

Title of Report:	Equality Impact Assessment for Council's draft Memorial Policy
Committee Report Submitted To:	Leisure & Development Committee
Date of Meeting:	17 September 2024
For Decision or For Information	For Decision
To be discussed In Committee	NO

Linkage to Council Strategy (2021-25)	
Strategic Theme	Cohesive Leadership Healthy and Engaged Communities
Outcome	Council has agreed policies and procedures and decision making is consistent with them. The Borough comprises cohesive and stable communities which work collaboratively with a range of stakeholders to address issues and deliver on opportunities.
Lead Officer	Head of Service for Community & Culture

Budgetary Considerations	
Cost of Proposal	n/a
Included in Current Year Estimates	YES/NO
Capital/Revenue	n/a
Code	n/a
Staffing Costs	No direct costs

Legal Considerations	
Input of Legal Services Required	YES/NO
Legal Opinion Obtained	YES/NO

Screening Requirements	Required for new or revised Policies, Plans, Strategies or Service Delivery Proposals.		
Section 75 Screening	Screening Completed:	Yes/ No	Date: August 2023
	EQIA Required and Completed:	Yes/ No	Date: July 2024
Rural Needs Assessment (RNA)	Screening Completed	Yes/ No	Date: August 2023
	RNA Required and Completed:	Yes/ No	Date: July 2024
Data Protection Impact Assessment (DPIA)	Screening Completed:	Yes /No	Date:
	DPIA Required and Completed:	Yes /No	Date:

1.0 Purpose of the report

The purpose of this report is to provide Members with the Equality Impact Assessment report for Council's draft Memorials Policy and on the basis of the findings, approve the draft Memorials Policy itself.

2.0 Project Background

The Leisure & Development committee were presented with a draft memorial policy in September 2023. Approval was granted to carry out an Equality Impact Assessment (EQIA) on the policy and that following the outcome of the Equality Impact Assessment, the final draft be brought back to council for consideration and approval.

3.0 The Policy

The purpose of the policy is to provide an overview of the Council's principles and conditions regarding memorials, together with a framework and set of criteria to be applied in the assessment of all applications made to Council.

The draft Public Memorials Policy aims to:

- a) provide an overview of the Council's principles and conditions with regard to memorials, together with a framework and set of criteria to be applied in the assessment of all applications made to Council;
- b) support and facilitate consistent, fair, transparent and ethical approaches to decision-making that has the confidence of the Elected Members, Council staff and the wider constituency of the Causeway Coast and Glens Borough Council;
- c) consider the responsibilities of Council and of those making the request.

Memorials in this context include monuments, statues, markers or other landscape features that honour significant historical figures or events. The Council may also consider requests for public commemorative naming (for example, naming or renaming of premises) or private memorial trees.

The policy considers existing policies already in place that deal with other particular forms of personal commemorative practices such as the Guidelines and Procedure for Open Spaces Memorial Provision i.e. benches, trees, personal remembrance etc (Environmental Services Estates Department), in Council owned open spaces.

As an alternative to a public structural memorial, the policy also makes provision for Council to consider requests for a public commemorative name; in the form of naming or renaming of premises, buildings, rooms, council owned halls or centres. This could be considered a cost-effective method for supporting a public memorial.

The policy sets out the details of who can make an application and the process for a range of requests as follows:

- a) Support to fund the erection of a public memorial on Council property by a third party.
- b) Support to third parties to utilise council land to erect/site a public memorial.
- c) Support to fund a public memorial in the Causeway Coast and Glens Borough Council area on land not in Council's ownership.
- d) Request for Council to lead on and fund a public memorial.
- e) Request for a public commemorative name (change) on a property owned by council.
- f) Request for a Private Memorial Tree dedicated to a loved one.

Exclusions

The following are not included in the proposed policy.

- a) Personal memorials, that are to individuals in the form of benches, personal memorials in cemeteries, personal commemorative plaques and personal memorials on buildings.
- b) Ulster History Circle commemorative “Blue Plaques”. These are administered via the Ulster History Circle.
- c) War memorials. Requests for insertion of names on to war memorials as these are authenticated by the relevant local branch of the Royal British Legion.
- d) Support. In circumstances where the Council cannot offer financial support under the terms of the policy then the Council will help in as much as possible to identify alternative sources of funding from elsewhere.

Application form/s and assessment matrix have been developed to ensure the process is straightforward and transparent. All relevant documents are contained within the Equality Impact Assessment (**Annex A**) as appendices.

4.0 The Equality Impact Assessment

Council carried out a 12-week consultation between 19 March and 11 June 2024 on its draft Public Memorials Policy Framework.

This EQIA final decision report (**Annex A**) sets out:

- a) The initial findings from the draft EQIA report.
- b) The results of the consultation process.
- c) Conclusions.
- d) Recommendations for monitoring any adverse impacts.

4.1 Consideration of available data and research

The EQIA final decision report summarises statistical data and other research which were considered, **see Annex A**.

4.2 Assessment of impacts

In accordance with the EQIA process, having gathered information on the policy and those affected by it, the report assesses and presents any potential differential impacts on one or more of the equality groups.

The draft EQIA considers that in reaching a decision on any potential for adverse impacts, it must be borne in mind that the policy per se does not relate to the merits of historical decisions made by the Council, but instead the process by which any future applications for public memorials will be handled by the Council.

4.3 Consideration of alternative policies and mitigating actions

The draft EQIA report considered that the Council remains of the opinion that there are sufficient safeguards within the proposed policy to ensure that decisions on public memorials will be fair, reasonable, transparent and proportionate, and consequently may have the potential to enhance good relations within the Borough.

In reaching any decision, the Council commits to remaining open to feedback and is committed to responding in a positive manner to views expressed through the consultation process

4.4 Consultation

The consultation process on the draft EQIA covered a 12-week period from 19 March to 11 June 2024, being advertised via the press, on Council's social media platforms, email to council's consultee list and community database and via council's website.

4.4.1 Written consultation responses

During the consultation period the draft EQIA report was available on the Council's website together with surveys designed to facilitate responses from staff and the public, with additional support offered for alternative formats.

4.4.2 Public online meetings

A public advertisement was placed in the local press, and there were two public meetings online. Elected Members and Equality Scheme consultees were notified of the availability of the report and invited to comment. Two public consultation events were hosted online via MS Teams on 17 April and 25 April 2024. There were no registrations or attendees at either event.

4.4.3 Public survey

There were 11 responses received to the online questionnaire aimed at the public. All responses were submitted by individuals residing in the Causeway Coast and Glens Borough Council area. No responses were received on behalf of organisations. Further information regarding the breakdown of information is attached within the body of the report **Annex A** (page 9).

4.4.4 Staff survey

There were 11 responses received to the online questionnaire aimed at Causeway Coast and Glens Borough Council staff. Further information regarding the breakdown of information is attached within the body of the report **Annex A** (page 10).

5.0 Conclusions

The information has been brought together within the EQIA report to ensure that the Council is in a position to take account of all issues and relevant data when making a decision.

The draft EQIA report set out in detail the proposed policy including measures already in place to mitigate any potential adverse impact. These measures include explicit statement that all memorials and installations must be in keeping with good relations' principles and that the policy will continue to provide "opportunities for civic and community leaders to promote the area as a model of best practice in developing respect, understanding and tolerance of the cultural, historical and traditional diversity of the residents."

The proposed policy will also ensure cross-community consensus on decision making through the establishment of a Council Memorial Advisory Group, made up of cross-party elected members and senior management. Final discretion will rest with the Council as to what is contentious, and the Council will follow due process in reaching a fair, reasonable, transparent and proportionate decision.

Furthermore, the proposed policy states that Council will commit to screen each application to identify potential adverse impacts and then, where appropriate, carry out an EQIA.

In terms of feedback obtained during the 12-week consultation period, responses were limited to 11 members of the public and 11 staff members who completed the pro forma questionnaire, despite promotion via advertising in the press, correspondence with council's equality scheme consultee list and community register, as well as promotion through council's website and social media platforms. Councillors were also provided with the opportunity to participate via the online survey or via direct engagement with the consultant, either as individuals or as party groups.

Taking the responses as a whole, there was a healthy level of support for the policy.

At the same time however, (36.4 %) either disagreed or strongly disagreed that the policy would promote good relations, with a small number suggesting that memorials *per se* should not be permitted as they may have the potential to cause division within the community.

There was general acceptance of the findings of the EQIA, with 77.2 % indicating contentment with the assessment of impact and 72.7 % with the conclusions reached.

There was also general support for modifying the policy to meet the special requirements of those who may not be able to apply in written English, with 27.2 % disagreeing with this proposal.

There was little feedback to suggest that the policy should be altered or amended, other than ensuring that the application process is accessible to all and including those who may not be able to submit in written English, for example, on grounds of ethnicity, age or disability.

6.0 Monitoring for adverse impact in the future

The Council's Public Memorials Policy will be reviewed on an annual basis by senior management and the Corporate Policy and Resources Committee, as per para. 4 (2) (b) of Schedule 9 of the Northern Ireland Act 1998 and to monitor the impact of the final policy in order to gauge its effect on the relevant groups and subgroups attached to the nine Section 75 categories and make adjustments if necessary.

7.0 Recommendations

It is recommended that Council accept the findings of the Equality Impact Assessment report, including the mitigation that the policy and associated application be made accessible for those who may not communicate in written English or may have literacy problems more generally, extending to those of different ethnicity, age or disability status and subsequently approves the draft Council Memorials Policy on this basis.



Equality Impact Assessment

Final decision report on Causeway Coast and Glens Borough Council's draft Public Memorials Policy Framework

June 2024

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Executive summary

Introduction

Between 19 March and 11 June 2024, Causeway Coast and Glens Borough Council carried out a 12-week consultation on its draft Public Memorials Policy Framework.

This EQIA final decision report sets out:

- the initial findings from the draft EQIA report
- the results of the consultation process
- conclusions
- recommendations for monitoring any adverse impacts

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

About the policy

The draft Public Memorials Policy Framework aims to

- provide an overview of the Council's principles and conditions with regard to memorials, together with a framework and set of criteria to be applied in the assessment of all applications made to Council;
- support and facilitate consistent, fair, transparent and ethical approaches to decision-making that has the confidence of the Elected Members, Council staff and the wider constituency of the Causeway Coast and Glens Borough Council;
- take into account the responsibilities of Council and of those making the request.

Memorials in this context include monuments, statues, markers or other landscape features that honour significant historical figures or events. The Council may also consider requests for public commemorative naming (for example, naming or renaming of premises) or private memorial trees.

Application process

Requests will only be considered when put in writing using a standard application form.

Applicants must allow a minimum of twelve months for applications to be considered. The Council is not in a position to give a timeline for completion.

Applications will be considered on merit using a scoring matrix.

Where an application is made in a designated area outside of the Council's land and property, all necessary approvals regarding the site will be required from the relevant planning authority.

Where a designated area has existing memorials or installations in place, the Council will have discretion not to create "saturation zones" that create an imbalance or proliferation of memorials to a particular figure or event or detract from the prime purpose of the area.

Costs

In any successful application, costs will be agreed in advance of any support from the Council including the applicant's contribution, which will be incorporated into a contract made between Council and applicant. Such contracts may include agreement on costs to be covered by Council and to be covered by applicant including, but not limited to, project management; design; fabrication; planning and approvals; delivery; site preparation; site safety; installation; insurance; and repair.

