

## Appendix 3: Draft Council response to The Executive Office's Consultation on its Race Relations Framework

### Framework for Race Relations Consultation: Development of a cross-departmental response from BCC

#### ❖ The Framework's Vision

*"A society, which is strengthened by its ethnic diversity, where we can live together free from racism, racial inequality and unlawful racial discrimination, where we share a common sense of belonging and where human rights and equality are enjoyed by all."*

**Do you agree or disagree with the draft Framework's Vision? (Required)**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Prefer not to say

**Please provide any comments you wish to make in relation to the draft Framework's vision in the space below**

There is a limit of 1000 characters

*Belfast City Council welcomes the high-level vision set out in the draft framework and supports the move towards an evidence-informed public health approach to race relations. This aligns with the Belfast Agenda ambition to create a more inclusive and welcoming city. While the vision is positive and ambitious, it remains largely aspirational, with limited clarity on implementation. To ensure this vision can be realised in a city as diverse as Belfast, we anticipate the delivery plan will be fully resourced, with ring-fenced funding. While the public health approach is innovative, it may not be embedded meaningfully across interventions within the draft. The framework provides a useful foundation but may require strengthening to deliver clear, measurable change. Greater clarity is also needed in the use of key concepts within the vision and across the framework; terms such as race and ethnicity, equality and equity are used interchangeably risking confusion and inconsistent application.*

#### ❖ Outcomes

Based on the engagement and research to date, four key outcomes have been identified which, if met, should achieve the overall vision. The outcomes serve as strategic pillars that guide both the implementation and evaluation of the Framework.

##### **Outcome 1: Elimination of Racial Inequality**

*To eliminate racial inequalities and promote equality of opportunity in all aspects of economic, social, cultural, political and public life. This includes a focus on capacity building, community development and celebration of cultural identity.*

**Do you agree or disagree that Outcome 1 will help us to achieve the vision as detailed in the draft Framework document?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Prefer not to say

**Please provide any comments you wish to make in relation to Outcome 1 in the space below.**

*Belfast City Council supports the inclusion of Outcome 1, the elimination of racial inequality, as a cornerstone of the framework. However, further elements are required to make this outcome achievable. Without appropriate resourcing, cross-departmental collaboration, and strong data-gathering mechanisms, this outcome risks remaining aspirational. Greater emphasis is also needed on systemic reform. Existing systems and structures can perpetuate inequality through cultural normativity. Awareness-raising alone is insufficient; anti-racist practice must be embedded across public services, including reviewing how public structures may inadvertently discriminate. Cultural awareness, while important, is insufficient, without accompanying structural and organisational change. Delivery of this outcome must be driven by clear responsibility and commitment from TEO.*

## **Outcome 2: Combatting Racism and Race Hate Crime**

*To combat racism and race hate crime and to provide effective protection against all manifestations of racism and race hate crime. This includes providing redress and having a victim-centred approach.*

**Do you agree or disagree that Outcome 2 will help us to achieve the vision as detailed in the draft Framework document?**

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Prefer not to say

**Please provide any comments you wish to make in relation to Outcome 2 in the space below.**

*Belfast City Council welcomes the inclusion of safety as a core outcome within the draft framework and agrees that eliminating racial abuse, harassment and violence is essential for a cohesive city. Closing the legislative gap through hate crime reform is a key step, alongside addressing the reporting gap by improving accessible reporting pathways and building trust between victims and authorities. However, the outcome places too strong an emphasis on reporting and redress, without sufficient focus on root causes. Increasing reporting alone will not address barriers such as fear of repercussions, lack of trust and poor institutional responses. A more holistic approach is required, including prevention, perpetrator-focused interventions and effective victim support. While the commitment to tackling racism and race hate crime is welcomed, there is no clearly aligned intervention in the delivery plan. The council encourages stronger links to ongoing work on tackling organised crime, engagement with perpetrators of hate or those at risk, and targeted, localised resources for high-tension areas.*

