



<b>Title of Report:</b>	<b>NI 100 Stained Glass Window</b>
<b>Committee Report Submitted To:</b>	<b>Corporate Policy and Resources</b>
<b>Date of Meeting:</b>	<b>24<sup>th</sup> January 2023</b>
<b>For Decision or For Information</b>	<b>For Decision</b>

<b>Linkage to Council Strategy (2019-23)</b>	
Strategic Theme	Cohesive Leadership. Council operates as an effective corporate unit with a common purpose and culture
Outcome	NI 100 Commemorative Window installed
Lead Officer	Head of Performance

<b>Budgetary Considerations</b>	
Cost of Proposal	20k (50% Funded)
Included in Current Year Estimates	<b>YES</b>
Capital/Revenue	Revenue
Code	
Staffing Costs	N/A

<b>Screening Requirements</b>	Required for new or revised Policies, Plans, Strategies or Service Delivery Proposals.		
Section 75 Screening	Screening Completed:	Yes	Date: N/A
	EQIA Required and Completed:	Yes	Date: N/A
Rural Needs Assessment (RNA)	Screening Completed	Yes	Date: N/A
	RNA Required and Completed:	Yes	Date: N/A
Data Protection Impact Assessment (DPIA)	Screening Completed:	Yes	Date: N/A
	DPIA Required and Completed:	Yes	Date: N/A

## **1.0 Purpose of Report**

1.1 The purpose of this report is to present the Stained Glass Window EQIA consultation report to Elected Members and to seek approval to progress the project.

## **2.0 Background**

2.1 A cross party Sub-Committee was appointed to oversee the design of a Stained Glass Window to commemorate the centenary of Northern Ireland.

2.2 Council agreed that the location of the commemorative window will be Coleraine Town Hall.

2.2 A tender process was carried out for a company to assist Elected Members with the design process and to carry out the manufacture of the Stained Glass Window. Mr Chris McClintock was appointed to carry out this work.

2.3 The Sub Committee met on numerous occasions to develop ideas in relation to the identification of particular images of historical significance within the Causeway Coast and Glens Borough that could be included within the window.

2.4 On completion of the final design, the image content of the Stained Glass Window was Section 75 Screened. This process identified the need to carry out a full Equality Impact Assessment. The resulting consultation period was 13 weeks, from 20<sup>th</sup> June to 19<sup>th</sup> September. Details regarding the consultation and the responses are contained within the full EQIA report, attached as Appendix 1.

2.5 To assist with the EQIA, Stella Gilmartin Associates was appointed. Their task was to plan and carry out a widespread consultation process with all stakeholders that could be impacted by the window and provide a report to Council.

2.6 The Honourable the Irish Society originally owned Coleraine Town Hall and transferred it to Council ownership in June 2021. The Society agreed to part fund the Stained Glass Window to the sum of 10k.

2.7 Stella Gilmartin Associates will be present at the Corporate Policy and Resources Committee meeting to explain the process and the conclusions emanating from the consultation.

## **3.0 Detail**

3.1 The Stained Glass Working Group met on a number of occasions to discuss the content of the window. The meetings were also attended by Cllr Richard Holmes, Mayor at the time, Mr Edward Montgomery from The Honourable the Irish Society, the appointed designer Chris McClintock and Council Officers.

3.2 A number of themes were identified as part of the process namely, Sport, Architecture, Military/Naval, Culture and Arts, Civic History, Landscapes, Industry, Government, Education and Young People.

3.3 The Working Group agreed that the window should have three crests representing the Council, Northern Ireland and the Honourable the Irish Society. The remainder of the window would be a patchwork of images that Elected Members felt reflected important historical aspects of the Council area within the Centenary period.

#### **4.0 EQIA Guidance**

4.1 In relation to the Equality Commission Guidance, the requirement for an EQIA places a responsibility on the Council to take consideration of the consultation carried out in making a decision. The guidance makes it clear that a Public Authority must be able to record the decision making process (As well as the decision), and that the decision must be justified.

4.2 The guidance also advises that all available information should be combined in making the decision. This includes the information gathered during the research phase, the results of the consultation and the analysis of alternative policy options.

#### **5.0 EQIA Consultation Summary (Extract from EQIA report)**

*The overall response to the EQIA on the stain glass window was very low. However, the views of the respondents in both surveys were clearly divided. A summary of the responses is provided below.*

- *There were 26 responses received to an online survey targeted at the general public and 29 responses received to an online survey open to Causeway Coast and Glens Borough Council staff.*
- *Taking the average response by religious category, people from Protestant and other faith or non-Christian backgrounds feel most comfortable with the stained-glass window proposal. People of no religion or from a Roman Catholic community background feel least comfortable.*
- *Once again when asked if the stained-glass window should be changed, 14 (53.9 per cent) did not feel the content should be changed and 12 (46.2 per cent) felt that it should.*
- *In relation to the staff survey, 37.9 per cent of respondents felt that the proposal would have a negative or very negative impact on a good and harmonious working environment within the Council, while 24.1 per cent felt it would have a positive or very positive impact.*
- *Naturally there are two very different opinions in relation to the proposed window. Comments in favour of the proposal were broadly on the grounds that it was a very special anniversary that was worthy of celebration by the Council.*
- *Comments against the proposal were broadly on the grounds that it was “divisive and political” or a “waste of money”:*

*When set alongside the issues raised in the Draft Consultation Report, and including in particular the Council's statutory obligations to promote equality of opportunity and good relations along with promoting a good and harmonious working environment, it is difficult to see how the current design would help advance these aspirations. Indeed, while survey return rates from both staff and the public were extremely low, there is evidence to suggest that the proposed window could be regarded as potentially divisive and unlikely to help portray the Borough as an area that is welcoming and inclusive to all communities.*

*The stated aim of the policy is, 'To create a permanent commemoration of the centenary of Northern Ireland and, in so doing, to support the reflection of future generations on the first 100 years of Northern Ireland.*

*It also aspires to contribute to the aims of the overall NI100 commemorative programme, namely to:*

- Promote the borough as an attractive place to visit, invest and do business;*
- Celebrate our people, places and products by showcasing the rich sporting, cultural, entrepreneurial and academic talent;*
- Build a shared understanding of our collective history in a way that can build good relations and reconciliation by facilitating opportunities that both reflect on our past as well as build for our future; and*
- Recognise and build awareness of this significant anniversary, locally, nationally and internationally, supporting expression of the diverse identities and culture that exist within the borough.*

*The evidence included in this final report indicates that, if one of the explicit intentions for the stained-glass window is to 'build a shared understanding of our collective history in a way that can build good relations and reconciliation by facilitating opportunities that both reflect on our past as well as build for our future', the proposed design is not viewed as a mechanism for achieving this aim. Instead, it may serve to celebrate the history of Northern Ireland in a manner that could be described as partial or partisan.*

*In other words, while the principle of celebrating NI100 in itself may not be problematic, the manner in which the anniversary is celebrated becomes of critical importance. Equally, while the placing of a stained-glass window in Coleraine Town Hall is not generally seen as contentious (other than its cost), it is the images contained within the proposed window, separately and in combination, that raise concerns and must ensure the stated aims of the project are supported.*

*Although the number of people responding to the consultation is very low, there is a consistent division of opinion in relation to the questions including:*

- the level of comfort with the design*
- changing the content of the window*
- impact on a good and harmonious working environment.*

*The preponderance of images that are more closely aligned with one community is a matter that the Council may wish to consider further. Furthermore, although no single image in isolation may have the potential to harm good relations or disrupt a good and harmonious working environment, it is the combined impact of images that are more closely aligned with only one community that becomes problematic.*

*To mitigate this potential for adverse impact, the Council may wish to consider ways in which the images contained within the window in toto could be seen as more inclusive and reflective on the rich diversity within the Borough, perhaps extending to more balanced depictions of gender, ethnicity, and disability.*

*In reviewing the images contained within the window, there may also be an opportunity to consider how views and opinions from across the political spectrum could be sought and referenced in the design process.*

*Ultimately, the Council retains executive authority to decide whether to proceed with the project, and design, as currently proposed. However, the EQIA would suggest that the Council should proceed with caution and would be advised to afford due regard to the matters raised in the EQIA before reaching a final decision.*

## **6.0 Options**

6.1 Having considered the information contained within the EQIA report, Elected Members are asked to consider two options:

Option 1. To agree to proceed with the manufacture of the Stained Glass Window as per current design.

Option 2. To review the design, giving due consideration to matters raised within the EQIA report

## **7.0 Recommendation**

**It is recommended** that the Corporate Policy and Resources Committee approve an option as set out in this report.

**Appendix 1.**

Equality Impact  
Assessment

Final decision report on  
proposed NI100  
commemoration stained-  
glass window

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# 1. Introduction

Causeway Coast and Glens Borough Council is committed to consultation which is timely, open and inclusive, and conducted in accordance with the Equality Commission's Guiding Principles and the Council's own Equality Scheme, which states that:

“The Council is committed to consulting with a wide range of groups, from the public in general and specific voluntary and community groups to elected representatives and other public sector bodies.”

Between 20 June 2022 and 19 September 2022, the Council carried out a 13-week consultation on its proposed design of a stained-glass window commemorating the 100<sup>th</sup> anniversary of the creation of Northern Ireland (NI100) and an associated draft equality impact assessment (EQIA).

The stained-glass window commission aims to create a permanent commemoration of the centenary of Northern Ireland and, in so doing, aims to support the reflection of future generations on the first 100 years of Northern Ireland. It also aims to contribute to the aims of the overall NI100 commemorative programme, namely to:

- Promote the borough as an attractive place to visit, invest and do business;
- Celebrate our people, places and products by showcasing the rich sporting, cultural, entrepreneurial and academic talent;
- Build a shared understanding of our collective history in a way that can build good relations and reconciliation by facilitating opportunities that both reflect on our past as well as build for our future; and
- Recognise and build awareness of this significant anniversary, locally, nationally and internationally, supporting expression of the diverse identities and culture that exist within the borough.

The Council also recognised that this initiative had the potential to impact on all residents of the Borough, visitors to the Borough and Council staff, and as a consequence could potentially impact on groups and individuals attached to Section 75 categories. For this reason, and in accordance with commitments made in its Equality Scheme, it was decided that the

proposed design should be subject to an Equality Impact Assessment (EQIA).

A public advertisement was placed in Coleraine Chronicle, Derry Journal, Belfast Telegraph and Irish News. The advertisement invited comments on the proposed policy.

The draft EQIA Consultation Report and accompanying questionnaire was made available on the Council's website.

The Council facilitated two online public consultation events on Tuesday 28 June and Monday 12 September 2022.

The proposed stained-glass window designs were also displayed to the public as follows.

Venue	Dates
<b>Cloonavin, 66 Portsewart Road, Coleraine</b>	11–24 July 2022
<b>Riada House, Charles Street, Ballymoney</b>	25 July–7 August 2022
<b>Limavady, 7 Connell Street, Limavady</b>	8–21 August 2022
<b>Sheskburn House, 7 Mary Street, Ballycastle</b>	22 August–4 September 2022
<b>Coleraine Town Hall, the Diamond, Coleraine</b>	5–18 September 2022

All Equality Scheme consultees were notified of the availability of the draft EQIA and invited to comment. A list of these Equality Scheme organisations is attached at Appendix 1.

All Elected Members and staff were notified of the availability of the draft EQIA report and consultation questionnaires on the Council's website, and were invited to submit written responses and attend online consultation events.

This EQIA final decision report sets out:

- the initial findings from the draft EQIA report

- the results of the consultation process
- conclusions
- recommendations for monitoring any adverse impacts

It has been prepared in order to provide the Council with all available information on which to base a decision.

## 2. The policy

As part of the NI100 centenary of the creation Northern Ireland, Causeway Coast and Glens Borough Council agreed to commission a commemorative stained-glass window to be installed in Coleraine Town Hall.

The proposed window will be situated at the side entrance of Coleraine Town Hall facing Church Street. The window is approximately 3.7m above ground level, and the images will face inwards. This location is considered prominent in terms of pedestrian flow and so will enable visitors touring the building to view the window.

The budget for commissioning the window was set at £20,000. Following a competitive procurement exercise, the Council's Leisure and Development Committee approved the appointment of the stained-glass window designer and manufacturer in June 2021.

### The stained-glass window working group

A working group of the NI100 Committee was set up to design and agree the content of the stained-glass window. It comprised members of all political parties. However, Sinn Féin did not attend any working group meetings.

Meetings were also attended by the Mayor, Cllr Richard Holmes (UUP); a representative from the Honourable the Irish Society; council Performance and Facilities staff; and the artist commissioned to design and manufacture the window.

Meetings took place in June and August 2021.

At its meeting on 3 August, the working group agreed to write to all elected representatives inviting proposals for the content of the window from across all seven DEAs. An email was then issued to all elected representatives asking them to identify iconic scenes, events and images that should be included in the window from within their particular DEA. Themes that were suggested to elected representatives to assist with this process were:

- Sport
- Architecture
- Military/naval
- Culture and arts
- Civic history

- Landscapes
- Industry
- Government
- Education
- Young people

Members were further reminded that suggestions should be relevant within the period (that is 1921 to present).

A list of proposals received is included at Appendix 2.

The working group then met again on 16 August to review the suggestions submitted by Councillors. The artist's brief that was agreed at the end of this meeting is included at Appendix 4.

The artist was instructed to begin the design process working to the agreed brief. The working group then met in November 2021 and February 2022 to discuss the draft designs.

The working group met again in March 2022 to discuss and agree the final draft design. At this meeting, following equality screening of the draft window design and in recognition that some of the images may be associated with particular political opinions or may not have the support of all political groups, the working group agreed that a public and staff consultation process should be carried out on the final draft design to identify any equality issues.

## About the design

The proposed design incorporates three crests (Council, Northern Ireland and the Honourable the Irish Society) at the top. Below the crests will be a "patchwork" of images reflecting the Borough's different district electoral areas (DEAs) and relevant themes including sport (including golf, surfing and the North West 100); culture (including the Pipe-band Championships, Irish and Scottish dancing and Limavady Arts Centre); local produce (from wheat and barley to Bushmills Whiskey); history and heritage (from Dunluce Castle to the Royal Ulster Constabulary) and the natural environment (including Glenariff, the Dark Hedges and Garvagh Forest Trail).

A copy of the proposed design, including a key to the images it contains, is included at Appendix 4.

Initial proposals to include a NI100 crest were amended after consideration that it could be considered contentious as the image did not represent an officially designated NI100 crest and in particular as it included an image of the Ulster Banner.<sup>1</sup> The crest was then replaced by the “Northern Ireland Coat of Arms”, which likewise also contains an image of the Ulster Banner and is now regarded as “historical” given that the body to which the arms were granted no longer exists.<sup>2</sup>

A storybook was to be developed to accompany the window in order to explain how different narratives can be represented by one image. For example, a motorbike racer image may depict the North West 200, the Dunlop family and Aghadowey racetrack.

## About Coleraine Town Hall

Originally built with funding from the Honourable the Irish Society, Coleraine Town Hall was the headquarters of Coleraine Borough Council. Today it is used by Councillors, Council staff and the general public to host meetings, functions, exhibitions, festivals and events. This includes councillor robing for Remembrance Sunday and other civic and historical occasions. It is also home to a visitor information centre which offers guided tours.

Coleraine Town Hall is already home to a number of commemorative stained-glass windows, such as one marking the Queen’s Silver Jubilee, as well as being the official war memorial and also contains a memorial to the Ulster Defence Regiment. The building is described in the equality screening as “very much a hub for memorial reflection”. The equality screening goes on to consider that as “a place of remembrance and history and therefore political emblems [the window] may be more accepted by the community it serves in the Town Hall.”

## About The Honourable The Irish Society

The Honourable The Irish Society was first created by Royal Charter in 1613 to undertake the plantation in the North West of Ulster. It was originally a subcommittee of the City of London Corporation and was identified by King James I as the most suitable organisation to pay for, build and run the most substantial element of the plantation, i.e., rebuilding the

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<sup>1</sup> <http://samsflags.blogspot.com/2012/12/northern-ireland-flag-and-coat-of-arms.html>

<sup>2</sup> [https://en.wikipedia.org/wiki/Coat\\_of\\_arms\\_of\\_Northern\\_Ireland](https://en.wikipedia.org/wiki/Coat_of_arms_of_Northern_Ireland)

City of Derry (renamed Londonderry), Coleraine and further development throughout County Londonderry.

In more recent times the Society has engaged in the support of a wide range of local activities and enterprises, on both a single-identity and cross-community basis, around four primary themes, Grant Giving: Property, River and Environmental Management; Promoting Education; Relationship Building.<sup>3</sup>

The Honourable The Irish Society paid for Coleraine Town Hall to be built in the mid eighteenth century. It subsequently financed repairs and additions, including other stained-glass windows.