Consultation

Applicants must provide evidence that the community to be directly impacted has been consulted widely by the applicant and that an appropriate level of support is forthcoming, with any objections declared, so that assessment by the Council is measured and reasonable.

Impact

The Council will consider the impact the proposed memorial or installation may make on equality of opportunity and good relations activity that focuses on providing "opportunities for civic and community leaders to promote the area as a model of best practice in developing respect, understanding and tolerance of the cultural, historical and traditional diversity of the residents."

In keeping with the Council's statutory obligations under Section 75 of the Northern Ireland Act 1998, memorials and installations must be in keeping with good relations principles. Applications will not be considered if the memorial is seen to:

- harden the attitudes and mindsets of one community over the other;
- harden the boundaries between groups or communities;
- appear to dehumanise or diminish one group or community;
- appear as an imposition of one group or community over another;
- erode the confidence of one group or community;
- appear to undermine identity through negation of culture, language and expression;
- negatively impact or affect any member of the public;
- serve to promote the values and rights of one group or community over another.

Further to Council's statutory obligations under Section 75 of the Northern Ireland Act 1998, each decision will be screened to identify potential adverse impacts and, where appropriate, an EQIA will be carried out.

In addition to an EQIA, a Council Memorial Advisory Group (consisting of cross-party elected members and senior management) may consider any application that has the potential to be contentious.

Discretion will rest with the Council as to what is considered to be contentious and the Council commits to following due process in reaching a fair, reasonable, transparent and proportionate decision.

Decommissioning/removal of memorials

The Council reserves the right to remove a memorial after 10 years or at a point at which it has fallen into a state of disrepair or shabbiness, or for health and safety reasons.

The Council reserves the right to remove or to relocate a memorial should this be required by any future development scheme(s) that are considered a priority for the Council or area.

Consideration of available data and research

The EQIA final decision report summarises statistical data and other research which were considered in the draft EQIA. These include:

- Data on Causeway Coast and Glens Borough Council residents by Section 75 category taken from the 2021 Census and 2023 local government elections
- Data on Causeway Coast and Glens Borough Council staff by Section 75 category based on Article 55 returns to the Equality Commission NI

- 2020 NI Life and Times Survey results on public opinion in relation to culture and identity
- Relevant Causeway Coast and Glens Borough Council policies and research including:
 - o A Better Future Together, a Community Plan for Causeway Coast and Glens 2017–2030
 - o Causeway Coast and Glen Borough Council Equality Scheme
 - o Causeway Coast and Glen Borough Council Equal Opportunities Policy
 - o Dignity and Respect at Work Policy 2018
 - o Policy and Procedure for Dealing with Harassment
 - o Good Relations Audit and Strategy
 - o Research commissioned to develop the draft Public Memorials Policy Framework
 - o Equality impact assessment on commemorative stained-glass window
 - o Consultation on the installation of a memorial to those who lost their lives in the 1973 Coleraine bomb
- Other relevant legislation, policy and research including
 - o Good Friday Agreement 1998
 - o Together: Building a United Community (T:BUC)
 - o Commission on Flags, Identity, Culture and Tradition
 - o UN Special Rapporteur in the field of cultural rights
 - o Fair Employment and Treatment Order 1998
 - o Fair Employment Code of Practice
 - o Promoting a Good and Harmonious Working Environment: A Guide for Employers and Employees
 - o Equality Commission Advice on Good Relations in Local Councils
 - o Other local council policies and practice

Assessment of impacts

In accordance with the EQIA process, having gathered information on the policy and those affected by it, the Council then assessed any potential differential impact on one or more of the equality groups.

The final decision report summarises the assessment of impacts as set out in the draft EQIA report.

The draft EQIA considered that in reaching a decision on any potential for adverse impact attaching to the draft Public Memorials Policy Framework, it has to be borne in mind that the public memorials framework per se does not relate to the merits of historical decisions made by the Council but

instead the process by which any future applications for public memorials will be handled by the Council.

While two of the grounds (i.e., religious belief and political opinion) were afforded primary consideration, potential adverse impacts attaching to one or more of the other seven grounds were also considered. For example, occasions where those of a particular identity face obstacles in making an application according to a predetermined format.

Where an application has the potential to interfere with either of its duties to promote equality of opportunity and good relations, then the Council is confident that there are in place sufficient checks and balances in the decision-making process to ensure that the Council will not harm good relations or be vulnerable to a subsequent challenge or complaint.

Specifically, the process makes explicit that memorials and installations must be in keeping with good relations' principles, and will continue to provide, "opportunities for civic and community leaders to promote the area as a model of best practice in developing respect, understanding and tolerance of the cultural, historical and traditional diversity of the residents."

Cross-community consensus on memorials will be copper-fastened through a Council Memorial Advisory Group made up of representative cross-party elected members and senior management, a group that has the authority to disqualify any application that has the potential to be divisive, contentious or harm good relations. Discretion will rest with the Council as to what is considered to be contentious and the Council will follow due process in reaching a fair, reasonable, transparent and proportionate decision.

Overall, the draft EQIA report found that if the policy is implemented in full then it is likely that rather than have an adverse impact it is likely to have a positive effect on the promotion of equality of opportunity and good relations generally within the Borough and will ensure that any decision is underpinned by overt cross-community support. In facilitating the expression of cultural identity in this sensitive, considered, appropriate and proportionate way, the framework is also likely to complement the aims of the NI Executive's Together: Building a United Community (T:BUC) strategy by contributing to a society where cultural expression is celebrated and embraced.

With regard to other Section 75 grounds, it is not likely that there will be an adverse impact in relation to sex, marital status, sexual orientation or dependants.

At the same time, the application process does require that a pro forma should be completed and submitted in written English, with no explicit concessions for those who may not communicate in written English or may have literacy problems more generally. This could potentially extend to those of different ethnicity, age or disability status, and perhaps may require some adjustments to be made to the original draft policy to accommodate these special circumstances.

Consideration of alternative policies and mitigating actions

The draft EQIA report considered that the Council remains of the opinion that there are sufficient safeguards within the proposed framework to ensure that decisions on public memorials will be fair, reasonable, transparent and proportionate, and as a consequence may have the potential to enhance good relations within the Borough.

Furthermore, the Council is open to views as to the need to modify the policy in order to meet the special circumstances of those who may not be able to submit an application in written English, for example on grounds of ethnicity, age or disability.

In reaching any decision, the Council commits to remaining open to feedback and is committed to responding in a positive manner to views expressed through the consultation process.

Summary of consultation results

The consultation process on the draft EQIA covered a 12-week period from 19 March to 11 June 2024. During the consultation period the draft EQIA report was available on the Council's website together with questionnaires designed to facilitate responses from staff and the public. A public advertisement was placed in the local press, and there were two public meetings online. Elected Members and Equality Scheme consultees were notified of the availability of the report and invited to comment.

The Council arranged two public consultation events online via MS Teams on 17 April and 25 April 2024. There were no attendees at either event.

Survey responses from the general public

There were 11 responses received to the online questionnaire aimed at the general public.¹

All responses were submitted by individuals residing in the Causeway Coast and Glens Borough Council area. No responses were received on behalf of organisations.

45.5 per cent identified as from a Roman Catholic community background. 36.4 per cent of respondents identified as from a Protestant community background. 18.2 per cent identified as having no religion.

Key findings include:

- 36.4 per cent of respondents agreed that the policy sets out a clear process for how the Council will make a decision on requests for a memorial. 36.4 per cent disagree.
- 54.5 per cent agreed that the policy sets out a consistent, fair, transparent and ethical approach to decision making. 18.2 per cent disagree.
- 9.1 per cent of respondents agreed that policy will promote equality of opportunity. 45.5 per cent disagreed.
- 9.1 per cent of respondents agreed that the policy will promote good relations. 36.4 per cent disagreed.
- 54.6 per cent of respondents agreed that the Council should consider modifying the policy to meet the special circumstances of those who may not be able to submit an application in written English. 36.4 per cent disagreed.
- 54.5 per cent of respondents were content with the conclusions in the EQIA; 45.5 per cent were not. No further comments were received.

Survey responses from staff

There were 11 responses received to the online questionnaire aimed at Causeway Coast and Glens Borough Council staff.²

¹ Unless otherwise stated, n=11

² Unless otherwise stated, n=11

45.5 per cent identified as from a Roman Catholic community background; 36.4 per cent of respondents identified as from a Protestant community background; and 9.1 per cent identified as “Other Christian”.

Key findings include:

- 72.7 per cent of respondents agreed that the policy sets out a clear process for how the Council will make a decision on requests for a memorial. 27.3 per cent felt neutral. (None disagreed.)
- 72.7 per cent agreed that the policy sets out a consistent, fair, transparent and ethical approach to decision making. 27.3 per cent felt neutral. (None disagreed.)
- 63.6 per cent of respondents agreed that policy will promote equality of opportunity. 18.2 per cent disagreed.
- 27.3 per cent of respondents agreed that the policy will promote good relations. 36.4 per cent disagreed.
- 63.6 per cent of respondents agreed with that the procedures the Council has put in place to ensure that the draft Public Memorials Policy Framework will promote good relations. 9.1 per cent disagreed.
- 36.4 per cent of respondents felt that the policy will have a positive impact on a good and harmonious working environment within the Council. 27.3 per cent felt it would have a negative impact.
- 63.6 per cent of respondents agreed that the Council should consider modifying the policy to meet special circumstances of those who may not be able to submit an application in written English. 18.2 per cent disagreed.
- 90.0 per cent of respondents were content with the assessment made in the EQIA; 9.1 per cent were not content.

Conclusions

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

The draft EQIA report set out in detail the proposed policy including measures already in place to mitigate any potential adverse impact. These measures include explicit statement that all memorials and installations must be in keeping with good relations’ principles and that the policy will continue to provide “opportunities for civic and community leaders to promote the area as a model of best practice in developing respect, understanding and tolerance of the cultural, historical and traditional diversity of the residents.” The policy also includes a stipulation than an

application would not be considered if the memorial or installation is seen to:

- harden the attitudes and mindsets of one community over the other;
- harden the boundaries between groups or communities;
- appear to dehumanise or diminish one group or community;
- appear as an imposition of one group or community over another;
- erode the confidence of one group or community;
- appear to undermine identity through negation of culture, language and expression;
- negatively impact or affect any member of the public;
- serve to promote the values and rights of one group or community over another.

The policy will also ensure cross-community consensus on decision making through the establishment of a Council Memorial Advisory Group, made up of cross-party elected members and senior management. This group will have the authority to disqualify any application that has the potential to be divisive, contentious or harm good relations. Final discretion will rest with the Council as to what is considered to be contentious, and the Council will follow due process in reaching a fair, reasonable, transparent and proportionate decision.

Furthermore, the Council commits to screen each application in order to identify potential adverse impacts and then, where appropriate, carry out an EQIA.

Feedback obtained during the 12-week consultation period was sparse, with only 11 members of the public and 11 staff members completing the pro forma questionnaire.

