

Belfast City Council

Section 75 and Schedule 9

Northern Ireland Act 1998

**Proposal to Erect Bilingual External
Naming and Internal Directional Signage
at Olympia Leisure Centre**

Equality Impact Assessment

Draft Final Decision Report

October 2023



Foreword

Between 12 June and 17 September 2023 the Council carried out a 14-week consultation on the Equality Impact Assessment (EQIA) attached to the Council's proposal to erect bilingual external naming and internal directional signage at Olympia Leisure Centre.

The Draft EQIA Consultation Report and accompanying questionnaire was made available on the Council's website and can be seen at <https://yoursay.belfastcity.gov.uk/olympia-signage-eqia>

Along with an on-line survey, the Council facilitated a series of 11 consultation events (see below):

Venue	Meeting	Date	Time
On-line	Open	13/6/23	10-11 am
St Simon's Community Centre	Organised through South City; invite sent to South Belfast Partnership Board, Greater Village Regeneration Trust, Windsor Women's Centre, Blackstaff Residents' Association and Forward South.	13/6/23	2-4 pm
Olympia LC	Open	14/6/23	3-4 pm
Olympia LC	Open	14/6/23	7-8 pm
Belfast City Hall	BCC Irish Language Stakeholders' Forum	26/6/23	10.30-12.30 am
9 Adelaide St.	BCC Ulster-Scots Stakeholders' Forum	26/6/23	2-4 pm
On-line	Open	23/8/23	12-1 pm
On-line	Open	23/8/23	7-8 pm
St Mary's Univ. College	Organised through the West Belfast Partnership board; invite sent to funded groups in the Court/Black Mountain wards	23/8/23	3-4.30 pm
On-line	CAJ (arranged by request of the CAJ)	30/8/23	11-12 am
On-line	<i>BCC Equality Consultative Forum¹</i>	15/9/23	2-3.30 pm

¹ This meeting was subsequently postponed as only one delegate (ECNI) registered for attendance.

All Equality Scheme consultees were notified of the availability of the draft EQIA and invited to comment².

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/or attend consultation events.

This EQIA final decision report sets out:

- A summary of the initial findings from the Draft EQIA Consultation Report (including subsequent amendments)
- The results of the consultation process
- Conclusions

If there is any information in this report which is not clear, or if you require further information, please contact the Equality and Diversity Officer (see below). All relevant documents, including this EQIA Final Decision Report, can be accessed on the Council's website at: <https://yoursay.belfastcity.gov.uk/olympia-signage-eqia>

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Access to information

As part of our commitment to promoting equality of opportunity and good relations, we want to ensure that everyone is able to access the documents we produce. We would therefore be happy to provide any of the information in this document in alternative formats on request. If you have any queries about this document, and its availability in alternative formats (including Braille, disk and audio cassette and in minority languages to meet the needs of those who are not fluent in English) then please contact: Equality and Diversity Unit, Belfast City Council, Belfast City Hall BT1 5GS.

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² A list of BCC Equality Scheme consultee organisations is available from the Council on request.

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1. Introduction

- 1.1 The Equality Impact Assessment (EQIA) relates to the proposal of Belfast City Council ('the Council') to erect bilingual external naming and internal directional signage in Olympia Leisure Centre and follows from an earlier consultation on naming and signage as carried out in four City-wide leisure centres (Andersonstown, Lisnasharragh, Olympia and Templemore) between 5 November 2019 and 10 January 2020.
- 1.2 Further to that consultation the Strategic Policy & Resources (SP&R) Committee initially determined to erect bilingual signage In Olympia Leisure Centre but Elected Members subsequently agreed that a decision relating to signage at Olympia Leisure Centre required further consideration.
- 1.3 As part of that consideration, in February 2022 the Council agreed to proceed with an EQIA on the proposal to erect bilingual external naming and internal directional signage at Olympia Leisure Centre.

Section 75

- 1.4 This EQIA has been carried out in accordance with the Council's statutory duties under Section 75 and Schedule 9 of the Northern Ireland Act 1998. These duties require the Council, in carrying out its functions in Northern Ireland, to have due regard to the need to promote equality of opportunity:
 - between persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation;
 - between men and women generally;
 - between persons with a disability and persons without; and
 - between persons with dependants and persons without.
- 1.5 Without prejudice to these obligations, the Council is also required to have regard to the desirability of promoting good relations between persons of different religious beliefs, political opinion or racial group.
- 1.6 Schedule 9 of the Northern Ireland Act sets out the detailed procedure for the implementation of these duties, including the conduct of screening exercises and EQIAs of policies.

1.7 When undertaking an EQIA, the Council follows the guidance issued by the Equality Commission for Northern Ireland in 2005. This guidance recommends that there should be seven steps in the EQIA process³:

Step 1: Definition of the aims of the policy

Step 2: Consideration of available data and research

Step 3: Assessment of impact

Step 4: Consideration of measures to mitigate

Step 5: Formal consultation

Step 6: Decision and publication of the results of the EQIA

Step 7: Monitoring for adverse impact

1.8 The Draft EQIA Consultation Report set out the findings of the first four steps of the EQIA process while any feedback obtained during the consultation period has been reflected on by the Council and incorporated into the Final EQIA Decision Report.

1.9 NB A number of consultees make reference to a longstanding debate regarding the status that should be afforded to good relations within Section 75 and in particular within EQIAs (see Unequal Relations, CAJ, May 2013⁴ and subsequent response by the Equality Commission [ECNI]⁵).

1.10 In line with commitments set out in its Revised Equality Scheme⁶, and guidance on screening/EQIAs from the Equality Commission which takes due cognisance of the different approaches that have been adopted by public authorities⁷, the Council continues to align with the Equality Commission in acknowledging the interdependence between the two statutory duties, at the same time recognising the greater weight attached to the equality of opportunity duty.

1.11 Hence, while the primary focus of an EQIA will fall on the duty to promote equality of opportunity, in the Council's view it would be remiss to ignore those occasions where harm to good relations may have the potential to have a

³[https://www.equalityni.org/ECNI/media/ECNI/Publications/Employers%20and%20Service%20Providers/Public%20Authorities/EQIA-PracticalGuidance\(2005\).pdf](https://www.equalityni.org/ECNI/media/ECNI/Publications/Employers%20and%20Service%20Providers/Public%20Authorities/EQIA-PracticalGuidance(2005).pdf)

⁴ CAJ 'Unequal Relations: Policy, the Section 75 duties and Equality Commission advice: has 'good relations' been allowed to undermine equality?' May 2013

⁵ <https://www.equalityni.org/ECNI/media/ECNI/News%20and%20Press/Speeches/2013/CAJ-conference-speech-Evelyn-Collins-11-June-2013.pdf?ext=.pdf>

⁶<https://www.belfastcity.gov.uk/Documents/Equality-Scheme-for-Belfast-City-Council>

⁷<https://www.equalityni.org/ECNI/media/ECNI/Publications/Employers%20and%20Service%20Providers/Public%20Authorities/S75Advice-ScreeningEQIA.pdf>

subsequent adverse impact on access to goods, facilities and services and hence the promotion of equality of opportunity within Belfast.

- 1.12 An EQIA is a thorough and systematic analysis of a policy initially to determine the extent of differential impact upon the groups within the nine Section 75 categories and then whether that impact is adverse. If it is decided that the policy has an adverse impact on groups within one or more of the nine categories, the Council must consider measures which may mitigate the adverse impact and alternative ways of delivering policy aims which have a less adverse impact on groups within each of the relevant categories.
- 1.13 In the view of the Council, it is not intended that this consideration should extend to balancing competing differential impacts, for example on occasions where an adverse impact for one group may be disregarded given a positive or affirmative action for another group. Instead, it is the view of the Council that the primary goal of an EQIA is to mitigate adverse impact.

About the Language Strategy 2018-2023

1.14 Further to its original Language Policy (2006), in 2018 the Council adopted a Language Strategy 2018 - 2023. In keeping with the Council's long-term vision for the City, as set out in the Belfast Agenda, the strategy aspires to create a place where linguistic diversity is celebrated and respected and where those who live, work and visit Belfast can expect to access what Belfast has to offer, using forms of language with which they are familiar and comfortable. The aims of the strategy are to:

- address language and communication challenges and opportunities within the Belfast Agenda outcomes;
- establish a transparent set of principles for promoting, protecting and enhancing the linguistic diversity of the city;
- increase the profile of different languages along with awareness and understanding of associated cultures, heritage and traditions;
- engage with language communities to address language barriers and promote equality of opportunity through the development and integration of different languages into mainstream civic life;
- enhance good relations within the city through the promotion of linguistic diversity and to celebrate the significance of language in the history and culture of the City;

- address staff training and capacity building needs in relation to the role linguistic diversity has in the workplace and in the delivery of services;
- work in partnership to promote linguistic diversity across the City, to move toward our shared vision of inclusive growth, where no one is left behind.

1.15 In adopting this strategy, the Council was mindful of various legal positions including Counsel's opinion and international and domestic legal obligations and standards. It was also informed by demands for minority languages and feedback from wide ranging consultation.

1.16 Based on this information, an approach was adopted that included the development of an overarching Language Strategy which articulated the Council's commitment to supporting minority languages while allowing the different needs of speakers of Irish, Ulster-Scots and other minority languages to be addressed appropriately and effectively.

1.17 The Language Strategy was subject to a formal consultation period which ran from 23 May 2017 to 18 July 2017. A Section 75 screening process accompanied the consultation and the Strategy was duly 'screened out' (i.e. no need for a further EQIA).

1.18 The Council launched a consultation for the Council's 'Language Strategy Review – Draft Action Plan 2023 – 2026' on 16 October 2023.

About External Naming and Internal Directional Signage in the Council's City-wide Leisure Centres (Andersonstown, Lisnasharragh, Templemore and Olympia)

1.19 Under this strategy, between November 2019 and January 2020, public consultation was undertaken to consider external naming and internal directional signage in four of the Council's City-wide leisure centres, namely Andersonstown, Lisnasharragh, Templemore and Olympia.

1.20 The Strategic Planning and Resources (SP&R) Committee, at its meeting on 24 January 2020, granted approval to erect bilingual external naming and internal directional signage in Andersonstown Leisure Centre.

1.21 At a subsequent meeting of the Committee on 24 September 2021, and further to due consideration of the findings contained within the consultation report, the Committee agreed:

- to erect bilingual external naming and internal directional signage at Olympia Leisure Centre (see below), with a report on the detail and appearance of that signage to be submitted to a future meeting;
- that a report on linguistic accessibility at Lisnasharragh and Templemore Leisure Centres be submitted to a future meeting;
- that a multi-lingual welcome sign be erected in the entrance/reception area of all leisure centres.

About External Naming and Internal Directional Signage in Olympia Leisure Centre

1.22 While the consultation on signage and naming in the four centres had been able to provide a clear steer to the Council with regard to three of the leisure centres (Andersonstown, Lisnasharragh and Templemore), the consultation in relation to Olympia was less conclusive.

1.23 Subsequent to the closure of the public consultation, submissions from local groups and individuals were received, including a petition signed by 571 local residents for the adoption of monolingual signage.

1.24 Further to a presentation and consideration of the consultation report on naming and signage in the four centres, at a meeting of SP&R Committee on 24 September 2021, it was decided, ‘to erect bilingual external naming and internal directional signage at Olympia Leisure Centre, with a report on the detail and appearance of that signage to be submitted to a future meeting.’

1.25 This decision was subsequently ‘called in’ by the required number of elected members on both procedural and community impact grounds. Under Section 41 of the Local Government Act (NI) 2014 the Council is required to reconsider a Committee decision if 15% (nine Members) present a requisition on either:

1. That the decision was not arrived at after a proper consideration of the relevant facts and issues (Procedural Grounds); or
2. That the decision would disproportionately affect adversely any section of the inhabitants of the district (Community Impact).

1.26 Subsequent legal opinion found that only the Community Impact element had merit. It also recommended that the Council should, in any

reconsideration of the decision, bear in mind its duties under Section 75 of the Northern Ireland Act 1998 and its Equality Scheme.

1.27 At the meeting of SP&R Committee on 21 January 2022 it was agreed to proceed with an EQIA on the erection of bilingual external naming and internal directional signage at Olympia Leisure Centre, a decision that was ratified by full Council on 1 February 2022 and confirmed by the Interim City Solicitor at a further meeting of SP&R Committee on 24 March 2023, and it is this decision that forms the basis of the current EQIA.

2. Definition of the aims of the proposal

2.1 The proposal falls under the Council's Language Strategy, which was first adopted in 2018. The Strategy has at its core the need to embrace diversity in the Council's ambition for Belfast to be a welcoming and inclusive city for all. The opening of the Council's four City-wide leisure centres was seen as providing a unique opportunity to live the principles of diversity as contained in the Language Strategy.

2.2 Working within the context of these linguistic frameworks, the proposal's aim is:

In line with the aims of the Language Strategy 2018 – 23, to commit to supporting minority languages while allowing the different needs of speakers of Irish, Ulster-Scots and other minority languages, including sign language, to be addressed effectively. In particular, to roll out the Council's Language Strategy by providing appropriate external naming and internal directional signage at Olympia Leisure Centre.

3. Analysis of available data and research

3.1 The Draft Consultation EQIA Report set out the following data and research (see Appendix 1):

- Legal position
- Central government strategies
- Advice from language agencies
- Policies of other councils in Northern Ireland
- Language legislation in the UK and Republic of Ireland
- Demand for minority languages
- Other Council policies and decisions

- Advice from Equality Commission NI
- Academic research
- Feedback from pre-consultation on Language Strategy
- Feedback from consultation on City-wide leisure centre naming & signage
- Census data by DEA & ward (religion, ethnicity, national identity, language)

3.2 Feedback obtained during consultation suggested that the following should also be afforded due consideration in the EQIA:

- Further reference to recommendations and guidance from Council of Europe periodical monitoring rounds from its Advisory Committee, Committee of Ministers and Committee of Experts, regarding UK implementation of both the ECRML and the Framework Convention for the Protection of National Minorities.
- This includes the 5th ECRML UK Framework Report⁸ (December 2020) which sets out a number of recommendations for immediate action including:
 - Provide the basic and further training of a sufficient number of teachers teaching in Irish;
 - Adopt a comprehensive law and strategy on the promotion of Irish in Northern Ireland.
- Regarding the ECNI guidance on Promoting a Good and Harmonious Working Environment⁹, the following part of the 2009 guidance should also be referenced: ‘The use of languages other than English, for example in corporate logos and communications, will not, in general, constitute an infringement of a good and harmonious working environment.’ [pg 9].
- Reference to the 2015 EQIA report on the DCAL Draft Irish Language Act, which included progressive provision for bilingual signage.
- Reference to the DfC (2022), Irish Language Strategy Expert Panel Report¹⁰ and specifically Recommendations 2.21 (b) and (c): ‘that the name of the body and any information provided on any signage used on the exterior of buildings used by the public body is in Irish and English,

⁸ <https://rm.coe.int/ukiria5rev-en/1680a0eef6>

⁹ <https://www.equalityni.org/ECNI/media/ECNI/Publications/Employers%20and%20Service%20Providers/GoodandHarmoniousWorkplace.pdf>

¹⁰ <https://www.communities-ni.gov.uk/system/files/publications/communities/dfc-irish-language-strategy-expert-panel-report-eng.pdf>

with letters of equal size used except in the case of those public bodies whose services are primarily focused on the needs of Irish speakers and that decide to use external signage which gives priority or exclusivity to the Irish language; to the maximum extent possible, that any sign used by the public body inside the building is in both Irish and English, with letters of equal size in both languages used'; Recommendation 2.29 (i): 'that clear bilingual branding facilitating greater visibility for the Irish language appears on their corporate identity, as well as on internal and external signage and at Council venues and facilities. It is recommended that this be undertaken in accordance with international best practice' (as stated on page 25 of the guidance provided by Foras na Gaeilge).

- During consultation on proposals for an Irish Language Bill, DCAL considered that the introduction of the bill had the potential to improve good relations as it will give the Irish language more equality and accessibility platform for all sections of the community.¹¹
- Contrary to the claim that bilingual signage can be seen by single language users as potentially confusing, The Advisory Committee on the Framework Convention for the Protection of Minorities states: 'The Advisory Committee is dismayed by and rejects the view expressed by the Danish Government in its report (p37): "that signs are less clear and less readable if bilingual".'¹² The same point is made by the Advisory Committee regarding, 'road traffic safety or the use of different alphabets may not be used as arguments against bilingual signposts.'¹³[page 21].¹³
- The most recent report into the UK's compliance with the Framework Convention for National Minorities is missing and would prove hugely beneficial.
- Acknowledge that an Irish translation of the title Olympia is currently available (Oilimpia)¹⁴

¹¹ <https://www.communities-ni.gov.uk/sites/default/files/publications/dcal/report-of-the-consultation-on-proposals-for-an-irish-language-bill.PDF>

¹² <https://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=090000168008bd3f> page 8, article 34

¹³ Advisory committee on the framework convention for the protection of national minorities thematic commentary no. 3 the language rights of persons belonging to national minorities under the Framework convention adopted on 24 May 2012 via: <https://rm.coe.int/09000016800c108d>

¹⁴ <https://www.tearma.ie/q/Olympia/en/>

4. Assessment of impacts

- 4.1 In accordance with the EQIA process, having gathered information on the proposal and those affected by it, the Council must then assess whether there is likely to be a differential impact on groups within one or more of the Section 75 categories if the proposal is adopted, before determining the extent of that differential impact and whether the impact is likely to be adverse.
- 4.2 The proposal under consideration is to erect bilingual external naming and internal directional signage within Olympia Leisure Centre, and is further to a decision reached by the Council's SP&R Committee on 24 September 2021. As agreed at SP&R Committee on 21 January 2022, a final decision has since been held in abeyance until the conclusion of the EQIA.
- 4.3 While the findings from the previous public consultation on naming and signage in four City-wide leisure centres (including Olympia) in 2019 and 2020 helped to inform the current EQIA this information was gathered over three years ago, and political times may have changed in the meanwhile. Furthermore, the previous public consultation focused on four centres and was not carried out as an integral part of the EQIA process while on this occasion exclusive attention falls on Olympia and within the established parameters of an EQIA. In combination, data from previous surveys alongside fresh data from the present EQIA should provide the Council with a foundation for reaching a decision on the proposal in question.
- 4.4 The previous public consultation in 2019/20 generated little interest in Olympia *per se* during the consultation period itself, However, further to an additional agreed period of consultation, strong local support was forthcoming for *English only* signage, with concerns raised that bilingual signage could heighten local community tensions. This finding stood in contrast to the results of the consultation survey which had indicated a majority in favour of bilingual signage (60.0%), with 25.8% favouring English only (see Appendix 1).
- 4.5 The present EQIA has afforded a contemporary opportunity to gauge local and city-wide opinion, and to test the potential of the proposal to adversely impact on the promotion of good relations and/or equality of opportunity at this time and mindful of any changed political circumstances in the City.
- 4.6 While the installation of bilingual external naming and internal directional signage would continue to fall comfortably within the scope of the Council's Language Strategy, as well as relevant local, national and international minority

language charters and guidance, the proposal also has the potential to raise concerns with regard to the promotion of good relations.

- 4.7 While many who speak Irish would contest that its use is non-contentious and apolitical, there are those, predominantly from Protestant, Unionist and Loyalist (PUL) communities, who would argue that the Irish language has been overtly politicised within the context of Northern Ireland.
- 4.8 Previous consultation has identified that the Centre is used by members of new communities who reside in the locality, and their needs and experiences should also not be ignored in any future determination.
- 4.9 Hence, prior to the consultation period it was seen that the proposal may have the potential to adversely impact people with regard to religious belief, political opinion and/or race/ethnic origin but the precise extent of this impact was to be determined.
- 4.10 The consultation attaching to the current EQIA has confirmed that sections of the local community do see the potential for adverse impact with regard to these grounds, and that this may extend to age and disability, but other sections and their representatives have argued strongly that there is no evidence of adverse impact, that the EQIA itself is based on a false premise, and as a consequence there are no opportunities for mitigation.
- 4.11 It is further contested that any adverse impact associated with harm to the promotion of good relations should not fall within the remit of an EQIA and hence should not be afforded consideration.
- 4.12 The Council would continue to affirm that the EQIA process, and in particular public consultation and stakeholder engagement, has the potential to consider further the tangible and contemporary impacts of the proposal in terms of the promotion of both equality of opportunity and good relations among all employees, users and potential users of the Centre, as well as more widely across the City.

Equality of opportunity

- 4.13 The EQIA process is intended to anticipate barriers to participation or failings in service provision (i.e. the promotion of equality of opportunity), and to assist

public authorities in mitigating these adverse impacts as well as complying with the law.¹⁵

- 4.14 One of the key indicators of adverse impact, as identified by the Equality Commission, can be lower participation rates or uptake by one or more group.
- 4.15 Prior to consultation it was suggested that the proposal for bilingual naming and signage may give rise to a potential adverse impact for:
- users and potential users, and in particular those from a Protestant, Unionist, or Loyalist (PUL) background;
 - individuals from different ethnic origins who may want to visit the Centre.
- 4.16 It was argued that there may be the potential for bilingual signage to introduce a 'chill factor' for those from particular PUL communities which may in turn discourage access to or use of the Centre. The consultation confirmed that this perception did exist within PUL communities, that these views were strongly held, and that the proposal did have the potential to alienate potential users from these communities and hence make it less likely that they would use Olympia in future. At the same time it was also suggested during the consultation that the absence of bilingual signage may have an adverse impact on those from the Irish language community.
- 4.17 Further, it had been argued that there may be the potential for bilingual signage to cause a degree of uncertainty or confusion for those who do not have English as a first language or those with literacy issues, perhaps linked to a disability.
- 4.18 Little evidence was forthcoming from the consultation to substantiate this assertion, and indeed reference was made to international research which refuted this suggestion. At the same time, a very small number of respondents with a disability did indicate that multilingual signage may have the potential to cause confusion given the nature of their disability (e.g. dyslexia, learning difficulties).