The Society retained ownership of the town hall until June 2021 when it was officially transferred to Causeway Coast and Glens Borough Council.

The Honourable The Irish Society is providing funding of 50 per cent of the cost of the NI100 stained-glass window.

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<sup>3</sup> <https://honourableirishsociety.org.uk/>

### 3. Consideration of available data and research

This section provides an overview of the data and research that was considered in the draft EQIA consultation report.

#### Statistical data

Data on Causeway Coast and Glens Borough Council residents by Section 75 category is set out in Appendix 5. This information is taken from the 2011 Census, 2021 Census as available and 2019 local council elections.

Appendix 6 provides a breakdown of Causeway Coast and Glens Borough Council residents by Section 75 category based on Article 55 returns to the Equality Commission NI.

Appendix 7 contains data from the 2020 NI Life and Times Survey on public opinion in relation to culture and identity.

#### Research

The draft EQIA consultation report included a range of background information on policies and guidance that may have an influence on the Council's policy. These are set out in the appendices to this report and include:

- Appendix 8: Relevant legislation
- Appendix 9: Relevant Causeway Coast and Glens Borough Council policy and strategy
- Appendix 10: Other relevant policies and research

## 4. Assessment of impacts

In accordance with the EQIA process, having gathered information on the policy and those affected by it, the Council must then assess whether there is a differential impact on one or more of the equality groups, determine the extent of differential impact and whether that impact is adverse.

Differential impact suggests that a particular group has been affected differently by the policy (either favourably or unfavourably), while adverse impact is an indication that the effect is less favourable (i.e., negative) and is potentially unlawful.<sup>4</sup>

In order to determine whether the policy has any adverse differential impact, it is necessary to consider the people affected by the policy, their needs and experiences and the equality categories to which they belong.

The following section summarises the assessment of impacts as set out in the draft EQIA report based on the evidence available at that time.

The draft EQIA found that the likely impact would be primarily in relation to two Section 75 grounds, religious belief and political opinion, although consideration was also be given to other grounds where representation may or may not have been taken into account (e.g., gender, race, disability, age, sexual orientation).

The draft EQIA recognised that this is not a temporary display but is intended to form an integral part of the fabric of a civic building. Coleraine Town Hall is not only a place of work for Council employees but also a civic building which, as such, should aspire to be welcoming to those from all communities.

With this in mind, looking first at the promotion of equality of opportunity, while it is unlikely that the window itself will impact directly on the ability of the Council to provide goods facilities and services to both residents and visitors to the Borough, at the same time as a prominent feature within the building it may have the potential to help foster an atmosphere that is more welcoming to one community in particular, and this potential cannot be disregarded.

In relation to the promotion of good relations, through Section 75 the Council is also asked to have regard to the desirability of promoting good

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<sup>4</sup> Practical Guidance on Equality Impact Assessment, Equality Commission for NI, 2004 (pp.22-23)

relations through its actions. Here the draft EQIA considered the views of those who are likely to be impacted by the adoption of the window, gathered through the public consultation, to be crucial.

The draft EQIA noted that no members of one political party (Sinn Féin) attended any meetings of the working group. This lack of engagement was unfortunate, and there is no evidence to indicate whether or not positive actions may have been taken subsequently to ensure that the ensuing imbalance in community representation was addressed during the design phase of the project.

The draft EQIA further considered how the proposed window aligned with the stated aim of its commission (see p.3).

The draft EQIA considered that of the 53 images that make up the window, it could be argued that the majority (40) would be regarded as “neutral” or non-contentious, and align with the stated aim of the policy, with its emphasis on celebration, diversity and inclusion.

However, it also identified that it could be argued that, through traditional association, around 11 proposed images would be regarded as more closely aligned with the Protestant/Unionist community (i.e., Lt Robert Quigg VC [44]; Air Show/Spitfire [46]; Poppy x 2 [45 & 48]; Coleraine Battery [35]; RAF Aghanloo [21]; UDR Crest 39]; RUC Crest [3]; NI Coat of Arms [1]; HM visit 1953 [17]; HM opening of Coleraine train station [37]).

By way of contrast, only three (traditional music [6]; shamrock [11]); Irish/Scottish dancing ((29) would have an equivalent resonance with those from the Roman Catholic / Nationalist community.

Opinion was sought on these images in particular through the public consultation process.

In its Guide to the Promotion of a Good and Harmonious Working Environment, the Equality Commission sees a clear distinction between those emblems that are directly linked to community conflict and/or local politics (which are best avoided), and those emblems that may convey religious or political identity to others but that are not directly linked to community conflict (which are generally acceptable).

While each of the images contained within the window may fall within the latter category (generally acceptable), nevertheless it is the cumulative impact of these images spread across the entire window which may be more problematic.

In further advice, the Equality Commission is clear with regard to the display of single identity emblems.

“This of course does not mean that working environments must always be devoid of anything that happens to be more closely associated with one or other of the two main communities in Northern Ireland.”

“Consequently, employers may find it preferable to facilitate diverse expressions of identity in a sensitive way which does not disrupt a good and harmonious working environment. Such an approach should be founded on choices that are reasonable, fair and appropriate at that time and in that place.”

Equally, the inclusion of particular images that could be regarded as contentious cannot be disregarded. In particular:

- The NI Coat of Arms includes the Ulster Banner which was the official flag of the Ulster Parliament up until 1972 but has had no legal authority since that time. It is now regarded by many as strongly aligned with only one community, and at certain times of year is displayed in a manner that could be regarded as offensive and provocative.
- The UDR and RUC crests may well represent significant agents in the history of Northern Ireland, but the difference in perceptions of the role played by those organisations by each community is likely to be considerable. By way of contrast, the absence of the PSNI crest is perhaps noteworthy.
- Seven images have British military associations (i.e., Lt Robert Quigg VC [44]; Air Show/Spitfire [46]; Poppy x 2 [45 & 48]; Coleraine Battery [35]; RAF Aghanloo [21]; UDR Crest 39 ;).
- Two significant local visits by Her Majesty Queen Elizabeth II are likely to register far greater import within the Protestant / Unionist community while a state visit by, e.g., an Irish President or religious leader may resonate more strongly with those from the nationalist / Roman Catholic community.

The draft EQIA concluded that in combination these considerations give rise to concern that, in its present form, the window may be unlikely to help promote equality of opportunity or good relations within the Borough, and that a final decision on the installation of the window should be contingent on further consultation and engagement.



## 5. Consideration of alternative policies and mitigating actions

The EQIA process requires that, if it is decided that the policy has an adverse impact on one or more of the nine equality categories, then a series of alternatives should be put forward for consideration and an assessment of the possible impact of these alternatives undertaken. The Council must consider measures which might mitigate the adverse impact and alternative ways of delivering policy aims which have a less adverse impact on the relevant equality category or which better promote equality of opportunity and good relations.<sup>5</sup>

Questionnaires were made available to both Council staff and the general public setting out detail of the proposed stained-glass window in Coleraine Town Hall and seeking views on:

1. Whether the Council should install a window to celebrate NI100 in Coleraine Town Hall.
2. The overall composition of the window as currently designed.
3. The proposed contents of the window and including in particular those images that may be more contentious (e.g., NI Coat of Arms, UDR crest, RUC crest, images with British military associations).
4. Suggestions for any mitigating measures that the Council could take should the window be installed (e.g., explanatory plaques).

At the time of preparing the draft EQIA, and prior to feedback obtained from the public consultation, other than seeking views on these alternative proposals (see above), it was not felt that any further mitigating measures needed to be introduced to the proposed policy.

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<sup>5</sup> Practical Guidance on Equality Impact Assessment, Equality Commission for NI, 2004 (pp.30-31)

## 6. Summary of consultation results

The Equality Commission's Guide to the Statutory Duties makes it clear that a formal consultation exercise should be included as a critical stage in an EQIA, immediately before decision making. Consultation should focus on the actual impact of the existing policy and the likely impact of proposed and alternative policies. Consultation should be inclusive, afford a fair opportunity to communicate pertinent information and enable consultees to give advice and opinion on the policy so that the public authority may reach a more informed decision. However, the Equality Commission has also made it clear that an EQIA should not be considered as a referendum whereby the views of consultees from a majority are counted as votes to decide the outcome.<sup>6</sup>

The consultation process on this EQIA covered a 13-week period from 20 June to 19 September 2022. During the consultation period the draft EQIA report was available on the Council's website together with questionnaires for staff and the public designed to facilitate the type of responses referred to above. A public advertisement was placed in the local press, and there were two public meetings online. The Council's Equality Scheme consultees were notified of the availability of the report and invited to comment. Elected Members were made aware of the draft EQIA report and consultation questionnaires on the Council's website, invited to submit written responses and attend an online consultation event.

### Responses to the online consultation events

The Council arranged two public consultation events online via MS Teams on Tuesday 28 June and Monday 12 September 2022. There were no attendees at either event.

### Survey responses from the general public

There were 26 responses received to an online survey targeted at the general public.<sup>7</sup> Twenty-three were received from individuals and three were received from organisations.

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<sup>6</sup> Practical Guidance on Equality Impact Assessment, Equality Commission for NI, 2004 (p.36)

<sup>7</sup> Unless otherwise stated, n=26

## Demographic profile of respondents

30.8 per cent of respondents identified as from a Protestant community background. 11.5 per cent identified as from a Roman Catholic community background.

Community background	Number	Percentage
Roman Catholic	3	11.5%
Protestant	8	30.8%
Other Christian (Including Christian related)	2	7.7%
No religion	8	30.8%
Prefer not to say/no response	5	19.2%

100 per cent of respondents (26) identified as white.

The majority of respondents (57.7 per cent) identified as female.

Gender identity	Number	Percentage
Male	7	26.9%
Female	15	57.7%
Prefer not to say/nil response	4	15.4%

The following table summarises respondents' broad age bands.

Age band	Number	Percentage
18-24	1	3.8%
25-34	4	15.4%
35-44	3	11.5%
45-54	7	26.9%
55-64	8	30.8%
Over 65	2	7.7%
No response	1	3.8%

## Responses in relation to the proposal

### *General attitude to the stained-glass window proposal*

Respondents were asked to indicate how they feel in general about the Council's proposal to install a NI 100 commemorative stained-glass window in Coleraine Town Hall using a scale of 1 to 10 where 1 meant "very uncomfortable" and 10 meant "very comfortable".

The average rating was 3 out of 10. 38.5 per cent (10) gave a rating of 1 (very uncomfortable) and 34.6 per cent (9) gave a rating of 10 (very comfortable).

<b>Attitude</b>	<b>Number</b>	<b>Percentage</b>
<b>1 (very uncomfortable)</b>	10	38.5%
<b>2</b>	0	0.0%
<b>3</b>	1	3.8%
<b>4</b>	1	3.8%
<b>5</b>	3	11.5%
<b>6</b>	0	0.0%
<b>7</b>	2	7.7%
<b>8</b>	0	0.0%
<b>9</b>	0	0.0%
<b>10 (very comfortable)</b>	9	34.6%

Taking the average response by religious category, people from Protestant and other faith or non-Christian backgrounds feel most comfortable with the stained-glass window proposal. People of no religion or from a Roman Catholic community background feel least comfortable on average.

<b>Community background</b>	<b>Number of responses</b>	<b>Average rating</b>
<b>Roman Catholic</b>	3	4.0
<b>Protestant</b>	8	7.8

<b>Other Christian (Including Christian related)</b>	2	8.5
<b>No religion</b>	8	2.6
<b>Prefer not to say</b>	5	4.8

Respondents were also offered the opportunity to explain why they felt that way. Twenty-four respondents provided a response, of which 9 were in support of the proposal (37.5 per cent) and 9 were against the proposal (37.5 per cent).

Those in favour of the proposal supported the commemoration of NI100 (“It’s a remarkable achievement to celebrate the centenary of a nation”) and the celebration of local history (“highlights the rich history we have in NI”). One respondent also noted that Coleraine Town Hall was a fitting setting given the array of existing commemorative windows.

Those against the proposal felt that it was “divisive”, “non-inclusive” and would have a “negative impact on relations”. Seven respondents were also concerned about the costs in current financial climate. One respondent considered, “I feel that in this new council Coleraine appears to be given everything while other areas like Limavady get left behind with nothing”.

Other comments queried the quality of the artwork (“It’s not a striking image...too busy!”), the selection of images (“will require substantive explanation”; “I think it is a good idea but there would seem to be more relating to the west of the council area”), its location (“will it be accessible to the public? How many public visitors go the town hall per annum?”) and the commissioning or procurement process.

#### *Content of the stained-glass window*

Respondents were asked, “Do you think the content of the proposed NI 100 commemorative stained-glass window should be changed in any way?” Thirteen (52 per cent) did not feel the content should be changed and 12 (48 per cent) felt that it should (one respondent did not answer this question).

Comments in support of the content included:

- Takes in many aspects of the local area.

- Representative of all
- I like how the focus is on the natural beauty plus the bravery of people, their loyalty, innovation, excellence, sport, fun. Very difficult to be uncontentious.

Comments among those who felt the content should change included:

- The design should reflect only non-controversial culture and borough landmarks/landscape to be truly inclusive and reflect positivity of borough. Not RUC/War/Soldiers etc
- There should be a better spread reflective of the council area and the importance of agriculture e.g., to include livestock (cows & sheep) and produce (potatoes & carrots)
- I believe that faith is so important to many in our country now and historically. It should be represented. A cross, or dove isn't offensive, or an Old Testament -Noah's Ark (NI is so rainy!) covers the three Abrahamic faiths (Christian, Muslim, Judaism)
- If anything, I would like to see a celebration of the rich history of our culture and the area which stretches back much further than NI100

Respondents were also asked to consider 14 images in particular and indicate whether or not they agreed with their inclusion.

Over two thirds of respondents agreed with the inclusion of Irish/Scottish dancing (69.2 per cent), a shamrock (69.2 per cent) and poppies (65.4 per cent).

Among images that had the lowest approval level were the UDR crest and RUC crest (50 per cent respectively).

Image	Yes		No		Don't know	
	Number	%	Number	%	Number	%
<b>44 Lt. Robert Quigg VC</b>	14	53.8%	8	30.8%	4	15.4%
<b>46 Air Show / Spitfire</b>	16	61.5%	9	34.6%	1	3.8%
<b>45 &amp; 48 Poppy (x2)</b>	17	65.4%	7	26.9%	2	7.7%
<b>35 Coleraine Battery (Egypt)</b>	12	46.2%	10	38.5%	4	15.4%
<b>21 RAF Aghanloo</b>	15	57.7%	10	38.5%	1	3.8%
<b>39 UDR Crest</b>	12	46.2%	13	50.0%	1	3.8%
<b>3 RUC Crest</b>	13	50.0%	13	50.0%	0	0.0%
<b>1 NI Coat of Arms</b>	16	61.5%	8	30.8%	2	7.7%

<b>17 HM Visit 1953</b>	14	53.8%	10	38.5%	1	3.8%
<b>37 HM Opening Railway Station</b>	13	50.0%	12	46.2%	1	3.8%
<b>29 Irish/Scottish dancing</b>	18	69.2%	7	26.9%	1	3.8%
<b>11 Shamrock</b>	18	69.2%	5	19.2%	3	11.5%
<b>6 Traditional Irish music</b>	18	69.2%	7	26.9%	1	3.8%

## Responses in relation to the draft EQIA

50.0 per cent of respondents agreed with the assessment of impacts in the EQIA, and 3.8 per cent per cent disagreed

<b>Agreement with EQIA</b>	<b>Number</b>	<b>Percentage</b>
<b>Strongly agree</b>	5	19.2%
<b>Agree</b>	8	30.8%
<b>Neutral</b>	12	46.2%
<b>Disagree</b>	1	3.8%
<b>Strongly disagree</b>	0	0.0%

Those who disagreed with the assessment of impacts were asked to explain their response. The following response was received.

“No where do I see the question asked or answered, would installing a NI100 stained glass window make Coleraine Town Hall a safer, inclusive shared space.

Respondents were also asked if they were aware of any further data or research that may be relevant to the assessment of impacts. One respondent suggested, “Speak to members of the public to see what we want”.

One respondent further considered in relation to the EQIA process, “Why did Council not promote a public pole – using facebook and local papers”.

## Survey responses from staff

There were 29 responses received to an online survey open to Causeway Coast and Glens Borough Council staff.<sup>8</sup>

### Demographic profile of respondents

48.3 per cent of respondents identified as from a Protestant community background. 10.3 per cent identified as from a Roman Catholic community background.