Taking the 22 responses as a whole, there was a healthy level of support for the policy, with 14 respondents (63.6 per cent) either agreeing or strongly agreeing that the policy sets out a consistent, fair, transparent and ethical approach to decision making. At the same time however, eight of 22 respondents (36.4 per cent) either disagreed or strongly disagreed that the policy would promote good relations, with a small number suggesting that memorials *per se* should not be permitted as they may have the potential to cause division within the community.

There was general acceptance of the findings of the EQIA, with 17 respondents (77.2 per cent) indicating contentment with the assessment of impact and 16 (72.7 per cent) with the conclusions reached.

There was also general support for modifying the policy to meet the special requirements of those who may not be able to apply in written English, with only six respondents (27.2 per cent) disagreeing with this proposal.

The relatively low levels of interest shown by both the public and Council staff, coupled with an absence of response from representative groups and key stakeholders, is noteworthy. This would suggest that the proposed policy is generally not regarded as contentious but perhaps instead represents a sensible way to proceed.

While those within the community and the Council who took the time to respond should be thanked for their contribution, there was little feedback to suggest that the policy should be altered or amended, other than ensuring that the application process is accessible to all and including those who may not be able to submit in written English, for example, on grounds of ethnicity, age or disability.

Monitoring for adverse impact in the future

The Council's Public Memorials Policy Framework will be reviewed on an annual basis by senior management and the Corporate Policy and Resources Committee.

1. Introduction

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

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

Between 19 March and 11 June 2024, the Council carried out a 12-week consultation on its draft Public Memorials Policy Framework. The draft Framework aims to

- provide an overview of the Council's principles and conditions with regard to memorials, together with a framework and set of criteria to be applied in the assessment of all applications made to Council;
- support and facilitate consistent, fair, transparent and ethical approaches to decision-making that has the confidence of the Elected Members, Council staff and the wider constituency of the Causeway Coast and Glens Borough Council;
- take into account the responsibilities of Council and of those making the request.

A public advertisement was placed in Coleraine Chronicle and the Co. Derry Post. The advertisement invited comments on the proposed policy.

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

The Council facilitated two online public consultation events on 17 April and 25 April 2024.

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

All Elected Members and staff were notified of the availability of the draft EQIA report and consultation questionnaires on the Council's website, invited to submit written responses and attend online consultation events. Staff could also discuss the consultation directly with the consultant facilitating the consultation at a time suitable to both parties.

This EQIA final decision report sets out:

- the initial findings from the draft EQIA report
- the results of the consultation process
- conclusions
- recommendations for monitoring any adverse impacts

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

2. The policy

Background

In January 2021, a report on the consultation on a proposed structural memorial to those who lost their lives in the 1973 Coleraine bomb included a recommendation that Causeway Coast and Glens Borough Council consider developing a policy for use when considering memorials and commemorations. This would provide both Council staff and the general public with “clarity, guidance and specific policy [...] so moving forward there is consistency surrounding advice, information, public engagement and general decision-making on this sensitive issue.”

In the absence of any overarching direction from the Northern Ireland Executive as to the management of memorials and commemorations, in June 2021, the Council commissioned research to develop a policy framework to be used within the Council for considering memorialisation and commemoration. This included desk research involving relevant local, regional and international policy, legislation and research, and consultation and engagement, including with Elected Representatives, Council staff, other councils, policymakers and academics. A list of research and organisations consulted is included at appendix 2.

In September 2021, Elected Representatives were presented with an options paper. This outlined a range of options in relation to the nature of memorials and commemorations; nature of applicants; application process; criteria; and timeframes.

Legal advice was subsequently sought in relation to land ownership, permissions, liability and maintenance and considered alongside the policy options by the Council's Senior Leadership Team.

A final draft Policy framework was completed in November 2021. However, it was placed on hold due to ongoing sensitivities with the Coleraine Bomb Memorial. It was subsequently agreed that further consideration on the draft policy framework would be postponed until after the Coleraine Bomb Memorial was completed further to the fiftieth anniversary of the bomb in June 2023.

Scope

The draft Public Memorials Policy Framework aims to

- provide an overview of the Council's principles and conditions with regard to memorials, together with a framework and set of criteria to be applied in the assessment of all applications made to Council;
- support and facilitate consistent, fair, transparent and ethical approaches to decision-making that has the confidence of the Elected Members, Council staff and the wider constituency of the Causeway Coast and Glens Borough Council;
- take into account the responsibilities of Council and of those making the request.

Any individual, families, groups or businesses that are based in, or operate within, the Causeway Coast and Glens Borough Council area may apply for a public memorial.

Public memorials in this context include monuments, statues, markers or other landscape features that honour significant historical figures or events.

As an alternative to a public structural memorial, Council may also consider requests for:

- a public commemorative name in the form of naming or renaming of premises, buildings, rooms, Council-owned halls or centres.
- a private memorial tree to be planted in memory of a loved one (see Memorial trees, below).

The policy will then enable the Council to consider:

- i. support to fund the erection of a public memorial on Council property by a third party;
- ii. support to third parties to utilise council land to erect/site a public memorial;
- iii. support to fund a public memorial in the Causeway Coast and Glens Borough Council area on land not in Council ownership;
- iv. requests for the Council to lead on and fund a public memorial;
- v. requests for a public commemorative name (change) on a property owned by the Council;
- vi. requests for a private memorial tree dedicated to a loved one.

Requests will only be considered when put in writing using a standard application form available on request through Council. Copies of the application form for:

- public memorials is included at appendix 3.
- public commemorative naming is included at appendix 4.

Memorial trees

In 2015, the Council developed its Guidelines and Procedure Open Spaces Memorial Provision policy, covering requests for memorials, such as benches and trees, for loved ones in Council-owned open spaces.

This policy has been considered and requests for memorial trees incorporated in to the draft Public Memorials Policy Framework. This is with the intention of:

- i. streamlining policy and procedures for both public and private memorials, and
- ii. confining the dedication of private memorials to trees only based on issues arising from memorial benches including management, maintenance, suitable locations, decommissioning and vandalism.

A copy of the application form, including guidelines and permitted locations for memorial trees, is included at appendix 5.

Other forms of memorial

The draft Policy Framework goes on to consider:

“In addition to the definition as outlined above, embedded decorative/inscribed paving, tiling or bricks may be considered. It is strongly recommended that an artist is involved in the creation of this type of memorial as their involvement can add interest and sincerity to the design of such a memorial.”

Implementation

A flowchart outlining the process for applying for and considering applications for public memorials and public commemorative naming is included at appendix 6.

Timeframes

Applicants must allow a minimum of twelve months for applications for commemorative naming to be considered.

Given the detailed processes to be followed in respect of proposals and requests for other public memorials, the Council is not in a position to give a timeline for completion.

Criteria

On receipt, applications will be considered on merit using a scoring matrix.

The scoring matrix for public memorials is included at appendix 7.

The scoring matrix for public commemorative naming is included at appendix 8.

Location

Applicants must be able to demonstrate that the proposed site is the best available location. The choice of location must have no negative impact on good relations.

Where an application is made in a designated area outside of the Council's land and property, all necessary approvals regarding the site will be required from the relevant planning authority. If the proposed site is on private property or land, the Council will not support any proposal without the formal consent of the owner.

Where a designated area has existing memorials or installations in place, the Council will have discretion not to create "saturation zones" that create an imbalance or proliferation of memorials to a particular figure or event or detract from the prime purpose of the area.

Costs

In any successful application, costs will be agreed in advance of any support from the Council including the applicant's contribution, which will be incorporated into a contract made between Council and applicant. Such contracts may include agreement on costs to be covered by Council and to be covered by applicant including, but not limited to, project management; design; fabrication; planning and approvals; delivery; site preparation; site safety; installation; insurance; and repair.

It is important to note that the Council will only consider a financial contribution to any proposed memorial and will not accept any physical input on the structure or any additionality to the structure.

Consultation

Applicants must provide evidence that the community to be directly impacted has been consulted widely by the applicant and that an

appropriate level of support is forthcoming, with any objections declared, so that assessment by the Council is measured and reasonable.

Impact

The Council will consider the impact the proposed memorial or installation may make on equality of opportunity and good relations activity that focuses on providing “opportunities for civic and community leaders to promote the area as a model of best practice in developing respect, understanding and tolerance of the cultural, historical and traditional diversity of the residents.”

In keeping with the Council’s statutory obligations under Section 75 of the Northern Ireland Act 1998, memorials and installations must be in keeping with good relations principles. Applications will not be considered if the memorial is seen to:

- harden the attitudes and mindsets of one community over the other;
- harden the boundaries between groups or communities;
- appear to dehumanise or diminish one group or community;
- appear as an imposition of one group or community over another;
- erode the confidence of one group or community;
- appear to undermine identity through negation of culture, language and expression;
- negatively impact or affect any member of the public;
- serve to promote the values and rights of one group or community over another.

Further to Council’s statutory obligations under Section 75 of the Northern Ireland Act 1998, each decision will be screened to identify potential adverse impacts and, where appropriate, an EQIA will be carried out.

In addition to an EQIA, a Council Memorial Advisory Group (consisting of cross-party elected members and senior management) may consider any application that has the potential to be contentious.

Discretion will rest with the Council as to what is considered to be contentious and the Council commits to following due process in reaching a fair, reasonable, transparent and proportionate decision.

Decommissioning/removal of memorials

The Council reserves the right to remove a memorial after 10 years or at a point at which it has fallen into a state of disrepair or shabbiness, or for health and safety reasons.

The Council reserves the right to remove or to relocate a memorial should this be required by any future development scheme(s) that are considered a priority for the Council or area.

Exclusions

The following are not included in the policy framework.

- Personal memorials, that is to individuals in the form of benches, personal memorials in cemeteries, personal commemorative plaques and personal memorials on buildings.
- Ulster History Circle commemorative “Blue Plaques”. These are administered via the Ulster History Circle.³
- War memorials. Requests for insertion of names on to war memorials are authenticated by the relevant local branch of the Royal British Legion.⁴
- Support. In circumstances where the Council cannot offer financial support under the terms of the policy then the Council will help in as much as possible to identify alternative sources of funding from elsewhere.

Evaluation and review of the policy

The Public Memorials Policy Framework will be reviewed on an annual basis by senior management and the Corporate Policy and Resources Committee and, as part of this review, an evaluation will be conducted on the effectiveness of the policy and procedures in relation to receiving and assessing requests from applicants.

The framework will also be reviewed in light of any guidance that may be forthcoming from the NI Executive as to the management of memorials and commemorations.

³ <https://ulsterhistorycircle.org.uk>

⁴ <https://counties.britishlegion.org.uk/counties/northern-ireland/>

3. Consideration of available data and research

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

Statistical data

Data on Causeway Coast and Glens Borough Council residents by Section 75 category is set out in appendix 9. This information is taken from the 2021 Census and 2023 local government elections.

Appendix 10 provides a breakdown of Causeway Coast and Glens Borough Council staff by Section 75 category based on Article 55 returns to the Equality Commission NI.

Appendix 11 contains data from the 2020 NI Life and Times Survey on public opinion in relation to culture and identity.

