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**Submission to
OFMDFM
on
the Programme
for Cohesion,
Sharing and
Integration**

October 2010

1. INTRODUCTION

- 1.1 NICEM is an independent non-governmental organisation monitoring human rights and racial equality in Northern Ireland. Our aim is to promote good race relations and to achieve the elimination of racial discrimination and the promotion of racial equality.
- 1.2 Our vision is of a society where equality and diversity are respected, valued and embraced, a society free from all forms of racism, sectarianism, discrimination and social exclusion, where human rights are guaranteed. NICEM works in partnership, to bring about social change through partnership and alliance building, and to achieve equality of outcome and full participation in society.
- 1.3 As an umbrella organisation, we currently count 29 affiliated Black and minority ethnic (BME) groups as full members, which represent settled ethnic minority and religious minority communities, Irish Travellers, migrants from the EU and non-EU migrants, asylum seekers and refugees. NICEM also has over 300 registered interpreters, who provide more than 80 national languages and/or dialects to the most vulnerable groups in our society whose mother tongue is not English, in the criminal justice system, as well as in other public services.
- 1.4 We welcome the government's publication of the consultative document, which was overdue. It is the starting point to move forward. At the same time we need to stress that the consultative document is not currently workable as it outlines all the outstanding issues under an overarching framework without elaboration. It is a DIY document where stakeholders are asked to fill in the blanks. This can only be explained in terms of the limitations imposed by the need for the two main parties in charge of OFMDFM to agree on the contents of the consultative document prior to publication. If this is the case, then civil society has a key role to play in filling these blanks.
- 1.5 The consultative document does not provide any background on how we have moved from the past to the proposed outstanding issues. We need to recognise that a lot of work has been done by civil society, expert organisations and governmental agencies in the field of community relations and race relations over the last two decades. The CSI Programme was not created in a vacuum and therefore it is the progress so far. It should also reflect these good models and practices as part of the continuum.
- 1.6 NICEM attended 11 public meetings across Northern Ireland, listening to the local groups and individuals talking about their issues and concerns regarding the CSI programme. We have also organised numerous consultation events with our members and the BME sector, to listen to their views and identify their concerns. This submission broadly reflects these views and makes constructive comments on the consultative document.

2. CONCEPTUAL FRAMEWORK: TOWARDS THE COUNCIL OF EUROPE'S RIGHTS BASED APPROACH OF SOCIAL COHESION

- 2.1 The consultative document does not provide a definition of cohesion, sharing and integration, nor does it identify the relationship between the three concepts. It only presents a statement of intent: "a cohesive society is one in which everyone can live, work and socialise together free from intimidation and prejudice in the context of fairness, equality, rights, respect and responsibility" (para. 1.7). From our perspective "sharing and integration" are the outcomes of cohesion.
- 2.2 We need to recognise that the consultative document is set in the context of a post-conflict society in which divisions and segregation (political, social, cultural, physical and economical) are still the norm, as well as a legacy of poverty and social deprivation, lack of investment in physical and social infrastructure, etc.. In this context we will expect the consultative document has a strong underpinning human rights framework that grounded in international obligations. Unfortunately there is nothing in the document. The same also applies to equality. This will make a sharp contrast to the Racial Equality Strategy 2005-2010 in which it outlined all international human rights standards on racial discrimination and racism. Without a holistic human rights and equality framework and a working definition of cohesion, the document becomes dry and piecemeal.
- 2.3 Policy makers have been using social cohesion as a driving concept for social goals in different European countries. Social cohesion is focused on social well-being and views harmony and stable social relations as integral to political, economic and social progress as well as peaceful co-existence. *A core concern is the extent to which people (both majority and minority communities) feel connected to society and give loyalty and commitment to a set of values and social goals that are widely shared, in particular the shared social values and goals in post-conflict society.* **What are our "Shared Values" in Northern Ireland's post-conflict society? Does the general public understand these values and how we communicate these values to them? This should be the key objective and outcome of the consultative process.**
- 2.4 There are different interpretations of social cohesion in the policy world and in academia. One view equates shared values and commitment to a unified community. This set of ideas views social cohesion as resting on the bonds and connectedness among individuals in society. In this context, social cohesion is close in meaning to the idea of social solidarity – where individuals and groups feel connected to each other by a common cause and are prepared to act for the collective good, seeing themselves as members of the community.
- 2.5 A second interpretation emphasises full and active participation, especially in economic life. This approach highlights the role of the market and the significance of economic inclusion. One of the most important functions of policy

is to ensure that everyone has the opportunity to participate in economic life, especially as regards access to employment. All behaviours and practices that serve to marginalise people from the labour market constitute a threat to social cohesion.