<b>Community background</b>	<b>Number</b>	<b>Percentage</b>
<b>Roman Catholic</b>	3	10.3%
<b>Protestant</b>	14	48.3%
<b>Other Christian (Including Christian related)</b>	1	3.4%
<b>No religion</b>	5	17.2%
<b>Prefer not to say/no response</b>	6	20.7%

Twenty-seven respondents (93.1 per cent) identified as white. Two respondents (6.9 per cent) preferred not to state their ethnic group.

The majority of respondents (62.1 per cent) identified as female.

<b>Gender identity</b>	<b>Number</b>	<b>Percentage</b>
<b>Male</b>	9	31.0%
<b>Female</b>	18	62.1%
<b>Prefer not to say/nil response</b>	2	6.9%

The following table summarises respondents' broad age bands.

<b>Age band</b>	<b>Number</b>	<b>Percentage</b>
<b>18-24</b>	0	0.0%
<b>25-34</b>	4	13.8%
<b>35-44</b>	6	20.7%

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<sup>8</sup> Unless otherwise stated, n=29

<b>45-54</b>	11	37.9%
<b>55-64</b>	4	13.8%
<b>Over 65</b>	0	0.0%
<b>No response</b>	4	13.8%

## Responses in relation to the proposal

### *General attitude to the stained-glass window proposal*

Respondents were asked to indicate how they feel in general about the Council's proposal to install a NI 100 commemorative stained-glass window in Coleraine Town Hall using a scale of 1 to 10 where 1 meant "very uncomfortable" and 10 meant "very comfortable".

The average rating was 5.4 out of 10.<sup>9</sup> 28.6 per cent (8) gave a rating of 1 (very uncomfortable) and 32.1 per cent (9) gave a rating of 10 (very comfortable).<sup>10</sup>

<b>Attitude</b>	<b>Number</b>	<b>Percentage</b>
<b>1 (very uncomfortable)</b>	8	28.6%
<b>2</b>	3	10.7%
<b>3</b>	1	3.6%
<b>4</b>	2	7.1%
<b>5</b>	2	7.1%
<b>6</b>	0	0.0%
<b>7</b>	0	0.0%
<b>8</b>	2	7.1%
<b>9</b>	1	3.6%
<b>10 (very comfortable)</b>	9	32.1%

Taking the average response by religious category, people of no religion and from Protestant backgrounds feel most comfortable with the stained-

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<sup>9</sup> n=28

<sup>10</sup> n=28

glass window proposal. People from a Roman Catholic community background feel least comfortable on average.

<b>Community background</b>	<b>Number of responses</b>	<b>Average rating</b>
<b>Roman Catholic</b>	3	1
<b>Protestant</b>	14	7.4
<b>Other Christian (Including Christian related)</b>	1	4
<b>No religion</b>	4	8
<b>Prefer not to say</b>	5	1.2

Respondents were also offered the opportunity to explain why they felt that way. Nineteen respondents provided a response, of which 5 were in support of the proposal (26.6 per cent) and 11 were against the proposal (57.9 per cent).

Comments in favour of the proposal included:

- A very special occasion worth marking
- Very special occasion, should be commemorated
- I think it is important to mark the occasion
- Because it is part of Northern Irelands history and should be remembered

Comments against the proposal were broadly on the grounds that it was “divisive and political” or a “waste of money”:

- I personally nor any of my family will have any benefit of this new window in fact we will probably never see it. [...] I think this is a total waste of rate payers money.
- Staff are struggling to fuel their vehicles to travel to and from work (cost of living). A pay rise should come before rate payers’ money is spent on a window!
- I believe that the stained glass is being used to celebrate the centenary of NI, "commemorative" is being used instead of "celebrate" in an attempt to portray that it is inclusive. This is not inclusive and money should not be wasted on it

One person further commented in relation to specific images:

“There shouldn't be crests ( RUC/UDR) outside of NI and Causeway ones - why is lily not included? Lily is parallel for poppy & shamrock actual citizens of borough missing representation”

Others commented on its location and geographic representation:

- Like the idea, but not very visible unless inside the hall
- This is another example of why staff feel the Council should be renamed Coleraine Coast and Glens Council.
- Whilst it is a beautiful piece there should be a plaque/representation of the window in all council areas. Respectfully placed in a suitable building for all to view i.e., Tourist Information Sites across the borough

#### *Content of the stained-glass window*

Respondents were asked, “Do you think the content of the proposed NI 100 commemorative stained-glass window should be changed in any way?” Fourteen (53.9 per cent) did not feel the content should be changed and 12 (46.2 per cent) felt that it should (3 respondents did not answer this question).

Comments in support of the content included:

- Wide range of items and scenes depicted
- Nothing that would cause offence
- No issues
- Some of the images might annoy some folk, but taking them away will annoy others.
- It covers lots of stuff and at the end of the day you can't fit everything in so you have to prioritise

Comments among those who felt the content should change included:

- I feel there are too many symbols belonging to one side of the community.
- Take away the coats of arms - very British/Royal looking
- Should only be 1 poppy and Lily also included

- The RUC & UDR pieces should be removed, I find these offensive
- There is some ridiculous items that do not require inclusion e.g., ice cream. It would have been much more appropriate to include a few Historical/scenic spots on a larger scale and then link them with poppy, shamrock, fiddle, drums

Respondents were also asked to consider 14 images in particular and indicate whether or not they agreed with their inclusion.

The NI Coat of Arms had the highest approval level at 62.1 per cent. The UDR and RUC crests received the most objections (11 each).

Image	Yes		No		Don't know		No response	
	Number	%	Number	%	Number	%	Number	%
<b>44 Lt. Robert Quigg VC</b>	13	44.8%	9	31.0%	6	20.7%	1	3.4%
<b>46 Air Show / Spitfire</b>	14	48.3%	10	34.5%	3	10.3%	2	6.9%
<b>45 &amp; 48 Poppy (x2)</b>	16	55.2%	9	31.0%	3	10.3%	1	3.4%
<b>35 Coleraine Battery (Egypt)</b>	13	44.8%	8	27.6%	6	20.7%	2	6.9%
<b>21 RAF Aghanloo</b>	14	48.3%	8	27.6%	6	20.7%	1	3.4%
<b>39 UDR Crest</b>	14	48.3%	11	37.9%	3	10.3%	1	3.4%
<b>3 RUC Crest</b>	15	51.7%	11	37.9%	2	6.9%	1	3.4%
<b>1 NI Coat of Arms</b>	18	62.1%	6	20.7%	4	13.8%	1	3.4%
<b>17 HM Visit 1953</b>	14	48.3%	10	34.5%	4	13.8%	1	3.4%
<b>37 HM Opening Railway Station</b>	14	48.3%	9	31.0%	5	17.2%	1	3.4%
<b>29 Irish/Scottish dancing</b>	16	55.2%	8	27.6%	4	13.8%	1	3.4%
<b>11 Shamrock</b>	16	55.2%	8	27.6%	4	13.8%	1	3.4%
<b>6 Traditional Irish music</b>	16	55.2%	8	27.6%	4	13.8%	1	3.4%

### *Impact of the proposal on a good and harmonious working environment*

Causeway Coast and Glens Borough Council staff were also asked, "What impact do you feel that the proposed NI 100 commemorative stained-glass

window will have on the promotion of a good and harmonious working environment within the Council?”

37.9 per cent of respondents felt that the proposal would have a negative or very negative impact on a good and harmonious working environment within the Council, while 24.1 per cent felt it would have a positive or very positive impact.

<b>Impact</b>	<b>Number</b>	<b>Percentage</b>
<b>Very positive</b>	3	10.3%
<b>Positive</b>	4	13.8%
<b>Neutral</b>	11	37.9%
<b>Negative</b>	6	20.7%
<b>Very negative</b>	5	17.2%

There was also an opportunity for staff to explain their response.

Two comments were received from respondents who felt the proposal would have a positive or very positive impact.

- It is part of everybody’s history that lives in NI and should be remembered by all
- It is good for future generations telling the story

Among those who felt the impact would be negative or very negative, comments included:

- You are proposing a window with UDR and RUC symbols. Their history of collusion in atrocities such as the Miami Showband Massacre and many others is enough to show the complete sectarian intention behind the proposal for this window.
- It ignores the opinion of one side of the community, the images are British/Royal and loyalist, the inclusion of a shamrock is an attempt to atone - it is insulting.
- It doesn’t represent everyone’s views, not all see NI100 as a cause for celebration
- The council working environment is not harmonious, to suggest a window would help this is ridiculous.

## Responses in relation to the draft EQIA

17.9 per cent of respondents agreed with the assessment of impacts in the EQIA, 25.0 per cent per cent disagreed, and 57.1 per cent neither agreed no disagreed.

<b>Agreement with EQIA</b>	<b>Number</b>	<b>Percentage</b>
<b>Strongly agree</b>	1	3.6%
<b>Agree</b>	4	14.3%
<b>Neutral</b>	16	57.1%
<b>Disagree</b>	1	3.6%
<b>Strongly disagree</b>	6	21.4%

Those who disagreed with the assessment of impacts were asked to explain their response. The following responses were received.

- Too expensive
- The EQIA is meaningless, you point out that Sinn Fein excluded themselves from the discussions/working group – any republican, nationalist would not participate – it is an insult that such a divisive event would be marked in any way, let alone commemorated. This project alienates Catholics, it excludes Catholics and it wastes money – put it to the ratepayers of this Borough and see if they want to pay for this.
- This stained glass window which is almost 4 metres from ground level will of course mean it is not eye level, I do not know anyone of that height. To say that this will attract Tourism is the worst statement I ever read. As for the diversity in culture, religion disability etc. again one of the worst statements ever to be made by council. I find it difficult to believe that our councillors agreed to spending approx. £20K of rate payer's money.

Respondents were also asked if they were aware of any further data or research that may be relevant to the assessment of impacts. One respondent commented,

“Where are the young people depicted as per the themes for the working group What was the make-up of the working group in terms of political/ civic representation and

was there a balance between those of different religious/ political opinion”.

Further comments relevant to the EQIA included:

- Were the residents ever asked directly as to their thoughts on what items could be included as best representing the Borough rather than via community groups.
- I think you should send every rate payer in the whole of the borough not just Coleraine or staff in the council. Every household from The Glens to Limavady. Ask all the people who pay rates and see what the reply you get. They will tell you that it is of no benefit to them.
- Although I am completing this document, I believe it to be a waste of time. Causeway Coast and Glens will do what Coleraine want.

## Response from the Equality Commission

In consideration of the aims of the policy, the Commission states that:

“Four key objectives are outlined including a commitment to, ‘Build a shared understanding of our collective history in a way that can build good relations and reconciliation by facilitating opportunities that both reflect on our past as well as build for our future’.

“Given that the screening and EQIA identified a potential major impact in terms of religious belief and/or political opinion it would appear that the policy itself is not in keeping with the objectives it is intended to achieve.”

In relation to the EQIA, it commented:

“Consideration of alternative policies and measures to mitigate adverse impacts which might better achieve the promotion of equality of opportunity are a fundamental part of the EQIA process and should be considered at the various stages of the policy-making process. It is the Council’s responsibility to make these assessments in the EQIA report to enable consultees to make informed contributions and therefore assist the Council to ensure that it pays the appropriate level of regard to its equality of

opportunity and/or good relations duties. In this instance, the EQIA does not present any policy alternatives or any assessment of the potential impacts of these alternatives on equality and/or good relations. The Council could have used the information included in the EQIA to develop these alternatives and assessments, for instance, by considering alternatives which would remove or reduce potential negative impacts or options which would better promote equality of opportunity and/or good relations.”

The Commission also advised that the final EQIA should include plans to monitor the impact of the policy in line with the Council’s equality scheme.

A copy of the response is included at Appendix 11.

## 7. Conclusions

Schedule 9 of the Northern Ireland Act 1998 requires that, in making any decision with respect to a policy, a public authority shall consider any EQIA and consultation carried out in relation to the policy (para. 9.2).

There is no strict definition of what “taking into account” entails. However, the Equality Commission guidance on how decisions should be recorded makes it clear that a public authority must be able to record the decision-making process (as well as the decision) and that the decision must be justified.<sup>11</sup>

The guidance also advises that all available information should be combined in making the decision. This includes the information gathered during the research phase, the results of the consultation and the analysis of alternative policy options.<sup>12</sup>

This information has been brought together in this report and the accompanying appendices in order to ensure that the Council is in a position to take account of all issues and relevant data when making a decision.

In any consultation, the number of people that have expressed a preference for a particular option cannot be ignored, but this information must also be considered in the context of all other relevant concerns, including the strength and depth of feeling expressed by those who have responded.

Equally, it is to be expected that those who took the time and trouble to respond to the consultation would be those with strong opinions on the subject, and they have made their views very clear. At the same time, the impact of the proposed policy on all those who engage with the Council or live within or visit the Borough should not be disregarded.

The following analysis of the key points arising from the EQIA and the consultation responses is provided to assist the Council, but is not exhaustive and is not meant to be a substitute for the detailed information presented in the report and appendices.

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<sup>11</sup> Practical Guidance on Equality Impact Assessment, ECNI 2004, p.45

<sup>12</sup> Practical Guidance on Equality Impact Assessment, ECNI 2004, p.45

The overall response to the EQIA on the stain glass window was very low. However, the views of the respondents in both surveys were clearly divided. A summary of the responses is provided below.

- There were 26 responses received to an online survey targeted at the general public and 29 responses received to an online survey open to Causeway Coast and Glens Borough Council staff.
- Taking the average response by religious category, people from Protestant and other faith or non-Christian backgrounds feel most comfortable with the stained-glass window proposal. People of no religion or from a Roman Catholic community background feel least comfortable.
- Once again when asked if the stained-glass window should be changed, 14 (53.9 per cent) did not feel the content should be changed and 12 (46.2 per cent) felt that it should.
- In relation to the staff survey, 37.9 per cent of respondents felt that the proposal would have a negative or very negative impact on a good and harmonious working environment within the Council, while 24.1 per cent felt it would have a positive or very positive impact.
- Naturally there are two very different opinions in relation to the proposed window. Comments in favour of the proposal were broadly on the grounds that it was a very special anniversary that was worthy of celebration by the Council.
- Comments against the proposal were broadly on the grounds that it was “divisive and political” or a “waste of money”:

When set alongside the issues raised in the Draft Consultation Report, and including in particular the Council’s statutory obligations to promote equality of opportunity and good relations along with promoting a good and harmonious working environment, it is difficult to see how the current design would help advance these aspirations. Indeed, while survey return rates from both staff and the public were extremely low, there is evidence to suggest that the proposed window could be regarded as potentially divisive and unlikely to help portray the Borough as an area that is welcoming and inclusive to all communities.

The stated aim of the policy is, 'To create a permanent commemoration of the centenary of Northern Ireland and, in so doing, to support the reflection of future generations on the first 100 years of Northern Ireland.

It also aspires to contribute to the aims of the overall NI100 commemorative programme, namely to:

- Promote the borough as an attractive place to visit, invest and do business;
- Celebrate our people, places and products by showcasing the rich sporting, cultural, entrepreneurial and academic talent;
- Build a shared understanding of our collective history in a way that can build good relations and reconciliation by facilitating opportunities that both reflect on our past as well as build for our future; and
- Recognise and build awareness of this significant anniversary, locally, nationally and internationally, supporting expression of the diverse identities and culture that exist within the borough.

The evidence included in this final report indicates that, if one of the explicit intentions for the stained-glass window is to 'build a shared understanding of our collective history in a way that can build good relations and reconciliation by facilitating opportunities that both reflect on our past as well as build for our future', the proposed design is not viewed as a mechanism for achieving this aim. Instead, it may serve to celebrate the history of Northern Ireland in a manner that could be described as partial or partisan.

In other words, while the principle of celebrating NI100 in itself may not be problematic, the manner in which the anniversary is celebrated becomes of critical importance. Equally, while the placing of a stained-glass window in Coleraine Town Hall is not generally seen as contentious (other than its cost), it is the images contained within the proposed window, separately and in combination, that raise concerns and must ensure the stated aims of the project are supported.

Although the number of people responding to the consultation is very low, there is a consistent division of opinion in relation to the questions including:

- the level of comfort with the design
- changing the content of the window

- impact on a good and harmonious working environment.

The preponderance of images that are more closely aligned with one community is a matter that the Council may wish to consider further. Furthermore, although no single image in isolation may have the potential to harm good relations or disrupt a good and harmonious working environment, it is the combined impact of images that are more closely aligned with only one community that becomes problematic.

To mitigate this potential for adverse impact, the Council may wish to consider ways in which the images contained within the window *in toto* could be seen as more inclusive and reflective on the rich diversity within the Borough, perhaps extending to more balanced depictions of gender, ethnicity, and disability.

In reviewing the images contained within the window, there may also be an opportunity to consider how views and opinions from across the political spectrum could be sought and referenced in the design process.