Research

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

- Appendix 12: Relevant Causeway Coast and Glens Borough Council policies and research
- Appendix 13: Other relevant legislation, policy and research

4. Assessment of impacts

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

Differential impact suggests that a particular group has been affected differently by the policy (either favourably or unfavourably), while adverse impact is an indication that the effect is less favourable (i.e., negative) and is potentially unlawful.⁵

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

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

The draft EQIA considered that in reaching a decision on any potential for adverse impact attaching to the draft Public Memorials Policy Framework, it has to be borne in mind that the public memorials framework per se does not relate to the merits of historical decisions made by the Council but instead the process by which any future applications for public memorials will be handled by the Council.

While two of the grounds (i.e., religious belief and political opinion) were afforded primary consideration, potential adverse impacts attaching to one or more of the other seven grounds were also considered. For example, occasions where those of a particular identity face obstacles in making an application according to a predetermined format.

The primary aim of the policy is to set out the principles and conditions operating with regard to the consideration of future applications for public memorials, before ensuring that the application process is fair, reasonable, transparent and ethical. This process must also take into account all relevant duties falling on the Council, including the need to continue to promote equality of opportunity and good relations within the Borough.

⁵ Practical Guidance on Equality Impact Assessment, Equality Commission for NI, 2004 (pp.22-23)

Where an application has the potential to interfere with either of these duties then the Council is confident that there are in place sufficient checks and balances in the decision-making process to ensure that the Council will not harm good relations or be vulnerable to a subsequent challenge or complaint. For example, where a memorial could be regarded by one section of the community as divisive or contentious then these concerns would reflect in any decision made.

Specifically, the process makes explicit that memorials and installations must be in keeping with good relations' principles, and will continue to provide, "opportunities for civic and community leaders to promote the area as a model of best practice in developing respect, understanding and tolerance of the cultural, historical and traditional diversity of the residents."

With this in mind, applications will not be considered if the memorial is seen to:

- harden the attitudes and mindsets of one community over the other;
- harden the boundaries between groups or communities;
- appear to dehumanise or diminish one group or community;
- appear as an imposition of one group or community over another
- erode the confidence of one group or community;
- appear to undermine identity through negation of culture, language and expression;
- negatively impact or affect any member of the public;
- serve to promote the values and rights of one group or community over another.

Cross-community consensus on memorials will be copper-fastened through a Council Memorial Advisory Group made up of representative cross-party elected members and senior management, a group that has the authority to disqualify any application that has the potential to be divisive, contentious or harm good relations. Discretion will rest with the Council as to what is considered to be contentious and the Council will follow due process in reaching a fair, reasonable, transparent and proportionate decision.

Previous research has provided strong evidence that the establishment of a specific working group to discuss such requests has helped to ensure that party politics does not unduly contaminate the decision-making process.

Overall, the draft EQIA report found that if the policy is implemented in full then it is likely that rather than have an adverse impact it is likely to have a positive effect on the promotion of equality of opportunity and good relations generally within the Borough and will ensure that any decision is underpinned by overt cross-community support. In facilitating the

expression of cultural identity in this sensitive, considered, appropriate and proportionate way, the framework is also likely to complement the aims of the NI Executive's Together: Building a United Community (T: BUC) strategy by contributing to a society where cultural expression is celebrated and embraced.

With regard to other Section 75 grounds, it is not likely that there will be an adverse impact in relation to sex, marital status, sexual orientation or dependants.

At the same time, the application process does require that a pro forma should be completed and submitted in written English, with no explicit concessions for those who may not communicate in written English or may have literacy problems more generally. This could potentially extend to those of different ethnicity, age or disability status, and perhaps may require some adjustments to be made to the original draft policy to accommodate these special circumstances.

5. Consideration of alternative policies and mitigating actions

The EQIA process requires that, if it is decided that the proposal may have an adverse impact on those within one or more of the nine equality categories, then mitigations or alternatives should be put forward for consideration, and an assessment of the possible impact of these alternatives will be undertaken.

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.⁶

The draft EQIA report considered the Council remains of the opinion that there are sufficient safeguards within the proposed framework to ensure that decisions on public memorials will be fair, reasonable, transparent and proportionate, and as a consequence may have the potential to enhance good relations within the Borough.

Furthermore, the Council is open to views as to the need to modify the policy in order to meet the special circumstances of those who may not be able to submit an application in written English, for example on grounds of ethnicity, age or disability.

In reaching any decision, the Council commits to remaining open to feedback and is committed to responding in a positive manner to views expressed through the consultation process.

⁶ Practical Guidance on Equality Impact Assessment, Equality Commission for NI, 2004 (pp.30-31)

6. Summary of consultation results

The Equality Commission's Guide to the Statutory Duties makes it clear that a formal consultation exercise should be included as a critical stage in an EQIA, immediately before decision making. Consultation should focus on the actual impact of the existing policy and the likely impact of proposed and alternative policies. Consultation should be inclusive, afford a fair opportunity to communicate pertinent information and enable consultees to give advice and opinion on the policy so that the public authority may reach a more informed decision. However, the Equality Commission has also made it clear that an EQIA should not be considered as a referendum whereby the views of consultees from a majority are counted as votes to decide the outcome.⁷

The consultation process on this EQIA covered a 12-week period from 19 March to 11 June 2024. During the consultation period the draft EQIA report was available on the Council's website together with questionnaires designed to facilitate responses from staff and the public. A public advertisement was placed in the local press, and there were two public meetings online. The Council's Equality Scheme consultees were notified of the availability of the report and invited to comment. Elected Members were made aware of the draft EQIA report and consultation questionnaires on the Council's website, invited to submit written responses and attend an online consultation event.

Responses to the online consultation events

The Council arranged two public consultation events online via MS Teams on 17 April and 25 April 2024. There were no attendees at either event.

Survey responses from the general public

There were 11 responses received to the online questionnaire aimed at the general public.⁸

⁷ Practical Guidance on Equality Impact Assessment, Equality Commission for NI, 2004 (p.36)

⁸ Unless otherwise stated, n=11

All responses were submitted by individuals residing in the Causeway Coast and Glens Borough Council area. No responses were received on behalf of organisations.

Demographic profile of respondents

45.5 per cent identified as from a Roman Catholic community background. 36.4 per cent of respondents identified as from a Protestant community background. 18.2 per cent identified as having no religion.

Community background	Number	Percentage
Roman Catholic	5	45.5%
Protestant	4	36.4%
Other Christian (Including Christian related)	0	0.0%
No religion	2	18.2%
Prefer not to say/no response	0	0.0%

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

The majority of respondents (81.8 per cent) identified as female.

Gender identity	Number	Percentage
Male	2	18.2%
Female	9	81.8%
Prefer not to say/nil response	0	0.0%

The following table summarises respondents' broad age bands.

Age band	Number	Percentage
18-24	0	0.0%
25-34	0	0.0%
35-44	1	9.1%
45-54	3	27.3%
55-64	4	36.4%
Over 65	3	27.3%
No response	0	0.0%

To what extent do you agree that the draft Public Memorials Policy sets out a clear process for how the

Council will make a decision on requests for a memorial?

36.4 per cent of respondents agreed that the policy sets out a clear process and 36.4 per cent disagree. The majority of respondents (45.5 per cent) felt neutral.

Attitude	Number	Percentage
Strongly agree	2	18.2%
Agree	2	18.2%
Neutral	5	45.5%
Disagree	2	18.2%
Strongly disagree	2	18.2%

To what extent do you agree that the draft Public Memorials Policy sets out a consistent, fair, transparent and ethical approach to decision making?

54.5 per cent agreed that the policy sets out a consistent, fair, transparent and ethical approach to decision making. 18.2 per cent disagree, and 27.3 per cent felt neutral.

Attitude	Number	Percentage
Strongly agree	1	9.1%
Agree	5	45.5%
Neutral	3	27.3%
Disagree	1	9.1%
Strongly disagree	1	9.1%

Respondents were also offered the opportunity to explain why they felt that way. One response was received from a respondent who strongly disagree with the policy. The respondent explained that their father, who had died suddenly, had a strong affiliation with the sea and local harbour. The respondent further explained:

“There is benches beside lifeboat house that have no names on them! I feel it would be a great comfort for [our] family to have something with his name on in at Portrush Harbour. A tree is not acceptable as he grew up near the sea all his life, and this would be more appropriate in our eyes.”

To what extent do you agree or disagree that the draft Public Memorials Policy Framework will promote equality of opportunity?

9.1 per cent of respondents agreed that policy will promote equality of opportunity. 45.5 per cent disagreed, and 45.5 per cent were neutral.

Attitude	Number	Percentage
Strongly agree	1	9.1%
Agree	0	0.0%
Neutral	5	45.5%
Disagree	3	27.3%
Strongly disagree	2	18.2%

Two of the respondents who disagreed provided comments to further explain their response.

“Memorial Benches are a blot on the landscape as they become shrines and the general public refuse to sit on them.”

“EQIAs do not count. Recommendations taken to Council have no weight and Councillor make a political decision with no accountability towards EQIA findings.”

To what extent do you agree or disagree that the draft Public Memorials Policy Framework will promote good relations?

9.1 per cent of respondents agreed that the policy will promote good relations. 36.4 per cent disagreed, and 54.5 per cent were neutral.

Attitude	Number	Percentage
Strongly agree	0	0.0%
Agree	1	9.1%
Neutral	6	54.5%
Disagree	2	18.2%
Strongly disagree	2	18.2%

Two of the respondents who disagreed provided comments to further explain their response.

“Memorial Benches are a blot on the landscape as they become shrines and the general public refuse to sit on them.”

“It will be used for political purposes only!!”

To what extent do you agree or disagree with the procedures that the Council has put in place to ensure that the draft Public Memorials Policy Framework will promote good relations?

9.1 per cent of respondents agreed with that the procedures the Council has put in place to ensure that the draft Public Memorials Policy Framework will promote good relations. 45.5 per cent disagreed, and 45.5 per cent were neutral.

Attitude	Number	Percentage
Strongly agree	0	0.0%
Agree	1	9.1%
Neutral	5	45.5%
Disagree	3	27.3%
Strongly disagree	2	18.2%

Two of the respondents who disagreed provided comments to further explain their response.

“Memorials only cause division and should be banded.”

“Procedures are normally swept under the carpet”

To what extent do you agree or disagree the Council should consider modifying the policy in order to meet the special circumstances of those who may not be able to submit an application in written English, for example on grounds of ethnicity, age or disability?

54.6 per cent of respondents agreed that the Council should consider modifying the policy to meet special circumstances of those who may not be able to submit an application in written English. 36.4 per cent disagreed, and 9.1 per cent were neutral.

Attitude	Number	Percentage
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Strongly agree	1	9.1%
Agree	5	45.5%
Neutral	1	9.1%
Disagree	2	18.2%
Strongly disagree	2	18.2%

One respondent who disagreed with the statement commented:

“We know where this will go if council propose to produce in different languages, is council not in enough debt with out proposing more way to spend money.”

One respondent who agreed with the statement commented:

“Yes it could be hard for people who live and work here and English is not their first language. Sometimes it is hard to reach elderly or people with disabilities so important that they get access to consultations too.”

Are you aware of any other equality of opportunity, good relations or rural needs issues that should be taken into account in relation to the proposed changes to the draft Public Memorials Policy Framework?

No further issues were identified.

Are you content with the assessment of impact made in the EQIA?

63.6 per cent of respondents were content with the assessment made in the EQIA; 36.4 per cent were not content.

Attitude	Number	Percentage
Yes	7	63.6%
No	4	36.4%

One comment was received from a respondent who was not content:

“Any assessment won't count when going to the Chamber.”