- 2.6 An opposite approach deriving from a perspective that regards societies as being shaped by conflict emphasises concentration of power, especially as it is associated with economic interests, and how markets will distribute resources unequally unless there is organised, state-led ameliorative action. The political project that derives from this approach sees social cohesion as necessitating, on the one hand, redistribution towards those who are least advantaged and, on the other hand, the creation of institutions and processes that challenge the existing structures of power and distribution, and mediate between sectors of population with different interests and ambitions.
- 2.7 A further approach focuses on cultural factors. In the context of multi-cultural societies, social cohesion is seen to require tolerance and cultivation of diversity and respect for different cultures. Identity is central here as is recognition – people want to have their own beliefs and culture valorised, especially if there are different to those of the majority. This view sees cohesion as being at risk if claims around different identities are not managed in a way that recognises and accommodates diversity.
- 2.8 The achievement of social cohesion rests fundamentally on its legal instruments but also derives from activities relating to statements of vision and good practice. The rights based approach is to treat access to rights for all as an essential reference for a cohesive society and also as a principle facilitating recognition of the dignity of all individuals regardless of their ability to meet their own needs. It builds upon social cohesion as a basis for human rights. This is, precisely, the approach promoted by the Council of Europe.
- 2.9 A full range of civil, political, social and economic rights are protected by the Council of Europe's two fundamental rights instruments – The European Convention on Human Rights and the European Social Charter¹, as well as other international human rights standards to which the British government is a party. In fact, **the Council of Europe's Directorate of Social Cohesion has the following definition of cohesion, which we propose the CSI Programme should adopt:**

"Social cohesion is the capacity of a society to ensure the well-being of all its members, minimising disparities and avoiding marginalisation."
(Report of the High Level Task Force on Social Cohesion in the 21st century)²

¹ The British government had signed and ratified the European Social Charter 1961 and signed the Amendment Protocol 1991 and the Revised European Social Charter 1996 but not yet ratify.

² Towards an active, fair and socially cohesive Europe, Report of High-level Task Force on Social Cohesion, January 2008, Box 3, p. 14

The Task Force emphasises society's capacity to manage differences and divisions as a means to achieve the welfare of all its members. It also sets the following Principles:

- *Equal access to rights and resources, with attention to vulnerable groups, and dignity/recognition of individuals, as expressed through human rights;*
- *Sharing responsibilities across the public and private spheres;*
- *A pro-active approach (participation and reconciliation); and*
- *Efficient management of the balance between interests, generations and domains of action.*³

- 2.10 This definition and the attached principles do fit in the context of the Belfast Agreement which we must adhere to. **Moreover, the rights-based approach provides an overarching human rights framework for both civil and political rights on the one hand, and economic and social rights on the other. This approach will guarantee that the essential task of filling the blanks in the CSI programme is completed in a satisfactory manner.**
- 2.11 Social cohesion is not just fundamental in its references to social life but has the potential to draw a whole series of policy domains together and to link them to an over-arching set of goals. Rather than adding another theme to the policy repertoire, social cohesion is in fact a global approach, bringing social factors together with economic, political and cultural factors. Policy needs such a broad social approach (although not a vague one) that can serve as a vision or end point in relation to social objectives.⁴ **Therefore we welcome that the CSI Programme has adopted such an approach (para. 1.8 “CSI is one of a family of policy...”)** and we also agree with the broad aim and the key goals of the CSI Programme, which form the back bone or the framework for social cohesion.
- 2.12 Social cohesion connotes the notion of all parts working together, the need for balance between the different parts and for systematic and co-ordinated action so that this balance can be realised.⁵ **This conception is crucial to the joined up approach across all government departments and their next step agencies, as well as all actors in civil society (para. 2.2). Our experiences tell us that other strategies such as strategies related to gender and children are not linked to the race strategy. Therefore the CSI Programme has a real opportunity to re-connect all strategies. We look forward to see more joint actions in these policy areas.**
- 2.13 Social cohesion is an approach that facilitates living peacefully together in