## **Outcome 3: Equality of Service Provision**

*To ensure that individuals from minority ethnic backgrounds have equitable access to and can fully benefit from public services, including opportunities in education and enterprise, in a manner that promotes equality of opportunity and good relations.*

**Do you agree or disagree that Outcome 3 will help us to achieve the vision as detailed in the draft Framework document?**

- Strongly agree
- Agree

- Neither agree nor disagree
- Disagree
- Strongly disagree
- Prefer not to say

**Please provide any comments you wish to make in relation to Outcome 3 in the space below**

*Belfast City Council welcomes equality of service provision as a central component of the framework and supports the ambition to ensure that a person's background does not impact the quality of service received. However, this must be supported by stronger interventions to review and address inherent barriers within services. The 2024 review highlighted inconsistent access to high-quality interpretation and translation services as a major barrier, and this must be addressed. We would welcome clearer detail on how increased ESOL provision will be delivered and funded (including support for conversational, accredited, job-related ESOL and requirements such as the Occupational English Test), alongside further clarification on how the proposed intervention to improve equality of opportunity in employment and leadership will operate in practice and align with existing employment legislation. As with Outcome 1, delivery of Outcome 2 requires a review of access barriers arising from cultural normativity within services. Robust and consistent data-gathering mechanisms across departments are also essential to track patterns of access and outcomes. The outcome should clearly prioritise equity, recognising that equal access or opportunity alone does not necessarily result in equal outcomes.*

#### **Outcome 4: Community Cohesion**

*To strengthen social relations and promote integration between all communities. This includes increasing the participation, representation and sense of belonging of people from minority ethnic communities.*

**Do you agree or disagree that Outcome 4 will help us to achieve the vision as detailed in the draft Framework document?**

- Strongly agree
- **Agree**
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Prefer not to say

**Please provide any comments you wish to make in relation to Outcome 4 in the space below.**

*Belfast City Council supports the inclusion of Community Cohesion as a core outcome within the framework. We encourage the recognition of cohesion as a shared responsibility and the proposed actions for host communities that promote two-way integration and look forward to further clarity on how this will be delivered in practice. For this outcome to succeed, sustainable and longer-term funding is required, particularly for grassroots organisations, to ensure social capital is maintained and progress is not disrupted. The council also encourages explicit recognition of economic inequality as a key driver of racial disparities. Economic justice is central to social justice and cohesion, as access to employment, fair wages and progression opportunities shape participation and representation, key elements of this outcome. Without addressing these economic dimensions, progress across other outcomes is likely to be limited.*

#### **❖ Primary Interventions**

The Framework adopts a public health model to address racial disparities through identifying and implementing interventions in line with the four strategic outcomes. To support the achievement of each outcome, the two-year Delivery Plan sets out the initial nine primary, secondary and tertiary actions that will be progressed as priorities. It is designed so that it will remain agile, allowing response to emerging needs and issues.

**Primary Interventions: Activities that reduce risks or those that address the cause**

- Launch a refreshed Minority Ethnic Development Fund (MEDF) that is effective in delivering the outcomes of the Framework
- Enhance linkages and improve communication between the Racial Equality Subgroup and wider minority ethnic communities using workshops to increase reach and opportunities for sharing knowledge and best practice
- Develop and deliver a communications strategy focused on community cohesion

**How much do you agree or disagree that each of the proposed Primary interventions should be progressed as priorities within the Two-Year Delivery Plan?**

Launch a refreshed MEDF that is effective in delivering the outcomes of the Framework	Strongly agree	<u>Agree</u>	Neither agree nor disagree	Disagree	Strongly disagree	Prefer not to say
Enhance linkages and improve communication between the Racial Equality Subgroup and wider minority ethnic communities using workshops to increase reach and opportunities for sharing knowledge and best practice	Strongly agree	<u>Agree</u>	Neither agree nor disagree	Disagree	Strongly disagree	Prefer not to say
Develop and deliver a communications strategy focused on community cohesion	Strongly agree	<u>Agree</u>	Neither agree nor disagree	Disagree	Strongly disagree	Prefer not to say