Are you content with the conclusions reached in the EQIA?

54.5 per cent of respondents were content with the conclusions in the EQIA; 45.5 per cent were not. No further comments were received.

Attitude	Number	Percentage
Yes	6	54.5%
No	5	45.5%

Survey responses from staff

There were 11 responses received to the online questionnaire aimed at Causeway Coast and Glens Borough Council staff.⁹

Demographic profile of respondents

45.5 per cent identified as from a Roman Catholic community background; 36.4 per cent of respondents identified as from a Protestant community background; and 9.1 per cent identified as "Other Christian".

Community background	Number	Percentage
Roman Catholic	5	45.5%
Protestant	4	36.4%
Other Christian (Including Christian related)	1	9.1%
No religion	0	0.0%
Prefer not to say/no response	1	9.1%

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

The majority of respondents (81.8 per cent) identified as female.

Gender identity	Number	Percentage
Male	4	36.4%
Female	6	54.5%
Prefer not to say/nil response	1	9.1%

⁹ Unless otherwise stated, n=11

The following table summarises respondents' broad age bands.

Age band	Number	Percentage
18-24	0	0.0%
25-34	0	0.0%
35-44	2	18.2%
45-54	2	18.2%
55-64	4	36.4%
Over 65	0	0.0%
No response	3	27.3%

To what extent do you agree that the draft Public Memorials Policy sets out a clear process for how the Council will make a decision on requests for a memorial?

72.7 per cent of respondents agreed that the policy sets out a clear process. 27.3 per cent felt neutral.

Attitude	Number	Percentage
Strongly agree	2	18.2%
Agree	6	54.5%
Neutral	3	27.3%
Disagree	0	0.0%
Strongly disagree	0	0.0%

To what extent do you agree that the draft Public Memorials Policy sets out a consistent, fair, transparent and ethical approach to decision making?

72.7 per cent agreed that the policy sets out a consistent, fair, transparent and ethical approach to decision making. 27.3 per cent felt neutral.

Attitude	Number	Percentage
Strongly agree	2	18.2%
Agree	6	54.5%
Neutral	3	27.3%
Disagree	0	0.0%

Strongly disagree	0	0.0%
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Respondents were also offered the opportunity to explain why they felt that way. Two responses were received from respondents who agreed with the statement.

“The word ‘shabbiness’ does not sound right in the policy. ‘unkept’ or ‘not maintained’ would sound better”

“Memorial benches should not be considered as they tend to become shrines and deter the public from sitting on them. Any unauthorised plaques should be removed. Memorial trees are the only option that should be considered. Don't turn the borough into a shrine.”

To what extent do you agree or disagree that the draft Public Memorials Policy Framework will promote equality of opportunity?

63.6 per cent of respondents agreed that policy will promote equality of opportunity. 18.2 per cent disagreed, and 18.2 per cent were neutral.

Attitude	Number	Percentage
Strongly agree	1	9.1%
Agree	6	54.5%
Neutral	2	18.2%
Disagree	2	18.2%
Strongly disagree	0	0.0%

One explanatory comment was received from a respondent in agreement with the statement:

“The policy shows equality as the process is clearly set out however if the policy is not followed in the council chamber by elected members, this is when there can be inequality.”

One explanatory comment was also received from a respondent who disagreed with the statement:

“To many genuinely engrained viewpoints for both perceived sections of community to be perceived equitable”

To what extent do you agree or disagree that the draft Public Memorials Policy Framework will promote good relations?

27.3 per cent of respondents agreed that the policy will promote good relations. 36.4 per cent disagreed, and 36.4 per cent were neutral.

Attitude	Number	Percentage
Strongly agree	0	0.0%
Agree	3	27.3%
Neutral	4	36.4%
Disagree	4	36.4%
Strongly disagree	0	0.0%

One explanatory comment was received from a respondent who felt neutral:

“The policy is clear and transparent. The policy will only impact on good relations if it is not followed by councillors in the chamber e.g. if they override the policy”

One explanatory comment was also received from a respondent who disagreed with the statement:

“it wont please all people”

To what extent do you agree or disagree with the procedures that the Council has put in place to ensure that the draft Public Memorials Policy Framework will promote good relations?

63.6 per cent of respondents agreed with that the procedures the Council has put in place to ensure that the draft Public Memorials Policy Framework will promote good relations. 9.1 per cent disagreed, and 27.1 per cent were neutral.

Attitude	Number	Percentage
Strongly agree	0	0.0%
Agree	7	63.6%
Neutral	3	27.3%
Disagree	1	9.1%

Strongly disagree	0	0.0%
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One explanatory comment was received from a respondent who agreed with the statement:

“The policy is clear and if followed should not impact good relations in a negative manager”

To what extent do you feel that the proposed Public Memorials Policy Framework will have on the promotion of a good and harmonious working environment within the Council?

36.4 per cent of respondents felt that the policy will have a positive impact on a good and harmonious working environment within the Council; 27.3 per cent felt it would have a negative impact; 36.4 per cent were neutral.

Attitude	Number	Percentage
Positive	4	36.4%
Neutral	4	36.4%
Negative	3	27.3%

To what extent do you agree or disagree the Council should consider modifying the policy in order to meet the special circumstances of those who may not be able to submit an application in written English, for example on grounds of ethnicity, age or disability?

63.6 per cent of respondents agreed that the Council should consider modifying the policy to meet special circumstances of those who may not be able to submit an application in written English. 18.2 per cent disagreed, and 18.2 per cent were neutral.

Attitude	Number	Percentage
Strongly agree	0	0.0%
Agree	7	63.6%
Neutral	2	18.2%
Disagree	1	9.1%
Strongly disagree	1	9.1%

Two respondents who disagreed with the proposed modifications commented:

“If the policy does; already include that it is available in other formats, this could be included or information could be provided by staff to anyone who the policy will be used.”

“well we all know where this is going”

Are you aware of any other equality of opportunity, good relations or rural needs issues that should be taken into account in relation to the proposed changes to the draft Public Memorials Policy Framework?

One additional issue was identified:

“Consideration to be given to the local area where the memorial is going. For example a republican memorial in a mainly protestant area and vice versa”

Are you content with the assessment of impact made in the EQIA?

90.0 per cent of respondents were content with the assessment made in the EQIA; 9.1 per cent were not content. No further comments were received.

Attitude	Number	Percentage
Yes	10	90.9%
No	1	9.1%

Are you content with the conclusions reached in the EQIA?

90.0 per cent of respondents were content with the assessment made in the EQIA; 9.1 per cent were not content. No further comments were received.

Attitude	Number	Percentage
Yes	10	90.9%
No	1	9.1%

7. Conclusions

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

There is no strict definition of what “taking into account” entails. However, the Equality Commission guidance on how decisions should be recorded makes it clear that a public authority must be able to record the decision-making process (as well as the decision) and that the decision must be justified.¹⁰

The guidance also advises that all available information should be combined in making the decision. This includes the information gathered during the research phase, the results of the consultation and the analysis of alternative policy options.¹¹

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

The Draft Consultation EQIA Report has already set out in detail the proposed policy, and measures already in place to mitigate any potential adverse impact. These measures include an explicit statement that all memorials and installations must be in keeping with good relations’ principles, and the Policy will continue to provide, “opportunities for civic and community leaders to promote the area as a model of best practice in developing respect, understanding and tolerance of the cultural, historical and traditional diversity of the residents.” The policy also includes a stipulation that an application would not be considered if the memorial or installation is seen to:

- harden the attitudes and mindsets of one community over the other;
- harden the boundaries between groups or communities;
- appear to dehumanise or diminish one group or community;

¹⁰ Practical Guidance on Equality Impact Assessment, ECNI 2004, p.45

¹¹ Practical Guidance on Equality Impact Assessment, ECNI 2004, p.45

- appear as an imposition of one group or community over another;
- erode the confidence of one group or community;
- appear to undermine identity through negation of culture, language and expression;
- negatively impact or affect any member of the public;
- serve to promote the values and rights of one group or community over another.

The policy will ensure cross-community consensus on decision-making through the establishment of a Council Memorial Advisory Group, made up of cross-party elected members and senior management, a group that will have the authority to disqualify any application that has the potential to be divisive, contentious or harm good relations. Under the policy, final discretion will rest with the Council as to what is considered to be contentious and the Council will follow due process in reaching a fair, reasonable, transparent and proportionate decision.

Furthermore, the Council commits to screen each application in order to identify potential adverse impacts and then, where appropriate, carry out an EQIA.

Feedback obtained during the 12-week consultation period was sparse, with only 11 members of the public and 11 staff members completing the pro forma questionnaire. Of those who responded, 10 (45.5%) self-declared as Roman Catholic and eight (36.7%) as Protestant, with others (18.2%) either no religion or other religion.

Taking the 22 responses as a whole, there was a healthy level of support for the policy, with 14 (63.6%) of all respondents either agreeing or strongly agreeing that the policy sets out a consistent, fair, transparent and ethical approach to decision-making. At the same time however, eight of the 22 (36.4%) either disagreed or strongly disagreed that the policy would promote good relations, with a small number suggesting that memorials *per se* should not be permitted as they may have the potential to cause division within the community.

There was general acceptance of the findings of the EQIA, with 17 (77.2%) indicating contentment with the assessment of impact and 16 (72.7%) with the conclusions reached.

There was also general support for modifying the policy to meet special needs of those who may not be able to apply in written English, with only six respondents (27.2%) disagreeing with this proposal,

The relatively low levels of interest shown by both the public and Council staff, coupled with an absence of response from representative groups and key stakeholders within the Borough and beyond, was noteworthy. This would suggest that the proposed policy is generally not regarded as contentious but perhaps instead represents a sensible way to proceed.

While those within the community and the Council who took the time to respond should be thanked for their contribution, there was little feedback to suggest that the policy should be altered or amended, other than ensuring that the application process is accessible to all and including those who may not be able to submit in written English, for example on grounds of ethnicity, age or disability.

8. Monitoring for adverse impact in the future

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

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

In line with this advice, the Council's Public Memorials Policy Framework will be reviewed on an annual basis by senior management and the Corporate Policy and Resources Committee. As part of this review, an evaluation will be conducted on the effectiveness of the policy and procedures in relation to receiving and assessing requests from applicants.

This annual review may also involve consideration of the following:

- collation and analysis of all applications for memorials and installations received, approved and refused by the Council by community background;
- collation and analysis of comments, queries and complaints received with regard to memorials and installations by community background;
- consideration of the minutes of the Council Memorial Advisory Group, and its composition.