Good relations

- 4.19 More generally, previous consultations have indicated that the proposal may have an adverse impact on those residents, visitors and employees from a

¹⁵ Practical Guidance on Equality Impact Assessment, Equality Commission for NI, 2004 (p.22)

Protestant, Unionist or Loyalist community background, as well as those of different ethnic origins, in terms of an expectation that the Council will have regard to the desirability of promoting good relations through its policies.

- 4.20 The evidence that is available to date, and including the previous round of public consultation in 2019/20 along with the current consultation, does indicate that the proposal for bilingual naming and signage has the potential to have an adverse impact on good relations on grounds of religious belief, political opinion, and also perhaps national identity.
- 4.21 Previous consultations on related matters, and including the introduction of dual language signage in leisure centres, have suggested that there may be the potential for those who do not support languages other than English to see dual language signage as potentially challenging to their sense of identity. These concerns appear to be most notable, and emotive, when decisions are seen to impact on local areas or facilities, and this perception was noteworthy within the current round of consultation.
- 4.22 The divide between the two communities cannot be overstated in this regard. On the one hand those from PUL communities have argued vehemently that bilingual signage would have a significant adverse impact on community relations while those who supported the promotion of the Irish language were adamant that such assertions were without substance, were based on sectarianism, and should be disregarded. Instead it was argued that the denial of bilingual signage would adversely impact on those from the Irish language community, and including younger people.
- 4.23 In conclusion, evidence available prior to consultation suggested that the proposal may have the potential for adverse impact and the consultation has confirmed that, within certain communities, this impact is perceived to be real and to be significant.

5. Consideration of measures to mitigate

- 5.1 This proposal and the accompanying assessment of impacts were presented for consultation. The EQIA process requires that, if it is decided that the proposal has an adverse impact on those within one or more of the nine equality categories, then a series of mitigations or alternatives should be put forward for consideration, and an assessment of the possible impact of these alternatives undertaken.
- 5.2 The Council must then consider the adoption of measures that may mitigate the adverse impact and/or alternative ways of delivering policy aims which have a less adverse impact on those within the relevant equality category or which better promote equality of opportunity and good relations.
- 5.3 The Equality Commission Guidance on this section advises that the Council should give consideration to options/measures that may mitigate any adverse impact, and to alternative policies that may better achieve the promotion of equality of opportunity. The guidance states:
- ‘The consideration of mitigating measures and alternative policies is at the heart of the EQIA process. Different options must be developed which reflect different ways of delivering the policy aims.** The consideration of these measures is intertwined with the consideration of alternative policies. Mitigation can take the form of lessening the severity of the adverse impact.’
- ‘Ways of delivering policy aims that have a less adverse effect on the relevant equality category, or which better promote equality of opportunity for the relevant equality category, must in particular be considered. Consideration must be given to whether separate implementation strategies are necessary for the policy to be effective for the relevant group.’
- 5.4 While the consultation may confirm that no mitigations are required, it is imperative that alternative options are made available for consideration as part of the consultation process. On this occasion this would include monolingual naming and signage, or consideration of alternative types of signage.
- 5.5 Equally, in reaching a decision on appropriate external naming, the Council may decide not to proceed with an Irish translation of the name Olympia or may consider where external bilingual signage is or is not appropriate.

- 5.6 The Council decided to seek views on the proposal for bilingual naming and signage at Olympia Leisure Centre, along with mitigating options, through public consultation. The Council has collated and analysed all comments received and has used this feedback to identify mitigating measures or alternative policies if appropriate.
- 5.7 It is highly unusual for an EQIA to be characterised by an absence of mitigations but on this occasion opinions were almost completely divided into two opposing camps, those in favour of the proposal and those not in favour. A small number of mitigating measures were suggested during the consultation, including the need for training to reduce prejudice against the Irish language or trilingual signage (English, Irish and Ulster Scots).
- 5.8 However, those instances where mitigating measures were mentioned were rare, and there was virtually no mention of alternative signage, forms of signage that could be seen as less contentious, or the location of signs. Instead, the Council was presented with a stark choice between monolingual or bilingual signage, with some recognition that internal directional signage should aspire to be as straightforward as possible to aid access and movement, especially in emergencies, with pictorial signage once more advocated.
- 5.9 With regard to the name of the centre itself, it was pointed out that an Irish translation of Olympia was available (Oilimpia)¹⁶.

Conclusions

- 5.10 In reaching a final decision, the Council will reflect on feedback from the consultation, and will strive to accommodate sensitivities around this issue and ensure that all steps are taken to minimise potential adverse impacts. At the same time, it has to be recognised that in the absence of significant mitigations and/or alternative options, ultimately the Council will face a stark choice regarding the proposal to erect bilingual external naming and internal directional signage at Olympia Leisure Centre

¹⁶ <https://glosbe.com/en/ga/Olympia>

6. Summary of Consultation Responses

- 6.1 The Council remains committed to consultation which is timely, open and inclusive and conducted in accordance with the Equality Commission's Guiding Principles. 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.
- 6.2 At the same time, 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 outcome¹⁷. Instead, all relevant information, both quantitative and qualitative, should be afforded due consideration in reaching a balanced decision.
- 6.3 The consultation process in respect of this EQIA lasted for 14 weeks from 12 June 2023 to midnight on 17 September 2023.
- 6.4 All Equality Scheme consultees and Elected Members were notified of the availability of this EQIA report and were invited to comment.
- 6.5 A press release was prepared and issued to various media outlets to make the public aware of the EQIA.
- 6.6 Information about the EQIA was placed on the Council's website (including Your Say Belfast - <https://yoursay.belfastcity.gov.uk/>) and through other appropriate social media channels.
- 6.7 An online questionnaire survey (English and Irish versions) was made available for the public and Council staff, along with hard copies for those who were unable to access the material electronically.

¹⁷ Letter from the Equality Commission to Strabane District Council, 29 July 2011

- 6.8 Comments were welcomed from any individual with an interest in the proposal, in whatever format was chosen while further engagement with the external consultant for individuals or representatives was available on request.
- 6.9 Face-to-face meetings were held with the Council's Irish Language Stakeholders' Forum (26/6/23) and Ulster Scots Stakeholders' Forum (26/6/23), together with an on-line meeting requested by the Committee on the Administration of Justice (CAJ; 30/8/23). On 13 June 2023 the Council facilitated a meeting held at St Simon's Community Hub, which was organised by the South City Resource and Development Centre. On 23 August 2023 the Council facilitated a meeting held at St. Mary's University College, which was organised by the West Belfast Partnership Board.
- 6.10 The Council also made its Migrant Forum, Disability Advisory Panel and Sign Language Users' Forum aware of the consultation and offered engagement sessions upon request.
- 6.11 An online meeting with the Council's Equality Consultative Forum (15/9/23) was arranged but postponed as only one delegate was in attendance.
- 6.12 The Council arranged and facilitated two public consultation events on Wednesday 14th June from 3.00pm – 4.00pm and 7:00pm – 8:00pm at Olympia Leisure Centre. Attendees were able to register for these events on the Council's YourSay platform but this was not essential.
- 6.13 There were also three online consultation events on Tuesday 13th June from 10.00am – 11.00am and on Wednesday 23rd August from 12.00pm – 1.00pm and 7.00pm – 8.00pm. (Attendees were able to register for these events on the Council's YourSay platform but this was not essential.)
- 6.14 All consultation documents were made available in hard copy, email and alternative formats on request and can be accessed on the Council's website: [Olympia signage: consultation on Draft Equality Impact Assessment | Your say Belfast \(belfastcity.gov.uk\)](https://www.belfastcity.gov.uk/olympia-signage-consultation-on-draft-equality-impact-assessment-your-say-belfast).
- 6.15 Copies of notes taken at consultation events are available in full at Appendix 2 while summaries are included below.

Online consultation events

- 6.16 The Council arranged three online consultation events. All followed the same format, i.e. a presentation by the Council's Governance and Compliance Manager (SW) and the External Consultant (JK) on the proposal, its background and the EQIA, followed by a Q&A session:

[Tuesday 13th June 10.00am – 11.00am \(n = 7\)](#)

Summary

The meeting was characterised by a series of questions dealing with the rationale behind the EQIA, along with its conduct content, often backed with an assertion that the Council was obliged to introduce bilingual signage irrespective of the EQIA and that Olympia should be a shared space for all users. By not erecting bilingual signage a negative message was being sent to the Irish language community which would hence become even further marginalised. It was also maintained that because Olympia served such a diverse group of users that this further reinforced the need for bilingual signage.

[Wednesday 23rd August 12.00pm – 1.00pm \(n = 16\)](#)

Summary

The session largely comprised questions as to how bilingual signage could be seen to have an adverse impact on anyone on the grounds of religion or ethnicity, that their exclusion was disadvantaging those from the Irish language community and that instead bilingual signage should be regarded as a positive action measure that would enhance the facility and promote diversity. The Council officers and external consultant who were in attendance endeavoured to address these questions with reference to relevant Council policy and practice.

[Wednesday 23rd August 7.00pm – 8.00pm \(n = 9\)](#)

Summary

Contributions were generally in the form of questions but were marked by a division of opinion. On the one hand it was suggested that the Lisnasharragh/Tempemore English only signage decisions had been made on a spurious sectarian basis and that the Council had a duty to promote minority languages including Irish. On the other hand it was argued that bilingual signage would only serve a small minority and if Irish was included then so should Ulster-Scots. The profile of Irish across the City was raised as an issue, and a number of other questions related to the technicalities of carrying out and reporting the EQIA and these were addressed by Council officers.

[Face-to-face public meetings](#)

6.17 The Council arranged four face-to-face consultation meetings. Two meetings were open to the public (Olympia, 14.6.23) while two were organised by local community groups (South City Resource and Development Centre [13.6.23, 2pm] and West Belfast Partnership Board [23.8.23, 3pm]):

Tuesday 13th June (St Simon's Community Hub 2 – 4 pm) (n = 33)

Summary

The meeting was noteworthy for the depth of feeling attached to contributions from those in attendance and who were unanimously and vehemently opposed to the proposal. It was suggested that consultation must focus on those close to Olympia where opposition to bilingual signage was strongest. The history of Olympia was outlined, and the attachment that the local community had felt towards the facility as 'their' centre in the past was stressed along with a sense that bond was weakening. The erection of bilingual signage would be seen as significantly accelerating this sense of alienation within a community which already felt disadvantaged and marginalised. It was maintained that the proposal would have a detrimental effect on good relations and would heighten community tension, was being used as a campaign for political ends, was unwelcome locally and would take up resources that would be better spent elsewhere.

Wednesday 14th June (Olympia LC 3 - 4.15pm) (n = 23)

Summary

The meeting was characterised by heated and passionate contributions from those who either supported or opposed the proposal. On the one hand there were those who argued that Olympia was built initially for the people in the area, with a strong Ulster Scots culture at its core despite a more recent influx of new communities. Introducing bilingual signage would make the centre less welcoming, would harm good relations and create divisions, and that the Irish language had been politicised and weaponised. On the other hand, supporters of the proposal pointed out that leisure centres should epitomise shared spaces for the young especially, that language threatens no one, that there is a large Irish medium school close to Olympia and the centre is well used by local schools, and that ultimately the Council is obliged to promote minority languages.

Wednesday 14th June (Olympia LC 7 – 8.15 pm) (n = 40)

Summary

In contrast with the meeting earlier in the day, all those who spoke were in opposition to the proposal, and the meeting was characterised by a high level of emotion and often anger. There was a sense of betrayal by the Council as it was argued the centre had been built for the people of the local community who would feel even further alienated should bilingual signage appear. It was suggested that signage may be vandalised given the strength of opposition to the proposal, and that money would be better spent on local community projects. Many contributors described how the

local PUL community had united in opposition to the proposal and that it was being imposed against the will of the people locally, who would react as a consequence. It was further suggested that currently 'everyone feels safe' in the centre, whatever their identity, but this may change should the proposal be adopted. It was also suggested that bilingual signage may be confusing for those with dyslexia.

[Wednesday 23rd August \(St Mary's University College 3 – 4.30 pm\) \(n = 33\)](#)

Summary

All those in attendance were in support of the proposal for bilingual signage, with the depth of feeling attaching to this support tangible from the outset. A number of contributors took issue with the conduct and content of the EQIA, including why an Irish only option was not included, the negative tone of the report and the status of good relations within EQIAs. Others articulated a range of arguments as to why the introduction of bilingual signage should be seen as a progressive and inclusive move by the Council, enhancing the atmosphere for all users of Olympia and especially those from the Irish language community.

Local support for the proposal was endorsed by all those present, and opposition was typically characterised as being based on misguided bigotry or sectarianism. It was strongly argued that this was a fundamental human rights issue and there was no scope for equivocation, with opponents failing to recognise the positive benefits that would attach to bilingual signage. Perception of an adverse effect was seen as unfortunate and misguided, and instead the centre should be a shared space that is welcoming and inclusive to those from all communities across the local communities and Belfast as a whole. The views of a small number of people could not be allowed to stand in the way of the proposal.

[Representative group meetings](#)

[Relevant Minutes of BCC Irish Language Stakeholders Forum \(26/6/23 10.30 – 12.30 pm; Belfast City Hall\)](#)

Attendees: Ciarán Mac Giolla Bhéin (Fís an Phobail); Cuisle Nic Liam (Conradh na Gaeilge); Piarais Mac Alastair (Forbairt Feirste); Dr. Liam Andrews (Pobal Gaeilge Bhóthar Sheoighe); Fionnuala Nic Thom (An Droichead); Pól Deeds (An Droichead); Brónagh Fusco (Conradh na Gaeilge).

Mrs. Sarah Williams (Governance and Compliance Manager); Mrs. Susan McNeill (Policy and Research Officer); Dr. Colm McGuigan (Irish Language Officer); Dr. John Kremer (Independent Consultant).

An update was given on the work to date on the EQIA. It was noted that there would be a meeting with community groups in west Belfast in St. Mary's University College, there was some objection to this. The difference between a local meeting and broader public meeting in this context was then discussed.

JK then gave a brief presentation on the background to the EQIA. A forum member asked if a clear impact on equality of opportunity needed to be demonstrated here. JK explained that only the potential for adverse impact needed to be shown. JK also discussed the issue of ruling responses out on the basis of the content of these responses being deemed 'sectarian'.

Forum members noted that international best practice, research and international agreements which state that the Council should take action to erect bilingual signage. It was also highlighted that the same evidence does not exist in opposition to the promotion of minority languages. There was an emphasis throughout the discussion on the concept of Olympia and other Council buildings being shared spaces.

Members felt that this issue may well be decided in the courts.

Members felt that the discussion was quite disheartening and that the Council had a duty to promote minority languages in a positive manner and challenge the negative perceptions of the Irish language. A reference was made to international guidance that supports this. Members felt that bilingualism should be seen as a positive development and that this EQIA and the erection of signage at Olympia presented a major opportunity to challenge any negative narrative around this.

It was noted that Scoil an Droichid use the centre for swimming and it is frequented by families who speak Irish. Members discussed the potential negative impact on these users and children especially were bilingual signs not erected. It was felt this would send a particularly negative message to Irish speakers in the city.

It was questioned whether not having the bilingual signs created an adverse impact and whether not taking action in relation to the language created a hierarchy. Members felt that a higher level of visibility of Irish was in fact the solution.

Forum members discussed the perception that the Council views Irish as being acceptable in West Belfast but not elsewhere and that this sent a particular message. It was felt that the erection of signage in other areas will go some way to challenging this perception among people who have no experience of the language.

Members felt that children and young people are particularly important here. there was a discussion of what was termed the 'emblematic use of Irish'.

Members questioned “when” it would be acceptable to have Irish at Olympia and other shared spaces. This was a question of rights and legislation versus opinions and that these issues should not be weighed against each other. Forum members felt that the same approach would not be taken by the Council in relation to race or sexual orientation.

One member voiced the opinion that the decision not to erect bilingual signs here would set the campaign for the visibility of Irish in Belfast back by years and effectively be a denial of rights.

It was noted that the majority of local councillors in the area would be in favour of the proposal.

The opinion was expressed that the decision making process was weighted against the Irish language community.

Members felt that Irish can be used as a tool for reconciliation and that increased visibility will contribute to this.

The example of the Irish language scheme at QUB was mentioned. This was initially resisted and is now highlighted by QUB as a success story.

Members felt that this issue cannot be solved by a monolingual policy.

Members felt that any Irish language policy should seek to address negative perceptions around these issues. It was noted that the Irish language or bilingual signs were not the problem, that the negative perceptions were the problem.

Members felt that any refusal to grant the signs would make the Irish language community in the city the losers in this scenario. When one member mentioned a potential gradual approach it was noted that having signs initially in Brook and Andersonstown and now potentially Olympia was gradual.

Members noted that cost is not an issue here, nor can bilingual or multilingual signs cause confusion.

It was noted that the issue of age should be considered here, that is that the Irish language community tend to be younger and that many older residents will not use social media or fill in a consultation response online.

Members felt that a comprehensive Irish language policy could be a mitigation here.

Members felt that some of the EQIA questions were worded poorly and that there was no opportunity for respondents to discuss the benefits of bilingual signage.

[Relevant Minutes of BCC Ulster-Scots Stakeholders' Forum \(26/6/23 2 – 4 pm; 9 Adelaide St.\)](#)

Attendees: David Gilliland, Ulster-Scots Community Network; Nelson McCausland; Ian Crozier, Ulster-Scots Agency; John Kremer, Consultant; Sarah Williams, Governance & Compliance Manager; Michael Johnston, Language Officer.

Note Taker- Beth Mulree

SW provided a brief background to the EQIA being carried out by the Council.

JK took members through the EQIA details. explaining that the EQIA will be carried out over 14 weeks due to summer period, and that both in-person and online meetings have been arranged. A report will be prepared summarising all information both quantitative and qualitative which will be brought to Strategic Policy and Resources Committee.

Members had some questions about the EQIA process.

Questions were raised about how the Council is going to manage the risk of signs being damaged this, considering how people feel about bilingual signage as Olympia is a mixed community location.

JK stated one Council in particular has had to replace signage due to damage or crime. Some councils monitor defaced signs.

In response to a question JK updated that the Council is asking the question again as previous consultation was carried out in 2019/2020.

JK asked Members about potential adverse impacts with Members noting that there is a perception that signage has been used in the past to demonstrate that some members of the community are not welcome.

In response to a question, SW confirmed that Olympia is one of the Council's citywide leisure centres with its own USP.

Members questioned the motivation of having Irish language signage at this location.

Members questioned the motivation of having Irish language signage at this location.

Members were concerned about the impact of this decision on the local community.

Members noted that some people may think that providing Ulster-Scots signage could be a potential mitigation however this would not be their view.

JK asked members about potential adverse impacts for young people / school children. Members noted that pictorial signage is already provided.

There was some disappointment from members towards no 'Ulster Scots only option', further expresses point of Ulster-Scots being forgotten.

SW provided a summary of the planned engagement over the summer period with an additional local community meeting in August and set out the next steps for decision-making.

[Committee on the Administration of Justice \(CAJ\) \(30/8/23; online\)](#)

Present: Sarah Williams, John Kremer, Susan McNeill, Beth Mulree

CAJ: Daniel Holder, Eliza Browning

CAJ opened the meeting by saying it had knowledge of the background of the EQIA, that it was a heavily contested issue and that the points he wanted to raise were mainly technical.

It was argued that the EQIA methodology was flawed and as a consequence the Council's Equality Scheme was not being adhered to.

CAJ had experience of two types of Council regarding such language matters:

- Councils where there is clearly no will;
- Councils where there is a will but the equality of opportunity duty is employed as an impediment to change

CAJ felt there was a need to avoid objections that were rooted in intolerance and sectarianism. Looking at bilingual signs cannot constitute an adverse impact or discriminatory detriment and signs at Olympia clearly not discriminatory.

Feels there is a clear emphasis in the EQIA on good relations, feels a host of other information should be in the final report, and the assessment of good relations substitutes a lay understanding of good relations for the good relations duty.

There was an identified need for a definition of the 'chill factor', the example of people refusing to use a facility because minority ethnic communities might use it is simple racism.

Furthermore, threats of violence are not an adverse impact.

There is a need for a reference in the report to the positive impacts, and to indicate the weight given to the initial 2019/2020 consultation.

Irish language community are rights holders, but generally young and are from the CNR community. This does not diminish their rights.

It was highlighted that equality of opportunity trumps good relations under Section 75 but the equality duty should draw on facts and evidence, not perceptions.

The EQIA should also consider the issue of local residents vs. service users, local residents at Olympia do not own the leisure centre.

It was seen as odd to define culture as the exclusion of another culture – how does seeing Irish constitute an adverse impact.

CAJ argued that there was a hint of sectarianism around the EQIA - what is the 'acceptable quota of Catholics' to allow this to go ahead.

