One respondent would like to see the Panel making an annual ‘Progress Review’ and believed that, as well as the Panel being chaired by the Junior Ministers and minority ethnic representative, another minority ethnic representative should act as a ‘monitor’ in order to ensure governance and accountability.

Another view supported the publication of minutes from the Panel meetings.

Membership of the Racial Equality Panel

One respondent commented that proactive outreach and engagement is required to ensure that the minority ethnic representatives on the Panel are reflective of the minority ethnic population.

Another suggestion was that “members of the Panel should be chosen from different geographical areas of NI and should include members from the BME community.”

Whereas another wanted the Panel to have “full representation of BME women, men and young people.”

One respondent wanted to see the RES provide an analysis of the Racial Equality Forum’s “performance including its monitoring, scrutiny and implementation role.”

Another respondent preferred the use of the term ‘cultural community’ rather than minority ethnic. They also believed that the Racial Equality Panel needed a representative from each ‘cultural community’.

However, one respondent believed there was a fundamental problem with the implementation approach “if advocacy groups are part of the monitoring process for the implementation of the strategy (while also being an integral component of implementation), then how will they be empowered and motivated to challenge this?”

Definitions

14.4% (14) asked for a glossary of terms, including a definition of racism that was included in the last Strategy to also be included in the revised strategy.

One view was “that there is a need to define ‘race’, ‘ethnicity’, ‘culture’ and ‘integration’ not just ‘community’”.

A comment was “there is no mention of systemic disadvantage/institutional racism – this needs to be addressed. Racism tends to only be viewed in the context of attacks, as opposed to neglect.”

Human Rights Obligations

28.9% (28) wanted a more detailed list of human rights obligations included in the Strategy.

One response noted that the document did not refer to the “European law for human rights: European Convention of Human Rights and Racial Equality Directive”.

Another respondent noted there was no mention of the United Nations Convention on the Rights of the Child and wanted this included in the final Strategy.

Another commented the Strategy failed to recognise the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) and that “all of the interrelated Human Rights Conventions, concluding observations and guidance should be considered.”

A further comment was that, although the consultation document refers to some international rights standards, “it does not indicate how commitments will be delivered, particularly in the implementation of the concluding observations of various Treaty Bodies.”

Another response wanted the final Strategy to provide “a comprehensive overview of the various international protocols and standards that are applicable to the remit of this strategy, as well as a full discussion and analysis of what needs to be done by government to fulfil these obligations.”

A recommendation was that “the final RES include reporting arrangements to the OFMDFM Committee for the purposes of scrutinising the NI Executive’s implementation of the international human rights treaty obligations”.

Ethnic Monitoring

(34%) 33 wanted ethnic monitoring to be mainstreamed. Some respondents also called for it to be made compulsory – such as NICEM and those that endorsed their response.

One respondent believed “it should be up to OFMDFM to ensure that appropriate funds are earmarked and allocated to each department for the purpose of ethnic monitoring”.

Minority Non-Christian Faiths

12.4% (12) believed that the Racial Equality Strategy should cover followers of minority non-Christian faiths while 7.3% (7) explicitly stated they did not believe this should be covered in the RES.

One respondent who was in favour of minority non-Christian faiths being included in the RES wanted to see “a clear statement, within the body of the document, about the protection of racial and religious minorities” but also considered that “it may be necessary to develop a separate framework to tackle this inequality”.

Another respondent was in favour of the Strategy including followers of non-Christian faiths and commented that the RES should “promote equality for everyone in society”.

One view was that there is an issue with ‘racism’ being defined to explicitly include religion as there are “increasing numbers of people who have grown up in Northern Ireland who have made an active choice to adopt a different faith.....In these cases there is clearly no issue in relation to race or ethnicity since such people are indigenous. Some would feel uncomfortable with a label of ‘race’ being used to describe such a group”. This respondent was also concerned that the inclusion of religion in the definition “could create a situation where the specific Northern Ireland issue of sectarianism could dominate all discussion and prevent issues of

sectarianism as it impacts on the minority faith communities being addressed.” Despite these concerns the respondent still believed minority non-Christian faiths should be included in the RES as long as “there is no implication that all members of minority faith communities are necessarily also members of minority ethnic communities.”

One respondent that was opposed to minority non-Christian faiths being included in the Strategy commented that “protection against religious discrimination is already afforded by legislation in Northern Ireland and in addition, some mono-ethnic groups have been recognised through case law as being a racial group” and also argued that “a strategy based on both ethnicity and religion may dilute the primary purpose of the strategy which is addressing inequalities based on race.”

Another comment was that the section in the introduction to Chapter 3 (The purpose, vision and aims of this Strategy) “should be clearly explained as this could be viewed by some as excluding Christian faiths entirely and/or be viewed as a reaction to current associations with race, religion and world events.”

Six shared aims

Whereas no respondents said they disagreed with the 6 shared aims, 25.4% (25) agreed with the 6 shared aims.

One suggestion has been to remove the word ‘public’ from the aim regarding equality of service provision; to reword the beginning of the aim on participation “To facilitate full participation” instead of “To increase participation, representation”; and to broaden the aim on capacity building to include increasing knowledge and understanding across society of the facts and myths relating to migrants and minority ethnic communities.

However, one respondent noted that ‘inclusion’ was not one of the six shared aims and believed this should be the top priority of the Racial Equality Strategy.

A reworded vision has been suggested of “A society in which ethnic diversity is supported, understood, valued and respected and where we live together as a society free from racism, sectarianism and social exclusion and where human rights and equality are protected for all.”

Another suggestion was that the vision should remove “sense of belonging” and be reworded to “call for a vision of a society free from racism, sectarianism and all forms of social exclusion under human rights principals.”

One respondent thought that the vision needed to reflect more strongly “obligations to uphold human rights standards and its opposition to inequality based on race” and suggested the first shared aim required specific recognition of the effects of multiple identity, including people with disabilities.

Another comment was that “the purpose, vision and aims of the strategy could be more clearly defined particularly in relation to the specific programmes which will be designed.”

One view was that the shared aims should instead be described as high level outcomes to be achieved.

Some responses called for the RES to include the NI Executive’s obligations under international human rights treaties and recommendations/concluding observations. They also want the Strategy to detail how these duties intersect with each of the shared aims.

A further view was that “Help understand/preserve/promotes other cultural identities” should be included in one of the aims.

Another respondent agreed with the vision, purpose and aims of the Strategy but also thought the RES would “benefit from also having a set of values and principles”.

One suggestion was there must be an aim to ensure respect from everyone for everyone from minority ethnic backgrounds.