³ *ibid*, Box 3, p.14

⁴ *ibid*, para. 27, p.12

⁵ *ibid*, para. 27, p.12

an environment that is made up of both uncertainty and stability. It encourages the exploration of new arenas for consultation and concertation as well as clarification of individual and collective responsibilities.⁶ *We would like to urge our government to adopt such an approach in the implementation of the CSI Programme.*

2.14 Social cohesion directs attention to the new roles of the public institutions in facilitating fora for consultation and clarifying communication channels with the citizenry. An approach based on social cohesion prioritises bridge-building across dividing lines, highlighting the existence of visible and invisible forms of inclusion and ‘belongingness’ but also marginalisation and discrimination.⁷ *We would like to urge our government to adopt such an approach scoping the issues further, as well as when implementing the PSI Programme.*

2.15 Social cohesion is a modular idea which has a direct connection to the functioning of democracy. Using a social cohesion lens enables us to identify the social underpinnings of democracy, in particular the social conditions that need to be in place for an optimally functioning democracy. This relates not just to the extent to which people vote and are in other ways active democratically. It also applies to the way that the public authorities reach decisions and the degree to which they take the wider interests of the public into account.⁸ *We would like to urge our government to develop such an accountability system, in addition to the current Assembly Committee, fostering participation from the grassroots people and groups who are marginalised and in disadvantaged position, without a voice or a sense of belonging to society. This is particularly relevant in the current context of severe public financial cuts, which will affect both jobs and public services (Section 3: People and Places).*

2.16 Sustainability is the essence of social cohesion. It must be considered along two key axes. The first pertains to demographic developments and changes to the composition and quality of life of our populations, with all their consequences in terms of confidence in the future and development of multicultural competences and tolerances at all levels. Secondly, attention must be given to the relationship between economic, social and environmental sustainability as a condition for social cohesion⁹. *Therefore we urge our government to have more input and available data in this area in the final document of the CSI Programme.*

2.17 Social cohesion is not just a process. It is also a set of outcomes. Hence social cohesion is expressed, and can be measured, by the achievement of certain conditions in society. A socially cohesive society is one in which social

⁶ ibid, para. 28, p.13

⁷ ibid, para. 28, p.13

⁸ ibid, para. 29, p.13

⁹ ibid, para. 37, p.15

rights are well-established and capable of being realised, people and groups act responsibly, social dialogue is accepted as normal and institutions and procedures are in place for wide civic dialogue and democratic participation, and a sense of security and confidence about the future prevails widely.¹⁰ We urge our government to outline details of the process in the final document of the PSI Programme, including measureable indicators and outcomes, as well as time frames across the areas aforementioned, such as the realisation of social rights, social dialogue, civic dialogue and democratic participation, the promotion of a sense of security and confidence about the future, in addition to the current proposed programme.

3. RELATIONSHIP BETWEEN HUMAN RIGHTS, EQUALITY AND GOOD RELATIONS

- 3.1 We need to recognise that the legacy of the past, victimhood and zero-sum games mentality creates a public discourse of human rights and equality in Northern Ireland. The underlying problem is reconciliation and the Legacy Commission will play a crucial role in the healing process. In a post-conflict society human rights and equality for all are the cornerstone for our “Shared Future” which is embedded into the Belfast Agreement.
- 3.2 It is essential to emphasise the mutually dependent and mutually reinforcing nature of equality and good relations: good relations cannot be achieved in the absence of equality in order to tackle poverty and social deprivation (economic and social rights), whether it is in the unionist, loyalist, nationalist or republican areas. Equality will be strengthened by good relations, demonstrating that people respect each other’s culture and identity, accept diversity and accommodate differences.
- 3.3 Based on the Council of Europe’s definition of social cohesion, the underlying principles and the dynamic conception of social cohesion, the relationship between human rights, equality and good relations is one of interdependence. Therefore we propose the following working definition of cohesion in the Northern Ireland context:

“Cohesion reflects the capacity of a society to ensure the well-being of all its members, minimising disparities and avoiding marginalisation. It emphasises society’s ability to manage differences and divisions, to achieve healing and reconciliation, and to efficiently implement the means of achieving welfare for all of its members.” This working definition is also attached to the following Principles:

- ***Equal access to rights and resources, with attention to vulnerable groups, and dignity/recognition for individuals, as expressed through human rights;***
- ***Sharing of responsibilities across the public and private spheres;***
- ***A pro-active approach (participation and reconciliation); and***

¹⁰ *ibid*, para. 37, p.15-16

- ***Management of the balance between interests, generations and domains of action.***

3.4 This working definition and principles will provide an overarching framework for the final document of the CSI Programme.