Not having signs is an adverse impact on the Irish language community. An English-only sign policy is not a mitigation as it does not better promote equality of opportunity. This potentially institutionalises sectarianism, and the Council could be open about not proceeding with a policy or decision because of threats. It was suggested that an argument that bilingual signage may confuse is an issue needs to be put to bed. It was maintained that the EQIA aim was much broader than the council decision, and it was important to make sure the policy aim is the same as the original decision. Also, there is a need to be explicit that there is no documented impact on equality of opportunity.

Survey responses

- 6.18 Two versions of the online survey questionnaire were made available, in English (n = 426) and in Irish (n = 158).
- 6.19 A total of 584 responses were received, with 12 on behalf of organisations (Resident group [1]; Irish Language group [1]; Voluntary / community group [4]; Statutory or public body [1]; Other [5]).
- 6.20 A summary of responses is provided below.

Demographic Profile

6.21 Of those answering this question (n = 553; 94.7%), 509 returns (92.0%) were from either residents or ratepayers in Belfast. In relation to gender, of the 496 responses (84.9%), 251 (50.6%) declared male and 193 (38.9%) female, with 52 (10.5%) preferring not to say. Of those who declared their ethnicity (n = 424; 72.6%), 415 (97.9%) declaring this as white. The age profile of the declared sample (500; 85.6%) suggests that the majority of respondents (64.6%) were between the ages of 25 and 54, with a relatively even distribution of respondents across all age bands.

Under 18	9	12	21	4.2
18-24	19	47	66	13.2
25-39	51	134	185	37
40-54	22	116	138	27.6
55-64	13	44	57	11.4
65+	11	22	33	6.6
Total	125	375	500	100

6.22 Respondents were also asked to indicate the first four digits of their postcode. Of those who answered this question (n = 506; 86.6%), a significant proportion (n = 439; 86.7%) came from six postcodes (BT7, BT9, BT10, BT11, BT12 & BT17), with two (BT9 [South Belfast: Malone, Lisburn Rd, Taughmonagh, Stranmillis] and BT12 [South Belfast: Sandy Row, The Village; West Belfast: Falls Rd]) accounting for over half of all returns (297; 58.7%).

Postcode	N	%
BT7	20	3.9
BT9	133	26.3
BT10	25	4.9
BT11	72	14.2
BT12	164	32.4
BT17	25	4.9
Other	67	13.2
Total	506	100

6.23 When asked 'Do you live or work within 15-20 minutes of Olympia, 449 (81.6%) answered 'yes' and 101 (18.4%) 'no'. A breakdown of respondents by religion and national identity is shown below. Of those who answered this question (n = 459; 90.7%), the majority self-declared as either Roman Catholic (n = 174; 37.9%), or neither (n = 188; 41.0%), with 21.1% Protestant.

Community background	Irish Q'aire N	English Q'aire N	Total N	% of total
Roman Catholic	44	130	174	37.9
Protestant	7	90	97	21.1
Neither	61	127	188	41.0
Total	112	347	459	100

6.24 In terms of national identity, of those answering the question (n = 451), nearly half (47.5%) indicated Irish, a third (33.5%) Northern Irish and 16.6% British.

National Identity	Irish Q'aire N	English Q'aire N	Total N	% of total
British	1	74	75	16.6
Irish	54	160	214	47.5
Northern Irish	47	104	151	33.5
Scottish	1	3	4	0.9
English	0	1	1	0.2

Welsh	0	1	1	0.2
Other	2	3	5	1.1
Total	105	346	451	100

6.25 In answer to the question, ‘How often in the last 12 months have you used Olympia, 234 (41.1%) said ‘often’, 231 (40.7%) ‘sometimes’, 76 (13.4%) ‘rarely’ and 27 (4.8%) replied ‘never’.

Responses to each of the survey questions are summarised below, together with a coding of additional comments.¹⁸

1. To what extent do you agree with the data presented in the EQIA?	Irish Survey N	English Survey N	Total	% of Total
Strongly agree	15	54	69	12.7
Agree	1	38	39	7.2
Neither agree nor disagree	12	78	90	16.5
Disagree	6	17	23	4.2
Strongly disagree	123	201	324	59.4
Total	157	388	545	100

6.26 Overall, 63.6% of respondents who answered this question either disagreed or strongly disagreed with the data presented in the EQIA (82.1% Irish Survey; 56.2% English Survey) including 45.3% of those self-declared as Roman Catholic, 52.2% of those self-declared as Protestant and 72.4% of those declaring neither religion, along with 46.5% of those who declared their national identity as Irish and 77.1% of those self-declared as Northern Irish. Responses by age were consistent across age bands while women (72.1%) were more likely to disagree or strongly disagree with the data presented than men (50.2%).

6.27 Of the 78 additional comments, a number were substantial and raised similar concerns to those previously aired elsewhere. These included a significant number of criticisms regarding the purpose or rationale behind the EQIA, the conduct of the EQIA, and the content of the EQIA. The positive impact of the proposal was also highlighted in a number of responses, with others citing the harm to good relations.

Summary of Comments

¹⁸ A full analysis of the survey data, including comments, is available on request.

Code	Code Response	N
R1	There are significant gaps in the data	18
R2	The information included in the EQIA is biased	2
R3	Bilingual signage will improve good relations	9
R4	Bilingual signage will harm good relations	10
R5	Bilingual signage will not be confusing to users of Olympia	4
R6	This is all a waste of time, effort and money	5
R7	Olympia should be a shared space for all users	4
R8	An Irish translation of Olympia is available, it is Oilimpia	6
R9	Bilingual signage will have a positive impact on Irish speakers	9
R10	The Council has a statutory responsibility to promote minority languages	9
R11	Monolingual signage avoids confusion	2
R12	Other comments	18
	Total	96

3. To what extent do you agree with the potential impacts identified in Section 5?	Irish Survey N	English Survey N	Total	% of Total
Strongly agree	10	41	51	9.5
Agree	4	29	33	6.1
Neither agree nor disagree	3	58	61	11.3
Disagree	9	28	37	6.9
Strongly disagree	132	224	356	66.2
Total	158	380	538	100

6.28 Once more, a significant proportion of respondents to this question (n = 393; 73.1%) either disagreed (6.9%) or strongly disagreed (66.2%) with the potential impacts identified in the draft EQIA, with only 84 (15.6%) agreeing or strongly agreeing. Those disagreeing included 61.4% of those declaring Roman Catholic, 82.3% of those declaring no religion and 49.4% self-declared as Protestant. By national identity, 81.9% of those declaring Northern Irish either disagreed or disagreed strongly along with 63.9% declaring Irish and 42.4 British. As with Q1, a higher proportion of women (77.7%) than men (59.1%) either disagreed or strongly disagreed.

6.29 Of the 81 additional comments, in line with Q1, a number of written responses were substantial and set out fundamental critiques of the purpose, conduct and content of the EQIA, on this occasion tending to focus on the negativity of Section 5, highlighting the positive benefits of the proposal, and querying the potential for any adverse impact. There were other voices as well arguing that the proposal may have the potential to harm local community relations and that Olympia should be a shared space for all sections of the community, some

arguing that bilingual signage will promote this aspiration while others argued the converse.

Summary of Comments

Code	Code Response	N
R1	There is no potential for adverse impact	20
R2	The information included in the EQIA is biased	8
R3	The information included in this section is negative	13
R4	Bilingual signage will help promote equality of opportunity	4
R5	Bilingual signage will improve good relations	11
R6	Bilingual signage will harm good relations	6
R7	This is all a waste of time, effort and money	5
R8	Olympia should be a shared space for all users	2
R9	Bilingual signage will have a positive impact on Irish speakers	6
R10	The Council has a responsibility to promote minority languages	4
R11	Monolingual signage avoids confusion	5
R12	English is the national language	3
R13	Bilingual signage will not cause confusion	7
R14	Other	5
	Total	99

5. Do you think the erection of bilingual signs could have an adverse impact on people because of their:	Irish Survey N	English Survey N	Total N	% of total sample
Religious belief	1	40	41	7.0
Political opinion	1	50	51	8.7
Race	1	14	15	2.6
Sexual Orientation	1	1	2	0.3
Age	2	16	18	3.1
Marital status	1	1	2	0.3
Disability	1	8	9	1.5
Gender	1	1	2	0.3
Dependency status	1	0	1	0.1
Total	10	131	141	100

6.30 A very small proportion of those who completed the survey identified any potential for adverse impact falling on one or more Section 75 category, with religious belief (41; 7.0%), political opinion (51; 8.7%), age (18; 3.1%) and race (15; 2.6%) being cited most frequently.

6.31 This question generated a significant number of comments (n = 127), with the majority arguing that there was no adverse impact attaching to the proposal and that 'none of the above' should have been included as an option A smaller

number saw the proposal as a political move that would adversely impact on the Protestant / Unionist community and would have an adverse impact on community relations locally and across the city.

Code	Code Response	N
R1	None of the above (and should be included as option)	65
R2	The proposal will impact adversely on PUL community	9
R3	The proposal is politically motivated	12
R4	Bilingual signage will benefit all	7
R5	Bilingual signage will harm good relations	6
R6	Bilingual signage will help good relations	3
R7	This is all a waste of time, effort and money	10
R8	Olympia should be a shared space for all users	5
R9	Bilingual signage will have a positive impact on Irish speakers	5
R10	The Council has a statutory responsibility to promote minority languages	4
R11	Bilingual signage causes confusion for those with a disability	3
R12	English is the national language	3
R13	Other	10
	Total	142

7. To what extent do you agree with the potential mitigations identified in Section 6?	Irish Survey N	English Survey N	Total	% of Total
Strongly agree	6	16	22	4.3
Agree	2	28	30	5.9
Neither agree nor disagree	7	77	84	16.4
Disagree	4	28	32	6.3
Strongly disagree	131	212	343	67.1
Total	150	361	511	100

6.32 In keeping with previous questions relating to the EQIA, a significant majority (n = 375; 73.4%) of those who answered this question (n = 511; 87.5% of sample) either disagreed (6.3%) or strongly disagreed (67.1%) with the potential mitigations as identified in the EQIA. Such responses were most prevalent among those who declared their national identity as either Northern Irish (82.8%) or Irish (61.1), or whose stated religion was either Roman Catholic (59.9%) or not determined (83.2%).

6.33 125 additional comments were received, often substantial in length, with the majority arguing that there was no need to consider any mitigating measures as bilingual signage in itself was unlikely to trigger an adverse impact or harm good relations. A number of other comments suggested there was no need for

change or that trilingual signage may be a possible mitigation, or that training/education would be important to help reduce prejudice against Irish.

Code	Code Response	N
R1	No mitigation is required	44
R2	Bilingual signage will harm good relations	6
R5	There is no need for change	10
R6	This is all a waste of time, effort and money	9
R7	Olympia should be a shared space for all users	7
R8	Education or training will help to remove prejudice	18
R9	Bilingual signage will have a positive impact on Irish speakers	3
R10	The Council has a responsibility to promote minority languages	8
R11	Trilingual signage may help mitigate	9
R12	Other comments	16
	Total	130

6.34 Respondents were asked to indicate their preference for signage and an overwhelming majority (79.1%) stated a preference for bilingual *Irish and English* signage. A higher proportion of women (86.5%) than men (70.8%) chose this option, with 22.4% of men opting for *English only*. In relation to community background, 88.4% of those self-declaring as Roman Catholic chose *Irish and English* but only 40.2% of Protestants, with a majority of the latter (51.5%) selecting *English only*. Regarding national identity, of those self-declaring as Irish, 93.4% chose bilingual *Irish and English* signage, in comparison with those declaring British (24.0%) and Northern Irish (79.4%), with *English only* being the most prevalent answer (70.7%) among the former.

10. Options for Signage	Irish Survey N	English Survey N	Total	% of Total
English only	1	94	95	16.4
Irish and English	153	305	458	79.1
Irish, English, Ulster Scots	3	18	21	3.6
English and Ulster Scots	0	2	2	0.4
No preference	0	3	3	0.5
Total	157	422	579	100

6.35 Respondents were given the opportunity to include any further comments on the EQIA. 123 comments were made. A number were substantial, setting out in considerable detail either support for or opposition to the proposal. Comments

ranged far and wide with a number emphasising the need for Olympia to be a shared space, others being critical of the EQIA, and others seeing the whole endeavour as a waste of ratepayers' money.

Code	Code Response	N
R1	Irish is apolitical, bilingual signage should be put up, no need for EQIA	20
R2	The proposal is being forced on the PUL community	7
R3	The EQIA is flawed, biased and/or negative	11
R4	This is all a waste of time, effort and/or money	10
R5	Bilingual signage will harm good relations	4
R6	Olympia should be a shared space for all users	33
R7	Bilingual signage will have a positive impact on Irish speakers	4
R8	The Council has a statutory responsibility to promote minority languages	11
R9	Those with a disability must be afforded consideration	3
R10	Olympia needs to be improved/renovated	4
R11	The proposal will harm community relations	3
R12	Other	13
	Total	123

Written responses

6.36 Written responses were received from the following organisations and individuals (copies of the full submissions are included in the Council's Consultation Report dated October 2023).

[Committee on the Administration of Justice \(CAJ\)](#)

The CAJ response to the EQIA ran to 28 pages and included 128 substantive bullet points. The submission begins by stating that, in its view, the purpose of an EQIA is, 'to assess whether a proposed policy positively impacts on equality of opportunity or whether the policy would constitute a discriminatory detriment (adverse impact) on equality against one or more Section 75 groups'.

Set against this purpose, the submission goes on to critique the conduct and content of the EQIA with particular emphasis on the status of good relations considerations within an EQIA.

It is argued that elements of the adopted EQIA methodology, 'depart from the framework provided by the legislation and Council's Equality Scheme', for example by not affording due consideration to the positive benefits accruing to certain groups by the proposal but instead focusing on adverse impacts that may be derived from harm to good relations and hence, potentially, the promotion of equality of opportunity.

A major theme relates to how the term ‘good relations’¹⁹ has been operationalised within the EQIA, and whether this duty should be afforded regard in the Council’s decision-making.

The submission also draws on a substantial literature making clear the various obligations falling on the Council to promote minority languages and including Irish, and the need to make more overt the ways in which Irish language users may benefit from the proposal.

In light of these considerations, CAJ are highly critical of the conduct of the EQIA and recommend that it be reframed to take on board their concerns, concluding that:

- ‘Overall, we contend that elements of the methodology followed by the draft EQIA are incompatible with the letter and spirit of the Section 75 legislation, ECNI Guidance and the Councils’ Equality Scheme.
- The assessment of adverse impacts in the draft EQIA departs entirely from the definition of this concept in the legislation, guidance, and Equality Scheme to instead construe a novel definition whereby policies that are politically opposed constitute discrimination.
- At worst the methodology adopted risks institutionalising prejudice, intolerance and sectarianism in the Council’s policy making process.
- The draft EQIA should be revised for its final version and be brought in line with the legislative framework, ECNI Guidance and Council Equality Scheme.’

[Fís an Phobail \(West Belfast Language Network\)](#)²⁰

¹⁹ For the purposes of the EQIA, and in accord with the ECNI’s Summary Guide for Public Authorities on Promoting Good Relations (2008, p.2), good relations have been defined as ‘The growth of relationships 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.’

²⁰ The same submission was received from the following 12 groups attached to the Network: Cumann Cultúrtha Mhic Reachtain; Conradh na Gaeilge; Ionad Uibh Eachach; Fóram na nÓg; Fís an Phobail; Glór na Móna; Turas; Cultúrlann; Raidió Fáilte; Forbairt Feirste; An Droichead; Seachtain na Gaeilge

In a substantial 27-page submission, Fís an Phobail set out in detail their significant concerns with the process and content of the EQIA and their advocacy of the proposal to install bilingual signage. This stance is supported by a wealth of evidence that charts the obligations falling on the Council to promote minority languages and in particular Irish.

The Network is opposed to the call-in procedure that precipitated the EQIA and is seen as running contrary to the Council's strategies and policies; 'the erection of bilingual signage is in keeping with the guidance outlined in the European Charter for Regional or Minority Languages, as well as Belfast City Council's own Languages Strategy which, among other aims, seeks to increase the visibility of the Irish language.'

The submission also questions the balance or bias within the EQIA: 'At a glance, however, it would appear throughout the consultation report that equal, if not more, weight is given to baseless and intolerant arguments and responses that oppose the erection of bilingual signage, as is given to clear, evidence-based, well-supported arguments in favour which are often grounded in international law and in keeping with the intent and aspirations of BCC's own Language's Strategy.'

In addition, the language used is called in to question, for example, 'The tone of a number of the statements within the EQIA document, and questions within the questionnaire itself, are problematic and loaded. There are several baseless assertions about the perceived adverse impact of bilingual signage throughout the EQIA document which, despite a lack of supporting evidence, are given immense significance throughout the document.'

The submission raises concerns that any attempt at mitigation is fraught with difficulty, 'The mere suggestion of mitigations indicates that somehow communities are discriminated against due to bilingual signage, a claim which has never been proven or supported by evidence and has no basis in international or domestic law; nor has it ever been demonstrated that bilingual signage, which would see Irish placed alongside English, is not inclusive. Olympia is a shared space. It is located on Boucher Road, also a well recognised shared space.'

The choice of external consultation is also called into question, 'We recommend that Council provide facilitators with expertise of language rights and international language frameworks and best practice when conducting consultations on the minority language issues. We assume this approach is adapted when consulting on other minority issues however during this process and other similar consultations organised by BCC it appears that those facilitating the consultation have little to no

knowledge of either international or domestic legislation and best practice concerning minority language issues.’

The Network also strongly recommends that any view/opinion expressed that is rooted in sectarianism is discounted from the consultation process and not considered relevant when any decisions are made

[Janet Muller²¹](#)

The five -page submission begins with expressing concern that the EQIA has been undertaken at all and instead argues that the proposal is in line with the Council’s various statutory obligations. The fundamental rationale for carrying out the EQIA is therefore challenged and in particular as the bilingual proposal is not exclusive but inclusive by nature.

It is further argued that an EQIA should be reserved only for consideration of the equality of opportunity duty but not good relations, ‘The EQIA report is problematic due to the way the document has broadly conceptualised the scope of “adverse impacts”.’ It is further argued that ‘an attitude per se is not an adverse impact on equality of opportunity’.

It is also maintained that ‘the EQIA does not include information on the experiences of Irish speakers and therefore the positive impacts of the signage have not been quantified’.

In conclusion, ‘I must question the approach of Belfast City Council in changing the decision to erect Irish language signage in four city-wide centres in the first instance. I believe this to have been the result of the application of the ‘call-in’ procedure by politicians from the unionist community. Whilst this procedure may have beneficial uses, in this case it appears to operate as a form of veto.’

[Blackstaff Residents’ Association](#)

The ten-page submission begins with setting out the history of the Association, and its primary purpose in considering schemes, projects etc. that may contribute to the development of the community.

²¹ Ms. Muller responded as an individual. She was formerly Chief Executive of POBAL, an umbrella organisation for the Irish language movement in Northern Ireland.

A considerable portion of the submission is then given over to the history of the local area, and the significant role played by both the Ulster-Scots and English cultures over time, along with the relative lack of influence of a Celtic culture in the greater Olympia area. The role that Olympia has played in this history is also set out in some detail alongside other leisure facilities in the area including Windsor Park. The cultural diversity of the area over recent years is also highlighted with the influx of members of new communities.

The submission goes on to highlight the role that the Association has played in lobbying for a leisure centre in the Olympia since the 1960s, and why a community hub along with a leisure centre was, and is, seen to be of such significance to the local community. The submission is interspersed with commentary on the current consultation and contributions that have been made by local residents. These highlight the strength of opposition to the proposal in relation to bilingual signage.

The opening and naming of Olympia is also catalogued along with the longstanding close association with the local community, which, it is argued, have regarded Olympia as 'their own' since its inception. This impression is reinforced by the holding of community events and meetings in the centre.

Petitions

6.37 Two petitions were received.

[Blackstaff Residents' Association²² \(n = 2617²³\)](#)

'We the undersigned, object to the proposal to have dual language signage at Olympia Leisure Centre which includes Irish and excludes Ulster-Scots and many other languages spoken in the Blackstaff and Windsor area and throughout South Belfast.

The proposal in our view, is discriminatory, divisive and even offensive. It fails to recognise the diverse nature of the local area with many languages being spoken.'

[An Dream Dearg \(n = 726\)](#)

'We the below listed fully support the erection of bilingual (Irish/English) signage in Olympia Leisure Centre. We strongly disagree proposed

²² <https://www.change.org/p/the-equality-diversity-unit-belfast-city-council-objections-to-dual-signage-at-olympia-leisure-centre>

²³ This number included those who had signed the earlier petition attached to the public consultation in 2019/20 (n = 571).

potential adverse impacts and strongly oppose any mitigations that would dilute or remove comprehensive bilingual signage.'

Email responses

6.38 625 emails were received based on a template provided by An Dream Dearg:

'To whom it may concern,

I write this email as an official response to Belfast City Council's ongoing public consultation into the proposed erection of bilingual signage at Olympia Leisure Centre.

I am responding as an individual who uses Olympia Leisure Centre once a fortnight.

I also confirm that I live or work within a 20-minute walk from Olympia Leisure Centre. I too wish to confirm that I am a ratepayer in the Belfast City Council area.

I wish to have this response recorded as one which **strongly supports** the erection of Irish/English signage at Olympia Leisure Centre.