**Please use the space below to provide any comments on the proposal to prioritise these Primary interventions within the Two-Year Delivery Plan.**

*Belfast City Council welcomes the proposed primary interventions, including the launch of a refreshed Minority Ethnic Development Fund (MEDF) as a commitment within the framework. Future iterations of MEDF must be accessible, with an increased budget to meet need in 2026. Refreshed MEDF should consider other funding streams and ongoing work at a local and regional level. While the value of the proposed interventions is acknowledged, we would welcome more ambitious primary interventions to achieve listed outcomes – interventions which are strategic and interdepartmental, with clearer ownership and responsibility. Stronger focus is needed on addressing root causes, including structural inequalities, institutional practices and the skills of departments to tackle racism and inequality, with due consideration of intersectionality. Race equality subgroups must be rooted in lived experience, with meaningful representation. Finally, whilst the development of a communications strategy is key, this should involve public bodies*

*taking a visible stance against racism and tackling misinformation, underpinned by strong political leadership to ensure credibility and impact.*

❖ **Secondary interventions**

**Secondary Interventions: Activities which focus on early detection to support early intervention and reduce the level of harm**

- Embed cultural awareness and anti-racism training across public services
- Enhance links between race relations work and the outworkings of the Together: Building a United Community (T:BUC) strategy review, to aid in incorporating race relations more effectively
- Develop interventions for the groups with the poorest outcomes, informed by the results of the research investigating outcomes of minority ethnic groups in Northern Ireland using the 2021 Census

**How much do you agree or disagree that each of the proposed Secondary interventions should be progressed as priorities within the Two-Year Delivery Plan?**

Embed cultural awareness and anti-racism training across public services	Strongly agree	Agree	<u>Neither agree nor disagree</u>	Disagree	Strongly disagree	Prefer not to say
Enhance links between race relations work and the outworkings of the T:BUC strategy review to aid in incorporating race relations more effectively	Strongly agree	<u>Agree</u>	Neither agree nor disagree	Disagree	Strongly disagree	Prefer not to say
Develop interventions for the groups with the poorest outcomes, informed by the results of the research investigating outcomes of minority ethnic groups in Northern Ireland using the 2021 Census	Strongly agree	Agree	<u>Neither agree nor disagree</u>	Disagree	Strongly disagree	Prefer not to say

**Please use the space below to provide any comments on the proposal to prioritise these Secondary interventions within the Two-Year Delivery Plan.**

*Belfast City Council supports interventions focused on early detection, early intervention and harm reduction. However, for the first two years of the delivery plan, more strategic, cross-departmental interventions are needed to address urgent issues. The council supports targeting structural and systemic barriers affecting groups with the poorest outcomes. While Census 2021 data is a useful*

starting point, it does not capture newer communities or changed migration patterns and may misrepresent Belfast's diverse landscape. Minority ethnic groups are not homogeneous, with different communities facing different barriers. The council welcomes efforts to strengthen links between race relations and the T:BUC strategy, embedding this work in the mainstream. We also welcome anti-racism training but encourage a shift from cultural awareness to cultural competency and trauma-informed practice. Overall, while these interventions are important, they remain underdeveloped, with limited clarity on implementation, including how early intervention will identify at-risk groups, allocate resources and ensure timely support.

❖ **Tertiary interventions**

**Tertiary Interventions: Activities that minimise and/or address the consequences and provide support**

- Develop scalable programmes on community cohesion and start roll-out
- Complete an initial round of community-led reviews to develop plans on key topics
- Expand community-based hubs led by the Refugee Integration Strategy to support all communities

**How much do you agree or disagree that each of the proposed Tertiary interventions should be progressed as priorities within the Two-Year Delivery Plan?**

Develop scalable programmes on community cohesion and start roll-out	Strongly agree	<u>Agree</u>	Neither agree nor disagree	Disagree	Strongly disagree	Prefer not to say
Complete an initial round of community-led reviews to develop plans on key topics	Strongly agree	Agree	<u>Neither agree nor disagree</u>	Disagree	Strongly disagree	Prefer not to say
Expand community-based hubs led by the Refugee Integration Strategy to support all communities	Strongly agree	Agree	Neither agree nor disagree	<u>Disagree</u>	Strongly disagree	Prefer not to say