Ultimately, the Council retains executive authority to decide whether to proceed with the project, and design, as currently proposed. However, the EQIA would suggest that the Council should proceed with caution and would be advised to afford due regard to the matters raised in the EQIA before reaching a final decision.

## 8. Monitoring for adverse impact in the future

Schedule 9 of the Northern Ireland Act 1998 requires that a system be established to monitor the impact of the final policy in order to gauge its effect on the relevant groups and subgroups attached to the nine Section 75 categories.

The results of ongoing monitoring must be reviewed and published on an annual basis (para. 4 (2) (b)). If the monitoring and analysis of results over a two-year period show that the policy results in greater adverse impact than predicted, or if opportunities arise which would allow for greater equality of opportunity to be promoted, the public authority must ensure that the policy is revised to achieve better outcomes for the relevant equality groups (Annex 1, para. 7.2).

The Council therefore needs to agree how the impact of the final policy will be monitored. This may involve some or all of the following:

- collation and analysis of all comments, queries, complaints received;
- surveys of visitors to the Town Hall;
- staff surveys;
- inclusion of appropriate questions in omnibus surveys.

## Appendix 1: Equality Scheme consultees

Please find below our list of consultees. Please note that this list is indicative and is not exhaustive. The list is reviewed on an annual basis to ensure that it remains relevant to our functions and policies:

55+ Activity Club	Armoy Community Development Association
1st Antrim CSI	Armoy Cross Community Playgroup
3rd Ballymoney Boys Brigade	Armoy Over 55's Club
4th Ballymoney BB	Armoy Primary School
1st Garvagh Boys Brigade	Armoy School Parent Teacher Association
7th Coleraine Guides	Armoy Woman's Institute
Action Cancer	Armoy Youth Group
Action Mental Health	Art & Disability Forum
Action Mental Health New Horizons Antrim	Articlave Community Development Group
Action on Elder Abuse Northern Ireland	Articlave District Community Association
Action on Hearing Loss	Arthritis Care NI
Action MS	Articlave Cultural and Historical Society
Adapt NI	Asian Over 50 Club
Age NI	Assistance Dogs NI
Age concern Causeway	Association for Spina Bifida & Hydrocephalus
Ageing Well Roe Valley	Asthma UK
Aghanloo Community Association	Autism NI
Agherton Grange Tenants Association	Autism NI – North Coast Branch
Aims Project	Aware Defeat Depression
Alliance Party	Baha'i Coleraine
All Saints' Church of Ireland Loughguile	Bahai Council for NI
Alzheimer's Society	Ballerin GAC
An Droichead	Ballybogey Community Association
Antrim to Gaza	Ballybogey Over 50s Club
Ardinariff Historical & Cultural Society	Ballybogey Youth Association
Armoy Auld Boys Musical Association	Ballycastle Church Action
Armoy Community Association	

Ballycastle Community  
 Development Group  
 Ballycastle Concern Group  
 Ballycastle Connect  
 Ballycastle & District Over 55's  
 club  
 Ballycastle & District Probus Club  
 Ballycastle Girls Brigade Youth  
 Ballycastle High School Youth  
 Club  
 Ballycastle Presbyterian Church  
 Ballycastle TRAINS Development  
 Association  
 Ballykelly Area Development  
 Association  
 Ballykelly Men's Shed  
 Ballylough Living History Trust  
 Ballymoney Arthritis Care Branch  
 Ballymoney Baptist Church  
 Ballymoney Church of God  
 Ballymoney Churches Forum  
 Ballymoney Community Resource  
 Centre  
 Ballymoney & District Community  
 Playgroup  
 Ballymoney Drama Festival  
 Ballymoney Elim Parent & Toddler  
 Group  
 Ballymoney First Presbyterian  
 Church  
 Ballymoney Methodist Church  
 Ballymoney Reformed  
 Presbyterian Church  
 Ballymoney U3A  
 Ballymoney Women's Institute  
 Ballymoney Writers  
 Ballysally Community Association  
 Ballyvoy & Carey Development  
 Group  
 Ballywatt Presbyterian Church  
 Ballyweaney Presbyterian Church  
 Ballywillan Community & Cultural  
 Group

Ballywillan Drama Group  
 Banagher Parish Church  
 Barnardo's NI  
 Be Safe Be Well  
 Beautiful Minds  
 Bee Heard  
 Benbradagh Community Support  
 Group  
 Benbradagh Resource Centre  
 Bendooragh & District Community  
 Association  
 Benedy Community Association  
 Ltd  
 Benedy Women's Group  
 Benvariden Apprentice Boys of  
 Derry  
 Benvariden Community  
 Association  
 Benvariden LOL 1001  
 Big Telly Theatre Company  
 Blaugh Sons of Ulster  
 Blind Centre  
 Boveedy Community Association  
 Boveedy Springwell Club  
 Brake PYDP  
 BraveheartsNI  
 Breen Centre  
 British Deaf Association  
 Brook, Coleraine  
 Building Ballysally Together  
 Building Communities Resource  
 Centre  
 Bushmills Community Centre  
 Burnfoot Community  
 Development Association  
 Burnside Presbyterian Church  
 Burnfoot Parent & Toddler Group  
 Bushmills & District Community  
 Association  
 Bushmills and District Motorcycle  
 Club  
 Bushmills Primary School &  
 Nursery Unit

Bushmills Residents &  
 Environmental Forum  
 Bushmills Residents Group  
 Bushmills Trust  
 Bushmills Ulster Scots Heritage  
 Bushvale Presbyterian Church  
 Business in the Community  
 Butterfly Survivors  
  
 Cairns Residents Group  
 CAN (Compass Advocacy  
 Network)  
 Cancer Focus NI  
 Carey Faughs GAC  
 Cara Friend  
 Carers NI  
 Carhill Integrated Primary School  
 P.T.A  
 Carnany Community Association  
 Carnanmore Community Group  
 Carnany Parent & Toddler Group  
 Carnduff Community Association  
 Carnduff Residents Association  
 Castle Community Association  
 Castle Community Centre  
 Castlerock Community  
 Association  
 Castlerock Senior Citizens'  
 Wednesday Club  
 Castleroe Area Community  
 Development Association  
 CAUSE  
 Causeway ADHD Support Group  
 Causeway Coast and Glens  
 Heritage Trust  
 Causeway Coast Peace Group  
 Causeway Coast Vineyard  
 Church  
 Causeway Hospital Radio  
 Causeway Multi-Cultural Forum  
 Causeway Older Active Strategic  
 Team (COAST)

Causeway Rural and Urban  
 Network  
 Causeway U3A  
 Causeway Volunteer Action Trust  
 Causeway Volunteer Centre  
 Causeway Women's Aid  
 Cedar Foundation  
 Ceres Europes (NI) Ltd.  
 Cheers Youth Group  
 Child Action Protection Trust  
 Children's Law Centre  
 Children in Northern Ireland  
 Child Poverty Action Group  
 Chinese Welfare Association  
 Choice Housing  
 Citizens Advice Causeway  
 Cloughmills Community  
 Association  
 Cloughmills Community Action  
 Team  
 Cloughmills Community Guides  
 Cloughmills Free Presbyterian  
 Church  
 Cloughmills Golden Oldies  
 Cloughmills Playgroup  
 Cloughmills Reformed  
 Presbyterian Church  
 Co Londonderry Agricultural Show  
 Society Ltd.  
 C.O.A.S.T  
 Coleraine Baptist Church  
 Coleraine Borough 50+ Forum  
 Coleraine Branch – The Royal  
 British Legion  
 Coleraine Borough Churches  
 Forum  
 Coleraine Carers Support Group  
 Coleraine Disability Forum  
 Coleraine & District Riding for the  
 Disabled  
 Coleraine Eotas Project  
 Coleraine Festival Committee  
 Coleraine Gardening Club

Coleraine Gateway Club  
 Coleraine Guide Hall  
 Coleraine Islamic Centre  
 Coleraine Probus Club  
 Coleraine Rotary Club  
 Coleraine Round Table  
 Coleraine Rural and Urban Network  
 Coleraine Street Pastors  
 Coleraine Talking News  
 Coleraine Young Farmers Club  
 Coleraine Youth Forum  
 Coleraine Ulster Scots Regeneration Club  
 Coleraine Versus Arthritis  
 Comhaltas Ceoltóirí Éireann Rasharkin  
 Comhaltas Ceoltoiri Eireann, Dun Lathai/Dunloy Comhaltas  
 Committee on the Administration of Justice (CAJ)  
 Community Advice Causeway  
 Community Development and Health Network NI  
 Community Family Support Programme  
 Community Foundation for NI  
 Community Relations Council  
 Compass Advocacy Group  
 Contact a Family  
 Connect Christian Fellowship  
 Conradh na Gaeilge  
 Coolessan Community Association  
 Cornerstone Youth & Community Centre  
 Corrymeela  
 COSO  
 Council for the Homeless NI  
 Crafts with Love  
 Cramsie Court Residents Association  
 Crossroads Caring for Carers  
 Cruse Bereavement Care NI  
 Croaghmore Presbyterian Church  
 Crockney Residents' Association  
 Portrush  
 Cross Glebe Community Association  
 Crow's Nest Community Playgroup  
 Cruse Northern Area  
 Curator Shackleton and Aviation Museum  
 Cushendall Development Group  
 Cushendall's Men's Shed  
 Cushendall Women's Association  
 Cushendall Women's Institute  
 Cushendun and District Development Association  
 Cushendun Building Preservation Trust  
 Cushendun GAC  
 CVSNI  
 Dalriada Rural Sure Start  
 Dalriada Training Services  
 Dalriada Rural Surestart  
 Deaf Association  
 Derrykeighan Church of Ireland (St Colman's)  
 Derrykeighan & District Community Association  
 Derry Well Woman  
 Drumrane Orange Community Association  
 Dunseverick Community Association  
 Dunseverick Primary School  
 Dervock & District Community Association  
 Dervock Presbyterian Church  
 Dervock Playgroup  
 Dervock Youth Association  
 Destined Feeny

Diabetes UK Limavady Branch  
Disability Action  
Disability Sports NI  
Down's Syndrome Association NI  
Dromboughil Community  
Association  
Dunloy Presbyterian Church  
Drum Men's shed  
Drumboughill Community  
Association  
Drumrane Orange Community  
Association  
Drumreagh Presbyterian Church  
Drumsum Community Association  
Dry Arch Children's Centre  
Dunaghy Flute Band  
Dungiven Faith and Crown  
Defenders LOL2036  
Dungiven Presbyterian Church  
Dungiven Regeneration Group  
Dunloy Development Association  
DUP

Eagle Glen community  
Partnership Ltd  
Early Years (North West)  
Early Years  
Eden Project Communities  
Education Authority NI  
EGSA Educational Guidance  
Service for Adults  
Employers Forum on Disability  
Eoghan Rua GAC  
Equality and Emergency Planning  
Team  
Equality Coalition  
Equality Commission for NI  
Errigal Hall Development  
Association  
Ethnic Minority Worker  
Evergreen Club  
Extern

Faughanvale Community Project  
Faughanvale GAC  
Feeny Community Association  
Feis Na Gleann  
Fibromyalgia Awareness Northern  
Ireland (FMANI)  
Fibromyalgia North West Support  
Group  
Finvoy Church of Ireland  
Finvoy Presbyterian Church  
Finvoy Young Farmers Club  
First Garvagh Presbyterian  
Church  
Flowerfield Writers Group  
Focus on Family  
Foras na Gaeilge  
Foreglen Community Association  
Foreglen Day Care Centre  
Foyle Downs Syndrome Trust  
Foyle Women's Aid (Limavady)  
Friends of Glenariffe

Gaeil Ruairí Óg agus Gaeil na  
nGlinntí  
Gaelcholaiste Dhoire  
Garryduff Presbyterian Church  
Garvagh & Agadowey Great War  
Society  
Garvagh & District Development  
Association  
Garvagh & District Diamond Club  
Garvagh Community Forum  
Garvagh Cultural Awareness  
Association  
Garvagh Development Trust  
Garvagh Young Farmers Club  
Garvagh Youth Centre  
Gelvin Area Community  
Association Ltd  
Girls Brigade NI  
Glebeside Community Association  
Glack Community Association  
GLAD

Glenariff Improvement Group  
Glenariffe Oisin CLG  
Glenariffe Resource Centre  
Glenariff Youth Group  
Glenmona House Trust  
Glenmona Resource Centre  
Glens Community Association  
Glenshane Care Association  
Glenshane Community  
Development Ltd  
Glenshesk Court Tenants  
Association  
Glens & Dalriada U3A Group  
Glens of Antrim Comhaltas  
Glór Dhún Geimhin

Glens Help Group  
Glens Red Squirrel Group  
Glens Rural Community Group  
Glens Youth Club  
Glenullin & Agivey Conservation  
and Development Trust  
GMB  
Good Morning Causeway  
Good Morning Roe Valley  
Gortnaghey Community  
Association  
Gortrighey AOH and Community  
Accordion Band  
Grand Orange Lodge of Ireland  
Greenlight Gateway  
Greenshed Recycling Project  
Greysteel Community Association  
Greysteel Community Enterprises  
Ltd  
Greysteel Playgroup  
Greysteel Parent & Toddler Group  
Guide Dogs for the Blind  
Association  
Guide Dogs NI

Habinteg Housing Association  
(Ulster) Ltd

Hampsey Harp School  
Happy Days Playgroup  
Hands That Talk Community  
Group  
Harpur's Hill Primary School  
Heart of the Glens Festival  
Hebron Free Presbyterian Church  
Heights Football Club  
HereNI  
Hezlett Court Tenant's  
Association  
Homestart, Causeway

IMTAC  
Indian Community Centre  
Inner Wheel Club of Ballymoney  
Institute for Conflict Research  
Iontaobhas ULTACH  
Irish Congress of Trade Unions  
Include Youth

Jack Horner Community  
Playgroup  
Jimmy O'Hara Comhalltas  
Ceoltóirí Éireann  
, Roe Valley  
Juniper Hill Caravan Occupiers  
Association

Kids Inn After Schools Club  
Killagan Church of Ireland  
Killowen & Churchlands  
Community Association  
Killowen Community Association  
Killowen Primary School PTA  
Kilraughts Presbyterian Church  
Kilraughts Reformed Presbyterian  
Church  
Kilrea Ageing Well Club  
Kilrea Community Early Years  
Kilrea Development Committee  
Kilrea Women's Institute  
Kilrea Young Farmers Club

Kilraughts Young Farmers Club  
Killyrammer & District Community  
Association  
Kingdom of Dalriada Ulster-Scots  
Society  
Knockmoy Fold Residents  
Association

Ladies Friendship and Craft  
Group  
Landhead Primary School  
Largy Community Development  
Association  
LCDI Advice Centre  
LCDI Disabled Daycare Centre  
Lesbian Advocacy Services  
Initiative (LASI)  
Lifestart Limavady  
Limavady Baptist Church  
Limavady Community and Leisure  
Association  
Limavady Family Centre  
Limavady Flexicare  
Limavady Garden Centre  
Limavady Initiative for the  
Prevention of Suicide  
Limavady Lions Club  
Limavady Orange Heritage Centre  
Limavady Rugby Club  
Limavady Volunteer Centre  
Limavady Youth Council  
Liscolman Community  
Development Association  
Lisnagaver Flute Band  
Little Orchids Ltd  
Little Rascals Community  
Playgroup  
Live Music Now  
Loughgiel Community Association  
Loughgiel Playgroup  
Loughgiel Youth Club

Macosquin Community  
Association  
Macosquin Senior Citizens Club  
Magilligan Community Association  
Magilligan Community Playgroup  
Main Street Presbyterian Church,  
Garvagh  
Marconi Radio Group  
MENCAP (West)  
MENCAP NI  
Men's Health Forum in Ireland  
Men's Action Network  
Migrant Centre NI  
Millburn Community Association  
MindWise Head Office  
Moneydig Rural Network  
Moneydig Young Conquerors  
Flute Band  
Mosside Community  
Mosside Monday Club  
Mosside Youth Group  
Mother's Union Group  
Mountsandel Discovery and  
Heritage Group  
Moycraig Young Farmers Club  
Moyle Gateway Youth & Friends  
MR SMITH Community Group  
Mullagh House  
Multi-Cultural Resource Centre  
Multiple Sclerosis Society NI  
Mummies Matter  
  
NACN  
National Deaf Children's Society  
NEELB  
NI Association for Mental Health  
NI African Cultural Centre  
Niamh Mental Wellbeing  
NICCY  
NI Chest, Heart & Stroke  
NICVA  
NI Deaf Youth Association  
NI Gay Rights Association