I strongly disagree with the claim that bilingual signage, which would see Irish side by side with English language signage, would have any negative impact on good relations or on equality of opportunity. I only see the potential positive impact of increasing the visibility of Irish throughout the city, both for those who use the language and for those who, for whatever reason, have not yet had the opportunity to do so.

I strongly disagree with the suggestion of any 'mitigations' or alternatives to bilingual signage because it feeds into the false narrative that bilingual signage isn't inclusive, when in fact, the Irish language belongs to everyone.

I would be extremely grateful if you could send any further correspondence which relates to my submission to XXXXX.

Go raibh maith agat'

6.39 In addition, two emails were received from individuals offering support for the proposal (referencing e.g. international obligations, minority rights and visibility of Irish), while a further seven were opposed to the proposal (citing e.g. impact on good relations, antagonising local PUL communities, political motive, and call for neutral space).

Olympia user data

6.40 A breakdown of the current membership of Olympia by postcode and age is shown below.

Postcode	Age Bands							Total
	-10	11-17	18-24	25-39	40-54	55-64	65+	
BT9	203	85	158	354	142	147	258	1347

BT12	105	43	70	233	86	37	42	616
BT10	120	37	11	56	48	65	121	458
BT8	122	24	17	49	32	37	46	327
BT17	66	28	19	47	33	22	50	265
BT7	51	8	23	88	37	13	30	250
BT11	38	13	15	24	25	23	31	169
BT6	36	4	10	26	15	11	8	110
BT28	35	4	9	19	13	0	0	80
Total	776	246	332	896	431	355	586	3622

A list of current bookings (n = 26) by school, postcode and start date is shown below:

SCHOOL	POSTCODE	Start date
Victoria Prep	BT9 6HT	January 2024
Seymour Hill PS	BT17 9QB	September 2023
St Annes PS	BT10 ONE	September 2023
St Annes PS	BT10 ONE	September 2023
St Annes PS	BT10 ONE	September 2023
Blythefield PS	BT12 5HX	September 2023
Seymour Hill PS	BT17 9QB	September 2023
St Anne's PS	BT10 ONE	September 2023
St Anne's PS	BT10 ONE	September 2023
St Anne's PS	BT10 ONE	September 2023
Blythefield PS	BT12 5HX	September 2023
Donegall Road PS	BT12 6HE	September 2023
Scoil an Droichid	BT7 2EP	September 2023
Forge Integrated PS	BT7 3HE	September 2023
Victoria Prep	BT9 6HT	October 2023
Forge Integrated PS	BT7 3HE	September 2023
Victoria Prep	BT9 6HT	October 2023
Blythefield PS	BT12 5HX	September 2023
Glenveagh SES	BT9 6TX	October 2023
Glenveagh SES	BT9 6TX	October 2023
Finaghy PS	BT10 OEF	January 2024
Finaghy PS	BT10 OEF	January 2024
Fane Street PS	BT9 7BW	January 2024
Cranmore PS	BT10 OJB	September 2023
Victoria Prep	BT9 6HT	October 2023
Victoria Prep	BT9 6HT	January 2023

According to GLL, Nine primary schools regularly use Olympia for school swimming, located in the following postcodes:.

Postcode	N
BT 7	1
BT 9	3
BT 10	1
BT 12	2
BT 17	2
Total	9

Relevant Belfast postcode districts by coverage is shown below

Postcode district	Coverage
BT1	Belfast City Centre (City Hall and north)
BT2	Belfast City Centre (south of City Hall)
BT3	Belfast Harbour Estate (including Belfast City Airport)
BT4	<i>East Belfast:</i> Sydenham, Belmont, Stormont, Ballyhackamore (Part)
BT5	<i>East Belfast:</i> Castlereagh, Clarawood, Crossnacreevy, Gilnahirk, Knock, Braniel (Part), Ballyhackamore (Part)
BT6	<i>East Belfast:</i> Castlereagh, Woodstock, Cregagh, Knockbreda
BT7	<i>South Belfast:</i> Ormeau, Botanic, University
BT8	<i>South Belfast:</i> Saintfield Road, Four Winds, Carryduff, Knockbreda, Newtownbreda
BT9	<i>South Belfast:</i> Malone, Lisburn Road, Taughmonagh, Stranmillis
BT10	<i>South Belfast:</i> Finaghy
BT11	<i>West Belfast:</i> Andersonstown, Lenadoon, Suffolk, Ladybrook, Turf Lodge
BT12	<i>South Belfast:</i> Sandy Row, The Village <i>West Belfast:</i> Falls Road
BT13	<i>North Belfast:</i> Shankill Road, Woodvale, Ballygomartin, Springmartin, Glencairn, Highfield <i>West Belfast:</i> Clonard
BT14	<i>North Belfast:</i> Crumlin Road, Ballysillan, Upper Ballysillan, Ardoyne
BT15	<i>North Belfast:</i> York Road, Antrim Road, New Lodge, Sailortown
BT16	<i>East Belfast:</i> Dundonald
BT17	<i>West Belfast:</i> Dunmurry, Hannahstown, Twinbrook, Poleglass, Lagmore. <i>North Lisburn:</i> Derriaghy, Seymour Hill

7. Conclusions

- 7.1 Prior to the consultation phase of the EQIA it was suggested that there may be an adverse impact on grounds of religious belief, political opinion and ethnicity (national identity), along with age and disability.
- 7.2 The consultation has established that, within certain communities and among their representatives, there is perceived to be an adverse impact on the three former grounds (religious belief, political opinion and ethnicity [national identity]), with some evidence with regard to age, disability and race/ethnic origin.
- 7.3 Those using a leisure centre are more likely to be somewhat younger than the population as a whole, and this will include those in full-time education. With this in mind, the special circumstances, and needs, of young people attending Irish medium schools was highlighted by a number of contributors, and should not be ignored.
- 7.4 With regard to disability, it had been suggested that those with a disability may find bilingual signage more confusing. While there was limited evidence from a small number of consultees to substantiate this claim, other international research evidence was cited to refute this proposition. Overall it would not appear that this is likely to be a significant adverse impact, with reliance on pictorial internal directional signage, wherever possible, helping to mitigate this effect.
- 7.5 It has also been claimed in the past that bilingual signage may be confusing for those who may not have English as a first language, and this may be of particular relevance given recent demographic changes in the locality including an influx of people from new communities. However, there was no virtually no evidence forthcoming from the consultation to support this contention.
- 7.6 Leaving these matters aside, the focus of attention then falls on the three grounds of difference originally highlighted, religious belief, political opinion and ethnic origin (national identity), three grounds which, in Northern Ireland, often coincide in relation to defining an individual's community background.
- 7.7 In keeping with the earlier round of public consultation on signage within the Council's four City-wide leisure centres in 2019/20, the present consultation has once more highlighted the deep division of opinion between the two communities.

- 7.8 On the one hand there are those individuals and groups whose advocacy and enthusiasm for the promotion of the Irish language is both remarkable and admirable.
- 7.9 Drawing on international examples, and citing various statutory commitments falling on the Council, a rights-based argument has been made repeatedly, passionately, and persuasively during the consultation. The central tenet of the argument is that the promotion of the Irish language should offend no one and represents nothing more than the natural outworking of the Council's own Language Strategy, complementing obligations attaching to various national and international statutes and frameworks.
- 7.10 This perspective pervades significant elements of the consultation where support for bilingual signage is unequivocal and where opposition to bilingual signage is often characterised as misguided sectarianism, perhaps fuelled by political opportunism.
- 7.11 Support for this perspective is noteworthy in each phase of the consultation, through both written and verbal contributions.
- 7.12 Among many of those who support this viewpoint the current EQIA process itself is held in scant regard, with considerable criticism levelled against the rationale behind the EQIA, the conduct of the EQIA and the content of the EQIA consultation report. In brief, many of these contributions suggest that the EQIA is ill-founded and can be accused of bias, for example by ignoring the positive benefits associated with bilingualism.
- 7.13 These concerns sit alongside significant reservations regarding the role that should be played by the second statutory duty, the promotion of good relations, within both Section 75 generally and an EQIA specifically. These concerns stretch far beyond the confines of this particular EQIA but continue to resonate strongly in any considerations of the promotion of minority languages.
- 7.14 Put as succinctly as possible, a number of contributors to the consultation fall squarely in line with the stance originally set out by the Committee on the Administration of Justice (CAJ) in 2013, and resolutely pursued over the last decade. In brief, this perspective maintains that good relations rests uneasily within Section 75 and should not inform deliberations or decisions attaching to an EQIA; instead focus should fall exclusively on the first Section 75 duty (the promotion of equality of opportunity). Furthermore, where there are positive impacts on one community then these should be afforded due consideration along with any adverse impacts attaching to a proposal or policy.

- 7.15 Further to support for this perspective on Section 75, to date three NI district councils have chosen to remove consideration of good relations from their revised Equality Schemes (and, in turn, in screening decisions and EQIAs). However, Belfast City Council continues to follow the guidance of the Equality Commission in recognising the interdependence between the two statutory duties within Section 75, while acknowledging the primacy afforded to the first statutory duty (the promotion of equality of opportunity). In other words, where a policy or proposal has the potential to harm good relations then this cannot be disregarded, in particular as there is a likelihood that the promotion of equality of opportunity may also be adversely impacted as a consequence, for example where members of one community are then less likely to use a facility or service.
- 7.16 Furthermore, the Council also acknowledges that while positive actions may be taken into account during the conduct of an EQIA, primarily the EQIA should remain focused on identifying and remedying adverse impacts that fall on one or more communities, for example where access to a facility or service is impeded or where a facility or service is made less welcoming.
- 7.17 According to many respondents to the current consultation, any opposition to bilingual signage should be disregarded for a variety of reasons, not least as it is likely to be based on good relations grounds alone, that signage in two or more languages cannot be construed as adversely impacting on the promotion of equality of opportunity, and that arguments opposing bilingual signage are likely to be based on sectarianism and hence should be deemed invalid.
- 7.18 In other words, the adoption of bilingual signage should not be construed as an adverse impact as it will not impede access to the facility but instead should be characterised primarily as a positive or affirmative action measure that will enhance the facility for Irish language users, while posing no harm or disadvantage to others.
- 7.19 While those supporting the proposal would cast opponents as misguided, it is impossible to disregard those on the other side of the divide who adopt a very different stance with regard to the proposal. Their vehement and passionate opposition to the introduction of bilingual signage in Olympia leisure centre was palpable at various times through the consultation period, and could indicate a significant risk of harm to community relations should the proposal be adopted.
- 7.20 The depth of feeling, as expressed verbally in meetings and in written contributions, was undoubtedly fuelled by a belief that the local PUL community was beleaguered, disadvantaged and under threat, with the current proposal

being perceived as one further example of a longstanding campaign designed to marginalise and disenfranchise.

- 7.21 The community's historical relationship with Olympia also presents a significant factor in this dynamic. Built in the 1970s, whether rightly or wrongly Olympia was described by many respondents as 'our' leisure centre, standing apart from leisure centres on the other side of the M1/Westlink which were regarded as 'theirs'.
- 7.22 The reality of this perception may be open to challenge, and especially when the designation of 'city-wide' is applied to the centre, but to many of those who took part in the consultation, this perception remains alive and significant, and should not be disregarded. With this in mind, it would be naïve to ignore the potential for harm to good relations should the proposal be adopted, and the adverse impact on the future relationship between Olympia, the Council and the local PUL community
- 7.23 Looking across the consultation in terms of numbers for and against the proposal, it is important not to forget the Equality Commission's advice. The Commission is adamant that an EQIA consultation should not be regarded as a headcount but instead a measured consideration of all available evidence and data. The weight that is attached to different types of quantitative and qualitative information brought forward during the consultation should take into account many factors over and above numbers, not least because the checks and balances available to assure the veracity of responses are limited.
- 7.24 With these caveats in mind, substantial petitions were handed in from both sides, there was healthy attendance at online and face-to-face meetings, many people took considerable time and effort in writing personal responses (along with substantial contributions from representative groups), and over 500 people completed either an English or Irish version of the questionnaire.
- 7.25 The cumulated data indicates just how many individuals and groups on both sides of the divide have been prepared to devote considerable time and effort in making their voices heard. Arguments presented for and against the adoption of the proposal have been equally persuasive but both positions are also noteworthy for one thing more than any other, the absence of compromise.
- 7.26 Ordinarily an EQIA will endeavour to set out ways in which potential adverse impacts can be mitigated but in this case there is scant reference to mitigating measures from either side of the divide.

- 7.27 Among those who support the proposal, one suggestion made by a number of contributors was for further training and education to remove resistance to the Irish language. Among those who are opposed to the proposal some did suggest the possibility of trilingual signage (English, Irish and Ulster Scots) although the numbers advocating this approach were small, and representatives of the Ulster Scots community were explicit in rejecting this as a potential mitigation.
- 7.28 Both sides did highlight the overarching need for Olympia to be a 'shared space' but it was interesting how this concept was construed, with diametrically opposed positions being advocated in order to achieve this goal. One side saw the introduction of bilingual signage as a gesture to make the centre welcoming and inclusive to all communities, the other side promoting the continued use of monolingual signs as a way of not offending anyone.
- 7.29 Given how diametrically opposed the two sides remain it is not easy to formulate a compromise position but instead the Council must simply be obliged to make a decision for or against the proposal, and bear the consequences.
- 7.30 However, in making that decision, it can be easy to forget to look beyond the rhetoric of the main protagonists. Beyond the 'great divide' of those for and against, there are those who matter just as much, if not more, i.e. the people who actually visit and use Olympia.
- 7.31 In this regard, the data included on p.40-42, while limited, may be revealing. During the course of the consultation many claims have been made regarding those who use Olympia but often this was based less on fact than conjecture.
- 7.32 Management data from GGL shows that around threequarters (75.9%) of Olympia's current members are drawn from four postcode districts, BT9 (37.2% - Malone, Lisburn Rd, Taughmonagh, Stranmillis), BT12 (17.0% - Sandy Row, The Village, Falls Rd), BT10 (12.6% - Finaghy) and BT8 (9.0% - Saintfield Rd, Four Winds, Carryduff, Knockbreda, Newtownbreda).
- 7.33 This profile also broadly reflects in the nine primary schools that regularly use the centre for school swimming plus 26 bookings from 11 schools located in BT9 (Malone, Lisburn Rd, Taughmonagh, Stranmillis), BT10 (Finaghy), BT12 (Sandy Row, The Village, Falls Rd), BT17 (Dunmurry, Hannahstown, Twinbrook, Poleglass, Lagmore, Derriaghy, Seymour Hill) and BT7 (Ormeau, Botanic, University).

- 7.34 While it is important not to place too great an emphasis on these statistics they do suggest a membership that appears to draw widely from across south and, to a more limited extent, west Belfast.
- 7.35 What may also be relevant is not physical distance from the centre but the construct of ‘functional distance’²⁴. The available data on usage by members and schools would suggest that the M1/Westlink corridor could play a role in determining functional distance to Olympia. At the same time the profile of users also suggests that proximity to the centre is not critical - and the volume of cars regularly parked outside the centre would confirm this impression.
- 7.36 Taking all this information into account, there is nothing to be gained by rehearsing the various national, international and regional imperatives that would actively encourage the Council to further the aims of its Language Strategy by enacting its proposal and installing bilingual signage. Without question, the Council has an inexorable right to erect bilingual signage at Olympia Leisure Centre should it so choose, a right that resonates strongly with the purpose of its own Language Strategy.
- 7.37 Put starkly, this Strategy sets out clearly the aspiration to promote and celebrate minority languages across the City, and the proposal would further this aim. Simultaneously however, the Language Strategy also explicitly states an aspiration to promote good relations through its implementation, and there is clear evidence that the proposal has the potential to harm community relations.
- 7.38 At both a tactical and strategic level, in making this decision the long-term benefits to the success of the Language Strategy, the Council, and good relations across the City should be afforded due consideration but ultimately the question remains. While the Council has the right to install bilingual signage in Olympia, at this time and in this location, does the Council choose to exercise this right?

²⁴ This typically defined as the likelihood that people will come into contact with each other taking into account obstacles and impediments. Hence the use of a facility may not be linked to physical distance alone but how straightforward it is to access.

Appendix 1: Available data and research

Legal position

(a) Counsel's opinion

In relation to the Language Strategy itself, in January 2013 the Council sought the opinion of Mr Richard Gordon QC to advise:

- whether the Council is in any legal conflict with the provisions of the European Charter and whether the current policies in relation to the use of Irish meet with the spirit and requirements of the Charter;
- whether the current language policies are open to legitimate criticism.

Mr Gordon advised of the potential for judicial review and recommended that the Council should – as a minimum – have in place a clear strategy to meet all the requirements of Article 10. He suggested that the Language Policy should be in a comprehensive and easily accessible form and should attempt to itemise in the clearest terms what is being done to implement the policy.

(b) High Court ruling

In December 2014, the High Court ruled on an application for judicial review by Eileen Reid of a decision taken by Belfast City Council to refuse to erect an additional street name plate in Irish at Ballymurphy Drive, Belfast. The application was made on five grounds, one of which was that the Council's street naming policy was inconsistent with its commitment to act in accordance with the European Charter. The ruling stated that, as a general proposition, international treaties or agreements which have not been incorporated into national law are not enforceable and went on to say:

'a public authority ... cannot be obliged to treat itself as bound to act in compliance with international obligation. Even where it does so it is clear from the authorities that the courts will adopt a very light touch review which will not extend to ruling on the meaning or effect of the International Treaty.'

(c) International and domestic legal obligations, charters and standards

European Charter for Regional or Minority Languages

The European Charter for Regional or Minority Languages is an international convention designed to protect and promote regional and minority languages.

The UK has an obligation not to create barriers regarding the use of a minority language. Article 7(4) of the Charter provides that, 'In determining their policy with regard to regional or minority languages, the Parties shall take into consideration the needs and wishes expressed by the groups which use such languages'.

In Northern Ireland, Part II of the European Charter applies to Irish and Ulster-Scots and Part III to Irish only.

Part II places a general duty on the state to facilitate and/or encourage the use of regional or minority languages in speech and writing, in public and private life but does not place any obligations directly on district councils.

Part III of the Charter extends to public services under public control. In Article 10, it states that services need to be able to be provided in the specified language and users of the language need to be able to submit requests for services in this language. Article 10 makes it clear that public authorities should have a capacity for translation and interpretation, allow or encourage the use of traditional forms of placenames and family names, draft documents in the specified language, facilitate oral and written applications in this language, facilitate the use of the language in debates and allow people to submit requests in the language.

The UK ratified the European Charter in March 2001, but it has not been incorporated into domestic law. At present there is no Language Act in place in Northern Ireland (unlike the position in Scotland and Wales) although policies have been formulated by central government

UN Special Rapporteur on minority issues

Guidance from the UN Special Rapporteur on minority issues issued in 2017²⁵ was also taken into consideration by the Council when revising this policy. The guidance notes that, 'Bilingual or multilingual signs used by public authorities demonstrate inclusiveness, and that various population groups share a locality in harmony and mutual respect'.

²⁵ www.ohchr.org/documents/issues/ieminorities/language/rights/linguistic/minorities/handbook.docx

Framework Convention for the Protection of National Minorities

The Framework Convention for the Protection of National Minorities is a multilateral treaty of the Council of Europe aimed at protecting the rights of minorities within Europe. The United Kingdom is a signatory nation to the Framework.

It does not place any directly enforceable obligation on local councils but includes a number of provisions in relation to minority languages.

Article 11 requires the state to facilitate the display of traditional local names, street names and other topographical indications in the minority language where there is a sufficient demand and in areas traditionally inhabited by substantial numbers of persons belonging to a national minority.

The Fifth Report on the United Kingdom by the Advisory Committee on the Framework Convention for the Protection of National Minorities (May 2023) addressed the issue of bilingual signage in Northern Ireland. This report placed an emphasis on the need for bilingual signage as a marker of shared territory.

New Decade, New Approach 2020

The NI Executive's New Decade, New Approach strategy sets out a number of proposals in relation to rights, language and identity. These include:

- establishing an Office of Identity and Cultural Expression 'to celebrate and support all aspects of Northern Ireland's rich cultural and linguistic heritage';
- appointing a Commissioner 'to recognise, support, protect and enhance the development of the Irish language in Northern Ireland';
- appointing a Commissioner 'to enhance and develop the language, arts and literature associated with the Ulster Scots/Ulster British tradition';
- officially recognising both Irish and Ulster-Scots languages in Northern Ireland;
- allowing any person to conduct their business in Irish or Ulster-Scots before the Assembly or any of its committees

While the document sets out proposals that are broadly in line with previous advice and guidance, at this time it does not provide specific guidance for local government other than:

'The guidance will ask the Commissioner, as a first priority, to focus on developing best practice standards that facilitate interaction between Irish language users and public bodies, including but not limited to making information or forms available in Irish where

required, enabling widely used public websites to have an Irish Language translation available, and ensuring that public bodies reply in Irish where practical to correspondence in Irish. **Public bodies will each continue to make their own decisions on other matters to do with the Irish language.'**

[Northern Ireland \(St Andrews Agreement\) Act 2006](#)

This Act places a duty on the NI Executive to adopt a strategy for the enhancement and protection of the Irish language.

