The Consultation is an important first step.
The Commission welcomes this consultation as an important first step towards the development of a new Racial Equality Strategy. We welcome the positive reference to our recommendations in relation to policy and law reform and the inclusion of a commitment to develop specific programmes to address particular challenges faced by groups such as Roma and Refugees.

A Racial Equality Strategy must however address key weaknesses in the consultation proposals.
The proposed Strategy should set out clear evidence of the social, political and economic inequalities faced by minority ethnic communities; develop and communicate clear rationales in support of priority actions; ensure actions are clearly defined, timetabled, allocated and resourced; and ensure appropriate high level commitment and oversight arrangements.

We recommend specific actions to tackle prejudice, racism & hate crime and promote equality.
Aligned to the priorities set out in our 2014 publication ‘Racial Equality Policy – Priorities and Recommendations’, the Strategy should set out specific actions to tackle prejudicial attitudes, racism and hate crime; alongside ensuring equality of opportunity in education, employment, accommodation, healthcare and access to social welfare.

The Strategy should contain a timetabled commitment to reform race equality law aligned to our proposals.
In Northern Ireland we have less legal protection against racial discrimination than in other parts of the UK. We recommend that the Strategy contain a specific and timetabled commitment to reform race equality law aligned to our proposals - ‘Race Equality Law Reform: Strengthening legal protection’.

The Strategy should focus on inequalities faced by BME groups and associated multiple identities.
The Strategy should focus on inequalities experienced by BME groups and associated multiple identities (e.g. where discrimination is based on race; or race in combination with other equality grounds). Extensive engagement with
minority ethnic groups / individuals should be central to developing the Strategy. The Strategy should also commit to developing targeted sub-strategies targeted at Traveller, Roma, and Refugee Integration.

**Leadership is key to effective implementation**
We recommend that OFMDFM ensures a high level of ministerial engagement through the Racial Equality Panel to oversee implementation of the Strategy; and ensures a coherent and co-ordinated approach to the delivery of the Strategy (in the context of linkages with associated strategies such as Together: Building a United Community).

**The Strategy must contain a comprehensive baseline assessment establishing the rationale for key actions**
The inclusion of a comprehensive baseline assessment should present a clear rationale for the strategic actions to be advanced; identify high-priority groups in need of protection; and gaps in existing programme coverage.

**The Strategy should include specific actions for each shared aim, with clear responsibilities and resourcing.**
The Strategy should set out specific headline actions to be advanced in key areas (e.g. education, health, housing etc). This should be accompanied by a detailed action plan setting out specific actions to be advanced; which Departments will lead; who will be involved; and the funding allocated.

**The Strategy should establish structures to mainstream racial equality**
Having an integrated and systematic approach to mainstreaming racial equality issues is key to the Strategy’s success. The Department should ensure that there are structures in place to ensure that Strategy is mainstreamed across and within Departments at all levels - including, for example, the potential for nominated Racial Equality Champions.

**The Strategy must ensure effective evaluation.**
We welcome the commitment in the consultation to ethnic monitoring and associated data collection. We recommend that OFMDFM provides for appropriate and independent evaluation of the Racial Equality Strategy, including via the Racial Equality Panel.

**Proposals must be equality impact assessed in line with Section 75 scheme commitments**
OFMDFM’s Equality Scheme commits to adhering to the principles of Section 75 of the Northern Ireland Act 1998. We note with concern that a meaningful assessment of equality impact has not been presented. The Commission anticipated at least a screening template being attached to the consultation.