NI Housing Executive	Our Lady & St Patrick's Roman Catholic Church
NI Human Rights Commission	
NI Islamic Centre	
NI Muslim Family Association	Parenting NI
NIPSA	Parents Advice Centre
NI Rare Disease Partnership	Pavestone Centre
NI Rural Women's Network	Parish of Errigal & Desertoghill
NI Union of Supported Employment	Parkinson's UK NI
NI Women's Coalition	People Plus NI
NI Women's Aid Federation	Phoenix ADHD
NI Women's European Platform	Phoenix Project
NI Youth Forum	Pinewood House
North Antrim Bands Forum	Playhouse Activity Centre
North Antrim Community Network	POBAL
North Antrim Villages Forum	Portballintrae Community Development Group
North Coast Community Transport	Portballintrae Residents Association
North Coast Integrated College	Portrush Community Forum
Northern Area Community Network	Portrush Heritage Group
Northern Health & Social Care Trust	Portrush Partnership
Northern Ireland Housing Executive	Portrush Summer Theatre
Northern Regional College	Portrush Theatre Company
North West Animal Welfare Group	Portrush Writers
North West Community Network	Portrush Youth Centre
North West Forum of People with Disabilities	Portstewart Baptist Church
North West Historical & Cultural Society	Portstewart Community Association
North West Livelong Learning Ltd	Portstewart Hospice Support Group
NSPCC	Portstewart Presbyterian Church
NWLLA - North West Lifelong Learning Ltd	Portstewart Presbyterian Youth Club
	Portstewart Probus Club
Oasis Causeway	Positive Futures
O' Connors Glack GAC	Pride of the Park Flute Band
Oakleaf Community Network	Promote Action Mental Health
Older Peoples Advocate NI	PSNI
Our Lady & St John The Evangelist Roman Catholic Church	PUP (Progressive Unionist Party)
	Pure Tashte Productions
	Queerspace

Rainbow Project  
 Ramoan Friendship Group  
 Rasharkin Community Association  
 Rasharkin Community Playgroup  
 Rasharkin Free Presbyterian Church  
 Rasharkin Women's Group  
 Rasharkin Primary School  
 Rathain Tenants Association  
 Rathlin Development & Community Association  
 Restore Community Group  
 Ridge Club - Afterschool & Holiday Club  
 Riding for the Disabled Association (Coleraine & District Group) Ltd  
 Ringsend Presbyterian Church  
 RNIB  
 RNID NI  
 Roe Valley Ancestral Researchers Ltd  
 Roe Valley Community Playgroup  
 Roe Valley Historical Society  
 Roe Valley Residents Association  
 Roe Valley Women's Network  
 Roseyards Presbyterian Church  
 Rotary Club of Coleraine  
 Royal National Institute for the Blind  
 Ruairi Og CLG  
 Rural Community Network  
 Rural Support  
  
 Saint Vincent de Paul, Portstewart  
 Sacred Heart Roman Catholic Church  
 Salvation Army  
 Sandel Centre  
 Save the Children Fund  
 SDLP  
 Second Dunboe Presbyterian Church

See-Saw Playgroup  
 Sense  
 Shelter NI  
 Sikh Cultural Centre  
 Simon Community Coleraine  
 Sinn Fein -  
 connollyhouse@sinnfein.ie  
  
 Snatch Club (1st Ballymoney Youth Club)  
 Society Human rights & Equality Committee  
 Solas Moyle  
 Somerset Residents Association  
 Sports NI  
 St Andrew's Church of Ireland Rasharkin  
 St Canice's GAC  
 St Canice's Ladies GAC  
 St Colm's Drum GAC  
 St Columba's Primary School  
 St Columba's Roman Catholic Church  
 St Joseph's Roman Catholic Church  
 St MacNissi's Roman Catholic Church  
 St Mary's Church Macosquin  
 St Mary's Roman Catholic Church Rasharkin  
 St Patrick's Church of Ireland Ballymoney  
 St Patrick's Church Portrush  
 St Patrick's Roman Catholic Church  
 St Peters & St Pauls Primary School  
 Stranocum Community Centre Ltd  
 Stranocum & District Development Group  
 Stendhal Festival  
 Stepping Stones Playgroup  
 Stroke Association NI

St Vincent de Paul  
St Vincent de Paul Cloughmills  
St Vincent de Paul, Kilrea  
St Vincent De Paul Society - St  
Malachy's  
St Vincent de Paul Society,  
Limavady  
Sunlea Youth Centre  
Supporting Communities NI

Tar Isteach  
Tha Boord o Ulster Scotch  
The Bushmills Trust  
The Corrymeela Community  
The Den Drop-In  
The Dry Arch Children's Centre  
The Friends group  
The Mae Murray Foundation  
The Princes Trust  
The Rainbow Project  
Topp Rural Regeneration and  
Cultural Society  
Topp Star Line Dancing Class  
Traditional Unionist Voice  
Training for Women Network  
Traveller Movement NI  
Trinity Presbyterian Church

UDR Association  
Ullans Centre  
Ullans Speakers Association  
Ulster Deaf Sports Council  
Ulster Scots Agency  
Ulster Scots Community Network  
Ulster Unionist Party (UUP)  
Ulster University Chaplaincy,  
Coleraine  
UNISON  
United Parish of Ballymoney,  
Finvoy and Rasharkin

UNITE The Union  
University of Ulster Coleraine  
University of Ulster Students  
Union  
Upper Station Road,  
Neighbourhood Watch

Vineyard Compassion  
Visual Access NI Ltd  
Voices of Young People in Care  
Volunteer Now Enterprises Ltd

Waterfoot Residents Association  
Wave Trauma Centre  
WELB Youth Service  
Wellington Park Business Centre  
West Bann Development Ltd.  
Windyhall 50+ Club  
Windyhall Community Association  
Windyhall Community, Cultural  
and Sports Action Group  
Windyhall Youth Club  
Women's Aid Federation NI  
Women's Centre Derry  
Women of the World  
Women's Regional Consortium  
Women's Resources and  
Development Agency  
Women's Support Network

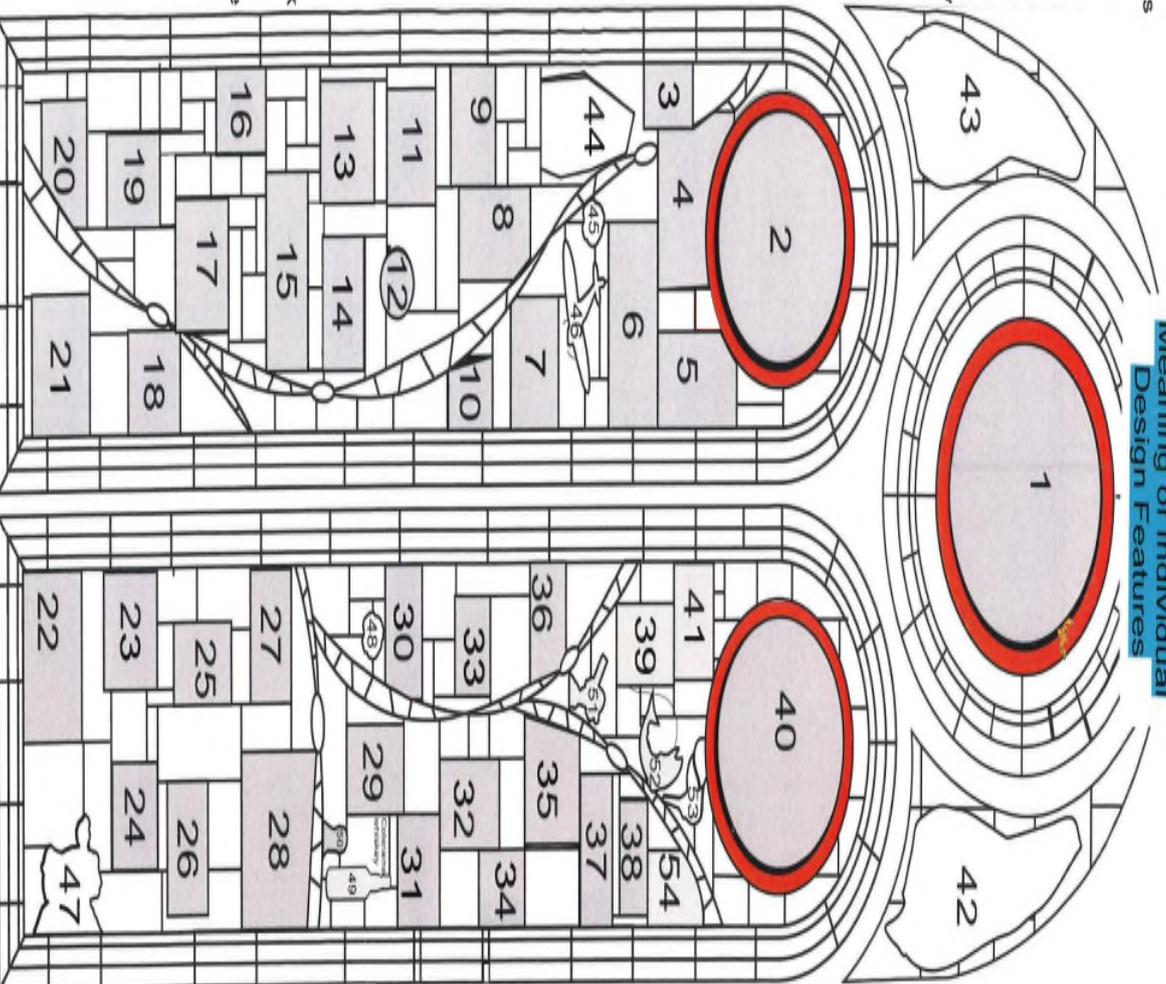
Youth Council (Causeway)  
Youth Action NI  
Youth Links

Zachary Geddis Break the Silence  
Trust  
Zomba Action Group



### Meaning of Individual Design Features

1. NI Coat of Arms
2. Flax Plant
3. Causeway Coast and Glens Borough Council Crest
4. RUC Crest
5. Glenariff
6. William Massey
7. Traditional Music
8. Sgt. Quigg V.C.
9. Poppy
10. Spitfire / Air Show
11. Limavady Arts Centre
12. May Hazlett Golfing pioneer
13. World Ploughing Championship
14. Girona Treasure
15. Shamrock
16. NHS
17. Causeway Centre
18. Dark Hedges
19. Golf Open
20. Garvagh War Memorial
21. HM Visit 1953
22. John Steinbeck
23. Rose
24. Dunluce Castle
25. RAF Aghanloo



42. Flax Plant
43. The Hon the Irish Society
44. Irish Surfing Championship
45. Olympics
46. UDR Crest
47. Fishing
48. Bertie Peacock
49. Branson's balloon trip
50. Tourism
51. HMI Opening Railway Station
52. Garvagh Forest Trail
53. Coleraine Battery, Egypt
54. Wheat / Barley
55. RNLI
56. Dr. Louise McLeroy
57. The Cutts, River Bann
58. Tug of War Championships
59. Poppy
60. Irish / Scottish Dancing
61. Puffin
62. Coleraine Whiskey
63. Bushmills Distillery
64. NW200
65. Thistle
66. Pipe Band Championships
67. Supercup
68. Stendahl Music Festival
69. Carrick-a-rede
70. Cow / Farming

## Appendix 3: Proposals received from elected representatives by DEA

DEA	Proposal
<b>Bann</b>	Garvagh War Memorial Dairy industry/Grain industry Stock cars and Aghadowey Airfield Flax Industry Wild Geese Parachute Team Tug Of War Ploughing (Hugh) Barr world champion)
<b>Causeway</b>	Sunset over Portstewart Strand with convent
<b>Ballymoney</b>	Town Clock/ Old Church Tower Chapel in Dunloy Lambey Drum (Tommy Louden) Ballymoney Town Hall Robinson Hospital
<b>Benbradagh</b>	RAF Ballykelly Steinback Finviola
<b>Glens</b>	Fair Head Carrick-a-rede rope bridge Dark Hedges Puffin

	<p>Tower in Cushendall,</p> <p>Bottle nose dolphins (general)</p> <p>Waterfall Glenariff</p> <p>Viaduct Glendun</p> <p>Land reclamation</p>
<b>Limavady</b>	<p>RAF Limavady (Dome training building)</p> <p>William Ferguson Massey – tractors went on to be president of New Zealand (tractor and Kiwi signs)</p> <p>Poppy for those killed in Aircraft accident into Benevenagh</p> <p>Shamrock Rose and Thistle cross cultural annual festival</p> <p>Danny Boy</p> <p>Stendhal, could include logo</p> <p>Brighter Gold</p> <p>Limavady Whiskey Distillery</p> <p>Dog Leap</p> <p>River Roe</p> <p>Benone Beach</p> <p>Donegal connecting ferry</p> <p>Wolfhounds GAA</p> <p>Lawn Bowls</p> <p>Water sports Benone beach (SUP Surfing etc)</p>
<b>Coleraine</b>	<p>Lifeboat, Barry`s</p>

## Appendix 4: Design specification as at August 2021

- Stained glass window to be traditional design
- Circle at top to house the NI coat of arms
- Six other circles to have the following themes:
  - Sport
  - Architecture
  - Military
  - Culture
  - Royal visits
  - Landscapes
- Content:
  - Queen`s visit, Ballarena train station.
  - Queens Visit Robert Quigg statue
  - Royal Yacht
  - Other Royal Visits
  - Game of Thrones
  - Dark Hedges
  - Ballintoy Harbour
  - Fairhead
  - North West 200
  - Airshow
  - River Bann
  - Fishing
  - Golf Clarke Mc Dowell
  - Golf Claret Jug

- Twinning with La Roche
- RUC George Medal
- 6th Battery anti aircraft division
- Sandelford Bridge
- Ulster University
- Milk Cup
- World ploughing championships
- New Causeway Centre
- Bertie Peacock
- Harry Gregg
- Red Sails 1955
- Actors
- Henry McCullough played with Paul McCartney
- Girona gold
- Richard Branson Balloon, Rathlin and Limavady
- John Clarke Ballintoy potato grower Maris Piper
- JFK visit 1940
- Mountsandel village found in 1970
- Admiral Sir Arthur Hezlet
- Salmon fishing
- American Troops Airfields, GI`s Battle for Atlantic
- Pillboxes
- Browter gold
- Beresford monument Limavady
- Something Constitutional

- Coleraine/Bushmills distillery
- Sons and Daughters
- Armed Forces Day
- Coleraine Battery
- Radar Dome
- Rowers
- Gaelic games
- Sam Maguire cup 1993 County Londonderry
- Background:
  - Coastal Headline
  - Giants Causeway
  - Bann Disc

## Appendix 5: Causeway Coast and Glens population by Section 75 dimension

### Census figures and election results

The usually resident population of the Council area at the 2021 Census was 141,749.<sup>13</sup>

#### Religious belief

The following table provides a breakdown of the religious belief of residents in the Causeway Coast and Glens borough and the Coleraine settlement area.<sup>14</sup>

<b>Census</b>	<b>Causeway Coast and Glens Borough Council (2011 Census)</b>	<b>Causeway Coast and Glens Borough Council (2011 Census)</b>	<b>Coleraine (2011 Census)</b>
<b>Roman Catholic</b>	37.6%	37.0%	24.1%
<b>Protestant and other Christian (including Christian related)</b>	45.3%	48.4%	68.1%
<b>Other religions</b>	0.7%	0.6%	1.2%
<b>None</b>	15.0%	5.6%	6.7%

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<sup>13</sup> Northern Ireland Statistics website, [www.nisra.gov.uk](http://www.nisra.gov.uk). Crown copyright material is reproduced with the permission of the Controller of HMSO. Where available, Census 2021 figures have been updated from the draft EQIA, which cited the 2011 Census results.

<sup>14</sup> Source: NISRA. Crown copyright material is reproduced with the permission of the Controller of HMSO.

## Political opinion

The following table presents the results of the 2019 local government elections for Causeway Coast and Glens Borough Council.<sup>15</sup>

<b>Party</b>	<b>First preference votes</b>	<b>Vote share (%)</b>	<b>Seats won</b>
<b>DUP</b>	15371	30.4	14
<b>Sinn Féin</b>	11221	22.2	9
<b>UUP</b>	7725	15.3	7
<b>SDLP</b>	4686	9.3	6
<b>Alliance</b>	4058	8	2
<b>TUV</b>	2177	4.3	
<b>Independent</b>	2039	4	
<b>PUP</b>	1576	3.1	
<b>Aont</b>	992	2	
<b>UKIP</b>	350	0.7	
<b>Green</b>	331	0.7	
<b>Conservative</b>	112	0.2	

## Ethnicity

One Census Day 2021, nearly 99 per cent of the population of Causeway Coast and Glens Borough Council was from a white racial background.<sup>16</sup>

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<sup>15</sup> Source: [www.ark.ac.uk/elections/flg19.htm](http://www.ark.ac.uk/elections/flg19.htm)

<sup>16</sup> Source: NISRA. Crown copyright material is reproduced with the permission of the Controller of HMSO.