4. CHAPTER ONE: RELATIONSHIP BETWEEN GOOD RELATIONS AND OTHER KEY POLICY AREAS

4.1 As we outline in 2.11 above, we agree the approach of the CSI Programme should be an overarching policy framework that brings all other policies that links to the goals of CSI. This policy framework, therefore, should be inclusive. In Great Britain the “Good Relations” duty has been extended to all grounds under the new Equality Act 2010. NICEM recognises the fact that we are far lack behind in this policy area in terms of equality law.¹¹ **Nevertheless the CSI Programme should provide a platform to accommodate all vulnerable groups, such as religious minority, sexual orientation, disability, women and different age group. We look forward to see action and policy development in the future, in particular sexual orientation and disability strategy to implement the CSI goals and objectives.**

4.2 If all the thematic groups, such as race, gender and children, have a specific strategy to deliver programmes and actions, the only missing link is “sectarianism” which is the key programme of actions for the CSI Programme. **Therefore we propose the development of an “Anti-sectarianism Strategy” as the programme of action for the CSI Programme, alongside the development of the sexual orientation strategy, disability strategy and elderly strategy. This holistic approach will enrich and enhance the future CSI Programme.**

4.3 There is a strong link between sectarianism and racism in Northern Ireland. We welcome this unique opportunity to create a new partnership to tackle racism and sectarianism at local and regional levels through a robust CSI Programme.

4.4 We also welcome the government’s acknowledgement that “good relations cannot build on inequality. It is recognised that the promotion of equality of opportunity is an essential element of building good relations.” (para. 1.4) Therefore it is essential to emphasise the mutually dependent and mutually reinforcing nature of equality and good relations: good relations cannot be achieved in the absence of equality in order to tackle social disadvantage and social deprivation. Equality will be strengthened by good relations, demonstrating that people accept and accommodate differences.

¹¹ The Single Equality Bill for Northern Ireland process has been frozen since 2006 after the Single Equality Bill Team of the OFMDFM completed the Green Paper consultation and started the drafting process. By 2006 we were ahead of Great Britain on the Single Equality Bill project which is now far behind. In particular, the current Race Relations (NI) Order did not have the same legal effects as the Race Relations (amendment) Act 2000.

- 4.5 We welcome the fact that the document highlights the legal position between Section 75 (1) [promote equality of opportunity to 9 vulnerable groups] and Section 75 (2) [promote good relations between racial and religious groups]. This means that good relations cannot be used as an excuse to trump equality, but should rather complement equality. Section 75 does not create a right for individuals or groups under Section 75(1), but imposes a legal obligation for public authorities to promote equality of opportunity and good relations. We should be very clear about this.
- 4.6 As race relations are subsumed under good relations, the voting down of the “Shared Future” Framework document in May 2007 lead to the immediate freezing of the Race Equality Strategy 2005-2010 (Race Strategy) in July 2007, despite the Assembly voting unanimously in its favour.
- 4.7 The Race Strategy requires each Department and their next step agencies to produce a robust Action Plan to implement the six aims of the Race Strategy, as well as a Race Champion to be appointed in each department to monitor their progress. We would like to see the CSI Programme have the same built-in delivery mechanism.
- 4.8 Since the current Race Strategy is due to expire at the end of this year, NICEM strongly feels that there is a clear need to continue the current Race Strategy whilst simultaneously either updating or developing a new one based on the current 6 aims. In light of the scale of the challenge brought about by increasing racism and changes of circumstances since 2005, the development of a new Strategy to tackle the issues and problems ahead is vital.
- 4.9 Since 2005, we have noted very little progress regarding the priorities established in *Annex 4 of the Race Strategy: ‘priority areas for action identified during consultation’ (p.62-64). Most of the priority areas are still relevant (at the end of 2010). Therefore we deserve to have an effective mechanism in place and appropriate resources to deliver the priority areas for action.*
- 4.10 *We therefore demand that a new Racial Equality Strategy, covering the period 2012-2017, be developed and implemented from 2012 onward. The current Strategy should continue to be implemented until the Executive approves a new one next year. There should be a process to engage all ethnic minority and religious minority groups to develop the new Strategy in order to create partnership and ownership.*
- 4.11 The Race Strategy will complement the delivery of the aims and goals of the CSI through the six Aims and the annual Action Plans required from each department and their next step agencies, and vice versa. In our view the current six Aims of the Race Strategy are robust enough and should be continued. Therefore good relations under both the CSI and the Race Strategy will be strengthened.