One respondent thought that some of the verbs used are “vague and ambiguous” such as ‘combatting’ racism and ‘ensure’ equality of opportunity. They argued that “setting unrealistic or vague objectives undermines the Strategy and measurement of its progress”. The shared aims should be “sharper and less vague with operational objectives which can be easily translated by each Government department and understood by the public.”

An additional comment was that the “setting of utopian goals such as the ‘eradication of racism’ is not useful” and that it can be damaging to effectiveness to overestimate the extent of racism “to imagine need on the basis that it has not been disproved.”

In reference to the shared aim on participation, one suggestion was that a definition of the term ‘a sense of belonging’ would be useful and that ‘guided by overarching human rights norms’ should be replaced with “by ensuring the Human Rights of everyone”.

Another suggestion was that the aim on equality of service provision should be reworded to focus on ‘equality of outcome’.

One respondent was “disappointed that no concrete proposals for forwarding these aims have been included in this section of the text. This is probably the most significant weakness of this document.”

Another proposal was to use “the first shared aim as the vision for the RES since it more accurately reflects the international human rights law in this area.”

English Language

One of the main practical issues raised was the need to have better/cheaper English language class provision or indeed that English should be designated as an essential skill – 17.5% (17) of responses referred to this issue.

One respondent mentioned extending free ESOL access from asylum seekers to refugees and described this as “currently a major barrier to integration”.

Another expressed that members of their organisation had difficulty in accessing English language courses due to oversubscription, which had resulted in long waiting lists.

One response discussed the provision of ESOL courses by community organisations and that most courses do not require them to be taught by a recognised ESOL teacher. They argued “this can be detrimental to those who wish to progress into further and higher education and into employment as colleges and employers will require a recognised level of English language before admission onto a course or as a criteria for employment. Those who then choose to obtain a recognised qualification are subsequently disadvantaged as they have not learnt the language in the correct way so they need to be retaught the basics”

Another comment was that the main barrier to employment is “language and access to affordable language classes and crèche facilities.”

A proposal was that “the model of provision of free ESOL classes should be taken from England and DEL should be made responsible for the delivery of the courses.....The service provision in terms of language classes at the moment is very scattered and depends on the council area.”

Another comment was that “to say ‘*poor or no English causes particular problems in relation to access to services*’ is a similar position to that of the ‘medical’ model of disability – whereas it should be that the problem is not the person with either a disability or the person who is not proficient in English, but rather it is how society changes to overcome any barrier by providing accessible information or language support and therein ensures equality of opportunity.”

Recognition of qualifications

11.3% (11) raised the difficulty in getting qualifications gained in other countries recognised here.

One argument was that DEL needs to find mechanisms to recognise qualifications and to provide a means of upgrading - courses available in other parts of the UK but not NI.

Another response noted that “currently available adaptation courses in the UK tend to be limited to the areas of nursing and teaching.” They also pointed out that the Overseas Nurses Programme is not taught here and that no educational facilities provide a midwifery adaptation course, meaning that anyone wishing to continue their work in this area “must be educated in London, which is both a financial and logistical barrier to progress”. Concern was expressed that the RES does not commit to any measures to “address the underemployment of individuals educated overseas.”

Seventh shared aim – cultural identity

6.2% (6) supported the inclusion of a seventh shared aim whilst 8.2% (8) did not support its inclusion.

One respondent was cautious about the introduction of a seventh shared aim and argued that, if it was included in the final RES, “there would have to be very close scrutiny to ensure that an appropriate balance was struck between enabling people to maintain legitimate cultural or racial identity and reserving the right to intervene to prevent certain expressions such as female genital mutilation and arranged marriage”.

Another commented they did not want a seventh shared aim included “to avoid the sense the RES wants to control one’s cultural identity”.

Whereas a respondent who agreed that a seventh shared aim should be included said “people in Northern Ireland should strive to better understand different cultures and their practices that may seem alien and strange to us”.

Another agreed with a seventh Shared Aim and believed this “would be important and entirely consistent with the ambition of creating a society predicated on interculturalism.”

However, a respondent who did not agree with a seventh shared aim argued that “cultural identity expressed in the wrong way can contribute to barriers between groups. Human rights, such as those of women and girls to protect their own bodies or the right of children to be free from indoctrination, have a higher claim than the claims of religions or ethnic groups to their traditions.”

Another comment was that “protection against religious discrimination is already afforded by legislation in Northern Ireland and in addition, some mono-ethnic groups have been recognised through case law as being a racial group. The specific inclusion of state promotion and protection of cultural rights in the current strategy may have the affect of reducing the effectiveness of the strategy’s key aims.”

One view was that a seventh aim is not needed as, if effectively implemented, the proposed 6 shared aims should protect cultural identity rights.

A number of other responses commented that they considered “the scope of the aims and visions is sufficient to address this issue without specifically identifying it as a separate aim”.

Another suggestion was that ‘maintaining cultural identity’ should be incorporated into the 6 shared aims, rather than including a separate aim.

One respondent commented that everyone should have the right to maintain one’s cultural identity – when lawful and within the boundaries set by the Human Rights framework. However the expression of some aspects of cultural identity “still has the potential to create exclusion from society. The specific inclusion of state promotion and protection of cultural rights in the current strategy may have the affect of reducing the effectiveness of the strategy’s key aims. Difficulties for the success of the strategy may also arise if part of the population questions why minority rights in relation to cultural expression are being protected by the State when theirs are not.”

Another similar response stated the final RES “should recognise the right to culture.....Such recognition could be expressed as an element of one of the ‘shared aims’ or separately.”

Length/review of strategy

4.1% (4) believed there should be an independent review of the Strategy.

One respondent noted that, although they believed the 10 year duration of the Strategy to be appropriate, it was essential that the Strategy “be adequately and regularly monitored, evaluated, reviewed and resourced during this timeframe and, particularly given the gap between the last strategy and this document, towards the end of the timeframe of the strategy to determine the next phases of the approach”.

A small number of responses believed the Strategy should only be for 5 years. One suggestion was for a 3-5 year Strategy. Another suggestion was “the strategy should be no more than five years in duration because the demography of Northern Ireland is changing rapidly and it is important that there would be an opportunity to revise the strategy in five years to take account of emerging issues.”

Another respondent agreed with the 10 year duration providing that progress was “monitored on an annual basis, a review every 3 years and a full evaluation in the final year designed to inform the content of the next strategy”.

Another suggestion was that progress should be monitored on an annual basis with a full review every three years and a “comprehensive, over-arching evaluation in year 10.”

An additional suggestion was that the reviews of the Strategy “should include formal engagement with the BME sector.....There should also be a mechanism in place to enable an earlier review on aspects of the strategy if required”.