	<b>Causeway Coast and Glens Borough Council (%)</b>	<b>Northern Ireland (%)</b>
<b>White</b>	98.55	96.55
<b>Irish Traveller</b>	0.03	0.14
<b>Chinese</b>	0.22	0.50
<b>Indian</b>	0.15	0.52
<b>Pakistani</b>	0.03	0.08
<b>Other Asian</b>	0.10	0.28
<b>Black African</b>	0.12	0.42
<b>Black Other</b>	0.04	0.16
<b>Mixed</b>	0.51	0.76
<b>Other ethnic group</b>	0.11	0.19

## Age

Causeway Coast and Glens Borough Council has a slightly older population than the Northern Ireland average based on the 2021 Census.<sup>17</sup>

	<b>Causeway Coast and Glens Borough Council</b>	<b>Northern Ireland</b>
<b>Under 15</b>	25,964 (18.32%)	365,217 (19.19%)
<b>16–39</b>	40,900 (28.85%)	594,361 (31.23%)
<b>40–64</b>	47,568 (33.56%)	617,125 (32.43%)
<b>65 and over</b>	27,314 (19.27%)	326,477 (17.15%)

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<sup>17</sup> Source: NISRA. Crown copyright material is reproduced with the permission of the Controller of HMSO.

## Marital status

The following table shows the marital status of the Causeway Coast and Glens Borough Council population on Census day 2011. <sup>18</sup>

	<b>Causeway Coast and Glens Borough Council (%)</b>	<b>Northern Ireland (%)</b>
<b>Single</b>	32.55	33.11
<b>Married</b>	50.02	48.45
<b>Re-married</b>	2.66	2.67
<b>Separated</b>	3.23	3.84
<b>Divorced</b>	4.14	4.12
<b>Widowed</b>	7.42	7.81

## Sexual orientation

Several UK- and NI-based studies have attempted to quantify the number of people who identify as LGBTQ+. Estimates for the LGBTQ+ population range from 0.3 to 10 per cent using different sources. A commonly used estimate of LGBTQ+ people in the UK, accepted by Stonewall UK, is approximately 5 to 7 per cent of the population.

The Northern Ireland Life and Times Survey 2020 provides the following information on the sexual orientation of people in Northern Ireland (this information is not available at local government level).<sup>19</sup>

	<b>%</b>
<b>I am “gay” or “lesbian” (homosexual)</b>	3
<b>I am heterosexual or “straight”</b>	94

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<sup>18</sup> Source: NISRA

<sup>19</sup> Source: <https://www.ark.ac.uk/nilt/2020/>

<b>I am bisexual</b>	2
<b>Other</b>	1

### Gender

On Census day 2021, 51 per cent of the population of Causeway Coast and Glens Borough Council was male and 49 per cent female.<sup>20</sup>

	<b>Causeway Coast and Glens Borough Council</b>	<b>Northern Ireland</b>
<b>Male</b>	50.88%	48.74%
<b>Female</b>	49.12%	51.26%

### Disabled people

One in five people in Causeway Coast and Glens Borough Council had a disability on Census day 2011.<sup>21</sup>

	<b>Causeway Coast and Glens Borough Council</b>	<b>Northern Ireland</b>
<b>Disabled people</b>	20.17%	20.69%
<b>People without a disability</b>	79.83%	79.31%

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<sup>20</sup> Source: NISRA. Crown copyright material is reproduced with the permission of the Controller of HMSO.

<sup>21</sup> Source: NISRA. Crown copyright material is reproduced with the permission of the Controller of HMSO.

### **People with or without dependants**

On Census day 2011, 28 per cent of households in the borough reported having dependent children and 11 per cent of residents provided long-term care for an adult.<sup>22</sup>

	<b>Causeway Coast and Glens Borough Council</b>	<b>Northern Ireland</b>
<b>Households with dependent children</b>	28.37%	36.19%
<b>Persons providing unpaid care to another because of long-term physical or mental ill- health/disability or problems related to old age</b>	10.73%	11.82%

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<sup>22</sup> Source: NISRA. Crown copyright material is reproduced with the permission of the Controller of HMSO.

## Appendix 6: Monitoring Returns for Causeway Coast and Glens Borough Council employees

### By religious belief/community background

As at 21 October 2021, 39 per cent of Causeway Coast and Glens Borough Council employees were from a Catholic community background and 55 per cent were from a Protestant community background.

Religious belief/ community background	Gender	Number of staff	Percentage
Roman Catholic	Male	123	19.52%
	Female	122	19.37%
Protestant	Male	218	34.60%
	Female	131	20.79%
Non-determined	Male	17	2.70%
	Female	19	3.02%

### By racial group/ethnic origin

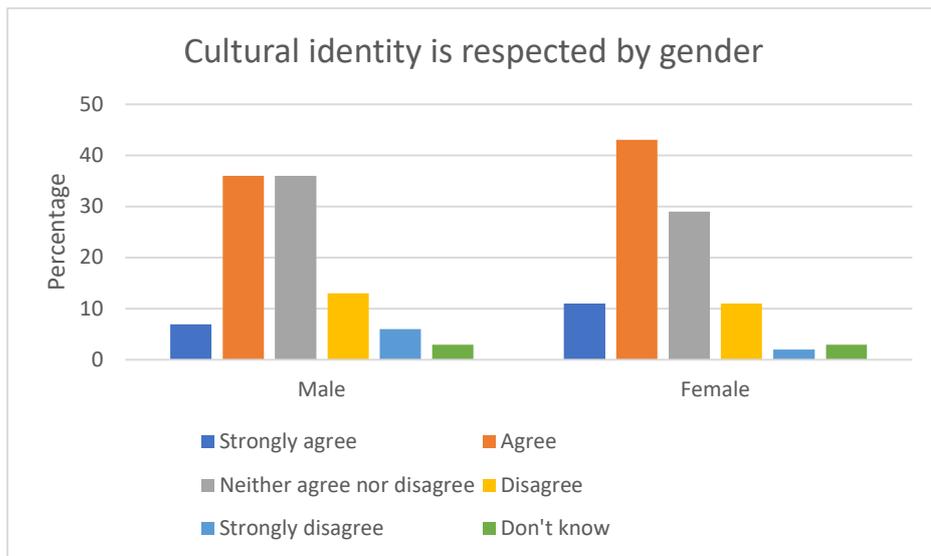
As at 21 October 2021, 89 per cent of Causeway Coast and Glens Borough Council employees were from White/White European racial group; 10 per cent were unknown; and less than 1 per cent were from an 'other' or 'mixed' ethnic background.

Racial group/Ethnic origin	Percentage
Mixed ethnic group	0.16%
Other	0.32%
White/White European	89.21%
Unknown	10.31%

## Appendix 7: NI Life and Times Survey

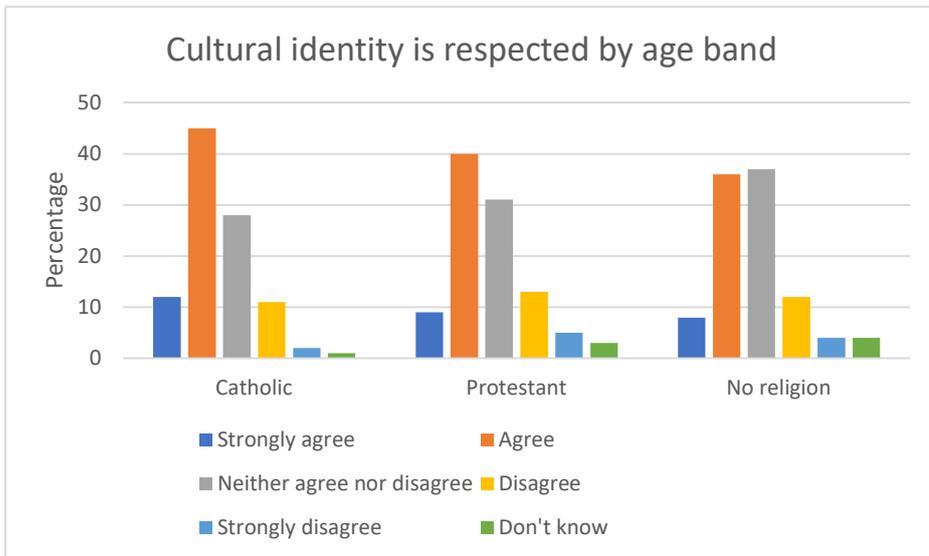
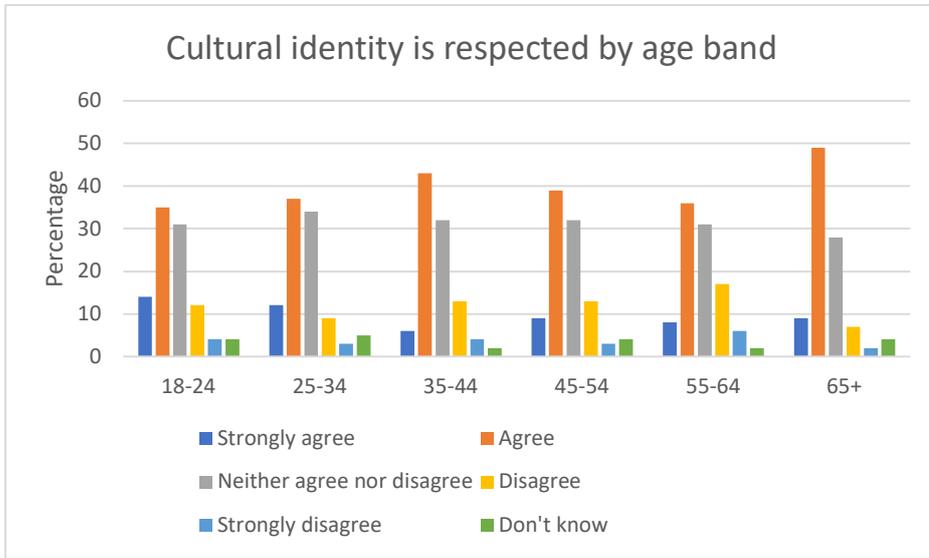
### Cultural identity

49 per cent of people surveyed in the 2020 NI Life and Times Survey<sup>23</sup> felt that their own cultural identity is respected by society. Men and people from a Catholic community background are least likely to agree.



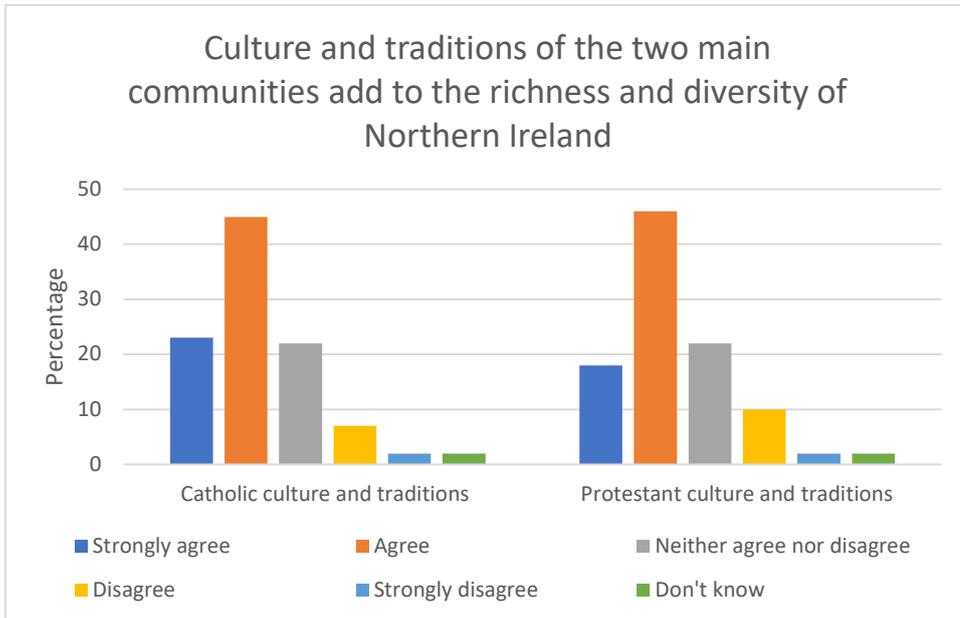
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<sup>23</sup> Source: <https://www.ark.ac.uk/nilt/2020/>



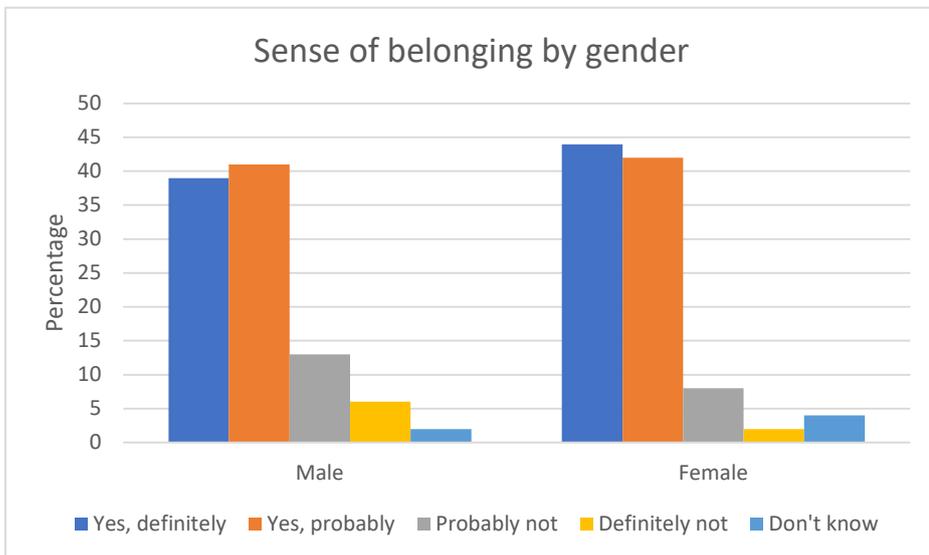
## Culture and traditions

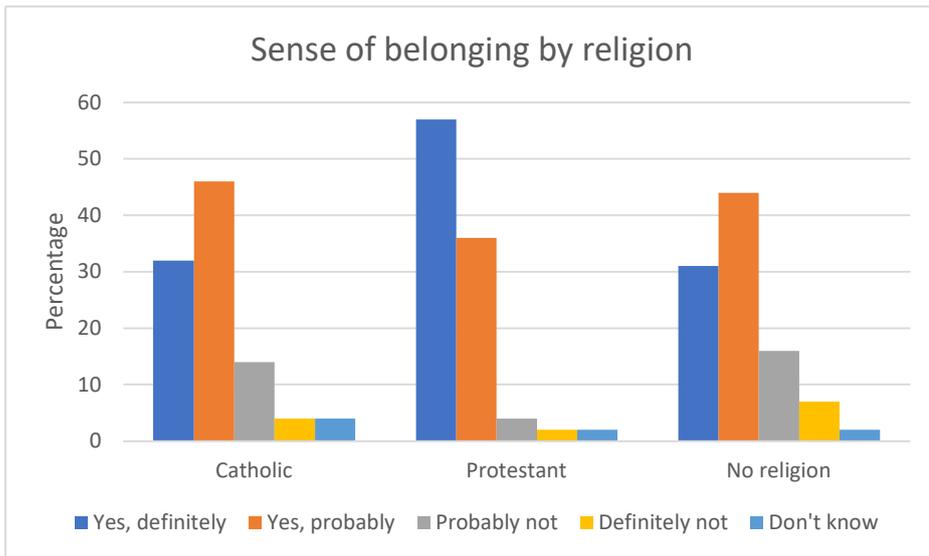
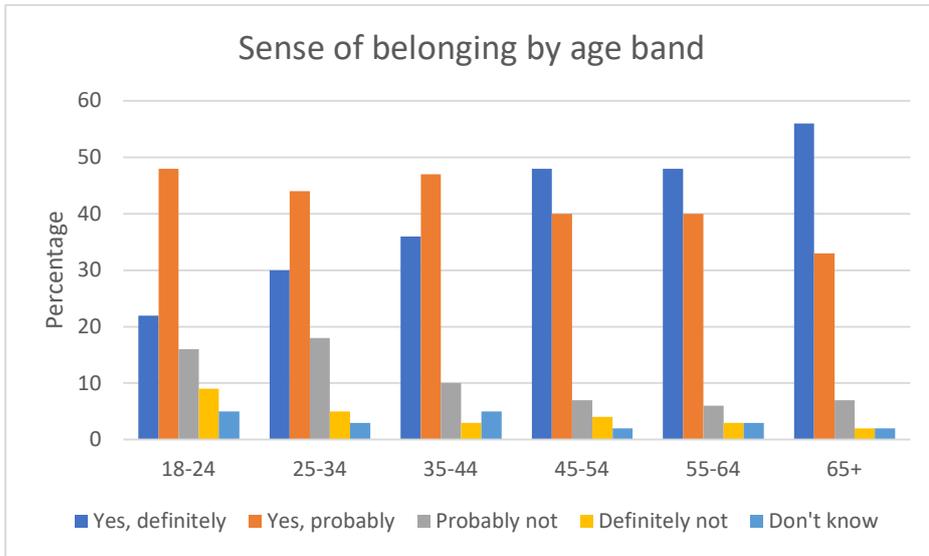
68 per cent of people agree that Catholic culture and traditions adds to the richness and diversity of Northern Ireland. 64 per cent agree that Protestant culture and traditions adds to the richness and diversity of Northern Ireland.