[Belfast \(Good Friday\) Agreement 1998](#)

Strand Three of the Belfast Agreement contains a series of commitments in respect of economic, cultural and social issues, including a general provision relating to minority languages:

'All participants recognise the importance of respect, understanding and tolerance in relation to linguistic diversity, including in Northern Ireland, the Irish language, Ulster-Scots and the languages of the various ethnic communities, all of which are part of the cultural wealth of the island of Ireland.'

[\(d\) Judicial Review Application Conradh Na Gaeilge March 2017](#)

The High Court found that the Executive Committee of the NI Assembly had failed to comply with obligations flowing from the NI Act 1998 requiring it to adopt a strategy in respect of the Irish language and that consideration was not sufficient to discharge the duty arising under the Act.

[\(e\) Fair Employment and Treatment \(NI\) Order 1998](#)

The Equality Commission's remit in this area stems from their duties under the Fair Employment and Treatment (NI) Order 1998 ('FETO') 'to promote equality of opportunity, affirmative action and to work for the elimination of religious/political discrimination'. The Commission's advice includes the following:

'[FETO] makes discrimination on the grounds of religious belief and political opinion unlawful, both in the workplace and in the provision of goods, facilities and services. Also, in the workplace, it bans 'harassment' on these grounds. In addition to the issue of discrimination and harassment, employers also have legal obligations which require them to promote fair participation in

employment and associated responsibilities to promote a good and harmonious workplace.’

‘In the field of employment, the Fair Employment Code of Practice provides general guidance for employers on these matters. The Code has been cited with approval by the Fair Employment Tribunal when upholding complaints against employers in numerous discrimination cases. A small number of these concerned the display of flags and emblems.’

‘The relatively new statutory definition of harassment under FETO (first enacted in 2003), has not yet been explicitly considered by the Tribunal in any case dealing specifically with ‘flags and emblems’ issues, and including signage. However, the case law that preceded 2003 can, with a reasonable degree of confidence, be used to predict how the Tribunal would approach these questions if raised today.’

‘In relation to fair employment obligations on the provision of goods, facilities and services, it is also not clear to what extent FETO impinges on the issue, as there has not been any case law to date in respect of these provisions in relation to the display of flags and emblems, including signage. Furthermore the coverage of the statutory provisions differs from those which apply to employment-related matters.’

[ECNI Guidance on Promoting a Good and Harmonious Working Environment](#)

In October 2009, the Equality Commission issued guidance on promoting a good and harmonious working environment. This guidance 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....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....In other words an ‘harmonious’ working environment does not necessarily mean a ‘neutral’ one.’

The guidance includes the following advice on the issue of workplace displays or emblems, which could extend to signage:

‘The Commission recommends that where an employer is seeking to provide or maintain fair participation, or to ensure that all services and

facilities are widely utilised by all sections of the community, there is sensitivity concerning displays wholly or mainly associated with one section of the community.'

(i) Central government strategies

Structural changes within central government have resulted in this work being taken forward by the Department for Communities (DfC).

(a) Irish Language Strategy

In January 2015, the Department of Culture, Arts and Leisure (DCAL) published a Strategy to Enhance and Protect the Development of the Irish Language over the period 2015-2035 (Straitéis le Forbairt na Gaeilge a Fheabhsú agus a Chosaint).

The key aims of the Strategy are to:

- support quality and sustainable acquisition and learning of the Irish language;
- enhance and protect the status and visibility of the Irish language;
- deliver quality and sustainable Irish language networks and communities; and
- promote the Irish language in a way that will contribute towards building a strong and shared community.

In relation to the delivery of public services, the Strategy envisages that public authorities will facilitate the use of Irish both orally and in writing and will produce and adhere to a Code of Courtesy that meets the needs of those who wish to conduct their business through Irish. The Strategy notes that language awareness and language training programmes need to be provided so that a higher proportion of public service staff can effectively deliver services in Irish to customers who seek them.

Local councils will be expected to:

- adopt Irish language policies and plans and appoint Irish language officers;
- initiate or expand facilities for the use of Irish in their council and committee meetings;
- increase the visibility of the Irish language by publicising the availability of their Irish language services;
- provide an Irish or bilingual version of publications, official documents and forms in line with the approach of the Strategy and the European Charter for Regional or Minority Languages;
- facilitate the proper preservation and signposting of Irish place-names and the naming of new housing developments; and
- encourage tourism and cultural initiatives through Irish.

Under New Decade New Approach there was a further commitment to an Irish Language Strategy to be taken forward by DfC. This led to the publication in 2022 of an Expert Advisory Panel Recommendation Report which placed an emphasis on the need for Irish and English bilingual signage to be available throughout public buildings in Northern Ireland.

(b) Consultation on proposed Irish Language legislation

In accordance with the Strategy, DfC continues to work towards introducing legislation to secure legislative protection of the Irish language and issued a consultation document in February 2015 setting out the provisions that might appear in an Irish Language Act. Some of the key proposals are summarised below:

- Irish will be defined as an Official Language in Northern Ireland in such a way as to guarantee services through Irish on a par with those available through English;
- There will be provision to create the position of an Irish Language Commissioner whose functions would include approving language schemes and providing advice to the public and public bodies;
- the Irish Language Commissioner would have the power to instruct public bodies to draft language schemes;
- public bodies, including district councils, will have a statutory duty:
 - to ensure that correspondence sent to them in Irish is replied to in Irish without undue delay;
 - to ensure that when information is provided to the public, the communication is in Irish and English;
 - to publish simultaneously in Irish and English documents setting out public policy proposals, annual reports, audited accounts or financial statements etc.;
 - to agree language schemes with the Irish Language Commissioner and to implement the commitments of such statutory schemes; and
 - to undertake public consultation exercises to assist in the preparation of language schemes.

Further to this work, in February 2022 DfC produced an Expert Advisory Panel Recommendation Report that sets out in some detail the goals, aims, objectives, action areas and recommendations attaching to the Irish Language Strategy²⁶. This includes recommendations specifically in relation to the provision of public services, both centrally and through local government.

²⁶<https://www.communities-ni.gov.uk/publications/irish-language-strategy-expert-advisory-panel-recommendation-report>

(c) Ulster-Scots Strategy

In January 2015 DCAL also published a Strategy to Enhance and Develop the Ulster-Scots Language, Heritage and Culture over the period 2015-2035 (Roadin furtae Bríng Forrits an Graith tha Ulstèr-Scotch Leid, Heirskip an Cultùr).

The Strategy has four key aims:

- promote and safeguard the status of, and respect for, the Ulster-Scots language, heritage and culture;
- build up the sustainability, capacity and infrastructure of the Ulster-Scots community; and
- foster an inclusive, wider understanding of the Ulster-Scots language, heritage and culture in a way that will contribute towards building a strong and shared community.

In relation to public services, the Strategy indicates that Departments, councils and public bodies need to:

- facilitate and encourage the use of Ulster-Scots in public life;
- increase awareness and visibility of the Ulster-Scots services they provide;
- encourage the promotion of Ulster-Scots cultural and heritage tourism initiatives;
- ensure that respect for Ulster-Scots within the context of cultural diversity is an element of their commitment to good relations;
- facilitate the proper preservation and signposting of Ulster-Scots place names.

The Strategy also says that awareness training for relevant staff needs to be a good practice requirement.

(ii) [Advice from language agencies](#)

(a) [Guidance from Foras na Gaeilge](#)

In March 2015 Foras na Gaeilge (the statutory body charged with the promotion of the Irish language) published a Guidance Document: Irish Language Services in the New Councils. Foras na Gaeilge has been assisting councils to develop their service provision in Irish since 2006, principally through the Irish Language Officers' Scheme.

Under this Scheme, joint funding for a three-year period is provided towards the salary of an Irish Language Officer, provided that a Council Action Plan is prepared in collaboration with Foras na Gaeilge. The most recent scheme ran from 2013-2016. Foras na Gaeilge has advised that a review of the Scheme has been initiated

to take account of the changed environment following local government reorganisation.

Foras na Gaeilge recommends that each council should include the Irish language in their Community Plans, adopt a strong Irish Language Policy and adopt a strategy for the development of Irish both within the council and in the community. They suggest that development of a strategic approach should be based on:

- consultation with local Irish speaking communities to gather information on which Irish language services would be beneficial to them and which they would be most likely to use; and
- an audit of the Irish language skills of existing staff.

The Guidance Document sets out examples of good practice in terms of support for minority languages and offers practical advice on ways to support and promote the Irish language including the provision of signage; these are set out as a 'menu' ranging from the simplest actions to a more comprehensive approach.

(b) [Guidance from the Ulster-Scots Agency](#)

The Ulster-Scots Agency has highlighted that it is essential that, when public authorities are undertaking actions to promote Ulster-Scots, they reflect the situation of the language, in accordance with the European Charter. The Ulster-Scots Agency has adopted the Fishman Model for reversing language shift, which sets out an eight-stage process for language development. The Model states that efforts should be concentrated on the earlier stages of restoration until they have been consolidated before proceeding to the later stages. The stages are:

- 1) acquisition of the language by adults, who in effect act as language apprentices (recommended where most of the remaining speakers of the language are elderly and socially isolated from other speakers of the language);
- 2) create a socially integrated population of active speakers (or users) of the language (at this stage it is usually best to concentrate mainly on the spoken language rather than the written language);
- 3) in localities where there are a reasonable number of people habitually using the language, encourage the informal use of the language among people of all age groups and within families and bolster its daily use through the establishment of local neighbourhood institutions in which the language is encouraged, protected and (in certain contexts at least) used exclusively;
- 4) in areas where oral competence in the language has been achieved in all age groups encourage literacy in the language but in a way that does not depend upon assistance from (or goodwill of) the state education system;
- 5) where the state permits it, and where numbers warrant, encourage the

- use of the language in compulsory state education;
- 6) where the above stages have been achieved and consolidated, encourage the use of the language in the workplace (lower worksphere);
 - 7) where the above stages have been achieved and consolidated encourage the use of the language in local government services and mass media;
 - 8) where the above stages have been achieved and consolidated encourage use of the language in higher education, government, etc.

(iii) [Policies of other councils in Northern Ireland](#)

Before local government reform, the majority of the 26 legacy councils in NI had policies relating to either the Irish language or linguistic diversity generally. However, at this time only four of the ten NI councils (excluding Belfast) have formally adopted policies addressing these issues.

[Fermanagh and Omagh District Council](#)

Fermanagh and Omagh District Council has adopted an overarching Linguistic Diversity Policy which embraces all language forms but affords particular status to Irish in accord with Part III of the European Charter. To date, the Linguistic Diversity Policy is reflected in its branding strategy: English and Irish are included on council stationery, vehicles and external signage with the exception of Strule Arts Centre and Enniskillen's Ardhoven Theatre, where Ulster Scots is also included.

[Derry City and Strabane District Council](#)

Derry City and Strabane District Council adopted a policy for the Irish language and a separate policy for Ulster-Scots in September 2014. It should be noted that Derry and Strabane District Council have trilingual English/Irish/Ulster Scots signage throughout their buildings.

[Newry, Mourne and Down District Council](#)

Newry, Mourne and Down District Council agreed its Bilingual Language Policy in 2015, establishing the Council's commitment to facilitate and encourage the promotion and use of both the Irish language and English language in the Council area. While procedures have been agreed, the Council has not as yet finalised an action plan to implement the commitments. Newry, Mourne and Down District Council have bilingual Irish/English signage throughout their buildings.

The Mid Ulster District Council Irish Language Policy is based on the requirements of Parts II and III of the European Charter for Regional or Minority Languages, thereby implementing a range of positive actions to promote, enhance and protect the Irish language while encouraging its use in speech and writing in private and public life. Mid Ulster District Council buildings have bilingual Irish/English signage.

(iv) Language Legislation in the UK and Republic of Ireland

(a) Wales

The Welsh Language Act 1993 established the principle that, in the conduct of public business and the administration of justice in Wales, the Welsh and English Languages should be treated on the basis of equality. Public bodies, including local councils, are required to prepare a Welsh Language Scheme to outline the Welsh language services they will provide and state how and when those Welsh services will be available.

The Welsh Language (Wales) Measure 2011 replaced many of the provisions of the Act and established official status for the Welsh language in Wales. The Measure created a new legislative framework to impose a duty on public authorities to comply with standards relating to the Welsh language, with these standards replacing existing Welsh Language Schemes over time. The purpose of introducing standards was to provide greater clarity to public authorities regarding their duties and to Welsh speakers about the services they could expect to receive in Welsh. Standards will also ensure greater consistency of Welsh language services and improve their quality. The Measure also required public authorities to use the Welsh language in a reasonable and proportionate manner.

Local councils in Wales have had Welsh Language Schemes in place for a number of years. Typically, these cover three specific areas:

- dealing with the Welsh speaking public (including correspondence, meetings and by telephone);
- the Council's public image (including corporate identity, signs, publications, forms, advertising, news releases, exhibitions, surveys, public notices and recruitment advertisements);
- staffing issues (including recruitment, language training and vocational training).

(b) Scotland

The Gaelic Language (Scotland) Act 2005 established the status of the Gaelic language as an official language of Scotland, commanding equal respect with the English language. It also established Bòrd na Gàidhlig as a public body with responsibility for preparing a National Plan for Gaelic every five years. The Bòrd has powers to require public authorities, including local councils, to draft and implement a Gaelic Language Plan. Each individual plan must take into account the National Plan and the extent to which Gaelic is used within, and in relation to, the work and services of the public authority.

The Bòrd has identified four core areas of service delivery that it wishes public authorities to address when preparing Gaelic Language Plans. These are:

- Identity (including corporate identity and signage);
- Communication (including reception, telephone, mail and e mail, forms, public meetings and complaints procedures);
- Publications (including public relations and media, printed material, websites and exhibitions);
- Staffing (including training, language learning, recruitment and advertising).

(c) Republic of Ireland

The Irish Constitution establishes that the Irish language is to be regarded as the first official language, while the Official Languages Act 2003 provided the public with the right to conduct business with the state solely through Irish. The Act requires the preparation by public authorities of Irish Language Schemes, specifying which services will be provided exclusively in Irish, exclusively in English and through the medium of both languages. Each scheme must set out the measures that the public authority will adopt to ensure that any services that are not currently provided in Irish will be so provided over a period of time. In developing its scheme, the public authority may take into account the underlying level of demand for specific services in the Irish language and the resources and capacity to develop or access the necessary language capability.

(v) Demand for minority languages

(a) Census

The 2021 Census included information on the main languages spoken by residents of Belfast and knowledge of Irish and Ulster-Scots, and the School Census 2014/15

provides information on the number of schools in the Belfast City Council area providing teaching through the medium of Irish. The figures (which relate to the Council's extended boundary) show that:

- 15.5% of the Belfast population (aged 3+) have some ability in Irish, compared with 12.5% of the population of Northern Ireland as a whole;
- over 18,000 people in Belfast speak, read, write and understand Irish; just under 3,000 pupils receive education through the medium of Irish in the Council area;
- 7.3% of the Belfast population (aged 3+) have some ability in Ulster-Scots, compared with 10.4% of the population of Northern Ireland as a whole;
- 2,753 people in Belfast speak Ulster-Scots on a daily basis;
- 5.7% of people in Belfast are deaf or have partial hearing loss;
- 2.6% of Belfast households contain at least one person who does not have English as a main language and in 3.9% of Belfast households, no-one has English as a main language;
- the most commonly spoken languages in Belfast (excluding English and Irish) are Polish, Arabic and Chinese (NISRA have indicated that all Chinese languages are grouped together for the purposes of the 2021 Census).

Table 1 below provides information on the number of pupils receiving education through the medium of Irish. The data is drawn from the School Census 2014/15.

Table 1: Schools and pupils taught in the medium of language

	No. of establishments	No. of pupils 2014/15
Naíscoileanna (Nursery/Pre-School Units)	13	442
Gaelscoileanna (Primary Schools/Units)	9	1,194
Gaeloideachas Dara Leibhéil (Secondary Stream)	1	580
Youth club provision	7	760
Total	30	2,976

In addition, there are also currently 16 secondary schools teaching Irish within the Council area.

(b) 2019/20 Continuous Household Survey (Northern Ireland data)

Data relevant to the Irish Language

Knowledge of Irish

In 2019/20, the proportion of adults who have some knowledge of Irish, i.e. can understand, speak, read or write Irish was 17%. This figure shows an increase on the previous years' figures (15%) and is the highest recorded proportion over the entire trend period from 2011/12. There were also increases in knowledge of Irish between 2017/18 and 2019/20 in a number of groups including females, Catholics, adults who do not have a disability and those living in urban areas.

Understand Irish

More than one in every ten (14%) of the adult population can understand Irish. One out of every hundred (1%) adults in Northern Ireland can understand complicated spoken sentences, so could understand programmes in Irish on the radio or television. A further three out of every hundred (3%) adults can understand a conversation in Irish conducted at a simple level so, for example, could understand directions given in the street. 4% of the population can understand simple spoken sentences or passages, e.g. 'It's half past three', while a further 6% can understand single spoken words or simple phrases, e.g. 'Hello', or 'How are you?'.

Speak Irish

Just over one in every ten (11%) of the adult population can speak Irish, while 1% can carry on a complicated conversation in Irish e.g. talking about any subject. An additional 2% could carry on an everyday conversation, e.g. could describe their day. A further 4% can use simple sentences in Irish e.g. 'Can I have a cup of tea?' or can use single words or simple phrases e.g. 'Hello' or 'How are you?'.

Read Irish

Nearly one in ten adults (8%) can read Irish while 1% can read and understand complicated passages, so could read a book or newspaper written in Irish. 2% can read and understand more difficult sentences or passages, so could read a letter or email written in Irish and 3% can read and understand simple sentences or passages, so could read a postcard written in Irish. A further 2% can read and understand single words or simple phrases, e.g. 'Entrance' or 'No smoking'.

Write Irish

One in every twenty adults (5%) can write Irish while 1% can write complicated passages, e.g. could translate part of a book or report into Irish, and can write difficult sentences and moderately difficult passages, e.g. could write a letter or email in Irish. An additional 2% of the adult population can write simple sentences or passages, so could write a postcard in Irish. A further 1% can write single words or phrases, e.g. 'Hello', or 'How are you?'.

Use of Irish

5% of adults in Northern Ireland use Irish at home, conversing with family or housemates, either on a daily basis or at least very occasionally (less often than once a week). A similar proportion (5%) use Irish socially, either on a daily basis or at least very occasionally, to converse with friends or acquaintances.

Data relevant to the Ulster-Scots Language

Knowledge of Ulster-Scots

In 2019/20, 16% of the population had some knowledge of Ulster-Scots i.e. can understand, speak, read or write Ulster-Scots. This is an increase on the proportion of adults in 2015/16 and 2017/18 who had some knowledge of Ulster-Scots (14%). There were also increases on the proportions of males who had some knowledge of Ulster-Scots from 16% in 2017/18 to 19% in 2019/20, this was also the case with Catholic adults (7% in 2017/18 to 11% in 2019/20).

Understand Ulster-Scots

More than one in every ten (15%) of the adult population can understand Ulster-Scots while 2% can understand complicated spoken sentences, so could understand programmes in Ulster-Scots on the radio or television. An additional 3% can understand a conversation in Ulster-Scots conducted at a simple level so, for example, could understand directions given in the street. 4% can understand simple spoken sentences or passages, e.g. 'It's half past three', while a further 5% can understand single spoken words or simple phrases, e.g. 'Hello' or 'How are you?'.

Speak Ulster-Scots

5% of adults can speak Ulster-Scots and 1% can carry on a complicated conversation in Ulster-Scots, e.g. talking about any subject, while a further 2% are able to carry on an everyday conversation, e.g. could describe their day. 2% can use simple sentences in Ulster-Scots, e.g. 'Can I have a cup of tea?' while a further 1% can use single words or simple phrases, e.g. 'Hello' or 'How are you?'.

Read Ulster-Scots

4% can read Ulster-Scots, while 1% can write Ulster-Scots. 1% can read and understand complicated passages, so could read a book or a newspaper written in Ulster-Scots. A further 1% can read and understand difficult sentences and less complicated passages, so could read a letter or email written in Ulster-Scots.

Write Ulster-Scots

1% of the adult population can read and understand simple sentences or passages, so could read a postcard written in Ulster-Scots.

[Use of Ulster-Scots](#)

6% use Ulster-Scots at home, conversing with family or housemates, either on a daily basis or least very occasionally (less often than once a week). The same proportion (6%) use Ulster-Scots socially, either on a daily basis or at least very occasionally, conversing with friends or acquaintances. The proportions of adults using Ulster-Scots at home and using Ulster-Scots socially have increased compared to the figures reported in 2017/18, 4% and 5% respectively..

[\(vi\) Other Council policies and decisions](#)

The Council's Language Strategy was formally adopted in April 2018. However, the Council also has in place other policies and has made a number of ad hoc decisions which have a bearing on the proposal in relation to signage. The following paragraphs summarise the decisions made.

[Street naming power](#)

The Council has a statutory discretionary power under Article 11 of the Local Government (Miscellaneous Provisions) (NI) Order 1995 to erect nameplates expressing street names in English and any other language. When exercising this power, the Council must have regard to any views on the matter expressed by the occupiers of premises in that street. The Council adopted a revised Dual Language Street Signs Policy in October 2022. This provides that an application for a dual language sign may be made by an occupier(s) of the street, an elected Member for the District Electoral Area or a developer. The Council will carry out a survey of the street and if 15% of the occupiers of the street are in favour of the sign, a report will be brought to the relevant committee to consider the application.