Additional comments made in the responses

Child care

The issue of access to flexible, affordable childcare was also raised. It was noted that increased provision after 6pm and before 7am was needed. The respondent also mentioned that flexible childminders charge time and a half which meant they did not feel flexible childcare was affordable. The impact of zero hours contracts and the inability to commit to regular childminding hours was also mentioned.

Another respondent argued that the provision of free or affordable day care is needed so women can access training – “there is no point in tackling race inequality alone if gender inequality isn’t addressed too”.

BME women

One response mentioned the issue of FGM and that “measures should be taken to establish a robust framework for preventing this offence taking place, as the current approach is demonstrably ineffective.” The respondent also wanted to see a commitment in the strategy to legislate against forced marriage and for the strategy to also refer to honour-based violence. An acknowledgment “of the barriers to BME women’s participation in political life” was also called for.

The issue of domestic violence was mentioned in a few responses. One comment was that the majority of Thai women settle with local partners and this can put them in a particularly vulnerable position if their partner becomes abusive; and if they have a low level of English “may be coerced or misled into signing agreements that allow their entitlements, including child benefit, to be paid to their partner rather than to themselves. This can establish a financial dependency between the victim and their abuser”.

The issue of no recourse to public funds was also raised, with the respondent saying “individuals experiencing domestic abuse may have to choose between either staying with an abusive partner or experiencing complete destitution”.

Education / schools

One response proposed that all primary schools should participate in a multi-cultural awareness programme to promote integration and equality at an early age.

Another view was that “it is not equitable to put children who have no experience of formal education into classes appropriate to their age but not their level of experience and skill and expect them to succeed.”

Another respondent agreed with this view and said there is a need to adapt education to children’s needs and not put them into age classes if they have no previous schooling.

An additional view was that education “should not be monolingual but a greater emphasis should be put on BME languages in mainstream education” and that Mandarin should be mainstreamed into the education system as a Modern Language.

The issue of racist bullying was mentioned in some responses. One respondent called for this to be addressed and “commitments should be made to tackle these difficulties, including to the development of central guidance on racist bullying to inform the development of schools’ racist bullying policies, in line with guidance provided in England and Wales.”

Another respondent commented that “some schools are reluctant to properly address this issue, even when it reaches an extremely serious level”. They described the “differential response between schools” as being “partially attributed to the fact that Northern Ireland does not currently provide national guidance on drafting a racist bullying policy akin to that published in England and Wales”.

A further view was there is a lack of provision of appropriate food for Muslim children in schools. An example was given of a child who was “denied the opportunity to opt out of religious education due to the alleged unavailability of staff to monitor the student in a separate room”. This was described as an “unacceptable reason to deny a pupil the opportunity to opt out of religious education, but it also gives non-Christian pupils mixed messages on moral, religious and cultural issues through the application of mandatory, Christian-focused religious instructions”.

Census

Some responses argued that the existing census categories are inadequate as they do not disaggregate the ‘white’ category. The proposal calls for:

- The ‘white’ ethnicity category to be disaggregated so there are sub-categories for Polish, Lithuanian and Slovakian people;
- Remove the Irish Traveller category and create a new grouping under ‘Roma/Traveller’ which included sub-categories of Irish Traveller, Gypsy and Roma; and
- Add Filipino as a new category.

Hate crime

A number of comments were received around the issues of hate crime; that the strategy must make it clear that hate crime is not acceptable and that measures should be taken to ensure that our criminal justice system “enables more hate crimes to be prosecuted and that more convictions are accompanied by the additional tariff marking the seriousness of hate crime.”

One comment was “I don’t want nor do I expect special treatment – I just want to feel safe to live here without being harassed or hounded out because I am different.”

Health

The issue of access to health services was mentioned in a number of responses. One respondent said there was still difficulty in accessing some GPs surgeries who are “not willing to take on new patients who are from the BME community”. They also argued for more resources for the translation of information materials.

Another response referenced a recent health and social care study which found that women from certain migrant and minority ethnic groups, including Irish Traveller and Roma, are more likely to have maternal ill health and have increased risk of maternal and infant death compared to the general population. They wished to see this issue highlighted more in the Strategy.

Interpreting services

There was some discussion in the responses about interpreting services. One concern was that minority ethnic people “may have to endure illnesses for longer periods of time due to the lack of availability of interpreters or the lack of co-operation of reception staff”. Another respondent said that “systemic racism was experienced particularly when accessing health care services” giving examples of “times the Roma were refused an interpreter on the grounds that they had not asked for one well in advance”.

However, another respondent said that the training of reception staff is often inadequate and “they often assume that the BME patients do not have enough English speaking ability and inappropriately seek the help of interpreters”.

Positive action

One response wanted to ensure that ‘positive action’ did not become confused with ‘positive discrimination’ as they believed this would be counter-productive and “exacerbate racial tensions and ill-feeling”.

Another respondent agreed that positive action measures should be used in certain circumstances and that the final RES “should explicitly set out details as to what areas of public policy positive actions can be devised”.

Immigration policy

One respondent argued that regional immigration policy should be as understanding, as respectful and as welcoming as possible.

Another respondent referred to the “very biased approach of this chapter in taking it for granted that a regional immigration policy is a good thing”.

Another comment was that “a regional immigration policy would provide an opportunity for NI to adopt a more planned approach and identify specific areas where there is a shortage of knowledge and skills.”

The issue of communication with the Home Secretary on immigration cases was raised, with one respondent saying that all elected political representatives should be able to communicate with the Home Secretary and the Home Office – not just MPs.

Majority Ethnic

One view was that “it is important that this strategy is applicable to everyone and not seen as merely targeted at ethnic minority people.”

One respondent said that “there is nothing explicit about identifying or addressing the needs of the majority ethnic population” and that “there should be support available to enable majority ethnic communities to develop leadership and collective capacity”.

The respondent also believed that there should be a consideration of a similar funding stream to the MEDF “to provide support for the majority community to build better race relations”.

Case studies

There was a suggestion to include case studies of racial equality incidents to strengthen the RES.

Similar to this was a suggestion that the strategy should highlight 'lived experiences' – "This would assist those implementing the strategy to consider the 'person' behind the statistic."

Leaders

One response wanted political parties to take the lead in promoting racial equality and to engage directly with BME communities in their policy making and in the "furtherance of their larger political objectives".

Another respondent said there was a need for "government bodies to come in to communities and ask BME people about racism and not just rely on leaders of organisations to speak on behalf of others.

Other comments

A number of the responses commented that "it is much weaker than the previous Racial Equality Strategy".

Another view was that the consultation document was wide in scope and aspirational in tone and the RES should scale back to "retain a clear focus on racial equality" and that "racial equality risks becoming diminished somewhat by the discussion on good relations and community cohesion."

Another comment was the role of the Racial Equality Unit in ensuring strategy implementation across departments needs to be made explicit.