**Please use the space below to provide any comments on the proposal to prioritise these Tertiary interventions within the Two-Year Delivery Plan.**

*Belfast City Council supports interventions designed to support and expand opportunities for community cohesion. While these steps are important, for the first two years of the delivery plan we would expect more strategic, cross-departmental interventions that address urgent issues. The listed interventions are generic and would benefit from greater clarity on operational delivery, particularly in relation to Outcomes 7 and 8. BCC welcomes the focus on practical, scalable and community-led actions, which must be appropriately resourced. We welcome community-led reviews but note the importance of transparency at all stages and the need for tangible outcomes, given the 2024 independent review highlighted “consultation fatigue”. We agree in principle with expanding community-based accessible support; however, consideration should be given to existing resources. The council recommends assessing current provision that is open to all*

*communities, building capacity and confidence of organisations to support minority ethnic communities, rather than creating bespoke or siloed hubs.*

### ❖ **Monitoring and Evaluation**

To ensure the Framework remains agile and adaptable, governance structures are built around principles of collaboration, accountability, and strategic alignment. These mechanisms enable timely responses to emerging priorities, promote cross-departmental learning, and ensure coordinated delivery.

Key governance mechanisms include:

- Oversight by the cross departmental Strategic Planning Group (SPG) and Tactical Delivery Group (TDG) including an SPG Performance Report
- Quarterly updates to the Racial Equality Subgroup & Thematic Groups
- Annual reporting to Ministers
- Five-year temperature check providing update on longer term progress
- Linking with other strategies
- Regular engagement with Racial Equality Subgroup and Thematic Groups
- Further research

**How much do you agree or disagree that these key governance mechanisms are helpful for monitoring progress?**

Oversight by the cross departmental SPG and TDG including an SPG Performance Report	Strongly agree	<u>Agree</u>	Neither agree nor disagree	Disagree	Strongly disagree	Prefer not to say
Quarterly updates to the Racial Equality Subgroup & Thematic Groups	Strongly agree	<u>Agree</u>	Neither agree nor disagree	Disagree	Strongly disagree	Prefer not to say
Annual reporting to Ministers	Strongly agree	Agree	Neither agree nor disagree	<u>Disagree</u>	Strongly disagree	Prefer not to say
Five-year temperature check providing update on longer term progress	Strongly agree	Agree	Neither agree nor disagree	<u>Disagree</u>	Strongly disagree	Prefer not to say
Linking with other strategies	Strongly agree	<u>Agree</u>	Neither agree nor disagree	Disagree	Strongly disagree	Prefer not to say
Regular engagement with Racial Equality Subgroup and Thematic Groups	Strongly agree	<u>Agree</u>	Neither agree nor disagree	Disagree	Strongly disagree	Prefer not to say

Further research	Strongly agree	<u>Agree</u>	Neither agree nor disagree	Disagree	Strongly disagree	Prefer not to say
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**Please provide any comments you wish to make in relation to the key governance mechanisms in the space below.**

*Belfast City Council agrees the framework should remain agile and adaptable, supported by strong governance structures that ensure responsiveness to need, cross-departmental learning and coordination. We encourage that oversight should sit at a senior level, with members oversight groups being decision-makers who have the skills, expertise, authority and capacity to drive outcomes. Informed and impactful representation is critical, as the 2024 review highlighted that departmental champions did not always have the seniority required to make key decisions. In relation to monitoring, outcome-based accountability is essential. TEO should establish baseline data and robust data-gathering mechanisms to track themes and trends that demonstrate impact. Periodic reviews should also be strengthened through more frequent and independent evaluation. A regular “temperature check” & ministerial reporting are key, but should more frequently, to ensure the framework remains relevant and effective.*

❖ **Further comments**

**Please provide any additional comments you wish to make in relation to the draft Framework for Race Relations and Delivery Plan 2026-2028 in the space below.**