As outlined above under 'High Court Ruling' under in December 2014, the High Court ruled on an application for judicial review by Eileen Reid of a decision taken by Belfast City Council to refuse to erect an additional street name plate in Irish at Ballymurphy Drive, Belfast. The Court ruled that the Council's policy and process were not unlawful and the application failed.

As stated above, a revised policy has now been adopted by Belfast City Council in relation to the erection of dual language street signage.

[Signage](#)

- On 7 December 1999 the Parks & Amenities Sub-Committee agreed that a welcome sign in English and Irish should be installed at the entrance of Falls Park.
- On 18 May 2012 the Strategic Policy & Resources Committee agreed that hoardings and signs relating to the delivery of the Investment Programme projects in the Gaeltacht Quarter should be bi-lingual (English/Irish).
- On 7 September 2012 the Strategic Policy & Resources Committee agreed that the Nollaig Shona sign (donated by An Cultúrlann) be erected again at the East entrance to the City Hall.
- On 18 August 2017, the Strategic Policy & Resources Committee agreed that in addition to the Nollaig Shona sign on one end column of City Hall, a ‘Blythe Yuletide’ sign would be erected at the other end column City Hall for the Christmas period.
- It should be noted that the Council agreed a draft policy on dual language (English/Irish) signage in 2006 but decided that signage should be in English only, with the exception of multi-lingual welcome signs where there is appropriate demand.
- On 17 June 2022, the Strategic Policy & Resources Committee agreed that English and Irish bilingual signage should be installed at Belfast City Cemetery.
- On 23 September 2022, at a meeting of the Council's Strategic Policy and Resources Committee it was agreed to erect bilingual English/Irish signage at Páirc Nua Chollann, a new Council facility on the Stewartstown Road.

Equality Scheme

The Council's Revised Equality Scheme (approved in 2021), which sets out the Council's arrangements for complying with the equality duties under Section 75 of the Northern Ireland Act 1998, includes a commitment to providing information in alternative formats on request, where reasonably practicable. The Scheme states that alternative formats may include Easy Read, Braille, audio formats (CD, mp3 or DAISY), large print or minority languages to meet the needs of those for whom English is not their first language

(viii) Advice from the Equality Commission for Northern Ireland

Response by the Equality Commission for Northern Ireland to the Consultation by the Department of Culture, Arts and Leisure on a *Strategy for protecting and enhancing the development of the Irish Language*, November 2012

‘Para. 12: The Commission considers that the use of any language should be a neutral act and that the speaking of Irish or its more general use in the community should not diminish the entitlements of those whose right to their British identity is guaranteed in the Good Friday Agreement. Similarly, the Commission considers that the wider use of Ulster Scots should not in any way diminish the entitlements of those whose right to their Irish identity is similarly guaranteed. The speaking of any language in Northern Ireland should not be perceived as a threat to any individual or group, nor should it be intended in such a manner.’

Following discussion at the Joint Diversity Group, 18 October 2013, an enquiry was made to the Equality Commission for Northern Ireland (ECNI) regarding Newry & Mourne Council’s Language Policy.

ECNI responded:

‘We have commented that Newry & Mourne has a clear policy in place to promote the Irish Language and the Commission has provided advice, when requested, in relation to the implementation of the policy. In general we consider the language rights issue to be more a human rights issue than an equality issue although there is an intersection with employment and good relations aspects’.

ECNI also summarised their response to Committee of Experts on the European Charter for Regional and Minority Languages:

‘Our response had made the point that the notion that providing equality or protection for one group limits their availability for another is both unfounded in itself and acts to the detriment of all who seek to live in a society that is fair and equitable and should be avoided in the drafting of public policy.’

Response by the Equality Commission for Northern Ireland to the Consultation by the Department of Culture, Arts and Leisure on *Proposals for an Irish Language Bill*, May 2015

‘Para. 3: On the relatively few occasions that language issues have been brought to our attention, it has come about because they were raised in the context of Section 75 of the Northern Ireland Act 1998 and/or the provisions of the anti-discrimination legislation, specifically the Race Relations (NI) Order 1997 and the Fair Employment and Treatment (NI) Order 1998. The Commission’s advice to public authorities has been specific to the context presented by the public authority. It has referenced our position on minority languages (as set out below), the public authority’s compliance with its Equality Scheme commitments and the Commission’s guidance, as well as the provisions of the relevant anti-discrimination legislation, if appropriate.’

‘Para. 11: An important aspect of language policy is the interrelationship between individuals or groups that speak different languages. Any duty placed on public authorities should ensure that the development of provisions to protect and promote the language is viewed within the context of the duty to have due regard to the need to promote equality of opportunity and to have regard to the desirability of promoting good relations within the provision of public services. Public authorities should consider aspects of mutual understanding, co-operation, communication and partnership between different ‘language communities’, including engagement with relevant communities to seek to explore and take reasonable account of concerns or perceptions about the promotion of minority languages.’

(ix) Academic research

[Language, Politics and Identity in Ireland: a Historical Overview – Tony Crowley](#)

Crowley provides insight into the significance of linguistic diversity, placed at the heart of the Good Friday/Belfast Agreement (1998), which brought about new constitutional arrangements between the Republic of Ireland and the United Kingdom, and a new structure of governance within Northern Ireland. The text of the concord included the following general declaration:

‘All participants recognise the importance of respect, understanding and tolerance in relation to linguistic diversity, including in Northern Ireland,

the Irish language, Ulster-Scots and the languages of the various ethnic minorities, all of which are part of the cultural wealth of the island of Ireland.’ (Belfast Agreement 1998: 19)

Crowley observes, ‘In the context of a document that outlined the contours of a major historical settlement, this is a striking statement about the significance of language(s) in Ireland which indicates the continuing social and political status of ‘the language question(s)’ in Irish history’.

(x) Feedback from pre-consultation on Language Strategy

Various meetings were held with representative groups in drawing up the Language Strategy 2018 - 23. The list below is a combination of key factors identified at such meetings.

Irish language sector

Various practical suggestions to build on currently available services were made, including:

- Information on services currently available for Irish speakers could be provided on the council’s website together with a link from the homepage to Irish language and culture sector websites; key council documents could also be provided in Irish on the website;
- There could be better promotion of the availability of tours of the city hall in Irish and an increase in the number of such tours available; consideration could also be given to making tours of other venues available in Irish;
- Greater access to council venues and facilities for Irish language and culture events could be facilitated and opportunities to present joint heritage exhibitions could be pursued;
- Initiatives should be implemented to raise awareness among council staff of the current language policy and the practical issues around translation; staff could also be made more aware of the work of the Irish language sector in Belfast;
- The possibility of appointing an Irish language officer could be considered.

Ulster-Scots sector

The sector representatives indicated that Irish and Ulster-Scots were at different stages of development and the use of the Ulster-Scots language was not received in Belfast in the same way as in other parts of Northern Ireland. There was an underlying prejudice with the use of Ulster-Scots and there was a need for wider

cultural engagement with Ulster-Scots heritage as well as language and for celebration of the culture in a more open way.

The sector representatives wished to see a focus on the cultural and heritage aspects of the language rather than promote the need for translation services. They welcomed the Council's commitment to support Ulster-Scots traditions and cultural activities in practical ways; however, they were concerned that the promotion of any language might be seen to be political and lead to division.

[New communities](#)

The sector representatives suggested that:

- the Council's Welcome Pack should be more widely publicised and an electronic link to the Welcome Pack could be included in a regular electronic update circulated to appropriate organisations;
- Council staff should be made more aware of the Big Word interpreting service and trained in how to use it;
- a leaflet could be made available to Council staff so that they can assist service users to identify the language translation required;
- the Council could support initiatives to promote the heritage and traditions associated with different languages spoken in Belfast.

[People with sensory or learning disabilities](#)

The sector representatives suggested that:

- our website is clear and provides technology for people who are blind and partially sighted
- the Council needs to think about how we make our information accessible to everyone
- as civic leader we need to lead others by example, in having menus in braille and large print
- there are so many Council services that people don't always understand that there are things there which are of interest – how does Council link with groups for people with disabilities
- hearing loops should be included in the new exhibition
- signed tours of City Hall could be offered and promoted

[\(xi\) Feedback from consultation on City-wide leisure centre signage](#)

Following a Special Council meeting on Friday 11 October 2019, the Council agreed to commission a public consultation regarding the installation of bilingual /

multilingual signage in four new or recently refurbished City-wide leisure centres (Andersonstown, Lisnasharragh, Olympia and Templemore). This signage and naming decision represents one element of the outworking of Council's Language Strategy 2018-2023, a strategy that aspires to make Belfast a place where linguistic diversity is celebrated and respected, and which complements the broader vision of the Belfast Agenda.

It was agreed that the consultation would employ both quantitative and qualitative methods to ensure widespread and meaningful engagement. These methods included the following:

- public and staff engagement events which were held in the local areas of each of the four leisure centres: (Andersonstown, Lisnasharragh, Olympia and Templemore); additional public meetings were held for both Templemore and Andersonstown due to the short notice of the first set of public meetings;
- Belfast City Council staff and GLL staff had the opportunity to complete an online survey or face-to-face engagement;
- an online questionnaire survey was made available for the public, along with hard copies for those who were unable to access the material electronically;
- face-to-face engagement with disabled communities (including the Council's Disability Advisory Panel); representatives of the Irish Language and Ulster Scots communities; the Council's Equality Consultative Forum; and the Council's Migrant Forum;
- further engagement with the external consultant for individuals or representatives was available by arrangement.

All relevant consultation materials were published on Belfast City Council's website and through other appropriate social media channels.

The consultation opened on 5 November 2019 and closed on 10 January 2020.

There was a substantial response to the consultation process from across all communities. Responses included:

- 3,393 completed response forms, submitted by members of the public by post or email;
- eight completed staff questionnaires, submitted anonymously by post or email;
- two written submissions (from Joanne Bunting MLA and the Northern Ireland Human Rights Commission);
- one photocopied summary response sheet with name and addresses included (n = 262).

In addition, a total of 127 members of the public attended one of the 12 scheduled public meetings (this included afternoon and evening sessions at each location, with two sets of meetings held at both Templemore and Andersonstown due to the short notice of the meetings held in these locations in the first week of the consultation), and 30 sector representatives attended at least one of the five scheduled meetings.

Only nine members of staff attended one of the six scheduled meetings at the four leisure centres, and no staff attended the drop-in session.

This represents a grand total of 3,822 responses.

The profile of questionnaire respondents (n = 3393) tended to be characterised by an over-representation of men (56.3%), those from the west of the city (35.5%), those whose national identity was Irish (47.9%) and those who self-identified as Catholic (48.9%), in comparison with 21.4% who identified as British and 28.8% Protestant. It was also noteworthy that of those aged under 18 years who completed the survey (n = 320), 90.3% were self-identified as Catholic.

In terms of written comments, the significant level of emotion revealed in many written responses was noteworthy. A number of comments focused on practical considerations, and including the expense attached to additional signage, or the priority of making buildings easily accessible to all users. In this regard, bilingual signage was seen by some as potentially confusing. Others argued that a focus on only a single issue, such as bilingualism, could be to the detriment of considerations such as the communication needs of those with a disability, those with literacy problems, or those from new communities.

Comments relating specifically to the use of either bilingual or monolingual signs varied widely in scope and focus but in very general terms, these could be broadly grouped into one of two camps.

On the one hand there were those who celebrated linguistic diversity, the promotion of minority languages and the benefits of bilingualism, arguing that naming and signage in languages along with English would enhance the cultural vitality of the city. In particular, the promotion of Irish was highlighted as a positive and progressive way forward, and in general saw no threat attached to this approach. While many did not couch comments in terms of rights, others saw the promotion of minority languages as a fundamental right that was being ignored. Others argued that greater use of Irish would be an indication of a welcoming and inclusive environment for all, including those who chose to communicate and educate primarily in Irish.

On the other hand there were those who may not have objected to the Irish language per se but who felt that, at the present time, the use of the language had been politicised and in their view now posed a threat to their culture and heritage. It was argued that this feeling had grown as the relative sizes of the two communities had shifted over recent times within Belfast. English was often described as sufficient, as it was seen to represent the main language of the UK. A smaller number voiced a concern that the imposition of Irish in areas where it may not be welcome had the potential to damage community relations and would be resisted by local communities.

Regarding the series of public meetings, the atmosphere that characterised these events varied dramatically. At many, the level of attendance was disappointing, and the questions that were asked were often no more than seeking information or clarification. These smaller meetings did raise a number of interesting issues however, for example, whether words such as Olympia could be translated into other languages, and the extent to which detail on internal signage could be presented bilingually without losing clarity. A further discussion point was why local solutions were being sought for 'City-wide' leisure centres as this appeared to be a contradiction in terms.

The atmosphere at larger meetings was far more confrontational. There was a considerable level of emotion at these meetings, and a deep suspicion among participants as to the true purpose of the exercise, and the Council's long-term objectives. During these events it was often difficult to maintain order or follow an agenda, as many participants' contributions were fuelled by considerable levels of anger and frustration at the Council, and this was seen as an opportunity to vent that anger. In particular, the consultation exercise was characterised as a conspiracy to impose language forms on local facilities against the will of that community.

There was widespread agreement on three matters, namely that:

- (i) internal directional signage should be pictorial to enhance accessibility;
- (ii) there should be consistency in language between internal directional signage and external signage; and
- (iii) in principle and subject to appropriate consultation, the Council should consider adopting bilingual/multilingual naming and signage at all of its leisure centres in future.

The majority of those who expressed an opinion stated a preference for *English and Irish* external naming signage at each of the four centres (overall, 61.4%), with this preference being most pronounced at Andersonstown Leisure Centre (66.9%).

However, this headline figure does not take into account the deep divisions of opinion across the sample and in particular in terms of preferences by national identity and community background.

Of those who self-identified as Catholic, four out of five respondents (80.1%) advocated external naming signage in *English and Irish* across all four centres, and this figure rose to 88.7% in the case of Andersonstown. In stark contrast, 85.4% of those who described themselves as Protestant indicated a preference for *English only* naming and signage for Lisnasharragh, Olympia and Templemore Leisure Centres, although this figure fell somewhat to 73.7% for Andersonstown.

These statistics were confirmed by views expressed in public meetings and by sector representatives, where events were generally characterised not by debate or difference in opinion but by consistent and unswerving unanimity of view. The level of emotion attaching to these views was often noteworthy. To summarise briefly, on the one hand there were those who celebrated linguistic diversity, the promotion of minority languages and the benefits of bilingualism, arguing that naming and signage in languages along with English would enhance the cultural vitality of the city. On the other hand there were those who may not have objected to the Irish language *per se* but who felt that, at the present time, the use of the language had been politicised and in their view now posed a threat to their culture and heritage.

Despite the survey inviting separate views on external naming signage for each of the four leisure centres, the overwhelming majority of respondents (86.1%) chose instead to give the same response for all four centres.

While no strict protocols exist in relation to how consultation can be used to inform decision-making by public authorities, the experience of Section 75 has provided some useful guidance on the weight to be attached. For example, Schedule 9 of the Northern Ireland Act 1998 requires that, in making any decision with respect to a policy, a public authority shall take into account any EQIA and consultation carried out in relation to the policy (para. 9.2).

Although there is no strict definition of what 'taking into account' entails, 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 justified²⁷.

²⁷ Practical Guidance on Equality Impact Assessment, ECNI 2004, p.45

The guidance also advises that all available information should be combined in the decision; this includes the information gathered during the research phase, the results of the consultation and the analysis of alternative options. It is hoped that this information has been brought together in this report in order to place the Council in a position to take account of all pertinent issues when making a decision.

In any consultation, the number of people expressing a preference for a particular option cannot be ignored but must also be considered in the context of all other relevant concerns, including the strength and depth of feeling expressed by all respondents. It was 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. In relation to Section 75 consultations, the Equality Commission has made explicit in the past 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.' Instead, all available quantitative and qualitative data should be interrogated in order to help reach a decision that aspires to be fair, reasonable and proportionate.

On this occasion there would appear to be no specific legal requirement acting on the Council to adopt a particular approach to naming and signage. The most recent guidance (New Decade, New Approach, see p.14 above) does not provide great clarity but instead implies that public authorities will have a degree of autonomy in deciding which language formats are deemed appropriate.

While the consultation did not provoke many responses in relation to Section 75 considerations and including the draft equality screening report the adverse impacts that may attach to any decision on naming and signage cannot be ignored. These adverse impacts were alluded to by a number of respondents who suggested either that good relations generally may be damaged by the imposition of a Council decision on a local facility or that a centre may be less welcoming to members of certain communities depending on the languages on display. At this time these concerns are only conjecture and have yet to be tested but should be borne in mind nevertheless.

With this in mind, the decision must also be married with the Council's Good Relations Strategy, and including a commitment to the development of shared spaces across the city.

The consultation revealed considerable support for only one form of bilingual signage, English and Irish, most especially among members of the Catholic

community who identify as Irish. This enthusiasm is not matched by those from the Protestant community who identify as British and the contrast in views could not be more stark.

The following tables provide a summary of preferences for each leisure centre.

The first table indicates that an overall majority would prefer to see a combination of *English and Irish* on all external naming signage. This is especially the case for Andersonstown Leisure Centre where around two-thirds of respondents (66.9%) preferred this option, with the other centres averaging around 60%. Around a quarter of those surveyed stated a preference for *English only* signage.

Q.1 Which of the following languages would you like to see on external naming signage for; (please tick one for each leisure centre as follows):

Table 2: External naming preferences: Overall sample by centre

Andersonstown LC		No. of responses	% of responses
1	English Only	778	22.9
2	English and Irish	2270	66.9
3	English and Ulster-Scots	25	0.7
4	English, Irish and Ulster-Scots	213	6.3
5	No preference	90	2.7
TOTAL		3393	100

Lisnasharragh LC		No. of responses	% of responses
1	English Only	901	26.6
2	English and Irish	2028	59.8
3	English and Ulster-Scots	54	1.6
4	English, Irish and Ulster-Scots	278	8.2
5	No preference	97	2.9
TOTAL		3393	100

Olympia LC		No. of responses	% of total responses
1	English Only	877	25.8
2	English and Irish	2035	60.0
3	English and Ulster-Scots	39	1.1
4	English, Irish and Ulster-Scots	314	9.3
5	No preference	87	2.6
TOTAL		3393	100

Templemore LC		No. of responses	% of total responses
1	English Only	907	26.7
2	English and Irish	2001	59.0

3	English and Ulster-Scots	60	1.8
4	English, Irish and Ulster-Scots	290	8.5
5	No preference	101	3.0
	TOTAL	3393	100

Differences in patterns of response between the two main communities were stark (see Table 3 below). Among those who self-declared as Catholic, 80.1% showed a preference for external signage in *English and Irish*, and this figure rose to 88.7% in the case of Andersonstown. Among those self-declared as Protestant, 85.4% supported *English only* signage for Lisnasharragh, Olympia and Templemore, although this figure dropped to 73.7% for Andersonstown. Around half of those who stated neither religion showed support for *English and Irish*, rising to 60.4% for Andersonstown.

Table 3: External naming preference by community background²⁸ by centre

Andersonstown LC		Protestant		Catholic		Neither	
		No.	%	No.	%	No.	%
1	English Only	571	73.7	20	1.5	162	27.0
2	English and Irish	72	9.3	1165	88.7	362	60.4
3	English and Ulster-Scots	11	1.4	5	0.4	8	1.3
4	English, Irish and Ulster-Scots	41	5.3	114	8.7	56	9.3
5	No preference	75	9.7	4	0.3	10	1.7
6	Not answered	5	0.6	5	0.4	1	0.2
	TOTAL	775	100	1313	100	599	100

Lisnasharragh LC		Protestant		Catholic		Neither	
		No.	%	No.	%	No.	%
1	English Only	671	86.6	24	1.8	178	29.7
2	English and Irish	32	4.1	1021	77.8	309	51.6
3	English and Ulster-Scots	35	4.5	10	0.8	9	1.5
4	English, Irish and Ulster-Scots	28	3.6	170	13.0	77	12.9
5	No preference	5	0.7	65	5.0	23	3.8
6	Not answered	4	0.5	23	1.8	3	0.5
	TOTAL	775	100	1313	100	599	100

Olympia LC		Protestant		Catholic		Neither	
		No.	%	No.	%	No.	%
1	English Only	652	84.1	24	1.8	173	28.9
2	English and Irish	33	4.3	1022	77.8	314	52.4
3	English and Ulster-Scots	23	3.0	7	0.5	8	1.3
4	English, Irish and Ulster-Scots	30	3.9	197	15.0	83	13.9
5	No preference	28	3.6	42	3.2	17	2.8
6	Not answered	9	1.2	21	1.6	4	0.7
	TOTAL	775	100	1313	100	599	100

²⁸ Excluding those who did not answer this question (n = 706)

Templemore LC		Protestant		Catholic		Neither	
		No.	%	No.	%	No.	%
1	English Only	670	86.5	27	2.1	181	30.2
2	English and Irish	31	4.0	1000	76.2	306	51.1
3	English and Ulster-Scots	36	4.7	16	1.2	8	1.3
4	English, Irish and Ulster-Scots	24	3.1	181	13.8	81	13.5
5	No preference	9	1.2	66	5.0	21	3.5
6	Not answered	5	0.7	23	1.8	2	0.3
TOTAL		775	100	1313	100	599	100

Differences between those who identified as either Irish or British were significant and broadly parallel the findings for community background. For those who stated their national identity as British, around 90% preferred *English only* external signage for Lisnasharragh, Olympia and Templemore, although this figure dropping slightly for Andersonstown (78%). In contrast, 90% of those who self-identified as Irish showed preference for *English and Irish* signage in Andersonstown, with around 78% choosing this option for the other three centres.