A proposal was that there should be a “commitment to engaging with relevant departments regarding a re-examination of current policies and subsequently determining if they require adjustments”.

One suggestion was that “the final strategy provides appropriate recognition to the structural and practical support offered by the community and voluntary sector. It should reflect on the benefits and commitment brought to these issues and the positive contribution made, and outline the current infrastructure, as well as the broad range of issues worked on.”

Another issue raised was the difficulty in obtaining a driving license as a Residence permit is not accepted as a form of ID.

One respondent said there was no effort to have work experience recognised as there is no base for comparison. They felt this was used by employers to exclude those from minority ethnic backgrounds from the job application process. They wished to see a co-ordinated approach by DEL, employers, trade unions and other stakeholders to tackle what they described as “insidious issues of casual discrimination”.

One respondent wanted to see sport acknowledged “as a ‘powerful tool’ to combat racism and racial discrimination”.

Two responses wished for the final RES to be “as short and concise as possible so as not to lose its impact due to the overuse of bureaucratic terminology”.

Another suggestion was for the Strategy to ensure that the needs of BME communities working and living in rural areas are considered.

One response called for a new Equality Impact Assessment to be carried out.

Responses from Umbrella Groups

Common Platform response

This was an agreed response signed by a number of organisations and was to highlight “agreed common themes and principles that the undersigned organisations believe are critical to the successful implementation of a strategy.”

Some of the main issues raised in the response were:

The strategy needs to elaborate and develop clear links between RES and Together Building a United Community (T:BUC), with other equality and anti-discrimination strategies and the Delivering Social Change and Programme for Government frameworks.

The proposed oversight structure is considerably weaker than under T:BUC. The oversight arrangements should be aligned with those established for T:BUC.

The RES should be accompanied by a detailed robust action plan which must include a comprehensive programme of activities.

The RES requires a senior official designated in each department, such as the previous champions, to promote and coordinate the implementation of the strategy across departmental structures and their relevant arms length structures.

A strong RES should include a meaningful assessment of the ‘scale of the challenge’ and utilise the wide range of contemporary evidence and research available.

Complex concepts of indirect discrimination and institutional racism/discrimination should be explained and definitions given to racism and sectarianism and the interplay with Section 75 groups.

A key focus of the strategy should be to encompass a framework to deal with not only issues on the grounds of race, but also with associated multiple identities. Such

an approach would allow the strategy to tackle inequalities associated with, for example, race and religion, or race and gender etc.

The RES should make clear the NI Executive's obligations under the international human rights' treaties and recommendations/UN Concluding Remarks regarding BME communities and specifically eliminating racial discrimination (CERD) and discrimination against women (CEDAW). It should detail how these duties intersect with each of the 'shared aims' and identified policy areas. It should also draw on influential soft law standards, such as the Durban Declaration and Programme of Action.

Adequate funding and development support over five year periods should be provided on the same basis as with equivalent funding schemes, to support actions that will have an immediate and positive effect on communities with a focus on outcomes, and transparency in selection.

Reform of race relations legislation should be implemented in line with Equality Commission proposals and clearly timetabled.

Develop and deliver a clear action plan across central and local government to tackle key inequalities in a range of social policy issues including social attitudes; education, employment, accommodation; health; welfare and ensure consideration of multiple identity issues therein.

OFMDFM needs to develop and implement overarching Roma and Traveller and Refugee Integration and Inclusion.

NICEM response

The Northern Ireland Council for Ethnic Minorities (NICEM) is an independent non-governmental umbrella organisation that represents the views and interests of black and minority ethnic (BME) communities.

Some of the main issues raised in the NICEM response were:

The Ministerial foreword should be strengthened to condemn racism and demonstrate political leadership through a robust commitment to eradicating racial inequalities. The foreword should also recognise the positive contribution of ethnic minorities to the local economy and linguistics, religious and cultural diversity.

The Strategy should attach greater emphasis to multiple identity issues by acknowledging overlooked international human rights standards.

A key measure in the thematic action plan for OFMDFM should be a timetabled legislative proposal to reform the current race relations law in line with Equality Commission proposals, with a deadline of 2017 for full implementation.

Chapters 2 and 5 should be rewritten to provide a rigorous review of available evidence on racial inequalities. These two chapters should form the backbone of both the Departmental and thematic Action Plans NICEM proposes.

Chapter 2 should include equivalent contextual information on the concepts of racism and racial discrimination to that included in the previous Strategy. This should include accessible definitions of concepts such as institutional racism and indirect discrimination.

Current, relevant research reports on racial inequality and social exclusion, and Departmental/next step agency Audit of Inequality Reports and Action Plans, should be annexed to substantiate the current racial inequalities here.

Using the phrase 'A Sense of Belonging' in the vision and title of the Strategy is inappropriate and does not accurately reflect the scale of the challenges facing ethnic minorities. NICEM recommends its deletion. Furthermore, baseline data on ethnic minorities' sense of belonging should be gathered through the commissioning of research.

NICEM proposes a reworded vision, reading: "A society in which ethnic diversity is supported, understood, valued and respected and where we live together as a society free from racism, sectarianism and social exclusion and where human rights and equality are protected for all."

NICEM supports the current 6 shared aims of the Racial Equality Strategy and supports the use of "positive action", based on research and data, to achieve these shared aims.

Minority non-Christian faiths need not be specifically addressed, as there are currently sufficient laws protecting these groups, which address incitement and religious discrimination. However, the level of protection is still subject to the improvement of the Race Relations law and the final document should state clearly up-front that it protects both racial and religious minorities.

There is no need to have a separate Strategy for a specific vulnerable group, as particular vulnerabilities and needs should be met within the Strategy's framework. Therefore, there is no need for specific Refugee Integration Strategy. Rather, specific programmes of work should be devised and a Thematic Working Group under the Racial Equality Panel should be established to produce a programme of action to provide for these vulnerable groups.

A commitment should be made to coordinate the implementation of the Strategy with action plans adopted under TBUC, DSC and other antidiscrimination strategies, through thematic actions.

The Strategy includes a commitment to ensure that the Racial Equality Panel is 'listened and responded to' through DSC bodies. However, no clarification is

provided on issues such as the frequency of engagement and the authority of Racial Equality Panel members in influencing these bodies. Therefore, the Strategy should clarify how these structures will interact with each other and whether the Panel will be represented in these bodies.

Adequately resourced ethnic monitoring should be mandatory across all Departments and their next step agencies.

NICEM suggests the following changes to ensure that ethnic monitoring is capable of capturing the demographic reality on the ground:

- Disaggregate the 'White' ethnicity category into the following the groups: Polish, Lithuanian and Slovakian;
- Remove the Irish Traveller category and create a new grouping under the EU definition of “Roma”. Under this grouping include the following sub-categories: Irish Traveller, Gypsy and Roma;
- Add “Filipino” as a new category.