Appendix 1: Equality Scheme consultees

55+ Activity Club
1st Antrim CSI
4th Ballymoney BB

Action Deaf Youth
Action Cancer
Action on Elder Abuse Northern
Ireland
Action on Hearing Loss
Adapt NI
Age NI
Age concern Causeway
Ageing Well Roe Valley
Aguano Community Association
Atherton Grange Tenants
Association
Alliance Party
Alliance Youth Works
All Saints' Church of Ireland
Lough guile
Alzheimer's Society
An Douché
Armoy Community Development
Association
Armoy Cross Community
Playgroup
Armoy Over 55's Club
Armoy Primary School
Armoy School Parent Teacher
Association
Armoy Woman's Institute
Armoy Youth Group
Art & Disability Forum
Artic lave Community
Development Group
Artic lave District Community
Association
Arthritis Care NI
Artic lave Cultural and Historical
Society
Asian Over 50 Club
Assistance Dogs NI
Association for Spina Bifida &
Hydrocephalus

Asthma UK
Autism NI
Autism NI – North Coast Branch
Aware Defeat Depression

Bahai Council for NI
Ballerina GAC
Ballybogey Youth Association
Ballycastle Church Action
Ballycastle Community
Development Group
Ballycastle Concern Group
Ballycastle Connect
Ballycastle & District Over 55's
club
Ballycastle & District Probus Club
Ballycastle High School Youth
Club
Ballycastle Presbyterian Church
Ballycastle TRAINS Development
Association
Bally Kelly Area Development
Association
Bally Kelly Men's Shed
Bally Lough Living History Trust
Ballymoney Baptist Church
Ballymoney Church of God
Ballymoney Churches Forum
Ballymoney Community Resource
Centre
Ballymoney & District Community
Playgroup
Ballymoney Drama Festival
Ballymoney Elim Parent & Toddler
Group
Ballymoney First Presbyterian
Church
Ballymoney U3A
Ballymoney Writers
Ballymoney Community Association
Billyboy & Carey Development
Group
Ballywatt Presbyterian Church
Ballyasny Presbyterian Church

Bally Willan Drama Group
 Banagher Parish Church
 Barnardo's NI
 Be Safe Be Well
 Beautiful Minds
 Bee Heard
 Banbridge Community Support Group
 Banbridge Resource Centre
 Bundoora & District Community Association
 Bendy Community Association Ltd
 Bendy Women's Group
 Bearden Apprentice Boys of Derry
 Bearden Community Association
 Bearden LOL 1001
 Big Telly Theatre Company
 Blackhill Community & Cultural Group
 Blough Sons of Ulster
 Blind Centre
 Boardwalk Collective
 Bovey Community Association
 Bovey Springwell Club
 Brake PYDP
 Bravehearts
 Breen Centre
 British Deaf Association
 Brook, Coleraine
 Building Bally sally Together
 Building Communities Resource Centre
 Bushmills Community Centre
 Burn foot Community Development Association
 Burnside Presbyterian Church
 Burn foot Parent & Toddler Group
 Bushmills & District Community Association
 Bushmills and District Motorcycle Club
 Bushmills Primary School & Nursery Unit

Bushmills Residents &
 Environmental Forum
 Bushmills Residents Group
 Bushmills Trust
 Bushmills Ulster Scots Heritage
 Bush vale Presbyterian Church
 Business in the Community
 Butterfly Survivors

 CAN (Compass Advocacy Network)
 Cancer Focus NI
 Carey Faughs GAC
 Cara Friend
 Carhill Integrated Primary School P.T.A
 Carnany Community Association
 Carnanmore Community Group
 Carnany Parent & Toddler Group
 Carnduff Community Association
 Carnduff Residents Association
 Castle Community Association
 Castle Community Centre
 Castlerock Senior Citizens' Wednesday Club
 Castleroe Area Community Development Association
 CAUSE
 Causeway Coast and Glens Heritage Trust
 Causeway Coast Peace Group
 Causeway Hospital Radio
 Causeway Neurodiversity
 Causeway Older Active Strategic Team (COAST)
 Causeway Rural and Urban Network
 Causeway U3A
 Causeway Volunteer Action Trust
 Causeway Volunteer Centre
 Causeway Women's Aid
 Cedar Foundation
 Ceres Europes (NI) Ltd.

Children's Law Centre
 Children in Northern Ireland
 Child Poverty Action Group
 Chinese Welfare Association
 Citizens Advice Causeway
 Cloughmills Community Association
 Cloughmills Community Action Team
 Cloughmills Community Guides
 Cloughmills Free Presbyterian Church
 Cloughmills Golden Oldies
 Cloughmills Reformed Presbyterian Church
 Co Londonderry Agricultural Show Society Ltd.
 C.O.A.S.T
 Coleraine Baptist Church
 Coleraine Borough 50+ Forum
 Coleraine Branch – The Royal British Legion
 Coleraine Disability Forum
 Coleraine & District Riding for the Disabled
 Coleraine Eotas Project
 Coleraine Festival Committee
 Coleraine Gardening Club
 Coleraine Street Pastors
 Coleraine Talking News
 Coleraine Ulster Scots Regeneration Club
 Coleraine Versus Arthritis
 Comhaltas Ceoltóirí Éireann Rasharkin
 Comhaltas Ceoltoiri Eireann, Dun Lathai/Dunloy Comhaltas
 Committee on the Administration of Justice (CAJ)
 Community Advice Causeway
 Community Development and Health Network NI

Community Family Support Programme
 Community Foundation for NI
 Community Relations Council
 Compass Advocacy Group
 Contact a Family
 Conradh na Gaeilge
 Coolessan Community Association
 COSO
 Council for the Homeless NI
 Craft Collective
 Crafts with Love
 Cramsie Court Residents Association
 Cruse Bereavement Care NI
 Croaghmore Presbyterian Church
 Crockney Residents' Association
 Portrush
 Cross Glebe Community Association
 Crow's Nest Community Playgroup
 Cushendall Development Group
 Cushendall's Men's Shed
 Cushendun and District Development Association
 Cushendun GAC
 CVSNI

 Dalriada Rural Sure Start
 Dalriada Training Services
 Deaf Association
 Derrykeighan & District Community Association
 Derry Well Woman
 Dunseverick Primary School
 Dervock & District Community Association
 Dervock Presbyterian Church
 Dervock Playgroup
 Dervock Youth Association
 Destined Feeny

Diabetes UK Limavady Branch
 Disability Action
 Disability Sports NI
 Downhill Community Association
 Down's Syndrome Association NI
 Drum Men's shed
 Drumrane Orange Community Association
 Drumsurn Community Association
 Dungiven Faith and Crown Defenders LOL2036
 Dungiven Presbyterian Church
 Dungiven Regeneration Group
 Dunloy Development Association
 DUP

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

Fairways Occupiers Association
 Faughanvale Community Project
 Faughanvale GAC
 Federation of Womens Institutes of NI
 Feis Na Gleann
 Fibromyalgia Awareness Northern Ireland (FMANI)
 First Garvagh Presbyterian Church
 Flowerfield Writers Group

Focus on Family
 Foras na Gaeilge
 Foreglen Community Association
 Foreglen Day Care Centre
 Foyle Downs Syndrome Trust
 Friendly Friday Craft and garden club
 Friends of Glenariffe
 Friends of Kilmoyle

Gaeil Ruairí Óg agus Gaeil na nGlinntí
 Gaelcholaiste Dhoire
 Garryduff Presbyterian Church
 Garvagh & Agadowey Great War Society
 Garvagh & District Development Association
 Garvagh & District Diamond Club
 Garvagh Cultural Awareness Association
 Garvagh Development Trust
 Garvagh Young Farmers Club
 Garvagh Youth Centre
 Gelvin Area Community Association Ltd
 Glebeside Community Association
 Glenariff Improvement Group
 Glenariffe Oisín CLG
 Glenariffe Resource Centre
 Glenshane Care Association
 Glenshane Community Development Ltd
 Glenshesk Court Tenants Association
 Glens & Dalriada U3A Group
 Glens of Antrim Comhaltas
 Glór Dhún Geimhin
 Glens Help Group
 Glens Red Squirrel Group
 Glens Runners
 Glens Rural Community Group

Glenullin & Agivey Conservation
and Development Group
GMB
Good Morning Causeway
Good Morning Roe Valley
Gortnaghey Community
Association
Gortrighey AOH and Community
Accordian Band
Greenlight Gateway
Greenshed Recycling Project
Greysteel Community Association
Greysteel Playgroup
Guide Dogs for the Blind
Association
Guide Dogs NI

Habinteg Housing Association
(Ulster) Ltd
Hampsey Harp School
Happy Days Playgroup
Hands That Talk Community
Group
Harpur's Hill Primary School
Health AllianceNI
Heart of the Glens Festival
Heights Football Club
HereNI
Homestart, Causeway

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

Jack Horner Community
Playgroup
Jimmy O'Hara Comhaltas
Ceoltóirí Éireann, Roe Valley

Juniper Hill Caravan Occupiers
Association

Kids Inn After Schools Club
Killowen & Churchlands
Community Association
Killowen Community Association
Killowen Primary School PTA
Kilraughts Reformed Presbyterian
Church
Kilrea Ageing Well Club
Kilrea Community & Fairy Thorn
Association
Kilrea Community Early Years
Kilrea Development Committee
Kilrea Primary School PTA
Kilrea Women's Institute
Kilrea Young Farmers Club
Kilraughts Young Farmers Club
Killyrammer & District Community
Association
Kingdom of Dalriada Ulster-Scots
Society
Knockmoy Fold Residents
Association

Landhead Primary School
Largy Community Development
Association
LCDI Advice Centre
LCDI Disabled Daycare Centre
Lesbian Advocacy Services
Initiative (LASI)
Lifestart Limavady
Limavady Community and Leisure
Association
Limavady Family Centre
Limavady Flexicare
Limavady Garden Centre
Limavady Initiative for the
Prevention of Suicide
Limavady Lions Club

Limavady Orange Heritage Centre
 Limavady Rugby Club
 Limavady Volunteer Centre
 Limavady Youth Resource Centre
 Lir Arts Festival
 Lisnagaver Flute Band
 Little Orchids Ltd
 Little Rascals Community
 Playgroup
 Live Music Now
 Loughgiel Community Association
 Loughgiel Playgroup
 Loughgiel Youth Club

Macosquin Senior Citizens Club
 Magilligan Community Association
 Magilligan Community Playgroup
 Main Street Presbyterian Church,
 Garvagh
 Marconi Radio Group
 MENCAP (West)
 MENCAP NI
 Men's Health Forum in Ireland
 Men's Action Network
 Migrant Centre NI
 Millburn Community Association
 MindWise Head Office
 Moneydig Rural Network
 Moneydig Young Conquerors
 Flute Band
 Mosside Community Association
 Mosside Monday Club
 Mosside Youth Group
 Mother's Union Group
 Mountsandel Discovery and
 Heritage Group
 Moyle Gateway Youth & Friends
 MR SMITH Community Group
 Mullagh House
 Multi-Cultural Resource Centre
 Multiple Sclerosis Society NI
 Mummies Matter

National Deaf Children's Society
 NI African Cultural Centre
 Niamh Mental Wellbeing
 NICCY
 NI Chest, Heart & Stroke
 NICVA
 NI Gay Rights Association
 NI Housing Executive
 NI Human Rights Commission
 NI Islamic Centre
 NI Muslim Family Association
 NIPSA
 NI Rural Women's Network
 NI Union of Supported
 Employment
 NI Women's Coalition
 NI Women's Aid Federation
 NI Women's European Platform
 NI Youth Forum
 North Antrim Bands Forum
 North Antrim Villages Forum
 North Coast Community Transport
 North Coast Integrated College
 Northern Area Community
 Network
 Northern Health & Social Care
 Trust
 Northern Regional College
 North West Animal Welfare Group
 North West Community Network
 North West Forum of People with
 Disabilities
 North West Historical & Cultural
 Society
 North West Livelong Learning Ltd
 NSPCC

