

To: Equality Commission for Northern Ireland  
Equality House  
7 – 9 Shaftesbury Square  
Belfast  
BT2 7DP

From: The Community Relations Council  
6 Murray Street  
Belfast  
BT1 6DN

Date: February 2007

## Issue: Promoting Good Relations-A Guide for Public Authorities

The Community Relations Council (CRC) welcomes the opportunity to contribute to the Equality Commission of Northern Ireland (ECNI) consultation on “Promoting Good Relations-A Guide for Public Authorities”. The Council has already attended a number of consultation events and we would like to take this opportunity to comment formally on a number of key issues within the guide.

Council congratulates the ECNI on the production of this guide and believes it should be used by all public authorities when delivering their obligations as set out under Section 75(2). Above all, CRC believes that there is a need to devise and implement a Good Relations strategy to assist with the delivery of the duty.

The document itself is easy to read and sets out very well how important the Section 75(2) duty is in delivering the government priority *A Shared Future*. It is also beneficial that the guide gives equal emphasis to Section 75 1 & 2. Council has already raised concerns that S75 (2) is viewed as secondary to S75 (1) with the result that this duty is not pursued as robustly as the equality duty. We are pleased that the Commission has restated the importance of both duties and emphasised the requirement to actively deliver them in a complementary manner and not as competing duties.

CRC also acknowledges the development of models of good practice for good relations work in many parts of the public sector in recent years. We believe that, over time, the integration of actions stemming from this legislation will contribute to better relations across society.

### **Extension of Section 75 (2)**

The major policy proposal within this guidance is the suggestion that Section 75 (2) is extended to cover other categories. The Community Relations Council is concerned that the extension of S75 (2) to include other categories will weaken the current duty.

CRC acknowledges the important developments such as Hate Crime legislation and the Single Equality Act in tackling discrimination further. Clearly, we do not want to see the continuation of discrimination within any of the S75 (1) categories. Nevertheless, we do not believe that the current focus of the duty should change until there is evidence of real progress across the existing three categories. As a result, the Council remains of the view that the urgency of tackling sectarianism and racism mean that they should remain the primary focus of this particular duty.

The Guide specifically mentions Jarman's research 'No longer a problem? Sectarian violence in NI', which refers to 'the persistence of virulent sectarian bigotry and hostility in NI'; the guide also points out the alarming figures from the PSNI with regard to the high level of sectarian and racially motivated crimes which occurred during 2005/06.<sup>1</sup> Whilst some public authorities have embraced S75 (2) and the case studies provide excellent examples of models of good practice, Council is also aware that some authorities do not see this duty as relevant to their organisation, or more importantly do not want to open the dreaded 'can of worms'. It would also appear that approaches to addressing racism via training, welcome packs etc., are greater in number; more challenging and open in content; creates more debate via conferences, cultural events and promotional events etc and generally appears to be given greater attention than that of sectarianism. We may already have competition between existing S75(2) categories where either sectarianism or racism is avoided or denied and consequently one or other has been inadequately addressed. Any extension of the duty might further compound this culture of avoidance, and would ensure that key issues are pushed further into the background. Indeed, precisely because these are such difficult issues, Council would suggest explicitly highlighting the need to tackle sectarianism and racism to all designated bodies.

CRC wants to emphasise the importance of promoting positive attitudes and relations throughout all nine Section 75(1) categories and welcomes initiatives such as the Disability Rights Commission which calls on the government to introduce policies aimed at integrating disabled people more closely into society pointing out the urgent need to promote positive attitudes to disabled people. This will not only help disabled people themselves, but serve to reduce prejudice and combat ignorance about disability in the long term by fostering greater contact between disabled and non-disabled people. While Council acknowledges the need to promote good relations within the other six S75 (1) categories, we believe that this approach should be clearly identified as separate under a title such as 'promoting social inclusion' and contained with S75 (1).