The Immigration chapter of the final document should seek to dispel immigration myths and recognise the positive fiscal and financial contribution of minority ethnic people here.

The Racial Equality Panel should be jointly chaired by the two Junior Ministers and an ethnic minority community representative in order to reinforce governance and accountability.

The annual reporting mechanism and Racial Equality Champions should be reinstated to provide annual reporting on and scrutiny of Departmental progress through the Racial Equality Panel's “Annual Progress Review”. Thus, the reporting and accountability mechanisms attached to the RES should be significantly enhanced.

There should be a formal review every 3 to 4 years in line with the Comprehensive Spending Review, in order to ensure that the Strategy remains relevant, responsive and effective, especially in light of its proposed 10-year time-span.

NICEM recommends the adoption of two types of Action Plan in the revised Strategy. The first type should be based on thematic topics and/or issues, which require inter-departmental actions and a joined-up approach. OFMDFM should develop this overarching thematic action plan, which coordinates key action measures across Departments. It should provide a limited number of strategic, realistic actions for each Department.

The second type should be a Departmental/next step agencies' Action Plan, adhering to the 'SMART' (specific, measurable, achievable, realistic and timeframe) framework, and which should have no more than two strategic actions, which would be able to secure more resources and thus have a more long-term impact.

The final document should detail on how the Racial Equality Panel is to cooperate with the bodies and mechanisms emanating from equality and equality-related Strategies other than TBUC and DSC.

The final document should detail how the Racial Equality Unit oversee the implementation of the Strategy across Departments as well as how Departments will ensure that their policies/practices 'take account' of the aims and principles of the Strategy. The Strategy also needs to detail how Departments will 'cascade' the Strategy to public bodies and other service providers in order to share expertise and best practices.

The final document should have a detailed timetable as to when relevant bodies should submit the two types of action plan to the Northern Ireland Executive for both monitoring and accountability purpose.

NICEM supports the use of targeted positive action measures based on evidence of racial inequality, to be built into both thematic and Departmental action plans.

For the thematic Action Plan, OFMDFM should co-ordinate a joint bid with various Departments. We suggest the joint bid should be approved by the Executive in order to attain sufficient priority and resources.

NICEM suggests that the bid for ethnic monitoring from various Departments should be treated as a Thematic Action and the securing of resources from the Executive as a matter of urgency and high priority."

Responses from Statutory Organisations

Equality Commission response

Some of the main issues raised in the ECNI response were:

Sense of belonging

The Commission welcomes the Department's reference to "a sense of belonging" which appears in the title of the document and in the vision. Research has shown that "social capital and a 'sense of belonging' are understood to foster civic engagement in a modern society which is otherwise characterised by individualism and consumerism – neither of which are conducive to democratic participation or collective action'.

However, for 'a sense of belonging' to be used as a title for the Strategy, the concept should be further explained within the document.

Ministerial foreword

We recommend inclusion of a stronger and signed Ministerial foreword which makes a clear commitment on behalf of the Executive to remove racial inequalities and eradicate racist hate crime. The foreword should also acknowledge the contribution made by BME citizens to economic, political, social and cultural life. In addition the foreword should set out the Executive's intention to fulfil its international treaty commitments with respect to racial equality.

There are also a number of omissions within the document. There is no reference to the positive contribution made by ethnic minority communities to the local economy or cultural life; the role of the arts and sport in promoting minority ethnic participation; of the need to build on work currently being undertaken at local level (by for example, NICEM or South Belfast Roundtable) or of the resources which will be made available to build capacity among the BME sector.

Vision

We recommend that the vision is reworded. The vision should not simply be to create a society in 'which racial equality is understood, valued and respected'. It should be recognised that diversity and difference are positive strengths to be embraced. This would reflect a more aspirational vision which is more closely aligned with the T:BUC vision of society 'which is strengthened by its diversity, where cultural expression is celebrated and embraced'.

It is further recommended that the vision includes reference to a society based on equality of opportunity. For ethnic minority communities to contribute and feel part of the society they must have the same life chances as all people living here.

Baseline assessment

Before the Strategy is finalised, the Commission recommends that the Department conducts and includes a comprehensive baseline assessment to present the basis or rationale for the strategic actions to be developed; identifies high-priority groups in need of protection and gaps in programme coverage that need to be addressed'.

Action plan

The Strategy should set out high level actions across all areas and be accompanied by an action plan which sets out SMART goals for the short, medium and long-term. The action plan should represent a comprehensive programme of activities aimed at progressively bringing about aims and high level actions to be set out with the strategy, towards improvements in the promotion of racial equality.

The Commission also recommends that OFMDFM gives consideration to how best it can ensure that the Racial Equality Strategy and associated action plans are mainstreamed within Departments, including, for example, the potential for nominated Racial Equality Champions. (The role of the 'champion' would be as agents of change with responsibility for overseeing the implementation of the strategy and developing and reporting on departmental action plans).

Comparison with T:BUC

The Commission notes with concern the weaker governance arrangements accorded to the Racial Equality Strategy compared to those accorded to T:BUC. The Together Building a United Community (TBUC) strategy, which repeatedly notes the importance of tackling racism, establishes a Ministerial Panel comprising *all* Ministers from the Executive, to set the strategic direction for the Strategy and oversee its delivery. This suggests a level of engagement with the issues which requires political leadership and ongoing Ministerial engagement through the Panel.

However, in stark contrast, there is no ministerial representation on the Racial Equality Panel. The Panel is instead to be chaired by an OFMDFM official and is only required to report to the Minister once a year.

In addition, the proposed structures for the implementation of the Racial Equality Strategy lack arrangements for a body/bodies to provide an independent challenge and scrutiny function. T:BUC, on the other hand, has tasked the Equality and Good Relations Commission with an independent challenge and scrutiny role, requiring the Commission, *inter alia*, to carry out an assessment of progress against the objectives of the strategy and produce a report to the Assembly every two years.

The Commission also recommends a coherence of approach with the arrangements under T:BUC for implementation and accountability to ensure that commonality of issues and the intersection between the two strategies is maintained on the issues of importance of improving relations in our society.

Multiple Identity

The Commission considers that a key focus of the strategy as a whole, and specifically the proposed framework, should be to address inequalities not only on the ground of race, but also where race intersects with other (i.e. multiple) identities.

The Commission therefore recommends that the proposed framework is amended so as to tackle inequalities centred on race or associated multiple identities (i.e. where race, or race and an additional equality ground are engaged).