### Sense of belonging to Northern Ireland

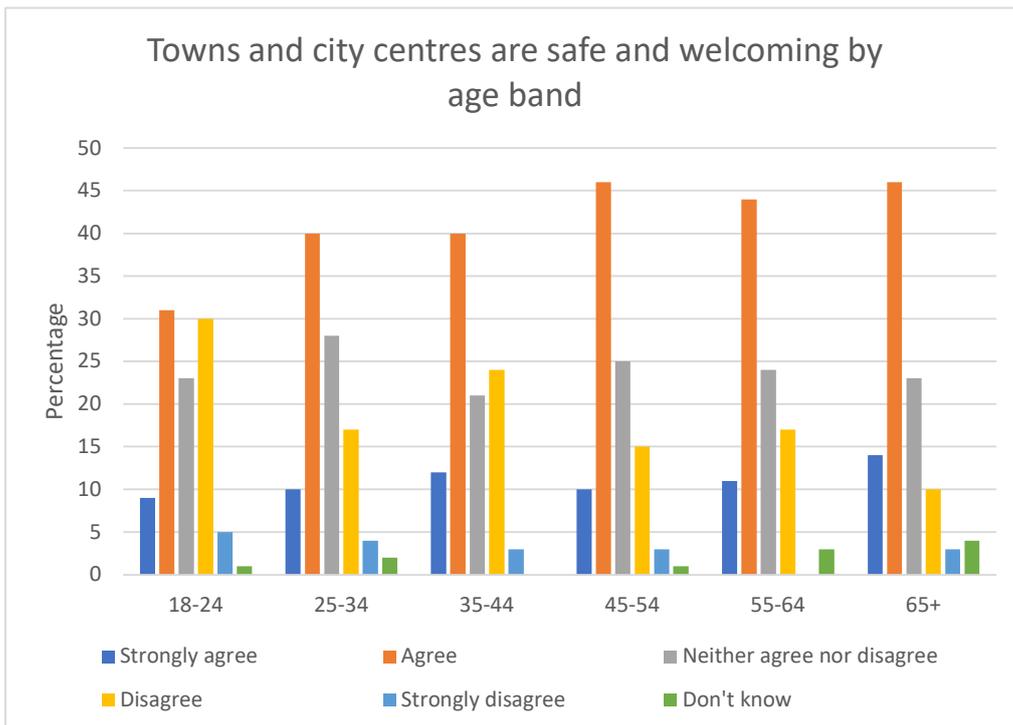
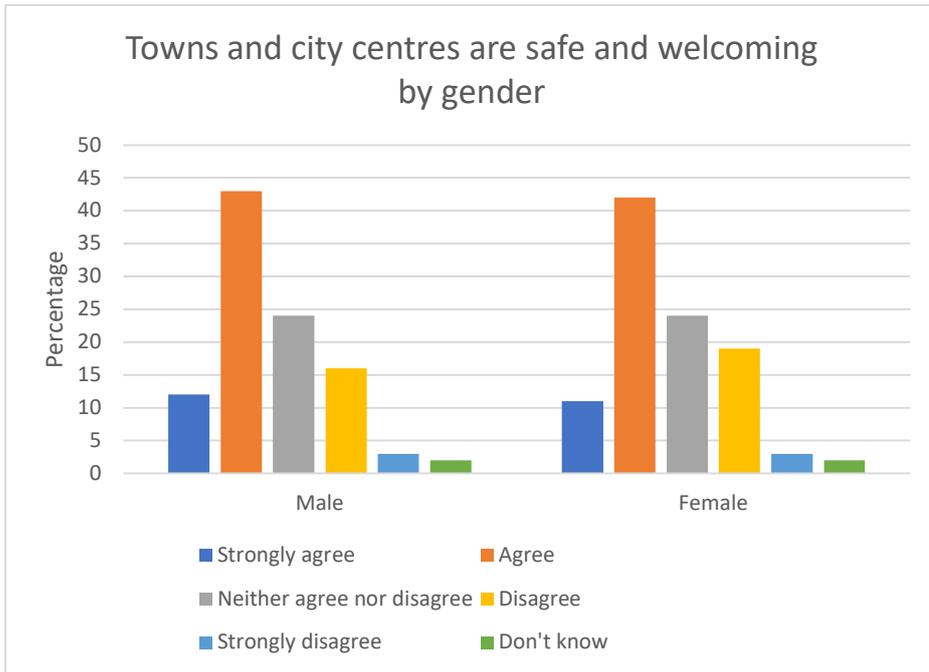
83 per cent of people surveyed in the 2020 NI Life and Times felt a sense of belonging to Northern Ireland. Men, younger people (aged under 35) and people with no religion were least likely to feel a sense of belonging.

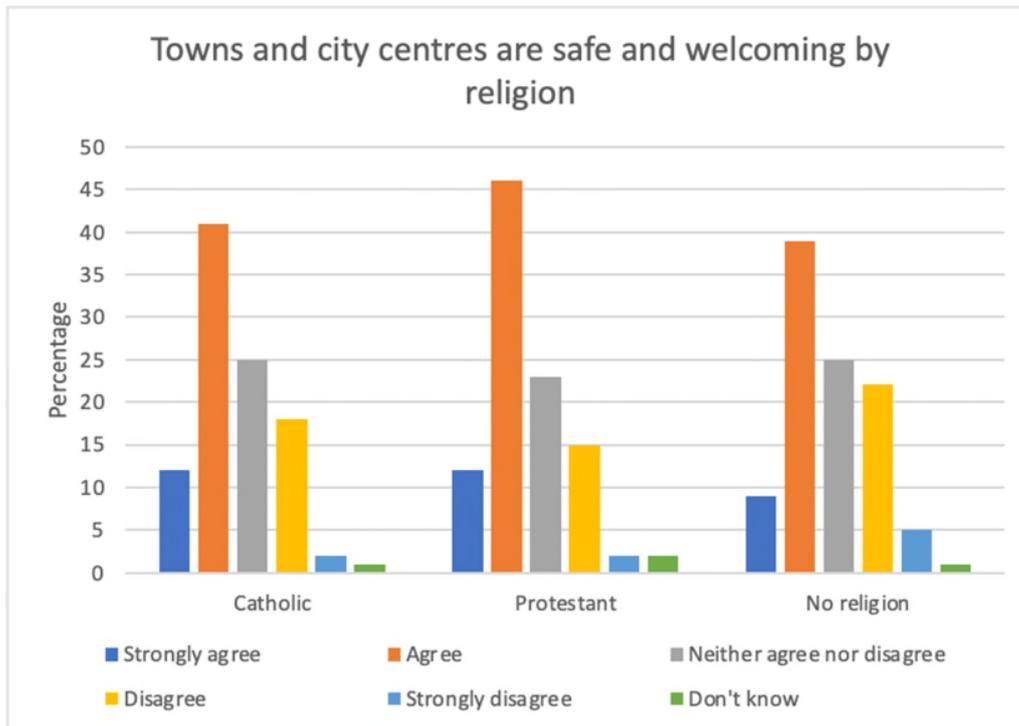




### Perceptions of towns and city centres

53 per cent of NI Life and Times 2020 respondents agreed that towns and city centres in Northern Ireland are safe and welcoming places for people of all walks of life. Young people (aged under 25) and people with no religion were least likely to agree.





In 2013, the Life and Times also found that 39 per cent of respondents would be less willing to shop in neighbourhoods with displays of loyalist flags or murals. This affected 52 per cent of people from a Catholic community background and 41 per cent of people from no religion compared to 26 per cent of people from a Protestant community background.

40 per cent of respondents would be less willing to shop in neighbourhoods with displays of republican flags or murals. This affected 50 per cent of people from a Protestant community background and 43 per cent of people from no religion compared to 32 per cent of people from a Catholic community background.

## Appendix 8: Relevant legislation

### A Better Future Together

A Better Future Together, a Community Plan for Causeway Coast and Glens 2017–2030 sets down a long-term vision and plan for the Causeway Coast and Glens area. Its values include “Respect – We will encourage fairness, making decisions based on evidence, need and equality”.

### Together: Building a United Community

The NI Executive launched its T:BUC strategy in 2013. Its vision is:

“a united community, based on equality of opportunity, the desirability of good relations and reconciliation – one which is strengthened by its diversity, where cultural expression is celebrated and embraced and where everyone can live, learn, work and socialise together, free from prejudice, hate and intolerance.”

T:BUC’s aims are:

1. Our children and young people: to continue to improve attitudes amongst our young people and to build a community where they can play a full and active role in building good relations.
2. Our shared community: to create a community where division does not restrict the life opportunities of individuals and where all areas are open and accessible to everyone.
3. Our safe community: to create a community where everyone feels safe in moving around and where life choices are not inhibited by fears around safety.
4. Our cultural expression: to create a community, which promotes mutual respect and understanding, is strengthened by its diversity and where cultural expression is celebrated and embraced.

An all-party group was established under T:BUC to consider contentious issues including flags and emblems.

## Fair Employment and Treatment Order 1998

The Fair Employment and Treatment Order makes it unlawful for an employer to discriminate against employees on the ground of religious belief or political opinion. It includes the duty to promote a good and harmonious working environment in which no worker feels under threat or intimidated because of his or her religious belief or political opinion.

The Equality Commission's Fair Employment Code of Practice provides general guidance to employers with regard to good practice in the promotion of equality of opportunity. In relation to the working environment the code states that employers should:

“Promote a good and harmonious working environment and atmosphere in which no worker feels under threat or intimidated because of his religious belief or political opinion, e.g., prohibit the display of flags, emblems, posters, graffiti, or the circulation of materials, or the deliberate articulation of songs, which are likely to give offence or cause apprehension among particular groups of employees.”

## Equality Commission guidance

### Promoting a Good and Harmonious Working Environment: A Guide for Employers and Employees

The Equality Commission guidance on promoting a good and harmonious working environment<sup>24</sup> states that:

“A good and harmonious working environment is one where all workers are treated with dignity and respect and where no worker is subjected to harassment by conduct that is related to religious belief or political opinion.”

However, the Commission acknowledges that “the very restrictive nature of a ‘neutral’ environment may give rise to other problems for employers” and

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<sup>24</sup> “Promoting a Good and Harmonious Working Environment, A Guide for Employers and Employees”, Equality Commission for Northern Ireland, October 2009

“This of course does not mean that working environments must always be devoid of anything that happens to be more closely associated with one or other of the two main communities in Northern Ireland.”

It continues:

“Consequently, employers may find it preferable to facilitate diverse expressions of identity in a sensitive way which does not disrupt a good and harmonious working environment. Such an approach should be founded on choices that are reasonable, fair and appropriate at that time and in that place.”

The Commission considers that “There are many ways in which we convey our religious or political identity to others”. In the category of “Symbols which are not likely to disrupt a good and harmonious working environment” when “displayed with decorum” and “a sense of due proportion” are:

“emblems that may be associated primarily with one religion or community but are not directly linked to community conflict.

“Such marks of identity are unlikely to be regarded as creating an intimidating or hostile working environment. There are many examples of such emblems, including:

- Marks of religious observance, insignia associated with organisations attached primarily to one religion, community or culture (e.g., crosses, crucifixes, ashes, kippot, turbans, Muslim veils, pioneer pins, Christian Union badge, fáinnes, dreadlocks)
- Marks of remembrance, celebration or commemoration (e.g., poppies, shamrock)”

However, it also notes that:

“At the same time, there may be occasions where the display of a particular item may be inappropriate for

reasons relating to a genuine occupational requirement (e.g., health and safety) and these other factors must also be taken into account.”

“Symbols with the potential to disrupt a good and harmonious working environment” include

“some individual emblems and symbols that, through their history and associations, and whether intended or not, have come to have a significance that has the potential to make those of a different identity feel uncomfortable or unwelcome.

“In this category are likely to fall a variety of symbols and emblems with the potential to cause disharmony, and especially those that have been directly linked to community conflict in Northern Ireland and/or to local politics. These include [...] Badges and insignia, e.g., Easter Lillies, Orange symbols”

The guidance continues:

“in many other contexts these and other symbols may be wholly acceptable – for example, football shirts worn at a football match, or political emblems displayed in the context of political events or institutions. However, within the workplace and at workplace organised events such emblems may have the potential to cause unnecessary tension and be divisive.”

The guide advises that it is for each employer to reach an informed decision with regard to its equality policies and the context in which it is operating.

While the guidance relates primarily to the religious belief and political opinion:

“it is hoped that the overarching principles for helping to promote and sustain a good and harmonious working environment may also be considered in terms of all aspects of identity where similar legal duties apply.”

## Other Equality Commission advice and guidance

In a letter dated 29 September 2011 to Belfast City Council from the Equality Commission in relation to their flag flying policy, the Commission considered:

“The Commission recognises that for local Councils there would be a difference between the customer base at the headquarters and that in more localised areas.”

It continues:

“To comply with Section 75(2) you need to ensure that, when the Council is formulating its Union flag policy, and considering the various options, account is taken of the desirability of promoting good relations. That goal must be given proper weight; i.e. the weight that is appropriate in the circumstances [...] Furthermore, you should not limit your consideration of the Section 75(2) goal to the immediate circumstances around flying the Union flag itself. The duty is continuous and wide and requires the Council to consider the broader and longer-term picture and to consider adopting other strategies that may mitigate the immediate effects of a particular policy.”

## Appendix 9: Relevant council policy and strategy

### Equality Scheme

The Council's Equality Scheme was approved by the Equality Commission in 2015 and reviewed and renewed in 2020. It is supported by the Equality Action Plan 2019–23, which aims to:

- Design, commission and deliver services that are accessible, inclusive and responsive to our customer's needs;
- Raise awareness of equalities issues and tackle prejudices, both internally and externally;
- Attract, recruit, retain and progress a diverse range of employees in a culture which celebrates diversity and inclusion;
- Provide a working environment where employees are treated with fairness, dignity and respect.

Issues identified through an audit of inequalities include:

- Need to tackle both persistent and emerging inequalities in a strategic manner;
- Need to have better information about our workforce which enables us to take appropriate action to make improvements in areas where we notice that there are issues with attracting, recruiting, retaining and progressing people with particular protected characteristics;
- Need to improve participation levels among under-represented groups in a range of the Council's activities and services.

### Equal Opportunities Policy

In line with the Fair Employment Code of Practice, the Council's Equal Opportunities Policy states that it is committed to:

- Promoting equality of opportunity for all persons;
- Promoting a good and harmonious working environment in which all persons are treated with respect;
- Preventing occurrences of unlawful direct discrimination, indirect discrimination, harassment and victimisation;

- Fulfilling all our legal obligations under the equality legislation and associated codes of practice;
- Complying with our own equal opportunities policy and associated policies;
- Taking lawful affirmative or positive action, where appropriate;
- Regarding all breaches of equal opportunities policy as misconduct which could lead to disciplinary proceedings.

## Dignity and Respect at Work Policy 2018

In its Dignity and Respect at Work Policy, Causeway Coast and Glens Borough Council also commits to promoting equality of opportunity and good relations and defines harassment as, among other things, “visual displays of posters, graffiti, obscene gestures, flags, bunting or emblems or any other offensive material”.

## Policy and Procedure for Dealing with Harassment

Within its Policy and Procedure for Dealing with Harassment, Causeway Coast and Glens Borough Council commits itself to providing equal opportunities and defines harassment, inter alia, as:

“Visual displays of posters, graffiti, obscene gestures, flags, bunting or emblems or any other offensive material.”

## Good Relations Strategy

The Council’s Good Relations Strategy 2018–23 adopts the Equality Commission NI’s definition of good relations: that is:

“the growth of relations and structures for Northern Ireland that acknowledge the religious, political and racial context of this society, and that seek to promote respect, equity and trust, and embrace diversity in all its forms.”