- 4.12 We welcome the fact that the government has joint competence and power over the immigration exception in the areas of education, housing, health, training, labour shortage, etc. We encourage our government to take a proactive role in all immigration matters in the best interest of Northern Ireland's economy, labour power and diversity.
- 4.13 We need to draw attention on the fact that people with different immigration status will determine the kind of social and welfare benefits they will receive, as well as their entitlement to public services. This affects , particularly the two most vulnerable groups under immigration control, namely asylum seekers and refugees. These two groups experience tremendous social and cultural barriers in getting access to our public service. They also have specific psychological needs due to trauma and/or other circumstances experienced in their home country. This experience also applies to migrants from A8 and A2 countries in the context of accessing public services.
- 4.14 We also welcome that the government is considering the setting up of an emergency fund to help those facing destitution, or who are destitute, through no fault of their own. The money should come from the CSI funding programme under Targeted and Emergency Fund.
- 4.15 To build a strong community we need to have a vibrant local ethnic minority infrastructure, which will facilitate participation and ownership. This requires resources to build the capacity of BME individuals and groups, who can then work together on a level playing field. We will have more detailed comments in the Chapter: Supporting local communities.

5. People and Places

- 5.1 We need to acknowledge that tackling class, social deprivation and inequality are essential pre-requisites and/or social conditions in working towards achieving good relations that will have significant impact on people and places, in particular in the context of the economic downturn and severe public finance cuts. We need to ensure a joined up approach and better co-ordination between Departments and their Next Step Agencies to tackle the same in the foreseeable difficult economic climate.
- 5.2 To a certain extent, issues in relation to racism are arising from prejudice, misinformation, misunderstanding and no contact with ethnic and religious minorities, whether they are settled ones, new migrants, asylum seekers, refugees, Travellers, Roma and Gypsy, minority faith communities or minorities with another immigration status. There is strong evidence of prejudice and discrimination in the workplace, as well as in neighbourhoods against ethnic and religious minorities. The CSI Programme and the Race Strategy offer an opportunity to create a new partnership to tackle these difficult issues on the ground (details statistics can refer to Race Strategy, Good Relations Performance

Indicators 2009 update and research reports on BME communities from various sources). We would like to urge the government to allocate appropriate resources in order to support the local infrastructure and enable ethnic and/or religious minorities to have a voice and to work with local majorities to tackle racism and sectarianism.

5.3 We have serious concerns regarding the severe public financial cuts resulting from the recent comprehensive spending review in Westminster. Although our devolved government has not yet published the budget for the next four years, we are aware that there will be a 4 billion spending cut during that period. Our experience shows that once the cuts are implemented, ethnic and religious minorities are always the first casualty, in particular with regards equal access to public services. The same goes in the employment sector, as most migrants are not protected under the existing employment law, particularly those who are agency workers or whose employers will not renew their work permit irrespective of good performance.

5.4 Workplace prejudice and discrimination are common experiences in migrant workers' lives in Northern Ireland, whether they are from A8, A2 or non-EU countries. The economic downturn threatens their jobs, particularly in the case of those working in low paid jobs, social care and nursing homes, or as agency workers. In times of economic growth they were exploited by being paid far less than the local average (one third of migrants from A8 or A2 countries received less than the minimum wage), including tie-in accommodation. In times of recession they are the first to be dismissed. We urge the government to provide more safeguards regarding economic exploitation and protection of the vulnerable.