In the absence of the introduction of a single equality bill, (which, in the Commission's view, is the most effective and appropriate means of addressing this legislative gap), we recommend that the race equality legislation is amended to include protection against intersectional multiple discrimination.

Minority Non-Christian Faiths

The Commission is concerned that the reasoning provided for extending the Strategy to non-Christian faiths is flawed and does not distinguish between groups which have been recognised as 'racial groups', in law and those who have not e.g. the Muslim community, the Rastafarian community.

As aligned with the position on the Committee for all Forms of Racial Discrimination, the Commission is of the view that the Strategy should only cover religion where there is an intersection between religion and one of the grounds covered under Article 1(1) of the Convention (i.e. race, colour, descent, or national or ethnic origin), which would align with the position of the Committee for the Elimination of All Forms of Racial Discrimination.

The CERD Committee has made clear that discrimination based solely on religious grounds does not fall in the scope of ICERD. The CERD Committee has however also stated that claims of multiple discrimination could be considered by them where one of the grounds did fall within the scope of CERD.

Specifically, CERD has expressed its view that the Committee "would be competent to consider a claim of 'double' [multiple] discrimination on the basis of religion and another ground specifically provided for in Article 1 of the Convention, including national or ethnic origin".

The rights of non-Christian faiths should already be covered under the T:BUC strategy. The Ministerial Forward to T:BUC states that [T:BUC] ‘provides the framework for government action in tackling sectarianism, racism and other forms of intolerance while seeking to address division, hate and separation’. It is, however, recommended that the Executive gives further consideration to the issue of non-Christian faiths and clarifies how T:BUC or other strategies will cover this group, including well-evidenced rationale supporting key actions.

Roma/Traveller Strategy and Refugee Integration Strategy

The Commission recommends that there is a specific commitment to develop a Refugee Integration Strategy as part of the new Racial Equality Strategy.

We also recommend that the Strategy contains a specific commitment to develop a co-ordinated overarching Traveller and Roma Integration Strategy.

Legislative reform

The final Strategy should contain a timetabled commitment to reform the race equality legislation aligned with the Commission’s proposals.

Should the final Racial Equality not include a commitment to legal reform, it will be difficult for the Executive to assert that the relevant commitments in the Racial Equality Strategy (to eliminate racial inequality and provide effective protection and redress against all manifestations of racism), have been addressed.

The Equality Commission is not just a ‘key stakeholder’, (as described at page 38), it has a specific legal duty, under Section 42 (2) (c) of the Race Relations (Northern Ireland) Order 1997, as amended, to keep the working of the Order under review and, when it thinks it necessary, to draw up submit to the Department proposals for amending the Order. This duty is not referenced in the Chapter 6 of the draft RES. The Commission recommends that the duty should be specifically referenced in the final RES given its centrality to any description of the legislative framework here.

Length of Strategy

The Commission is of the view that if the timeframe for the Strategy is to be set at ten years, it must be completely re-evaluated at after the 3 – 4 review period.

Racial Equality Panel

The section on membership of the Racial Equality Panel should make explicit reference to the number of representatives from the minority ethnic sector, in the context of ensuring an appropriate numerical balance between the representatives of the sector and other representatives on the Panel. Such balance is important to help ensure that the voice of the sector is sufficiently robust to be heard.

Furthermore, as referred to above, provision should be made within the terms of reference for the Racial Equality Panel to be able to submit a minority report to OFMDFM Ministers and the OFMDFM Committee in the event that the Racial Equality Panel cannot agree with the annual report submitted by OFMDFM to Ministers and the OFMDFM Committee on the implementation of the programme of work. This would ensure that the Panel has a strong and independent voice in advising Government on what is required to deliver an effective Racial Equality Strategy.

The Commission also recommends that the BME members of the Panel should be chosen through a public appointments process to ensure that representatives of communities have the necessary knowledge and skills to effectively contribute its work.

The Commission recommends that the provision should be made within the terms of reference for the Racial Equality Panel to be able to submit a minority report to OFMDFM Ministers and the OFMDFM Committee in the event that the Racial Equality Panel cannot agree with the annual report submitted by OFMDFM to Ministers and the OFMDFM Committee on the implementation of the programme of work.

Organisations that submitted a written response

ACSONI

Alliance Party

Amnesty International

Antrim Borough Council

Arts Council NI

Artsekta

Ballymena Borough Council

Ballymoney Community Resource Centre

Barnardo's

Belfast City Council

Belfast Friendship Club

Belfast Health and Social Care Trust

Belfast Islamic Centre

Belfast Metropolitan College

Black and Minority Ethnic Women's Network

British Psychological Society

British Red Cross

Bryson Charitable Group

Bulgarian Association

Centre for Cross Border Studies

Chinese Welfare Association

Churches in Ireland Connecting in Christ

Common Platform

Consortium for the Regional Support for Women in Disadvantaged
and Rural Areas

Craic NI

CRC

Design Crafts Council of Ireland

Disability Action

Early Years

East Belfast Community Development Agency

EMBRACE

Equality Commission

Filipino Community NI PUSO-NI

Green Party

Horn of Africa (HAPANI)

HUMANI

Hungarian/Slovakian Roma Community

ICTU

International Futures Forum

Ivory Coast (Ivorian) Community NI

Joseph Rowntree Foundation

Law Centre

LORAG

Mandarin Speakers Association

Mid & East Antrim District Council

Newry & Mourne District Council

NI Human Rights Commission

NIACRO

NICCY

NICEM

NICIE

NICRAS
NIHE
NIPSA
NISMP
North Belfast Ethnic Minority Support Network
North West Black and Minority Ethnic Strategic Forum
North West Migrants Forum
Northern Ireland Inter-Faith Forum
Northern Ireland Youth Forum
NUS-USI
Omagh Ethnic Communities Support Group
Omagh District Council
Omagh Forum for Rural Associations
PlayBoard
Policing Board
Polish Abroad
Public Health Agency
Refugee & Asylum Forum
Roma Network (92)
Rural Community Network
SDLP Party
South Belfast Partnership Board
South Belfast Residents
South Belfast Roundtable
South Eastern Health and Social Care Trust
Southern Area Traveller Support Group
STEP

Sudanese Community
Thai Community Group
Traveller & Gypsy Network
Traveller & Gypsy Network (303)
Ulster Teachers Union
Ulster Unionist Party
UNISON
Wah Hep
West Belfast Against Racism Network
Wheelworks
Women of North Down
Women's Aid for NI
Workers' Party
Youthnet

Responses to Online Consultation

There were 49 responses to the online questionnaire.

N.B. Responses were not mandatory for any of the questions, hence the discrepancies in percentages of respondents. Figures in brackets give the number of respondents for each response.

Responses to questions on the Strategy

80.4% of respondents (37) said they agreed with the approach of the Strategy.