Table 4: External naming preferences by national identity by centre

Andersonstown LC		British		Irish		NI		Other	
		No.	%	No.	%	No.	%	No.	%
1	English Only	566	78.0	14	0.9	166	22.7	10	3.2
2	English and Irish	44	6.1	1455	89.6	92	47.7	21	95.2
3	English and Ulster-Scots	13	1.8	5	0.3	6	0.0	0	0.1
4	English, Irish and U-Scots	29	4.0	141	8.7	31	22.7	10	0.3
5	No preference	69	9.5	4	0.3	12	6.8	3	0.3
6	Not answered	5	0.7	5	0.3	1	0.0	0	0.9
TOTAL		726	100	1624	100	308	100	44	100

Lisnasharragh LC		British		Irish		NI		Other	
		No.	%	No.	%	No.	%	No.	%
1	English Only	650	89.5	20	1.2	195	63.3	10	22.7
2	English and Irish	17	2.3	1274	78.5	66	21.4	19	43.2
3	English and Ulster-Scots	35	4.8	10	0.6	9	2.9	0	0.0
4	English, Irish and U-Scots	17	2.3	218	13.4	30	9.7	10	22.7
5	No preference	4	0.6	77	4.7	6	2.0	5	11.4
6	Not answered	3	0.4	25	1.5	2	0.7	0	0.0
TOTAL		726	100	1624	100	308	100	44	100

Olympia LC		British		Irish		NI		Other	
		No.	%	No.	%	No.	%	No.	%
1	English Only	636	87.6	18	1.1	187	60.7	10	22.7
2	English and Irish	17	2.3	1280	78.8	67	21.8	19	43.2
3	English and Ulster-Scots	22	3.0	8	0.5	8	2.6	0	0.0

4	English, Irish and U-Scots	18	2.5	248	15.3	32	10.4	12	27.3
5	No preference	24	3.3	48	3.0	12	3.9	3	6.8
6	Not answered	9	1.2	22	1.4	2	0.7	0	0.0
	TOTAL	726	100	1624	100	308	100	44	100

Templemore LC		British		Irish		NI		Other	
		No.	%	No.	%	No.	%	No.	%
1	English Only	651	90.0	25	1.5	195	63.3	10	22.7
2	English and Irish	16	2.2	1254	77.2	60	19.5	19	43.2
3	English and Ulster-Scots	34	4.7	15	0.9	10	3.3	1	2.27
4	English, Irish and U-Scots	15	2.1	231	14.2	32	10.4	9	20.5
5	No preference	5	0.7	75	4.6	10	3.3	5	11.4
6	Not answered	5	0.7	24	1.5	1	0.3	0	0.0
	TOTAL	726	100	1624	100	308	100	44	100

Despite these stark differences in opinion between communities, both the questionnaire results and the qualitative data did indicate a willingness to accept that bilingual signs would be more acceptable in some centres than others. For example, while there was considerable local opposition to bilingual signage in Templemore and Lisnasharragh Leisure Centres, these same respondents often expressed a view, either verbally or in writing, that what was decided as appropriate for Andersonstown was of little concern to them, so long as the decision did not have an impact on their local facility.

In this respect a decision to erect external bilingual naming and internal directional signage in Andersonstown Leisure Centre did not run counter to the findings of the consultation, albeit that concerns were raised by various sector representatives that a local, as opposed to 'City-wide' solution could serve to 'ghettoise' or 'linguistically balkanise' the language.

However, local consultation revealed that a similar decision would have been regarded as an unwanted imposition by those who live close to Lisnasharragh and Templemore Leisure Centres, and would be likely to be met with considerable local opposition. Instead, the preferred option was clearly English Only signage in these centres.

The case of Olympia Leisure Centre was potentially more problematic, and the consultation was less well placed to help inform this decision. While the two communities expressed diametrically opposed views as to whether *English only* or *English and Irish* signage and naming were appropriate in this and other centres, there was little by way of direct feedback from the community local to Olympia during the consultation.

It was noted by one respondent that the local area is now culturally very diverse, and that users of the centre come from a variety of new communities, as well as from across the city. It was suggested that bilingual signage may be additionally confusing to those whose first language is not English. Furthermore, the centre has been open for over two years and the existing signage was well established, and the costs of replacement and rebranding were likely to be considerable. In addition, from a practical point of view, it is not clear if there is an Irish translation of Olympia, and therefore how Irish would be accommodated in the external naming.

Written comments and face-to-face exchanges brought to light a number of other practical considerations regarding naming and signage, which it was argued should be borne in mind in any future proposal, including:

- Cost: The cost involved in installing new signage in new centres may be less than changing existing signage.
- Translation: Names of centres may be more or less amenable to translation
- Wordage: A protocol may be required to determine the level to which bilingual signage should be applied (e.g. titles or subheadings).

Addendum: Olympia Consultation

Further to the end of the public consultation, an independent consultation report was prepared summarising the key findings and presenting conclusions to be drawn from the consultation process. The report highlighted the widespread engagement with a range of stakeholders, both locally and city-wide, but also acknowledged the paucity of local response with regard to Olympia Leisure Centre. (Two public consultation events were held at Olympia on 18 November 2019, at which a total of two members of the public attended.)

The report also recognised the special circumstances of Olympia in relation to the issue of naming and signage, as summarised in the final two bullet points of the report:

5.21 The case of Olympia Leisure Centre is potentially more problematic, and the consultation may be less well placed to help inform this decision. While the two communities expressed diametrically opposed views as to whether English Only or English and Irish signage and naming were appropriate in this and other centres, there was little by way of direct feedback from the community local to Olympia during the consultation, other than that the needs of new communities should be given due consideration in terms of accessibility in particular.

5.22 It was noted by one respondent that the local area is now culturally very diverse, and that users of the centre come from a variety of new communities, as well as from across the city. It was suggested that bilingual signage may be additionally confusing to those whose first language is not English. Furthermore, the centre has been open for over two years and the existing signage is now well established, and the costs of replacement and rebranding are likely to be considerable. In addition, from a practical point of view, it is not clear if there is an Irish translation of Olympia, and therefore how Irish would be accommodated in the external naming.

During the consultation period, Olympia did not tend to feature prominently as a topic, although at the meeting with the Council's Equality Consultative Forum (10.12.19), it was noted that, 'Olympia Leisure Centre was the closest to Coláiste Feirste, the largest Irish-medium secondary school anywhere in Ireland. It was felt by some that it would be a shame if the Irish language was not reflected in the signage here while others argued that the community around Olympia would not want this.' (Independent Consultation Report, p.33).

Further to the presentation of the consultation report to SP&R Committee on 24 January 2020, on 12 February 2012 a meeting was convened in City Hall by DUP Councillor Tracy Kelly. This was primarily to voice concerns regarding the possible naming of Olympia, as well as the lack of local input into the decision-making process to date. The meeting was attended by representatives of communities local to Olympia (i.e Blackstaff and Windsor), together with DUP elected members and staff officers.

At the meeting it was argued that details of the original consultation had failed to reach representatives of local communities in time, and hence the ability of those communities to air their concerns had been lost.

Those representatives present at the meeting unanimously agreed that naming and signage in Olympia should be in *English only*, and expressed grave concerns as to the potential damage to good relations, locally and city-wide, should bilingual signage be imposed against what were described as the wishes of local residents.

It was also acknowledged that the local community adjacent to Olympia was now extremely diverse and included many new communities from e.g. Poland, Romania and Somalia, with different language needs that moved well beyond a consideration of English, Irish or Ulster-Scots.

A petition outlining concerns had been circulated by word of mouth and via social media, and has attracted 571 signatures.

During the meeting, concerns that a decision to include bilingual signage had already been made were allayed by Council officers, along with a commitment to bring forward the views expressed at the meeting to appropriate decision-making bodies within the Council.

Conclusions

While the meeting, and associated representations, fell outside the agreed period of consultation, it was not considered helpful or inclusive to set aside these submissions and perhaps in particular given the time constraints within which the consultation was originally carried out.

The sentiments expressed by those present indicated strong local support for *English only* signage, along with concern that good community relations could potentially be damaged if bilingual signage was to be installed.

Such a decision may also require the Council to reflect on its obligations under Section 75, as the potential for major adverse impact on good relations, and possibly also equality of opportunity grounds, cannot be ignored.

(xii) Census data by DEA & ward (religion, ethnicity, national identity, language)

Data from the 2011 Census provides a profile of the adjacent wards (Blackstaff and Musgrave) and District Electoral Areas (Botanic and Balmoral) by ethnic origin, religious belief, national identity and language use. Although this information is now somewhat dated (local 2021 census breakdowns are not yet publicly available), it may still be broadly indicative of the demographic profile of each area. In summary, Olympia is located in an area that can be characterised as ‘mixed’ with only one area, Blackstaff ward, being predominantly of one community (71.5% Protestant). Returns from the latest local government elections (May 2023) confirm this impression with elected members from four parties accounting for the five seats in Balmoral, and five different parties for the five seats contested in Botanic DEA.

Table 5: Local Demographic Profile

Ethnic Origin	Council Area		Northern Ireland
	District Electoral Area	Ward	

	<u>Botanic</u>	<u>Balmoral</u>	<u>Musgrave</u>	<u>Blackstaff</u>	<u>Windsor</u>	
White*	91.5%	95.6%	95.2%	96.7%	89.0%	98.3%
Other	8.5%	4.4%	4.8%	3.3%	11.0%	1.7%

*Note: Includes Irish Travellers

Religious Belief	Council Area					Northern Ireland
	District Electoral Area		Ward			
	<u>Botanic</u>	<u>Balmoral</u>	<u>Musgrave</u>	<u>Blackstaff</u>	<u>Windsor</u>	
Roman Catholic	45.5%	43.4%	60.6%	15.0%	41.6%	45.1%
Protestant	38.6%	47.8%	32.9%	71.5%	40.7%	48.4%
Other / ND*	17.9%	8.8%	6.5%	13.5%	17.7%	6.5%

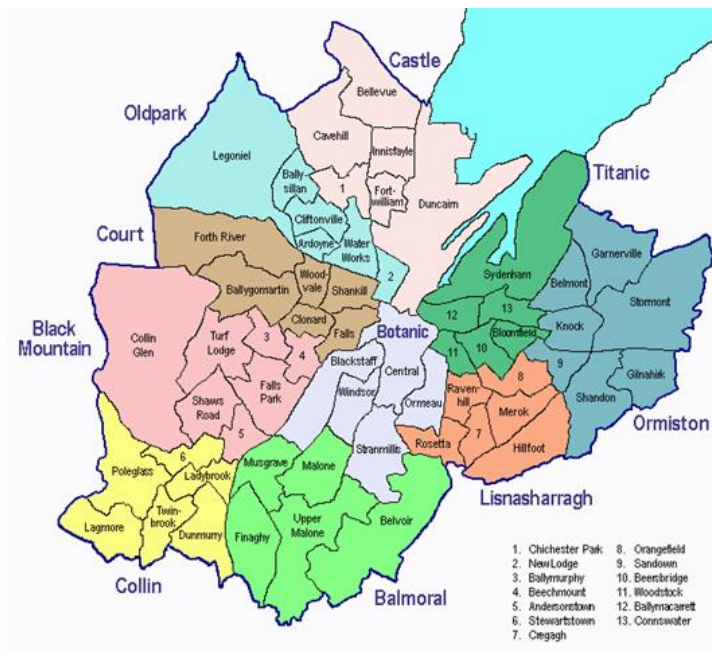
*Note: ND = not determined.

National Identity	Council Area					Northern Ireland
	District Electoral Area		Ward			
	<u>Botanic</u>	<u>Balmoral</u>	<u>Musgrave</u>	<u>Blackstaff</u>	<u>Windsor</u>	
British	38.4%	48.7%	34.4%	63.2%	36.5%	48.4%
Irish	33.5%	32.0%	42.9%	10.1%	31.5%	28.4%
Northern Irish	29.2%	29.3%	28.1%	26.5%	32.2%	29.4%

* Note: Respondents could indicate more than one identity.

Language	Council Area					Northern Ireland
	District Electoral Area		Ward			
	<u>Botanic</u>	<u>Balmoral</u>	<u>Musgrave</u>	<u>Blackstaff</u>	<u>Windsor</u>	
Irish*	15.6%	12.0%	18.6%	3.6%	14.6%	12.4%
Ulster Scots*	6.7%	6.7%	5.4%	8.1%	7.5%	10.4%
English not 1 st	9.7%	3.2%	4.2%	9.4%	12.2%	4.6%

* Note: Indicates some knowledge of the language (Population aged 3+ yrs.)



Section 75 category	Details of evidence/information and engagement
Religious belief	<p>According to the 2021 Census, 48.7% (45.7%) of the usual residents of Belfast were from a Catholic community background compared with 36.4% (43.4%) from a Protestant or other Christian related background, with 3.3% (1.5%) Other and 11.6% (9.3%) None.</p> <p><i>(Figures in brackets refer to NI as a whole.)</i></p> <p>The Continuous Household Survey 2013/14 data showed that:</p> <ul style="list-style-type: none"> • A higher proportion of both Protestants (22.4 per cent) and those with other or no religion (18.1 per cent) have knowledge of Ulster-Scots than Catholics (9.1 per cent). • A higher proportion of Catholics (30.4 per cent) have knowledge of Irish than both those with other or no religion (12.3 per cent) and Protestants (2.9 per cent). • Adults living in the most deprived areas are less likely to have knowledge of Ulster-Scots than those living in the least

deprived areas (9.4 per cent and 18.7 per cent respectively). Similarly, a lower proportion of adults living in urban areas (13.2 per cent) have knowledge of Ulster-Scots than those living in rural areas (23.0 per cent).

- The proportion of those who live in the least deprived areas of Northern Ireland who have knowledge of Irish increased from 7.8 per cent in 2011/12 to 13.0 per cent in 2013/14. Similarly, for those living in urban areas, the proportion who had some knowledge of Irish increased from 11.2 per cent in 2011/12 to 14.6 per cent in 2013/14. All other groups and areas saw no change in the proportion who had some knowledge of Irish when 2011/12 and 2013/14 are compared.
- In addition, adults living in rural area are more likely to have some knowledge of Ulster-Scots in 2013/14 compared with 2011/12 (19.8 per cent and 23.0 per cent, respectively). All other groups and areas saw no change in the proportion who had some knowledge of Ulster-Scots when 2011/12 and 2013/14 are compared.

Political opinion

Local government elections on May 18th 2023. The results of the election to Belfast City Council are shown below.

Party	Number of elected candidates
Sinn Féin	22
Democratic Unionist Party - D.U.P.	14
Alliance Party	11
Social Democratic and Labour Party – SDLP	5
Green Party Northern Ireland	3
Ulster Unionist Party - UUP	2
Independent	1
People Before Profit Alliance	1
Traditional Unionist Voice - TUV	1

Results for the two District Electoral Areas adjoining Olympia (Balmoral and Botanic), were:

Balmoral

Alliance 2
DUP 1
SDLP 1
Sinn Féin 1

Botanic

Alliance 1
DUP 1
SDLP 1
Sinn Féin 1
Green 1

Racial group

Country of birth statistics taken from the last census in 2021, show that 8.6% of all usual Belfast residents were born outside the UK and Ireland.

The Census showed that the most commonly spoken languages in Belfast (excluding English and Irish) are Polish, Arabic and Chinese

Age

The age profile of Belfast is slightly younger compared to that of the wider region. 18.0% are aged under 15 (slightly lower than the Northern Ireland average of 19.2%), 37.1% are aged 15-39 (compared with 31.2%), 30.1% aged 40-64 (32.4% for NI), and 14.7% 65 and

	<p>over (17.2%).</p> <p>The Continuous Household Survey 2013/14 data showed that:</p> <ul style="list-style-type: none"> • Knowledge of Ulster-Scots increases with age, with those age 45 years and over being more likely to have knowledge than those aged 16-44 years (64.9 per cent and 34.3 per cent respectively). • Age and level of deprivation of the area they live in area also related to the likelihood of having knowledge of Irish. People aged 45 years and over are less likely to have knowledge of Irish than those aged 16 to 44 years (38.8 per cent and 52.3 per cent respectively). • In addition, adults living in the least deprived areas are less likely to have knowledge of Irish than those living in the most deprived areas (19.0 per cent and 12.9 per cent respectively).
<p>Marital status</p>	<p>According to the 2021 Census, around one third (33.2%) of all usual residents in Belfast (aged 16+) are married or in a civil partnership – a relatively low proportion when compared with the Northern Ireland average (45.8%). Belfast has a higher percentage (49.8%) of residents who are single when compared with the Northern Ireland average (38.1%). There is also a higher than average proportion of people in Belfast who are separated, divorced or widowed (17.0% to 16.2% NI average). Belfast also has 720 residents who are in a registered same-sex civil partnership, around a quarter of all such partnerships in Northern Ireland (2742).</p> <p>The Continuous Household Survey 2013/14 data showed that for those who are married/cohabiting, the proportion who had some knowledge of Ulster-Scots increased from 15.9 per cent in 2011/12 to 19.1 per cent in 2013/14. 2013/14 data showed that adults who are married/cohabiting or widowed (19.1 per cent and 19.0 per cent respectively) are more likely to have knowledge of Ulster-Scots than those who are single (11.2 per cent).</p>
<p>Sexual</p>	<p>According to the 2021 Census, 31,600 people aged 16 and over (2.1%) identified as LGB+ ('lesbian, gay, bisexual or other sexual</p>

<p>orientation</p>	<p>orientation'), 1.364 million people (90.0%) identified as 'straight or heterosexual' and 119,000 (7.9%) either did not answer the question or ticked 'prefer not to say'.</p> <p>A higher proportion (4.1% of adults) in Belfast identified as LGB+,</p> <p>Several UK and NI based studies have attempted to quantify the number of people who identify as LGB. Estimates for LGB population range from 0.3-10% using different sources. A commonly used estimate of LGB people in the UK, accepted by Stonewall UK, is approximately 5-7% of the population.</p>
<p>Men and women generally</p>	<p>Belfast has a slightly higher proportion of women (51.3% of all residents), in comparison with Northern Ireland as a whole (50.8%).</p> <p>The Continuous Household Survey 2013/14 data showed that the proportion of males who have knowledge of Ulster-Scots increased from 16.2 in 2011/12 to 19.9 per cent in 2013/14. 2013/14 data showed that men (19.9 per cent) are more likely to have knowledge of Ulster-Scots than women (13.5 per cent).</p>
<p>Disability</p>	<p>2021 Census figures show that over one quarter (26%) of Belfast residents have a long-term health problem or disability which affects their day to day activities. This is a slightly higher proportion than the Northern Ireland average (24.3%). Over one-third of Belfast residents reported that they had a long-term condition (defined as a condition which has lasted, or is expected to last, at least 12 months). The most common conditions were mobility or dexterity, pain or discomfort , shortness of breath or difficulty breathing, and emotional, psychological or mental health condition.</p> <p><u>Deafness and hard of hearing</u></p> <p>The table below provides information on people with deafness (or partial hearing loss), blindness (or partial sight loss) and other communication difficulty. The Northern Ireland Census does not provide information on users of sign language or readers of Braille, but</p>

DCAL estimates that approximately 5,000 people in Northern Ireland use sign language as the preferred means of communication, with 3,500 using BSL and 1,500 using ISL.

	Belfast		Northern Ireland	
	No.	%	No.	%
People with deafness or partial hearing loss	19,527	5.7	109,457	5.8
People with blindness or partial sight loss	6869	2.0	33,961	1.8
People with a communication difficulty	5659	1.6	28,138	1.5

DCAL set up a Sign Language Partnership Group in 2005 which produced best practice guidance on providing public services to Deaf people who use British Sign Language (BSL) or Irish Sign Language (ISL). Speaking in the Assembly on 1st December 2015, the Minister for Culture, Arts and Leisure said that the Partnership Group had contributed much to improving the lives of sign language users and their families but that she was convinced of the need to do much more. She indicated that the Deaf community had made it clear that they want legislation to safeguard their rights as a cultural and linguistic minority. The Minister said that she would take initial steps to address this issue before responsibility transfers to the Department of Communities in 2016. A draft Sign Language Framework was opened for public consultation from 15 March 2016 to 4 July 2016, the consultation report has not, to date, been published.

Dependants

According to the 2021 Census, 40.1% of households in Belfast included no dependent children, in comparison with 44.9% of households across Northern Ireland.

	<p>The Belfast City Council Residents Survey 2014, reported that 32.3% of the population have dependants or caring responsibilities. The 2011 Census shows that 28.58% of households in Belfast include dependent children, compared with the Northern Ireland average of 33.86%.</p>
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The Continuous Household Survey 2013/14 data showed that a higher proportion of adults who do not have dependents (17.8 per cent) have knowledge of Ulster-Scots than those who have dependents (14.7 per cent).