### **Compliance and Non-Compliance**

CRC is aware that some public authorities appear to be resistant to taking active steps to fulfil the S75(2) statutory duty. There is some evidence that the wide range of definitions of what good relations means, is allowing some authorities to opt out from active participation. Within the guide there are a number of different definitions/visions as to what Good Relations is and the definitions show how different bodies have shaped a definition to match the functions and responsibilities of their organisation. While remodelling programmes to suit specific circumstances may well be desirable, it would be helpful if the Commission could provide a baseline

---

<sup>1</sup>ECNI, GR Guidelines, Page 21 & 22.

template outlining minimum requirements. Such a template could then be built on without reducing the value or content of the work.

CRC is aware of examples of designated bodies promoting good relations in relatively unchallenging ways i.e. an inadequate vision, consultation process, audit, strategy, monitoring and outcomes. In addition, there are a number of examples of good relations initiatives being targeted in one small part of a very large organisation and not being rolled out nor moved on to a second phase. The Community Relations Council is therefore pleased that the Guide sets out clearly the importance of delivering outcomes and achievements, and incorporating strong monitoring and evaluation procedures that will determine a real change in 'hearts and minds'. CRC believes that minimum requirements must be clearly identified.

Compliance with the duty needs to become part of normal public sector culture and there needs to be a mechanism to challenge public authorities when evidence emerges that authorities are not adequately promoting Good Relations. CRC also recommends that the guidance should include **a mechanism for GR impact assessments** which should identify possible negative GR impacts on statutory organisations policies and practices. These should be submitted as part of their GR plans submitted to ECNI. In addition, models of best practice could be identified for rolling out across the public sector and public events to promote this work might be developed as an annual event.

While enforcement may become a necessary tool, Council believes that active persuasion is the most productive way forward as outlined in '*A Shared Future*'. Thought should also be given about mechanisms to ensure compliance where there is evidence of persistent avoidance. In order for compliance to be based on firm evidence, it is essential that appropriate monitoring takes place in order to ensure the strategy is achieving the desired outcomes. Within '*A Shared Future*' the values of audits and annual progress reports is underlined, with a clear indication that they should form part of the Government's triennial report on the community relations/good relations' health of Northern Ireland'<sup>2</sup>.

### **A Structured Approach**

Good relations cannot be developed through the delivery of events alone, nor via pockets of service delivery. Public bodies need to demonstrate strong and robust policies and plans for good relations, embedded in the fabric of their organisations. It will be important for the organisation to provide the necessary structures, support and to develop innovative programmes and networks external to the organisation.

When this guidance is finalised CRC recommends that it is developed into a code of practice enabling public authorities to use it to make informed decisions in the development of Good Relation Strategies and their implementation.

Each public body should prepare a good relations action plan covering employees and service users. For some this will be a matter of updating their existing plan/strategy/policy and for those who are just beginning the process, there are many

---

<sup>2</sup> ASF, Page 6

models to learn from. In preparation for this change, training in good relations should be made available.

Ideally good relations plans should span three years, informed by the good relations audits included in the guidance. The plans should cover both internal and external matters: good relations is not just about 'them out there' but also 'us in here'.

### **Conclusion**

Council is pleased that ECNI has recognized CRC's 'A Good Relations Framework' as a model of good practice to use alongside the ECNI's own guidance. Since the introduction of Section 75(2) Council has worked with a number of public authorities and assisted them in the development of Good Relation Strategies. Within the ASF policy document it states that

*The revamped Community Relations Council will complement the work of the Equality Commission which has a duty to offer advice to public authorities and others in connection to the statutory equality and good relations duties under Section 75 of the Northern Ireland Act 1998. ECNI is also required to keep under review the effectiveness of these duties. The Commission also has a statutory duty under the Race Relations (Northern Ireland) Order 1997 to promote good relations between persons of different racial groups. The Equality Commission will be consulted on any proposed changes to the current community relations legislation.*

CRC looks forward to engaging with ECNI in the important work of developing and implementing S75 (2).