Those who did not agree were given the opportunity to say why not. There were views that the title is "offensive" and "patronising", that there is a lack of detail around accountability. That the timescales given are too long and that success should not be linked to spending - "what price equality?".

95.2% (40) agreed that the Strategy should be underpinned by international human rights instruments, most notably the International Convention on the Elimination of All Forms of Racial Discrimination, the European Convention on Human Rights and the Framework Convention for the Protection of National Minorities.

Other instruments suggested included the Durban Declaration and Programme of Action, UN resolutions, e.g. CERD and CEDAW, the proposed Bill of Rights in the Good Friday Agreement and Section 75 of the Northern Ireland Act.

97.8% (44) agreed that the language barrier, lack of information, the training needs of staff and the cultural needs of minority ethnic people are relevant issues. 70.5% (31) said that there were, however, other issues which they would like to see covered. These included education/schools, housing, the workplace, access to mental health services, community planning, and addressing existing prejudice.

There was agreement that the Joseph Rowntree research highlights the important and positive contribution made by migrant workers, however respondents felt that there needed to be more research and monitoring. Other specific inequalities that respondents wished to highlight included access to services, inequalities in the Criminal Justice system, women and second generation groups.

97.3% (36) agreed that the strategy should also provide a framework for tackling inequalities experienced by followers of minority non-Christian faiths, such as Jews and Sikhs.

84.4% (27) were happy with the vision for the Strategy.

Exactly half of respondents (16) thought the strategy covers everything that needs to be covered. Those that disagreed gave details of other aspects they felt needed to be included, including the need to define race, given that the largest minority groups here are white Europeans, the need to address "inherent discrimination and prejudice" in Northern Ireland. There was support for the NICEM proposal to rename the strategy.

Shared Aims

Almost all of the respondents were supportive of the six shared aims.

Shared Aim	Agree	Disagree
Elimination of Racial Inequality	36	0
Combating racism and hate crime	37	0
Equality of Service Provision	35	1
Participation	35	0
Social Cohesion	35	0
Capacity Building	33	2

67.6% (25) thought there is a need for an additional shared aim concerning the right to maintain one's cultural identity.

All respondents (37) agreed that positive action measures should be used in certain circumstances to achieve the six shared aims of the strategy.

When asked if there was anything not covered by the six shared aims, respondents answered the indigenous population in NI, the use of the term racial, two way integration, implications for existing law and existing provisions.

When asked if any of the aims should be reworded, respondents said that equality of service provision should be reworded to focus on equality of outcome. "Elimination of racial inequality is the desire/aspiration". Perhaps this could be reworded to "commitment to Racial Equality". They also said that the terms 'participation' and

'capacity building' are unclear, and that "the language used could be simplified to aid a wider understanding".

64.9% (24) thought that the idea of 'A Sense of Belonging' in the vision and as the title made sense. However, more than one person called it "patronizing and offensive". There was again support for NICEM's proposal. There was also the fear that the title could get "lost in translation". It is "more about shared diversity". "It isn't strong enough - a sense of belonging is an abstract concept ... we need a stronger articulation not least in relation to racism/hate crime"

72.2% (26) thought that the idea of 'A Sense of Belonging' was easy enough to understand. Those that disagreed mentioned translation issues, the complication that 'belonging' can imply ownership in another context, which may not be clear to non-native speakers of English. Other terms used were "Vague" and "belonging to what?".

76.3% (29) agreed that there is a need to have research on the sense of belonging of minority ethnic people here to benchmark the progress of the strategy. The overarching feeling was that minority ethnic groups themselves must be consulted with, and involved heavily in any research, whether this includes "community leaders" community groups, NGOs, focus groups, surveys, longitudinal research, and benchmarking of existing data.

80% (28) agreed that there is a need for a specific Refugee Integration Strategy.

94.7% (36) agreed that there is a need for specific programmes of work to address particular challenges and vulnerabilities facing particular groups.

91.4% (32) agreed that the strategy should refer to T:BUC and DSC.

94.1% (32) agreed that the Racial Equality Panel and a specific focus on race should be retained.

When asked how the strategy should focus on addressing the issue of multiple discrimination, respondents said consultation must happen, there must be an emphasis on education, that issues are cross-cutting across and any response must be holistic and cross-sectoral. They also said that we must "focus on diversity as

common, not unique", and that legislation or policy must have "a strong focus on human rights".

89.2% agreed that ethnic monitoring is a critically important measure that government must undertake. When asked what form this monitoring should take, respondents said that the OFMDFM guidance on Ethnic Monitoring is a good starting point, but should be "compulsory". Work must be linked to ECNI work and should be inclusive. Respondents advocated the accurate and regular publishing of employment levels, age groups, educational levels, with monitoring following "the DHSSPS example". Ethnic monitoring should also be a legal requirement for surveys of employers and schools.

93.9% (31) agree that an effective legal protection will enhance the achievement of the six shared aims of the Strategy.

97.1% (34) think that reform of the Race Relations (Northern Ireland) Order 1997 is a priority.

100% (31) agree with the Equality Commission's proposals around race equality legislation, as set out in Chapter 6 of the consultation document.

When asked if there are any areas of Race Relations law which require reform, additional to those identified by the Equality Commission, one commented "Race relations is the wrong term since the majority of recent migrants are racially identical to the majority population."

When asked if there are any actions we can and should take under existing devolved powers in this area, respondent said the "strategy should... address inconsistencies in the level of legal protection afforded against racial discrimination in Northern Ireland in comparison to Great Britain". Respondents also said that Northern Ireland should have a "fit for purpose system not a one size GB model".

Respondents were asked about the aims of a regional immigration policy, and responses focussed overwhelmingly on the need to, as one respondent put it, "enhance NI as a place of well being and opportunity; to encourage diversity, innovation and enterprises; to promote economic and social activity. Respondents recognised however, that any immigration strategy needs to take into account of the

social and economic context, ensuring that infrastructure is able to cope with new migrants, both so that an increased use of services does not impact on either existing citizens or new migrants.

86.7% (26) agree with the proposal for a forum for Ministers from the devolved administrations and the Home Office as a mechanism for change.

Respondents had several suggestions when asked if they had an alternative views as to how we might lever change, including education and the use of the arts sector, as well as including minority ethnic people in the decisions which impact upon them.

82.1% (23) were content with the proposals for structures to implement the strategy set out in Chapter 8 of the consultation document.

75% (21) were content with the Terms of Reference of the Racial Equality Panel, as set out in Annex C of the consultation document. Of those who did not agree, respondents said that we "need to have ethnic minorities involved in any decision making about their future" and that a definite timeframe for a review of membership must be stated, rather than "from time to time".