5.5 The current verification criteria of the qualification system which operates in England are not fit for purpose in the context of our needs. It takes between 3 to 6 months to verify each qualification. It does not help the local employer to appoint a qualified and experienced migrant worker. The Scottish Executive has commissioned a research to address this common issue. We would like to urge the government to work together to defend the interests of our economy.

5.6 We also have serious concern regarding children and young people in the school system. Children and young people of ethnic and religious minority backgrounds routinely experience racial and religious bullying in our school system. School authorities take no action or simply deny the existence of any racial or religious element when they receive complaints. Most of the complainants are being victimised as a result of their complaint. We would like to urge the government to set up an independent complaint system on racial and religious bullying in school.

5.7 Ethnic minority young people, in general, achieve better grades in both GCSE and A levels in comparison with the local average (5 % higher). At the same time we have more ethnic minority young people who have no qualification in GCSE

than the local average (8 % lower). We urge the government to target this low achiever group through special measures to increase and improve their education performance and employability.

5.8 Health inequality is widespread amongst different ethnic minority communities due to barriers in accessing health and social care services. Improvements have been made through the provision of interpreters and the involvement of the community through partnership programmes and support. The current economic climate will result in severe cuts on public services. We foresee that the health inequality gap will become wider and wider. We urge the government to address these un-met social needs of ethnic and religious minorities, particularly with regards to mental health needs.

6. Empower Next Generation

6.1 Education and training, both formal and informal, are the best way to tackle prejudice and different forms of oppression, whether they are based on sectarianism, racism, sexism, homophobia, ageism, disability, etc. Children develop better when mixed together at an early age rather than when they are older. The school environment is a microcosm of the wider society. Therefore the school curriculum should play a crucial role in helping students to understand different cultures and identities with the view to tackle prejudice and different forms of oppression.

7. Respecting Cultures

7.1 Respecting other people's culture has been an ongoing issue in Northern Ireland, based on the dichotomy between the Irish and British cultures. We now need to refocus our efforts to address and resolve this issue in the context of multiple cultures to reflect Northern Ireland's linguistic and cultural diversity. The extensive promotion of intercultural relations, cultural exchanges, joint events, as well as the active prevention of attacks at events and on symbols and properties, of bullying in schools and in the workplace, will ensure not only a greater understanding of each other's cultures and a more peaceful co-existence, but will also boost Northern Ireland's economy (tourism, foreign investments, etc).

7.2 In order to promote and to understand cultural and linguistic diversity, the syllabus for religious education in Northern Ireland should expand to World Religions (such as Baha'i, Buddhism, Hinduism, Judaism, Islam and Sikhism) for all children. Currently a module at Key Stage 3 offers a World Religion subject to individual schools whether their teacher are trained to teach it or not (the two Teacher Training Colleges only cover the Christianity curriculum). Thus our school curriculum encourages cultural segregation between the two majorities and the minority: this defies the purpose of the CSI programme. We urge the government to rectify this wrongdoing.

7.3 Linguistic diversity is one of the key elements of diversity. The two majorities are fighting for the right to learn and use their language but ignore the rights of minority languages. Currently individual minority communities organise their own language classes in order to sustain and to promote minority languages and cultures, towards which the government has an obligation under the international human rights law to provide financial and/or other support. We urge the government to take positive action to promote linguistic and cultural diversity in Northern Ireland.

8. A Secure Community

8.1 Hate crime is an issue of increasing concern to BME groups in Northern Ireland. As immigration has steadily increased over the past 10 years to stabilise in 2010, so have issues related to hate crime and community safety. Preventing and addressing hate crime involves a considerable amount of human and financial resources to support the victims of racial hate crime (these do not include resources under the mainstreaming Victim Support programme) through comprehensive expert support services. In fact NICEM has developed expertise in this field over the last 8 years with very little government support. The Northern Ireland Office, in the past, has ignored the rights and equal protection of minorities (Aim 2 of the Race Strategy). Promoting initiatives based on the principle of mutual respect, reflecting acceptance of cultural diversity as a positive aspect of the Northern Irish culture, is essential.