Appendix 2: Consultation Events

Online consultation events

The Council arranged three online consultation events. All followed the same format, i.e. a presentation by the Council's Governance and Compliance Manager (SW) and the External Consultant (JK) on the proposal, its background and the EQIA, followed by a Q&A session:

[Tuesday 13th June 10.00am – 11.00am \(n = 7\)](#)

Summary of Comments and Questions

- Why is there is a need for a bespoke EQIA in this instance, BCC is making this a divisive issue;
- This is a citywide shared facility;
- During the previous consultation there was a majority in favour of signage at all four facilities;
- Council has obligations under its own strategy and under the European Charter
- Bilingual signage cannot have a negative impact;
- Bilingual signs are not confusing;
- This sends a negative message to the Irish language community when signs are not erected;
- Olympia is adjacent to Coláiste Feirste and Gaelscoil na bhFál;
- Affording rights to a minority does not impact on the rights of the majority;
- Arguments against the Irish language should not be given the same weight as international best practice and guidance on this issue;
- Bilingual signage can have a positive effect;
- The Irish language community is a marginalised community;
- If Olympia serves a diverse area then this is all the more reason to have Irish signs;
- Stigma attached to Irish borders on racism and stigmatises both Irish speakers and staff;
- Is there any research to show that Irish signage is confusing?;
- Olympia is often the only centre open on bank holidays;
- There a duty on councils to screen when a decision is not made (i.e., screening the lack of Irish signs);
- There is a need for further information in relation to citywide use of leisure centres;
- Olympia is the most accessible of all the centres because of where it is;
- Olympia is used by many people from West Belfast.

[Wednesday 23rd August 12.00pm – 1.00pm \(n = 16\)](#)

Summary of Comments and Questions

- A series of questions were posed as to:

- how bilingual signage can have an adverse impact on anyone on the grounds of religion or ethnicity;
- why an Irish only option was not considered;
- whether the signs will stretch out on to the Boucher Road;
- would it be beneficial to have an Irish interpreter on the call;
- whether the potential impact of not erecting signs in Irish was being considered;
- what was the EQIA timeline;
- whether the Council has considered the benefits of the promotion of diversity;
- potential alienation of local people and the large non-English speaking community;
- should Polish/Mandarin be included in signs.
- Opinion offered that the Boucher Road is a neutral space.

The Council officers and external consultant who were in attendance endeavoured to address these questions with reference to relevant Council policy and practice.

[Wednesday 23rd August 7.00pm – 8.00pm \(n = 9\)](#)

Summary of Comments and Questions

- The Lisnasharragh/Templemore signage decisions were made on a spurious sectarian basis;
- There are no such precedents for signage in public buildings for such a small minority;
- European charter and international agreements talk about low thresholds as these are minority issues;
- Acceptance of other community languages is indicative of good community relations;
- Adverse impacts arise from not erecting bilingual signs. If the idea that the inclusion of Irish in the public realm is political, its exclusion is also political.
- Idea that Irish can be accepted without the need for bilingual signs.
- More Polish speakers – referred back to the language strategy;
- Why was there no Ulster Scots only option – based on previous 2019/2020 questions;
- Question about Irish/Gaelic script – FnaG guidance on this;
- The lack of visibility of Irish in public life is noteworthy;
- The Council is not in line with the European Charter;
- What is the status of petitions within the EQIA?

[Face-to-face public meetings](#)

The Council arranged four face-to-face public consultation meetings, Two meetings were open to the public while two were organised by local community groups (Forward South [13.6.23, 2pm] and West Belfast Partnership Board [23.8.23, 3pm]):

Tuesday 13th June (St Simon's Community Centre 2 – 4 pm) (n = 33)

Summary of Comments and Questions

- More people need to be consulted eg the people who live around Olympia;
- This is an English speaking country;
- Views have not changed since the last consultation;
- This is a waste of money; spend it on facilities in the community;
- There will be no wall space left if these signs go up;
- Olympia is too expensive to use. This is a working class area. Communities are struggling and are underfunded;
- Keep the language where people speak the language;
- Rangers tops are not allowed into Olympia but GAA tops are allowed in;
- Olympia leisure centre is more for West Belfast than for 'us';
- Intelligence has told me not to use this centre. I don't feel comfortable in it;
- How many people in this country speak Irish?;
- This will make the centre even more unwelcoming for the local people;
- The proposal will have a detrimental effect on Good Relations;
- Why change something that is broken?;
- People will feel uncomfortable. This is still a PUL community;
- People will not accept it. If this happens, the place will be plastered with flags;
- Having a consultation is creating more difficulties;
- We asked for Ulster Scots nameplates but no money and now the money is there for this signage and the dual language street signs;
- Use the money for something better for the children in the community;
- Braille should be put up instead;
- This will affect the wider community;
- Olympia leisure centre is not good for kids;
- Feels like they are trying to ostracise the community from their leisure centre;
- You cannot impose culture successfully;
- This is damaging – there will be more flags and more community tension;
- How many nationalists speak Irish? The SF conference was held in English;
- SF are using this as a beating stick to beat the Protestants;
- Where would transgender come into this?;
- The consultation is too complicated.

Wednesday 14th June (Olympia LC 3 - 4.15pm) (n = 23)

Summary of Comments and Questions

- Olympia was built for the people in this area. The community has changed dramatically but there is still an Ulster Scots core as well as an influx of nationalities;
- Would like to see this centre in a way that nobody is offended.
- Bilingual signage will take away from my enjoyment of the centre.
- The Irish Language will create division.

- The EQIA is slightly out of date eg does not include the 5th framework report and there are gaps in the ECNI data;
- The census has shown a huge growth in Irish;
- There is a large Irish medium school very close to Olympia;
- The most recent elections delivered a majority of councillors who would be in favour of an Irish Language Act;
- English only signage is not a neutral position eg Wales has bilingual signage everywhere;
- Welsh is not seen as political. Unionists here see Irish as a political weapon – that is the reality and by putting up Irish signage you are being divisive;
- The Protestant / Unionist / Loyalist community are being used as pawns in this process;
- Olympia is well used by local schools and those who want to see the Irish language are not weaponising it but rather just want to speak it and to see it;
- Leisure Centres are the epitome of shared spaces. The Irish language is being politicised here by those who are scared of it. People learn and improve Irish by seeing it and listening to it.
- This signage will not dilute anyone's culture and it is not being 'pushed down throats'.
- I am raising my child through Irish and would love him to see it in the centre. Irish language is a shared language and Olympia is a shared space. One language policies are divisive;
- I do not hate the Irish language and would encourage anyone to learn it but this is causing anger within the community and will introduce problems;
- Olympia should be seen as neutral;
- Olympia has been run the centre into the ground.
- My child is being raised in an Irish medium school and cannot understand the English signs.
- The council assured the Blackstaff Residents Association that Olympia would benefit the people who live nearby. The local people backed this centre 100%;
- The council should look at other jurisdictions and see how they have got through consultations like this one;
- The 'local' communities go as far as the Falls;
- 'Local' people are also in favour of Irish;
- Bilingual signage was illegal before 1994. There is no legal right to be offended;
- I have never heard Irish being spoken in this centre;
- Bilingual signage will create antisocial behaviour;
- As a mother of 4 children and a user of the centre, my children seeing the signage should not be a threat;
- Request that the council provides reassurance that any opposition to the Irish language has to have a clear evidence base;
- This is already causing community tension;
- Sinn Féin politicising the Irish language has done more harm than good;
- The Council have caused tension around local and international human rights equality commitments. This is not the way to carry out this exercise;
- The feeling in this room is intense – can you imagine what will happen if the signs go up?;

- The Irish language belongs to everyone, it needs to be visible;
- This leisure centre and Boucher Road is a shared space. There is no adverse impact and the council should not be looking for mitigations;
- There has been a lot of money spent on this already. That money would be better spent on things that are needed in the community;

Wednesday 14th June (Olympia LC 7 – 8.15 pm) (n = 40)

Summary of Comments and Questions

- This signage came from 'Sinn Féin / IRA' with support from the Alliance party;
- How do disabled / bedridden people contribute to this survey?;
- This centre was built for the people of this community – the people of the Falls and West Belfast have their own centres;
- This is a waste of money;
- This isn't the same as Lisnasharragh or Templemore;
- If you try to force this, the flags will come up;
- We let 'them' use our centre;
- This is not promoting Good Relations, therefore 'end of story' ;
- 'We are British'
- Who is paying for all this? The ratepayer. Money would be better spent on alleygating;
- If the council pushes this through and the signs are vandalised, the ratepayers will have to fund it;
- 'Can guarantee that they will be vandalised';
- How many people using these facilities cannot speak English?;
- Let 'themuns' pay for it themselves;
- Recognition that the area has changed with 'foreigners';
- The indigenous people of this area are PUL – the majority of the people do not want it;
- 'It will discriminate against us as a community';
- This is enflaming something that we don't want;
- We will be called bigots;
- There is no need for it and no money for it;
- Don't like the threats of violence but the signage will fuel it;
- Cllr. Kelly – the decision has not been made.
- People here were murdered by an organisation with 'Irish' in its title;
- Olympia is a welcoming place – people come in with Rangers tops and Celtic tops. This is being imposed on our community and has damaged reconciliation;
- The council has a statutory duty and has not fulfilled it. If the decision is brought forward, it will be legally challenged. The council is imposing this on people who do not want it;
- The centre was lobbied for by the Village community. It was then knocked down and is now a citywide centre and there is no longer a community centre;
- The centre floors are filthy, lockers are broken and the showers don't work, it's terrible;

- Everyone feels safe here because it is a citywide gym eg there are people in Celtic tops. Olympia has been welcoming and tolerant. If it's not broken, don't fix it;
- Ethnic minorities visit the centre and find their way around;
- If 'theseuns' are pushing for it, I take offence that they are not living in this area – they aren't from here;
- Olympia was given to 'us'. We weren't allowed to go across the road. This is stirring up hatred. We all want to get along but this will go up in smoke. This is all we had;
- My husband fought for this centre. My house was bombed by the INLA and he was shot. How would he feel about this?;
- What benefit have 'they' got from the Irish language? Has it improved their day to day life?;
- There is no need for the signage;
- We have bent over backwards apologising for being British / Protestant;
- The money should be spent on a playpark;
- The adverse impact could cause confusion for people with disabilities eg dyslexia;
- If this is put up, the troubles will start again. There will be petrol bombs;
- This could become a multi-cultural conflict;
- The centre has refused to put up a notice board for the local community meetings and yet they will put up Irish signs?;
- Not everyone is on social media – how will they get involved in this?;
- This process is not being run fairly;
- It's got nothing to do with 'them';
- 'They won't be around to pick up the pieces';
- 'It's a slow process towards a united Ireland'.

Wednesday 23rd August (St Mary's Univ College 3 – 4.30 pm) (n = 33)

Summary of Comments and Questions

- Why did the survey not include an Irish only option?;
- Strong feeling in West Belfast that there should be bilingual signage;
- Purpose of the citywide leisure programme was to encourage people to travel to other centres;
- Bilingual signs are inclusive not exclusive and that they were not asking for Irish only;
- Only a minority are opposed and the proposal is progressive and inclusive;
- Equality trumps the concept of good relations and the concept of good relations is being used to block diversity;
- There is a need to respect different identities, people would have no problem with Ulster Scots;
- Perceptions are not rooted in evidence but in bigotry;
- The leisure centre is seen by some, schools especially as an extension of the classroom. Not having bilingual signage here excludes IME children;
- Some Irish speakers already feel unwelcome in the centre;

- People feel this is a shared space so Irish should be on signs;
- Support in the last consultation for bilingual signs.
- Children in West Belfast / St. James are local to Olympia.
- Any discussion of mitigations should focus on mitigating against sectarianism;
- The consultation was couching these issues wholly negatively;
- Perception vs. reality. The idea of perceived harm to someone's identity through Irish signage is not legitimate;
- This is a human rights issue and there can be no equivocation here;
- This is Ireland and English is the colonial language;
- Are Irish-speaking children under threat in this centre? Sectarian opinions do not trump equality;
- Coláiste Feirste nearby with nearly 1000 pupils. Visibility normalises Irish and makes it part of everyday life. This is an equality issue and equality cannot be mitigated against;
- Not having bilingual signs in Olympia is exclusionary;
- Overwhelming majority of research on this issue shows bilingual signage helps promote tolerance;
- Perception that locality is being allowed to trump equality;
- Some feel that this could lead to a form of apartheid; the sole impediment to bilingual signs is bigotry;
- The failure to erect bilingual signage is against the Good Friday Agreement;
- Perception among some sections of unionism that bilingual signage is in fact their loss – this perception is their problem;
- Some sentiment in the local area against newcomers. Anyone should be allowed to use Olympia and a small group should not be allowed to make or influence decisions here;
- Not having bilingual signs is regressive and would set us back significantly;
- No detrimental effect on anyone on having to look at bilingual signage. The 2015 DCAL EQIA showed a potential positive effect on good relations. Did not feel they would have to defend themselves as an Irish speaker.
- Will west Belfast be viewed as local?;
- People feel as if they have to defend their own children and their language here. these issues are being framed and approached wrongly;
- Policy is weighted against this proposal;
- Many others from outside the area use Olympia – their identity deserves respect as well.

Representative group meetings

[Relevant Minutes of BCC Irish Language Stakeholders Forum \(26/6/23 10.30 – 12.30 pm; Belfast City Hall\)](#)

Attendees: Ciarán Mac Giolla Bhéin (Fís an Phobail); Cuisle Nic Liam (Conradh na Gaeilge); Piarais Mac Alastair (Forbairt Feirste); Dr. Liam Andrews (Pobal Gaeilge Bhóthar Sheoighe); Fionnuala Nic Thom (An Droichead); Pól Deeds (An Droichead); Brónagh Fusco (Conradh na Gaeilge).

Mrs. Sarah Williams (Governance and Compliance Manager); Mrs. Susan McNeill (Policy and Research Officer); Dr. Colm McGuigan (Irish Language Officer); Dr. John Kremer (Independent Consultant).

SW opened the meeting by welcoming forum members. An update was given on the work to date on the EQIA. It was noted that there would be a meeting in August with community groups in west Belfast about this issue. It was explained that this would be held in St. Mary's University College, there was some objection to this. The difference between a local meeting and broader public meeting in this context was then discussed.

JK then gave a brief presentation on the background to the EQIA and opened the discussion on the issue.

A forum member asked if a clear impact on equality of opportunity needed to be demonstrated here. JK explained that only the potential for adverse impact needed to be shown.

JK also discussed the issue of ruling responses out on the basis of the content of these responses being deemed 'sectarian'. It was explained that ruling any responses out could set a dangerous precedent and that the onus would be on the Council to explain why any response would be deemed "sectarian".

Forum members noted that there is a considerable body of international best practice, research and international agreements which state that the Council should take action to erect bilingual signage. It was also highlighted that the same body of evidence does not exist in opposition to the promotion of minority languages. There was an emphasis throughout the discussion on the concept of Olympia and other Council buildings being shared spaces.

Members felt that this issue may well be decided in the courts.

Members felt that the discussion around this issue was quite disheartening and that the Council had a duty to promote minority languages in a positive manner and challenge the negative perceptions of the Irish language. A reference was made to international guidance that supports this.

Members felt that bilingualism should be seen as a positive development and that this EQIA and the erection of signage at Olympia presented a major opportunity to challenge any negative narrative around this.

It was noted that Scoil an Droichid use this centre for swimming and the centre is frequented by families who speak Irish. Members discussed the potential negative impact on these users and children especially where bilingual signs not erected. It was felt this would send a particularly negative message to Irish speakers in the city. It was questioned whether not having the bilingual signs created an adverse impact and whether not taking action in relation to the language created a hierarchy.

Members felt that a higher level of visibility of Irish was in fact the solution.

Forum members discussed the perception that the Council views Irish as being acceptable in West Belfast but not elsewhere and that this sent a particular message. It was felt that the erection of signage in other areas will go some way to challenging this perception among people who have no experience of the language. Members felt that children and young people are particularly important here. there was a discussion of what was termed the 'emblematic use of Irish'.

Members questioned "when" it would be acceptable to have Irish at Olympia and other shared spaces. This was a question of rights and legislation versus opinions and that these issues should not be weighed against each other. Forum members felt that the same approach would not be taken by the Council in relation to race or sexual orientation.

One member voiced the opinion that the decision not to erect bilingual signs here would set the campaign for the visibility of Irish in Belfast back by years and effectively be a denial of rights.

Was noted that the majority of local councillors in the area would be in favour of this. The opinion was expressed that the decision making process was weighted against the Irish language community.

Members felt that Irish can be used as a tool for reconciliation and that increased visibility will contribute to this.

The example of the Irish language scheme at QUB was mentioned. This was initially resisted and is now highlighted by QUB as a success story.

Members felt that this issue cannot be solved by a monolingual policy.

Members felt that any Irish language policy should seek to address negative perceptions around these issues. It was noted that the Irish language or bilingual signs were not the problem, that the negative perceptions were the problem.

Members felt that any refusal to grant the signs would make the Irish language community in the city the losers in this scenario. When one member mentioned a potential gradual approach it was noted that having signs initially in Brook and Andersonstown and now potentially Olympia was gradual.

Members noted that cost is not an issue here, nor can bilingual or multilingual signs cause confusion.

It was noted that the issue of age should be considered here, that is that the Irish language community tend to be younger and that many older residents will not use social media or fill in a consultation response online.

Members felt that a comprehensive Irish language policy could be a mitigation here. Members felt that some of the EQIA questions were worded poorly and that there was no opportunity for respondents to discuss the benefits of bilingual signage.

JK thanked those in attendance and the Governance and Compliance manager discussed next steps in relation to the EQIA and potential dates for the next meeting of the forum.

[Relevant Minutes of BCC Ulster-Scots Stakeholders' Forum \(26/6/23 2 – 4 pm; 9 Adelaide St.\)](#)

Attendees: David Gilliland, Ulster-Scots Community Network; Nelson McCausland; Ian Crozier, Ulster-Scots Agency; John Kremer, Consultant; Sarah Williams, Governance & Compliance Manager; Michael Johnston, Language Officer.

Note Taker- Beth Mulree

SW provided a brief background to the EQIA being carried out by the Council.

JK then took members through the EQIA details. explaining that the EQIA will be carried out over 14 weeks due to summer period, and that both in-person and online meetings have been arranged. A report will be prepared summarising all information both quantitative and qualitative which will be brought to Strategic Policy and Resources Committee.

Members had some questions about the EQIA process.

Questions were raised about how the Council is going to manage the risk of signs being damaged this, considering how people feel about bilingual signage as Olympia is a mixed community location.

JK stated one Council in particular has had to replace signage due to damage or crime. Some councils monitor defaced signs.

In response to a question JK updated that the Council is asking the question again as previous consultation was carried out in 2019/2020.

JK asked Members about potential adverse impacts with Members noting that there is a some perception that signage has been used in the past to demonstrate that some members of the community are not welcome.

In response to a question, SW confirmed that Olympia is one of the Council's citywide leisure centres with its own USP.

Members questioned the motivation of having Irish language signage at this location. Members were concerned about the impact of this decision on the local community.

Members noted that providing Ulster-Scots signage could be a mitigation.

JK asked members about potential adverse impacts for young people / school children. Members noted that pictorial signage is already provided.

There was some disappointment from members towards no 'Ulster Scots only option', further expresses point of Ulster-Scots being forgotten.

SW provided a summary of the planned engagement over the summer period with an additional local community meetings in August and set out the next steps for decision-making

Meeting ended 4pm

[Committee on the Administration of Justice \(CAJ\) \(30/8/23; online\)](#)

Present: Sarah Williams, John Kremer, Susan McNeill, Beth Mulree

CAJ: Daniel Holder, Eliza Browning

CAJ opened the meeting by saying it had knowledge of the background of the EQIA, that it was a heavily contested issue and that the points he wanted to raise were mainly technical.

It was argued that the EQIA methodology was flawed and as a consequence the Council's Equality Scheme was not being adhered to.

CAJ had experience of two types of Council regarding such language matters:

- Councils where there is clearly no will;
- Councils where there is a will but the equality of opportunity duty is employed as an impediment to change

CAJ felt there was a need to avoid objections that were rooted in intolerance and sectarianism. Looking at bilingual signs cannot constitute an adverse impact or discriminatory detriment and signs at Olympia clearly not discriminatory.

Feels there is a clear emphasis in the EQIA on good relations, feels a host of other information should be in the final report, and the assessment of good relations substitutes a lay understanding of good relations for the good relations duty.

There was an identified need for a definition of the 'chill factor', the example of people refusing to use a facility because minority ethnic communities might use it is simple racism.

Furthermore, threats of violence are not an adverse impact.

There is a need for a reference in the report to the positive impacts, and to indicate the weight given to the initial 2019/2020 consultation.

Irish language community are rights holders, but generally young and are from the CNR community. This does not diminish their rights.

It was highlighted that equality of opportunity trumps good relations under Section 75. But the equality duty should draw on facts and evidence, not perceptions.

The EQIA should also consider the issue of local residents vs. service users, local residents at Olympia do not own the leisure centre.

It was seen as odd to define culture as the exclusion of another culture – how does seeing Irish constitute an adverse impact.

CAJ argued that there was a hint of sectarianism around the EQIA - what is the 'acceptable quota of Catholics' to allow this to go ahead.

Not having signs is an adverse impact on the Irish language community.

An English-only sign policy is not a mitigation as it does not better promote equality of opportunity. This potentially institutionalises sectarianism, and the Council could be open about not proceeding with a policy or decision because of threats.

It was suggested that an argument that bilingual signage may confuse is an issue needs to be put to bed.

It was maintained that the EQIA aim was much broader than the council decision, and it was important to make sure the policy aim is the same as the original decision. Also, there is a need to be explicit that there is no documented impact on equality of opportunity.