51.7% (15) were content with the membership of the Racial Equality Panel, as set out in Annex C of the consultation document. Of those who did not agree, several respondents recommended that the panel be chaired by the Junior Ministers. There must also be representation from minority ethnic groups, and the panel must be independent.

88.9% agreed with the proposals outlined in the consultation document for developing a programme of work.

When asked how the proposed Equality and Good Relations Commission should fulfils its role as outlined in the consultation document, respondents said that it needs to be inclusive of minority ethnic groups, as well as "ethnic groups that were born in Ireland", must be independent and must have adequate resources.

When asked if they wished to make any comment on the resourcing of the Racial Equality Strategy, respondents said that there must be a long term commitment to funding, and that "resources must be geared to outcomes, not just activity".

Respondents see the funding of the strategy as a "priority".

75% (21) agreed on the need to treat TBUC indicators and Indicators for the Racial Equality Strategy separately.

Organisations that responded to the online consultation

Victim Support NI

ACSONI (African and Caribbean Support Organisation NI)

Unite trade union

BAEM Unite the Union

Labour Party, Northern Ireland

Ballymena Inter-Ethnic Forum

ND YMCA

Police Service of Northern Ireland

GEMS NI

Parenting NI

LGBT labour Northern Ireland

Newtownabbey Borough Council

Ballymena Borough Council

British Association for Counselling and Psychotherapy

Public consultation events

Six public consultation events were held in September 2014 in Ballymena, Dungannon, Derry/Londonderry, Belfast, Craigavon and Newry. Below is a summary of the main issues raised at the events. The number of attendees at each event is given in brackets.

Ballymena (26)

- More transparency – what government has done to address challenges already.
- If Comprehensive Spending Review reduces money available do the targets fall?
- How is getting windows broken going to be affected by this strategy?
- Things need dealt with quicker – e.g. incidents of graffiti.
- Can you tell the difference if someone is suffering an inequality because of faith or race?
- Cultural identity – at home any cultural expression is OK but in a public space you have to respect others.
- How do you measure a “Sense of Belonging” to what?
- School – no interest of other religions in Religious Education.
- Strategy should include numbers of people who belong to other religions.
- Empower people to make a complaint under legislation.
- UK legislation – one size fits all. How can we influence UK decisions?
- More control over an NI specific immigration policy would mean there’s more control on the positives.
- Impact on NI is different than in England.
- Qualifications from other countries should be recognised here.
- More prominence to positive economic contribution in the strategy.
- Resources – where will they go on the ground and what impact will they have?
- Could PSNI work with Facebook to clamp down on racist comments?

Dungannon (2)

- The Racial Equality Strategy must fit in with T:BUC and DSC in a clear and obvious way.
- There must be sufficient and suitably flexible funding available to help smaller, newer groups.
- There must be a constant challenge to the stereotypes and myths surrounding BME people and migrants to ensure reality and reporting is honest and accurate.

Derry/Londonderry (12)

- Legal reform is imperative.
- The speaking and understanding of English must be treated as an essential skill.
- The strategy must be properly resourced.
- Unacceptable behaviour that falls short of breaking the law must be challenged.
- All strategies must take into consideration racial equality.
- The strategy needs clear actions.

Belfast (16)

- Important that Minority Ethnic representatives are given the opportunity to participate in accountability mechanisms.
- The Racial Equality Strategy is deserving of having the same scrutiny as T:BUC.

Craigavon (10)

- There needs to be an analysis of the last strategy.
- Minority Ethnic people do want to integrate but are proud of their culture and wish to be able to retain that identity.

- There has to be greater and fairer leadership from politicians and senior civil servants.
- There must be a clear commitment as well as adequate ring fenced funding to achieve the strategy's goals.
- The current existing evidence base is weak and should be reviewed and revised.
- Racist bullying in schools must be addressed.

Newry (4)

- Sectarianism is similar to racism.
- We should see more representation of ME people in our institutions.
- People working with the public should receive mandatory training about working with ME people.

In addition to the 6 public consultation events, another organisation (North West Migrants Forum) had arranged its own meeting on the Strategy which OFMDFM officials were invited to attend to hear the views of those gathered.

The meeting took place in Derry/Londonderry in October and 16 people were in attendance.

Main issues raised were:

- The length of the Racial Equality Strategy should be 5 years.
- PSNI must be trained to combat racism and hate crime.
- Racism should be dealt with on a par with sectarianism.
- Formal qualifications should be recognised here.
- Nursing staff should also receive training in dealing with other cultures.
- The problems facing migrants living near the border have to be addressed.
- There should be an information booklet in appropriate languages for migrants.

Academic events

Two events were also held at Queen's University and the University of Ulster in order to capture the results of recent research in the field and gain the views of the researchers.

Queen's University Belfast (16)

- The challenge for the RES is to recognise that inequalities exist and to allow people to fulfil their capability – this is an issue of social justice.
- The diversity of people's ethnicity and needs has to be recognised – whilst there is method in them combining to lever support – Common Platform for instance – the groups do not remain static.
- The strategy must address the relationship between migrants, ethnic minorities and the mainstream.
- There must be an admittance that racism exists – imperative that there is law reform. Also society must not ignore its moral obligations. There are no second class citizens and the strategy must be based clearly on equal respect – this is an entitlement, this is not earned.
- The current local political landscape makes it difficult for minority ethnic people to align with political parties. The minority ethnic groups are electorally invisible. There has to be clear unequivocal leadership from elected representatives. Some statements were clearly unpopular and society leaders must respect all.
- The Education system - that allows for a maintenance of other culture and languages.
- Is racism taught at home? Can we challenge the myths and lies that are repeated in media?
- Racism and bullying at school.

University Of Ulster (28)

- The contribution of the BME community here must be recognised. Negative portrayals have to be challenged.

- The contribution of the current education system towards perpetuating racism should be looked into.
- The strategy should list the difficulties facing BME people and how each will be addressed.
- Multiple identity issues have to be addressed – in particular those around gender inequality.
- Occupational segregation does exist and should be investigated.
- Should the media be held accountable for the portrayal of BME people here?
- Would the strategy be more effective with the inclusion of case histories?
- There has to be a toughening up on race hate crime and social media should not be exempt.
- The membership of the Racial Equality Panel needs to be reviewed, there is a possibility of the usual faces becoming gatekeepers for larger communities.
- Whilst it is important to discuss issues such as FGM we should do so with an eye on whether too much emphasis on one practice is pandering to a negative stereotyping of all cultural differences.
- There needs to be an acceptance and acknowledgment of all our international legal obligations.
- Trade Unions can play a positive role in protecting and promoting workers who could very easily be exploited. Early engagement with them would be a positive step.
- More research – both qualitative and quantitative – is needed.