**1. Addressing structural inequalities and providing strong leadership and strategic coordination**

*Belfast City Council welcomes the adoption of a public health approach within the Framework, however, to be effective, the Framework must explicitly recognise that racial inequality is also a structural issue that shapes outcomes across the entire life course for many people from minority ethnic communities. From early years and education, through labour market entry and progression, to housing, health and later life, racial inequality compounds disadvantage and undermines wellbeing and inclusion.*

*Belfast City Council recommends that the Framework and proposed interventions are more strategic, ambitious, cross departmental and explicitly aimed at addressing structural inequalities that inadvertently give rise to racial inequality.*

**Belfast City council recommends:**

- *Clearly defining and acknowledging the impact of structural inequalities as embedded in institutions, policies, practices and social norms*
- *Commits the Executive to tackling structural inequalities across public institutions, even where overt discrimination is not present*
- *Commits the Executive to providing consistent political leadership, sustained commitment and adequate resourcing*
- *Provides alignment with existing strategies and commitments, to avoid duplication and ensure racial equality is embedded across all policy agendas including:*
  - *Tackling paramilitarism*
  - *Ending violence against women and girls*
  - *The review of Together: Building a United Community (TBUC)*
  - *Anti-poverty and health inequalities strategies*
- *Places a clear commitment on departments to review and act on the structural factors driving racial inequality, such as*

- *Educational attainment gaps, including language support and exclusion from opportunities*
- *Occupational segregation, insecure and low paid work, and barriers to progression*
- *Poverty and low income*
- *Poor housing conditions*
- *Poor physical and mental health outcomes*
- *Unequal access to transport, green space and essential services*
- *Hate crime, discrimination and exclusion*

*Without tackling the underlying structures that produce unequal outcomes, progress will remain limited and uneven.*

## **2. Improving Data, Evidence and Understanding**

*A persistent challenge in Northern Ireland is the lack of robust and comparable ethnicity data.*

*Belfast City Council recommends:*

- *The Executive Office (TEO) takes a lead role in issuing guidance and setting standards for data collection across public bodies*

*Without improved data, inequalities remain hidden and unaddressed.*

## **3. Building Capacity Across Public Sector Organisations**

*While the Framework's focus on anti-racism and cultural awareness training is welcomed, this must go further.*

*Belfast City Council recommends:*

- *Interventions that move beyond cultural awareness to develop:*
  - *An understanding of structural inequalities*
  - *An understanding of Intersectionality, including the interaction with class, gender, faith, disability and migration status*
- *Interventions that develop the competence of public bodies / departments so they have the skills, confidence and structures needed to implement racial equality consistently and effectively.*

## **4. Strengthening the Minority Ethnic / Voluntary and Community Sector**

*The minority ethnic / voluntary and community sector plays a critical role in advocacy, service delivery and building trust.*

*Belfast City Council recommends:*

- *Long term investment, rather than short term or project-based funding*
- *Meaningful partnerships between the sector and the Executive*

## **5. Access to Justice and Accountability**

*Minority ethnic people must have improved access to justice systems that are accessible, trusted and trauma informed.*

*Belfast City Council recommends a stronger focus on interventions by the Department of Justice (DOJ)*

- *Interventions that are also focused on potential perpetrators.*
- *Interventions to address the fear and isolation that is persistent among many within minority ethnic communities, particularly following on from the recent hate riots.*

## **6. Role of Councils**

*Belfast City Council welcomes the commitment in the framework to working with Councils but would welcome further guidance in relation to this.*

## **7. Commitment to Measurement and Continuous Improvement**

*Finally, addressing racial inequality must be a whole Executive commitment, supported by people that have lived experience who are involved in the co design and oversight of interventions.*

*Belfast City Council recommends that the Executive commit to:*

- *Reviewing current thematic working groups, the Race Equality Subgroup and other tactical and strategic delivery structures in relation to this framework, to ensure they are reflective of those with lived experience and that the membership has the skills and expertise to input into the delivery of this framework.*