 Oasis Ashes to Gold
 O' Connors Glack GAC
 Oakleaf Community Network
 Older Peoples Advocate NI
 Our Lady & St Patrick's Roman
 Catholic Church

Parenting NI
 Parents Advice Centre
 Pavestone Centre
 Parish of Errigal & Desertoghill
 Phoenix Ballycastle
 Playhouse Activity Centre
 POBAL
 Portballintrae Community Development Group
 Portballintrae Residents Association
 Portrush Community Forum
 Portrush Heritage Group
 Portrush Partnership
 Portrush Summer Theatre
 Portrush Theatre Company
 Portrush Writers
 Portrush Youth Centre
 Portstewart Baptist Church
 Portstewart Community Association
 Portstewart Hospice Support Group
 Portstewart Presbyterian Church
 Portstewart Presbyterian Youth Club
 Portstewart Probus Club
 Pride of the Park Flute Band
 PSNI
 PUP (Progressive Unionist Party)
 Pure Tashte Productions

 Queerspace Belfast

 Rasharkin Community Association
 Rasharkin Community Playgroup
 Rasharkin Women's Group
 Rasharkin Primary School
 Rathlin Development & Community Association
 Restore Community Group
 Ringsend Presbyterian Church

RNIB
 RNID
 Roe Valley Ancestral Researchers Ltd
 Roe Valley Community Playgroup
 Roe Valley Historical Society
 Roe Valley Residents Association
 Rotary Club of Coleraine

 Saint Vincent de Paul, Portstewart
 Salvation Army
 SDLP
 Second Dunboe Presbyterian Church
 See-Saw Playgroup
 Sikh Cultural Centre
 Simon Community Coleraine
 Sinn Fein

 Snatch Club (1st Ballymoney Youth Club)
 Society Human rights & Equality Committee
 Solas MWellbeing Ballycastle
 Somerset Residents Association
 Steinbeck Festival Limavady
 St Annes Primary School Corkey
 St Canice's GAC
 St Canice's Ladies GAC
 St Colm's Drum GAC
 St Columba's Primary School
 St Marys Faughanvale GAC
 St Mary's Church Macosquin
 St Matthews GAC & Community Drumsurn
 St Patrick's Church Portrush
 St Peters & St Pauls Primary School
 Stranocum Community Centre Ltd
 Stranocum & District Development Group
 Stendhal Festival

Stepping Stones Cross
 Community Playgroup
 Stroke Association NI
 St Vincent de Paul
 St Vincent de Paul Cloughmills
 St Vincent de Paul, Kilrea
 St Vincent De Paul Society - St
 Malachy's
 St Vincent de Paul Society,
 Limavady
 Sunlea Youth Centre
 Supporting Communities NI

Tha Boord o Ulster Scotch
 The Bushmills Trust
 The Cornerstone Youth &
 Community Centre
 The Corrymeela Community
 The Den Drop-In
 The Dry Arch Children's Centre
 The Hummingbird Project
 The Mae Murray Foundation
 The Open Door
 The Rainbow Project NI
 Topp Rural Regeneration and
 Cultural Society
 Topp Star Line Dancing Class
 Traditional Unionist Voice
 Traveller Movement NI

UDR Association
 Ullans Centre
 Ullans Speakers Association
 Ulster Deaf Sports Council
 Ulster Scots Agency

Ulster Scots Community Network
 Ulster Unionist Party (UUP)
 Ulster University Chaplaincy,
 Coleraine
 UNISON
 United Parish of Ballymoney,
 Finvoy and Rasharkin
 UNITE The Union
 University of Ulster Students
 Union
 Upper Station Road,
 Neighbourhood Watch

Vineyard Compassion

Waterfoot Residents Association
 Wave Trauma Centre
 We are Causeway
 WELB Youth Service
 West Bann Development Ltd.
 Windyhall Community Association
 Windyhall Community, Cultural
 and Sports Action Group
 Women's Aid Federation NI
 Women's Resources and
 Development Agency
 Women's Support Network

Youth Work Alliance
 Youth Links
 Youth Voice

Zachary Geddis Break the Silence
 Trust
 Zomba Action Group

Appendix 2: Research sources

- Advisory Council on Historic Preservation (USA) and Advisers to the President of the USA
- Antrim and Newtownabbey Borough Council
- Ards and North Down Borough Council
- Armagh, Banbridge, Craigavon District Council
- Belfast City Council
- Contemporary European History and Memory Studies, Nottingham Trent University
- Commission for the Administration of Justice
- Commission on Flags, Identity, Culture and Tradition (CAJ)
- CAJ, Unequal Relations? Policy, the Section 75 duties and Equality Commission Advice: Has “good relations” been allowed to undermine equality?
- Commemorative Works in District of Columbia, USA
- Community Relations Council
- Derry and Strabane District Council
- Equality Commission NI
- Equality Commission reports on McCreesh Park
- Fermanagh and Omagh District Council
- Gary Younge, the Guardian: Why Every Single Statue Should Come Down
- Healing through Remembering
- Human Rights Commission NI
- Human Rights Commission NI Technical Analysis on Dealing with the Past
- Jane Leonard, Memorials, Memorials to the Casualties of Conflict: Northern Ireland 1969 to 1997
- Joe Robinson, Transitional Justice: Inscribing the Past in N.I.
- LGBT Memorial Competition, New York, USA
- Lisburn and Castlereagh District Council
- Mid and East Antrim District Council
- Mid Ulster District Council
- Museums Services, Coleraine
- Newry, Mourne and Down District Council
- Nolan Principles for Local Authorities
- Peace Monitoring Reports 1 to 5
- Policy on National Commemorative Monuments, Canada
- Senator George J. Mitchell Institute for Global Peace, Security and Justice, Queen’s University Belfast

- The Invention of Tradition, edited by Eric Hobsbawm and Terence Ranger
- United Nations Human Rights Council Special Rapporteur
- Quarto Collective

Appendix 3: Application form for public memorials

APPENDIX II
CAUSEWAY COAST AND GLENS BOROUGH COUNCIL
APPLICATION FORM FOR PUBLIC MEMORIALS

Public Memorials: *The term memorial in this context refers to any one of the following placed in the public realm such as: Statue, Monument, Structure or Marker, or other landscape feature. The Public Memorial is intended to celebrate or honour the memory of a significant person or historical event.*

This application process is appropriate for requesting:

- (a) Council to consider funding and/or erecting a public memorial on Council property.*
- (b) Support from Council to fund a public memorial in the Causeway Coast and Glens Borough Council area.*
- (c) Council to lead on a public memorial.*

INDIVIDUAL/GROUP/ORGANISATION DETAILS NAME:

MAIN CONTACT DETAILS

ADDRESS:

TELEPHONE:

EMAIL:

LEGAL STATUS (If application is on behalf of a group/organisation)

MANAGEMENT COMMITTEE AND STAFF (If application is on behalf of a group/organisation)

FINANCIAL DETAILS

FINANCIAL MANAGER IF SUBMITTING ON BEHALF OF AN ORGANISATION

Appendix 4: Application form for public commemorative name

Public Commemorative name in this context is: The naming or renaming of premises, buildings, rooms, Council owned halls or centres.

This application process is appropriate for:

(a) Council to consider naming / renaming a room, building, centre, hall or other public space or premises owned by council.

INDIVIDUAL/GROUP/ORGANISATION DETAILS NAME:

MAIN CONTACT DETAILS

ADDRESS:

TELEPHONE:

EMAIL:

1 PROJECT DETAILS

Title of proposed public commemorative name

Who or what does the commemorative name represent?

What form will the commemorative name take? (ie plaque, plate, plinth, sign, etc)

Location: Where are you proposing to be named as a commemorative location?

(if you already know an exact location please include a photo)

Date: When do you propose the installation/launch?

Support being requested from Council

Erecting a public commemorative name on Council property

☐

Are you requesting Council to support and or fund anything other than a commemorative naming and marker to show the naming? (please provide details)

2 PROJECT NEED

1. Please provide details of when the person deceased, or the specified event took place. (It is Council policy to have a minimum of 10 years between death/event and memorialisation).

2. Please detail why there is a need for a specific commemorative naming for the person or event (what is the justification)

3. Why is there is a connection to the location for a commemorative naming to the person / event.

4. If applicable, have you consulted with those who use the space or place that will be directly impacted by the commemorative name? Please provide evidence and attach consultation process and outcomes.

3 PREPARATION, PROCESS, AND INSTALLATION

5. Have you sought the consent from members of the family, estate, or group connected to the individual or event to be commemorated? Please provide details.

6. Please provide proposed wording for the commemorative name (Please attach any proof that wording is accurate if applicable).

4 IMPACT ON EQUALITY / GOOD RELATIONS

7. Council will consider the impact the proposed commemorative name may make on equality of opportunity and good relations activity that focuses on providing *'opportunities for civic and community leaders to promote the area as a model of best practice in developing respect, understanding and tolerance of the cultural, historical and traditional diversity of the residents.'* The application will not be considered if it is considered that it may have a negative impact on Equality and Good relations

Declaration

Please sign_____

ATTACHMENTS

- 1) Consultation process and outcomes (if applicable)
- 2) Evidence of consent of family, estate or group connected to individual/event being commemorated.
- 3) A map and photographs of proposed location.
- 4) Proposed text and evidence that the text is accurate and factual.

Appendix 5: Memorial trees application, guidelines and permitted locations

Scheme Objectives

1. To replace any previous policy/guidelines/approval process for the provision of Open Space Memorials/Trees. An existing Memorial/Tree cannot be taken as a precedent for future approval as previous approvals were granted by previous legacy councils and not by Causeway Coast & Glens Borough Council. Alterations to existing Memorials/Trees will need to comply with this Policy.
2. To confirm that, from November 2015, only trees can be provided by members of the public to commemorate the memory of a loved one.
3. To provide a consistent approach to the provision of Memorial Trees.
4. To ensure the design and siting of Memorial Trees is consistent with the public interest, conserves the natural environment and cultural character of Council's Open Spaces.
5. To ensure that the placement of any Memorial Tree is proportionate to the surroundings and does not provide a safety risk now or in the future.

Operating Principles

1. Memorial Trees will only be considered for planting in designated Open Spaces (see attached list of locations)
2. In locations where there will be several trees in the same area, no more than 50% of trees will be approved as Memorial sites. This is to prevent the area taking on the ambience of a dedicated memorial garden/space.
3. A small memorial plaque will be permitted and should be situated close to the base of the tree. It should measure no more than 25cm x 15 cm, be supported on a single post between 60cm and 1m above ground level. The inscription on the plaque is to be restricted to 'In The Memory of...' the name of the person with dates of birth and death. Wording such as 'Beloved wife and mother of..' will not be permitted.
4. To ensure installation is undertaken safely to the required standards, Council will provide and install all Memorial Trees and associated groundworks.
5. Memorial Trees and their siting which have a financial burden for Council will not be considered eg requiring regular pruning/cutting back
6. Council accepts no replacement liability for the Memorial Tree at the end of its life or if damaged through vandalism. Any replacement of Memorial Trees will be the responsibility of the original applicant and this process must follow the same application procedure within this policy. Applicants may wish to take out insurance against accidental damage or vandalism.
7. No additional mementoes, eg. statues, flowers, wreaths, vases etc will be permitted on or around the Memorial Tree.

