

**Equality Commission**

FOR NORTHERN IRELAND

03 July 2024

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## **NIHE consultation Draft Community Involvement and Cohesion Strategy 2024-2029**

We welcome the opportunity to respond to the draft Community Involvement and Cohesion Strategy 2024 – 2029 and acknowledge the importance of collaborative and participatory approaches in addressing societal challenges, including tackling longstanding inequalities.

We welcome the aim of the Strategy to, among others, “embrace community cohesion within and between our communities” and have longstanding positions on the need to advance sharing in housing while ensuring that objectively assessed housing need is met. Furthermore, we have highlighted the need to combat prejudicial attitudes and promote equality and diversity by adopting actions designed to incentivise and advance safe, shared housing and communities based on equality, dignity, and respect. We also recommend action to ensure mutual respect and sharing of public spaces through greater regulation of the display of flags and emblems.

Within this letter we have sought to highlight policy recommendations that should be considered within the continued development of the Strategy. Our response does not consider all areas of the consultation on the Draft Strategy, nor reflects all of the Commission’s positions on Housing and Communities, but rather focusses on specific areas for consideration.

We highlight the following key points for consideration:

- The need to include further detail on actions to tackle hate crime and underreporting of hate crime.
- Actions to promote equality for Travellers.
- The need to collect data and track the impact of the Strategy across the different equality groups.
- The need to undertake Ethnic Equality Monitoring.

### **Actions to tackle hate crime and underreporting of hate crime**

We have made a range of recommendations relating to hate crime and the need to tackle the under-reporting of hate incidents and crimes (against persons and dwellings), that should be considered in the development of the Strategy. Regarding wider Government Strategies, for example, the Equality and Good Relations Strategies (including Race, Gender, Disability, Sexual Orientation, and Age), we have consistently called for specific actions to address prejudicial attitudes, stereotypes, and hate crime. NIHE should consider how this Strategy will relate to Executive Equality and Good Relations Strategies.

The Strategy should additionally consider integration of actions required to address the under-reporting of hate crime, for example:

- raising awareness of hate crime, the methods to report hate crime, the rights of individuals under hate crime legislation, and measures available to support victims, including amongst equality groups and the general public.
- building trust and confidence in the criminal justice system/agencies amongst victims of hate crime, including by working in partnership with equality groups; securing prosecutions and improving outcome rates for hate crimes; ensuring appropriate training for police; ensuring criminal justice agencies are representative of the communities they serve; and improved engagement with victims.
- removing barriers to particular equality groups reporting hate crime by, for example, ensuring reporting mechanisms are accessible; and addressing fears of victims due to lack of anonymity.

We also suggest that the commitment to ‘improved race relations’ within the draft Strategy may be aligned to the aims of the [Racial Equality Strategy 2015-2025](#), including references to combating racism and hate crime. The aims of the Racial Equality Strategy are:

- 1) Elimination of racial inequality.
- 2) Combating racism and hate crime.
- 3) Equality of service provision.
- 4) Participation.
- 5) Social cohesion.
- 6) Capacity building.
- 7) Cultural identity.

Further detail on the Commission’s recommendations regarding hate crime are available at [www.equalityni.org/HateCrimePolicy](http://www.equalityni.org/HateCrimePolicy).

### **Actions to promote equality for Travellers**

We note the Northern Ireland Life and Times Survey (2023) that showed that 33% of those surveyed would not accept a Traveller living in a house as a resident in their local area. This was significantly higher than across other minority ethnic groups. The Draft Strategy should include explicit reference to the need to address negative stereotypes and prejudice against Travellers, and to develop actions to promote community cohesion between Travellers and non-Travellers.

Regarding Aim 3 of the Strategy to ‘Contribute towards improved race relations at a strategic and operational level through effective partnership working’, we recommend adding further detail to acknowledge the need to work with voluntary and community groups representing minoritised ethnic communities (including Irish Travellers).

We further highlight that the reference to ‘travellers’ on page 30 of the Strategy should be revised to use a capital ‘T’ to denote an ethnic group and to reflect approach taken in [Article 5.2](#) of the Race Relations (Northern Ireland) Order 1997.

### **Equality Data, Targeting Interventions and Tracking Impacts**

We welcome the detail provided regarding measuring outcomes associated with the Strategy, and the identification of clear outcome measures. We highlight, however, the importance that all key measures of Government should assess the impact on individuals from across the full range of equality grounds. There is a need for Government and Public Authorities to collect and share comprehensive equality data to

underpin the targeting of interventions and tracking of equality impacts. Providing comprehensive equality metrics for all key measures will assist equality considerations to be a core component of public policy design and delivery, facilitating the targeting and delivery of interventions, including for the full range of equality groups. The Commission has developed a range of recommendations related to equality data, which can be found at: <https://www.equalityni.org/EqualityData>.

## **Ethnic Equality Monitoring**

NIHE should also commit to undertaking Ethnic Equality Monitoring in relation to securing the elimination of racial inequality and equality of service provision. Previous [research](#) has highlighted that “with the current absence of robust, reliable statistical or administrative analysis, significant gaps exist in the knowledge base” on minority ethnic groups in Northern Ireland, while also highlighting that “any impact on outcomes for people of ethnic minority backgrounds is unclear as data is required to demonstrate the policy effectiveness”.

The Commission recommends that public bodies ensure appropriate equality monitoring and related evaluation are in place across all areas of public policy and service provision. The development of any specific proposals for equality monitoring (on race or any other grounds) will need to consider the areas to be covered; how any proposals interact with and support requirements on Public Authorities under Section 75 of the Northern Ireland Act; and consider issues such as proportionality and effectiveness.

## **Further Detail**

Further detail on the Commission’s recommendations regarding race equality are available at: <https://www.equalityni.org/Race>, while our recommendations on housing and communities are available at: <https://www.equalityni.org/Housing/Policy>.

Best regards,

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