While it notes that Section 75 places a legal obligation on councils to contribute towards the eradication of sectarianism and racism, Causeway Coast and Glens Borough Council also recognises an opportunity to promote good relations on other grounds as:

“it is vital that a shared and pluralist society also includes proactively addressing homophobic and sexist actions and behaviours, as well as the outworking of prejudiced attitudes to disability.”

The Good Relations Strategy’s vision is:

“a united community, based on equality of opportunity, the desirability of good relations and reconciliation – one which is strengthened by its diversity, where cultural expression is celebrated and embraced and where everyone can live, learn, work and socialise together, free from prejudice, hate and intolerance.”

It will do this by:

“Tackling sectarianism, racism and other forms of intolerance while actively promoting Good Relations both within Council and building positive relations at a local level.”

Intended outcomes include:

1. Increased use of shared space and services (e.g., leisure centres, shopping centres, education, housing);
2. Shared space is accessible to all;
3. A community where spaces and places are safe for all;
4. Reduce the prevalence of hate crime and intimidation;
5. Increase sense of community belonging (widens contribution beyond community background).

The strategy was informed by the results of an audit which consulted with stakeholders through public meetings, an online survey, a street survey, one-to-one interviews, focus groups and telephone interviews.

In response to a 2018 survey that was used to develop the strategy, the Council found that:

- 50.3 per cent of respondents felt that the borough is welcoming to people of different religions; 31.8 per cent felt that is

sometimes welcoming to people of different religions; and 5.6 per cent felt that it is not welcoming;

- 43.6 per cent of respondents felt that the borough is welcoming to people of different political opinions; 34.4 per cent felt that is sometimes welcoming to people of different political opinions; and 9.7 per cent felt that it is not welcoming;
- 49.2 per cent of respondents felt that the borough is welcoming to people of different racial backgrounds; 27.1 per cent felt that is sometimes welcoming to people of different racial backgrounds; and 5.1 per cent felt that it is not welcoming;
- 12.0 per cent think sectarianism is a major problem and 38.3 per cent think it is a minor problem;
- 7.2 per cent think racism is a major problem and 30.5 per cent think it is a minor problem.

## Appendix 10: Other relevant research

### Legal precedents

The Johnston case (Johnston v Belfast City Council, 2000) dealt with emblems within Belfast City Council's Dunbar Depot and, in particular, the hanging of a portrait of the Queen following refurbishment. The tribunal decided there was no justification for the display of a portrait of the Queen in a council cleansing depot because the Council had failed to explain or justify the presence of the portrait and there was therefore unlawful discrimination.

In the Brennan case (Brennan v Short Bros plc. 1995), the tribunal held that the applicant had suffered less favourable treatment on the grounds of his religious belief and political opinion by reason of his employer's toleration of manifestations of sectarianism in the workplace and of victimisation of the applicant when he complained of these manifestations. Mr Brennan, a Roman Catholic, complained about a number of matters which he alleged constituted sectarian harassment including the display of Union flag stickers on a number of tool boxes, the painting of a tool box red, white and blue and the wearing of Glasgow Rangers football shirts and scarves, in such a way as to display the Union flag.

### Other local council policies

#### Ards and North Down Borough Council

In 2019, Ards and North Down Borough Council carried out an EQIA in response to a request to locate Ulster Scots Agency Operation Lion<sup>25</sup> plaques at Bangor and Donaghadee harbours.

The EQIA followed an equality screening exercise where the Council's Internal Screening Group and External Screening group considered that the wording of the plaques could create a "chill" factor for people from Nationalist communities.

Overall, the EQIA identified potential differential impact on six Section 75 equality grounds, namely:

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<sup>25</sup> Operation Lion is the name of the 1914 Ulster Volunteer Force gunrunning, commonly considered to be the birth of Unionism.

- religious belief
- political opinion
- race/ethnic origin
- age
- persons with a disability and persons without
- persons with dependants and persons without

## Belfast City Council

### *Shared Space Framework*

Belfast City Council's Good Relations Strategy, published in 2019, identifies four "shared space principles" based on an understanding that that shared space is not neutral space, but a place where identity can be expressed in an open and non-hostile environment.

Its principles are:

- Welcoming – where people feel secure to take part in unfamiliar interactions, and increase an overall sense of shared experience and community;
- Accessible – well-connected in terms of transport and pedestrian links within a network of similar spaces across the city and managed to promote maximum participation by all communities;
- Good quality – attractive, high quality unique services and well-designed buildings and spaces;
- Safe – for all persons and groups, trusted by both locals and visitors.

### *Policy for promoting Belfast City Hall as a good and harmonious environment*

Belfast City Council agreed its policy for promoting Belfast City Hall as a good and harmonious environment, including in the display of its exhibits, artefacts and memorabilia, in 2012.

The aim of the policy is

"To manage Belfast City Hall and its grounds in order to help promote a good and harmonious environment for those who visit and work in the building, while reflecting

both the diverse identities of its users and the several functions served by the City Hall, and acknowledging its prominent role in the civic life and history of Belfast.”

Legal counsel sought in 2011 in the development of the policy considered:

“To some degree, City Halls perform a function similar to that performed by a museum or archive. [...] The particular context of the display of memorabilia in City Hall which might be thought to favour the unionist tradition is such that a tribunal would be very unlikely to conclude that this breached the requirement to maintain a neutral working environment. This context includes the fact that the articles are on display as historical exhibits of interest; that they reflect the history of the Council and City (albeit that history is evolving and, perhaps, more ‘balance’ in such artefacts will come about over time); and that they are not within the parts of the building actively used as offices but, rather, within parts of the building used for ceremonial or civic functions.”

A subsequent EQIA was undertaken in 2012. This considered both the City Hall and its grounds and included a wide range of artefacts including stained glass windows. The principle underpinning this work was to ensure that the Council moved towards, ‘more balanced and inclusive displays in the City Hall’ and that these should be:

- Welcoming
- Attractive
- Interesting
- Representative of the history and heritage of Belfast
- Representative of the diversity of the City

The EQIA concluded that:

Given these competing concerns and perceptions, it is proposed that rather than removing these displays, instead they should be reviewed and repositioned in order to create an environment that is not only more welcoming to those from diverse community backgrounds but also presents this historical material in a more coherent fashion. In addition, opportunities for supplementing these

displays with materials from elsewhere should also be explored.

A total of 14 recommendations were set out to help achieve this goal.<sup>26</sup>

## Northern Ireland Human Rights Commission

The Northern Ireland Human Rights Commission's 2013 report *The Display of Flags, Symbols and Emblems in Northern Ireland*<sup>27</sup> notes that:

“The display of flags, symbols or emblems in a public space may act as a territorial marker or a method of harassment, irrespective of the intention behind its erection. The ECt.HR has noted that expression, which is not, on its face, offensive, can be offensive in certain circumstances. Consequently, when public authorities make decisions pertaining to the erection or removal of a flag, symbol or emblem, a broader discussion of the rights of those who live in the vicinity and those who travel in or through the area for purposes of accessing services is required. The existence of such displays may have an impact on individuals from other communities, acting as a form of intimidation which creates an access barrier to the area. This may have consequences for individuals accessing health care services and for children in accessing public recreational spaces, both of which are protected by international human rights law.”

## Commission on Flags, Identity, Culture and Tradition

Under the remit of T:BUC, the Commission on Flags, Identity, Culture and Tradition published their final report in December 2021. It identified museums and civic and administrative centres as “physical spaces that all citizens are entitled to use on a shared basis”.

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<sup>26</sup> <https://minutes.belfastcity.gov.uk/documents/s91743/Appendix%201%20-%20EQIA.pdf>

<sup>27</sup> <https://nihrc.org/publication/detail/the-display-of-flags-symbols-and-emblems-in-northern-ireland2>

The Commission differentiated between the individual expression of identity and civic identity, which “might include local identities and a city identity, which is often the work of local Councils”:

“The first aspect of shared space involves maximising the rights of individuals and groups to use and express themselves in public spaces. In this sense, shared space reflects people’s rights as citizens, their access to freedom of speech, freedom of assembly and their access to the resources, facilities and amenities within our society. The state has a positive duty to protect these rights. The second feature of shared space is the creation of places of interaction and common experience. This involves the facilitation of events that are open, welcoming and that encourage diversity and learning. These will typically bring together people from different communities of interest and cultural identities at common events and impart a sense of belonging and a sense of place through the said event.”

It goes on to identify five key elements of shared space:

“It is a physical public space where people from all backgrounds can live, learn, work and play together

“It is a space that is free from symbols or displays of aggression, threat or intimidation that prevents a person entering and using the amenities within that space

“It is a space that requires balancing the right to freedom of expression and assembly with rights to security, freedom of movement and to live free from fear and intimidation

“It is a space that fosters interactions that move beyond joint access to or use of a particular space to create sustained connection and relationships between groups and individuals

“It is a space where identity or political perspective is not suppressed or hidden, but a space where diversity, cultural expression and difference can be expressed, tolerated and celebrated.”

It continues:

“The interface between shared space and good relations is therefore about the right to access areas, and the opportunity to experience the space together with other

members of our diverse society. It does not deny or disallow differences, but rather provides for areas of commonality and binding ideas of citizenship. It is a place where expressions of cultural identity (that may have previously been grounds for threat or dispute) become grounds for tolerance and even celebration.”

## UN Special Rapporteur in the field of cultural rights

### Report on the importance of public spaces for the exercise of cultural rights

In her 2019 Report on the importance of public spaces for the exercise of cultural rights,<sup>28</sup> the UN Special Rapporteur’s definition of public spaces, which includes public buildings, cultural sites and museums, is space that is

“publicly owned and accessible to all without discrimination, where people can share in the project of building a common society based on human rights, equality and dignity [...] while still nurturing and expressing their own identities. [...] The pursuit of social cohesion does not mean that controversies and debate cannot arise in public spaces. They are places where various, sometimes opposing, world visions can at times be expressed and where controversies can be debated in circumstances that respect the human rights of all.”

A potential problem is identified

“when a particular narrative or worldview, whether commercial, religious, political, national or exclusively reflecting the viewpoint of a majority group, becomes overly dominant and renders diversity invisible. The effect, intentional or not, is that public spaces may not be considered as shared spaces welcoming for all.”

Recommendations include:

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<sup>28</sup> [www.ohchr.org/en/calls-for-input/reports/2019/report-importance-public-spaces-exercise-cultural-rights](https://www.ohchr.org/en/calls-for-input/reports/2019/report-importance-public-spaces-exercise-cultural-rights)

- Encourage the display of artwork in public spaces and, to that end, establish public art committees that include artists, urban designers and inhabitants, with clear rules;
- Adopting measures to ensure that all persons can effectively access, enjoy and contribute freely to public spaces, and facilitating such opportunities for groups facing obstacles in this regard;
- Providing training for relevant public officials on the concept of inclusive public spaces;
- Establish specialized, cross-disciplinary professional teams responsible for the design, maintenance and conservation of public spaces that are welcoming for all and create mechanisms for citizen participation in the management of such spaces.

## Report on memorization processes in post-conflict and divided societies

The 2014 report on the field of cultural rights addressed memorialisation processes in post-conflict and divided societies<sup>29</sup> considers memorials and museums of history or memory. The UN Special Rapporteur considers that “too much memory, especially if presented in the form of irreconcilable versions of the past, might hurt rather than help a society” and that there is a need to establish a “delicate balance between forgetting and remembering.”

The Special Rapporteur concludes that an essential element for successful memorialisation is collaboration between the authorities, citizens and civil society, especially representatives of those directly affected by past events, providing “the necessary space for those affected to articulate their diverse narratives in culturally meaningful ways”.

## Sport Northern Ireland

In light of addressing a number of potentially divisive matters relating to the use of flags, emblems and anthems in sport, Sport NI has produced

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<sup>29</sup> [https://documents-dds-ny.un.org/doc/UNDOC/GEN/G14/105/01/PDF/G1410501.pdf?OpenElement%20EN/HRBo dies/HRC/RegularSessions/Session25/Documents/A\\_HRC\\_25\\_49\\_ENG.DOC&action=default&DefaultItemO%20pen=1](https://documents-dds-ny.un.org/doc/UNDOC/GEN/G14/105/01/PDF/G1410501.pdf?OpenElement%20EN/HRBo dies/HRC/RegularSessions/Session25/Documents/A_HRC_25_49_ENG.DOC&action=default&DefaultItemO%20pen=1)

guidance, Promoting Fair Play: A guide to sport and equality legislation in Northern Ireland, and including reference to the use of the Ulster Banner:

“Sporting organisations in receipt of Sport Northern Ireland funding and/or recognition must acknowledge that certain flags, emblems, anthems, symbols and regalia have the potential to disrupt a good and harmonious environment. In Sport Northern Ireland’s view any event hosted by a sporting organisation that is associated with Sport Northern Ireland must be mindful of the need to present a good and harmonious environment for those taking part and spectating.

“Under the Belfast/Good Friday Agreement, an athlete or team has the right to represent either a Republic of Ireland or UK team and it is then wholly appropriate for that athlete/team to compete under the flag of that country, i.e. the Irish tricolour or the Union flag. However, difficulties arise when an individual or team represents either an All Ireland body or a Northern Ireland organisation. For the former, i.e. All Ireland, then Sport Northern Ireland’s preferred option is a flag that is non-contentious, such as the ‘patchwork’ containing the flags of the four provinces. For the latter, ultimately it will be for the governing body to decide which flag is appropriate. Many existing flags have no official status and this includes the former Northern Ireland ‘flag’ (or flag of the Executive Committee of the Privy Council of Northern Ireland or Ulster Banner) that only had official status during the life of the NI Government between 1953 and 1972, and would be regarded by many as contentious in the current political circumstance. The Northern Ireland Executive has yet to agree a symbol or flag to represent Northern Ireland but itself uses the flax plant on Assembly stationery.”

## Complaints

There have been no complaints about the display of emblems during the lifespan of Causeway Coast and Glens Borough Council.

There have been no complaints regarding the nature of the emblems and memorials in Coleraine Town Hall including the content of the stained-glass windows that have already been installed.

# Appendix 11: Response from the Equality Commission

## Equality Commission for Northern Ireland

### **Response to Causeway Coast and Glens Borough Council Equality Impact Assessment (EQIA) of NI100 Commemoration Stained Glass Window**

The Commission welcomes the opportunity to comment on the Causeway Coast and Glens Borough Council consultation on the NI100 Commemoration Stained Glass Window equality impact assessment.

The Commission's remit in this area stems from our duties under the Fair Employment and Treatment (NI) Order 1998 and our duty to offer advice to public authorities in relation to Section 75 of the Northern Ireland Act 1998. Given that the EQIA references Commission advice on the flying of the Union Flag these comments relate to the EQIA process.

#### **Defining the Aims of the Policy**

The EQIA states that the policy is intended, '*To support the reflection of future generations on the first 100 years of Northern Ireland and contribute to the aims of the overall NI100 commemorative programme*'. Four key objectives are outlined including a commitment to, '*Build a shared understanding of our collective history in a way that can build good relations and reconciliation by facilitating opportunities that both reflect on our past as well as build for our future*'. Given that the screening and EQIA identified a potential major impact in terms of religious belief and/or political opinion it would appear that the policy itself is not in keeping with the objectives it is intended to achieve.

#### **Consideration of available data and research and assessing impacts**

The EQIA contains a range of information, data and research throughout and determines that the policy may adversely impact on people with regard to religious belief and political opinion and may be unlikely to help promote equality of opportunity or good relations within the Borough.

#### **Consideration of alternative policies and measures to mitigate adverse impacts**

Consideration of alternative policies and measures to mitigate adverse impacts which might better achieve the promotion of equality of opportunity are a fundamental part of the EQIA process and should be considered at the various stages of the policy-making process. It is the Council's responsibility to make these assessments in the EQIA report to enable consultees to make informed contributions and therefore assist the Council to ensure that it pays the appropriate level of regard to its equality of opportunity and/or good relations duties. In this instance, the EQIA does not present any policy alternatives or any assessment of the potential impacts of these alternatives on equality and/or good relations. The Council could have used the information included in the EQIA to develop these alternatives and assessments, for instance, by considering alternatives which would remove or reduce potential negative impacts or options which would better promote equality of opportunity and/or good relations.

### **Monitoring**

The Commission recommends that the final EQIA report sets out the monitoring arrangements that the Council will establish in order to monitor the impact of any policy decision in regard to this policy. There are currently no arrangements set out in the draft EQIA.

This response is made without prejudice to any consideration or determination which the Commission might make in performance of its statutory function to investigate individual complaints under Schedule 9 of the Northern Ireland Act 1998 or conduct any other investigation under that Schedule.