8.2 Another barrier for the victims is their experience in police stations when they report crimes. Not all police officers provide care and support. In most cases they just ignore their concerns, particularly in cases of complaints of low level of intimidation and/or harassment. It creates mistrust between ethnic minority communities and the PSNI. Over the years there we have witnessed slight progress but with the new financial constraints and the removal of the post of Minority Liaison Officer, we will be back to square one. In addition, if victims' needs are not addressed, reporting of hate crimes will not be encouraged. This vicious circle will affect the trust of ethnic minority communities in our criminal justice system, as a consequence of the low number of prosecutions in cases of racial motivated crime and no justice has been brought. The new Ministry of Justice should engage into dialogue with ethnic minority communities in order to tackle increasing racial hate crime (for details see PSNI statistics, keeping in mind that this is only the tip of the iceberg as the majority of hate crimes and incidents are not reported to the police) in the post-conflicts society through special measures to address these outstanding issues.

8.3 The CSI and the Race Strategy offer the opportunity to build the capacity of the local and minority ethnic communities to support people who have experienced racial hate crime, and to tackle and prevent hate crime through local comprehensive support services, events and campaigns. Self-sufficiency, partnership and good governance at the local level, supported by the

government through resources, support, training and guidance, are key to achieving a secure community thriving on partnership and free from fear.

9. A Cohesive Community

9.1 The current piece meal approach to tackle racial inequality not only does it ineffective but more costly in the longer term. It does not fit for the purpose in the current economic climax. Ethnic and religious minority health inequality will affect their ability to work and their concentration in the school. Health problems are linked to living environment, such as accommodation, stress due to racial harassment and racist attacks, etc. Therefore we urge the government use joint up approach across all departments and their next step agencies to tackle racial inequality in all major policy areas, such as health and social care, education, training and employment, housing, welfare and benefits, criminal justice, etc.

10. Supporting Local Communities (Implementing the District Council Good Relations Programme)

10.1 Local BME communities and their leaders tend to feel isolated from involvement in the wider local and regional infrastructure in terms of public, economic, social and cultural life. The CSI and the Race Strategy offer the opportunity to develop mechanisms of good governance, policy and practice that will enable local BME groups to develop strong infrastructures and nurture relationships within the wider local and regional context.

10.2 We need clarification on whether the local councils will support the development of the local ethnic minority infrastructure through the funding programme in order to combat racism. We want to emphasise that without local infrastructure and parallel development of an exhaustive capacity building programme which is essential to empower BME groups to work with local community groups of all cultures, as well as to encourage participation in public life.

11. Future OFMDFM Funding Options

11.1 We wish to insist that robust mechanisms are put in place to prevent double funding of the same organisation amongst different departments and local councils. Ethnic minority and religious minority communities or groups should have rights to access all pots of funding rather than we are currently restricted under the Ethnic Minority Development Fund in which over two thirds are not ethnic minority and/or religious minority groups, but the local groups. And finally we wish to insist that an efficient and transparent mechanism is put in place to determine who will fund what and at what level (local/regional) among departments and the local council.

11.2 Thematic Fund

We welcome and support the creation of the Thematic Fund. But we need more details on how the most appropriate body to deliver the future Ethnic Minority Development Fund under the CSI programme will be chosen particularly what criteria will be set and whether will it consult the ethnic and religious minority sector.

11.3 The Ethnic Minority Development Fund should be a vital element in supporting BME groups to implement the 6 aims of the Racial Strategy through their projects and/or core work. And finally Ethnic Minority Development Fund should take the lead in an external research on the state of ethnic minority groups and their funding situation in order to identify and rectify issues and gaps that link into the new CSI funding programme.

11.4 Targeted and Emergency Fund

We welcome and support the creation of a Targeted and Emergency Fund to help those facing destitution, or who are destitute, through no fault of their own. The CSI and the Race Strategy offer the opportunity to examine the rationale behind the setting up of this fund and to push the development of the fund forward.

12. Equality of Opportunity Issues

12.1 The consultation document does not provide the EQIA which is requested under Section 75(1) duty. We are saddened to see this important document does not provide such information. We urge the government to have a full EQIA in the final document.

12.2 We need clarification on the information used when assessing and monitoring issues with regards to equality of opportunities in relation with the CSI programme.

12.3 We need clarification on whether the CSI programme has any differential impacts on ethnic minority issues?

12.4 And finally the CSI and the Race Strategy offer the opportunity to research into potential alternative approaches to the promotion of equality of opportunities and good relations under the existing law.

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