Memorial Purchase Procedure

1. Customer enquiries are provided with a copy of this policy along with an application form.
2. Completed form should be returned to *Environmental Services, Riada House, 14 Charles Street, Ballymoney, BT53 6DZ.*

3. The allocated officer considers the request and subject to meeting the criteria will put before the Director for approval.
4. Approved requests will be notified to the customer and once payment has been received, the Memorial Tree will be purchased and installed by Council.
5. Unsuccessful requests will be notified to the customer along with the reason for their refusal.

Causeway Coast and Glens Borough Council

APPLICATION FOR APPROVAL TO PROVIDE/INSTALL AN OPEN SPACE MEMORIAL TREE

1. **Proposer:** (in Block Capitals)

Name:

Address:.....

Tel. No.:email address.....

2. **Proposed location**¹ for Memorial Tree and preferred species²:

.....

3. **Name of person** who is being commemorated

.....

Signed:.....

Date:.....

When completed this form should be returned to:

Environmental Services, Causeway Coast & Glens Borough Council, Riada House, 14 Charles Street, Ballymoney, BT53 6DZ

¹ See attached approved locations

² Species of tree subject to approval

Causeway Coast & Glens Borough Council
--

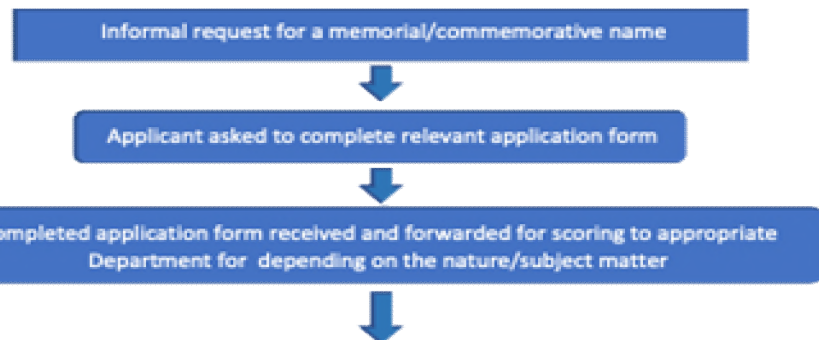
For Official Use
CC&G BC reference:
Date Proposal Received:
Date of Response:
Estimated date of provision:
Date Memorial Tree planted:

Permitted Locations For Memorial Trees

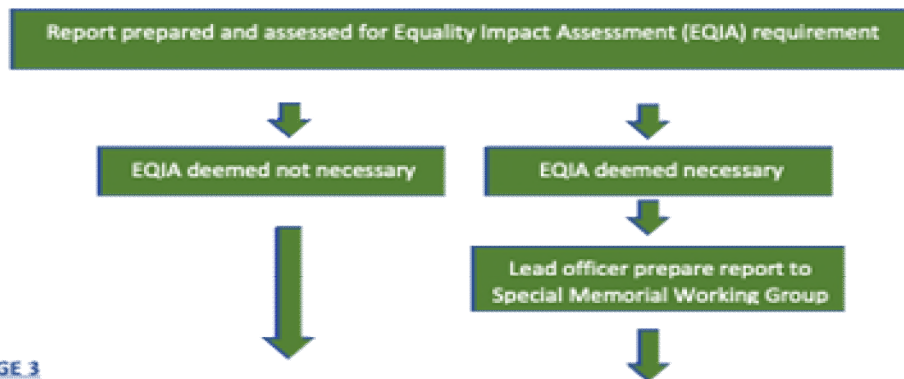
Armooy	Riverside Park
Ballycastle	Quay Road Playing Fields/Tow Path
Ballymoney	Riverside Park
Ballymoney	Drumaheglis Caravan Park
Ballymoney	Megaw Park
Ballymoney	Riada Playing Fields
Bushmills	Millennium Park
Coleraine	Anderson Park
Coleraine	Poorhouse Gardens
Coleraine	Christie Park
Coleraine	Rose Gardens
Coleraine	Cloonavin
Cushendall	Cottagewood
Dungiven	Environment Park
Kilrea	New Park
Limavady	Blackburn Park
Limavady	Benone Complex
Limavady	Swans Bridge
Limavady	Shanreagh Park
Portstewart	Flowerfield
Portstewart	Memorial Garden at Cemetery
Portstewart	Mullaghacall Park
Waterfoot	Around Main St Car Park

Appendix 6: Process flowchart for public memorials and commemorative naming requests

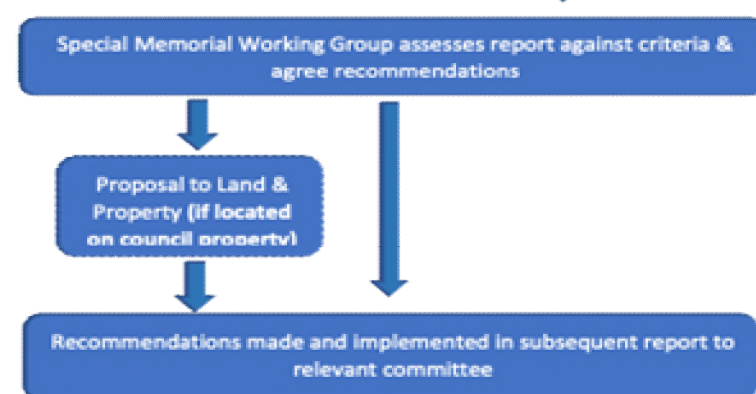
STAGE 1



STAGE 2



STAGE 3



STAGE 4



Appendix 7: Scoring matrix for public memorials

CRITERIA	SCORE (0-5)	FURTHER CLARIFICATION INFORMATION NEEDED	COMMENTS
1. Is there a strong connection between proposed site and person, group or event which the memorial is seeking to commemorate?			
2. Is there clear justification that a memorial is the most appropriate way to remember the connection between location and person or event?			
3. A period of at least 10(?) Years has elapsed since death of person or specified event?			
4. a) Will the memorial enhance the proposed site? b) Is the scale, design, aesthetics appropriate to the site? c) Are the materials and technical requirements appropriate?		Site visit may be required and further exploration of proposed memorial.	If necessary, Council to seek expert advice and agree any changes with applicant.
5. Will the memorial prove meaningful for lasting generations (see also 1 & 2 above)?			
6. Is there a funding proposal accompanying the application (see also 11 below)?			A funding/costings plan submitted with application.
7. Has a contractor been approached or		Is contractor approved by Council?	Council to agree with applicant on appointment

appointed?			of suitable contractor.
8. Has an artist/architect been appointed?		Is artist/architect approved by Council?	Council to agree with applicant on appointment of suitable artist or architect.
9. Has applicant considered who is the owner / custodian for the memorial?			Council to agree with applicant on ownership/custodianship of the memorial.
10. Has members of family, estate or group been involved or consented to memorial?			Evidence in the form of writing submitted with application.
11. Are the necessary funds in place to ensure future preservation of the memorial?			A funding/costings plan submitted with application.
12. Has the application included site plan, maps/photographs as necessary of the memorial or site?		A site visit may be necessary.	Documents submitted with application.
13. If text is part of the memorial, is this included with photographs?			Any text must be agreed and approved by Council.
14. Is there documentation to prove the memorial, location and text is factually correct?			Supporting material to be submitted with application.
15. Will the public memorial impact negatively on good relations - is it potentially contentious? Is there accompanying documentation on consultation with community? Do any of these statements apply to the memorial as a result of its; structure, symbolism, wording, meaning: o Harden the attitudes and mindsets of one		Site/location may need further consideration.	Evidence submitted with application that the community to be directly impacted have been consulted and a level of support has been forthcoming.

community over the other. - o Harden the boundaries between groups/communities. - o Appear to dehumanise and diminish one group/community. - o Appear as an imposition of one group/community over another. - o Erode the confidence of one group/community. - o Appear to undermine identity through negation of culture, language, and expression. - o Negatively impact or affect any member of the public. - o Is used to promote the values and rights of one group/community over another.			
16. Will the memorial impede on everyday life of the community (location for example).			Council to check health and safety considerations.
17. Have health and safety considerations been taken into account?		Structure; wear and tear and maintenance may need further exploration.	Council to check health and safety considerations.
18. Has the applicant considered insurance for the memorial?		A consideration for the applicant	Council will not be held responsible for insurance.
19. Public education: What message is the memorial relaying to the wider public?		Has the applicant considered promotion, information on the proposed memorial?	Agreement to be sought between Council and applicant.

SCORING MATRIX:

Score	Description
0	The response does not address the criterion
1	The evaluator is not confident that the applicant: - Understands the Council's requirements covered by this criterion; and / or - Will be able to satisfactorily meet the criterion requirement(s)
2	The evaluator has some reservations whether the applicant: - Understands the Council's requirements covered by this criterion; and / or - Will be able to satisfactorily complete the contract requirements covered by this criterion
3	The evaluator is reasonably confident that the applicant: - Understands the Council's requirements covered by this criterion; and - Will be able to satisfactorily complete the contract requirements covered by this criterion to a reasonable standard
4	The evaluator is confident that the applicant: - Understands the Council's requirements covered by this criterion; and - Will be able to satisfactorily complete the contract requirements covered by this criterion to a high standard
5	The response exceeds the expectations of the evaluator or is deemed to offer added value or where the criterion requires a 'yes' or 'no' response.

Appendix 8: Scoring matrix for public commemorative name

CRITERIA	SCORE (0-5)	FURTHER CLARIFICATION INFORMATION NEEDED	COMMENTS
1. The request is for the naming of a room, building centre, hall etc and will take the form of a plaque, name plate, sign, to show the name			
2. A period of at least 10 years has elapsed since death of person or specified event?			
3. Is there clear justification that the naming is relevant to the location and person or event?			
4. Is there a strong connection between proposed location and person, group or event which the naming is seeking to commemorate?			
5. Has those who will be directly impacted by the naming been consulted?			
PREPARATION, PROCESS, INSTALLATION			
6. Has members of family, estate or group been involved or consented to the naming?			Evidence in the form of writing submitted with application.
7. If text is part of the commemorative name, is this included with			Any text must be agreed and approved

photographs? Is the wording accurate?			by Council.
8. Has the application included location, maps/photographs as necessary?		A visit to location may be necessary.	Documents submitted with application.
IMPACT ON EQUALITY/GOOD RELATIONS			
9. Will the commemorative naming impact negatively on good relations - is it potentially contentious? Is there accompanying documentation on consultation with those who will be directly impacted by the naming? - o Harden the attitudes and mindsets of one community over the other. - o Harden the boundaries between groups/communities. - o Appear to dehumanise and diminish one group/community. - o Appear as an imposition of one group/community over another. - o Erode the confidence of one group/community. - o Appear to undermine identity through negation of culture, language, and expression. - o Negatively impact or affect any member of the public. - o Is used to promote the values and rights of one group/community over another.		Site/location may need further consideration.	Officer to carry out an equality screening of the application

SCORING MATRIX:

Score	Description
0	The response does not address the criterion
1	The evaluator is not confident that the applicant: • Understands the Council's requirements covered by this criterion; and / or • Will be able to satisfactorily meet the criterion requirement(s)
2	The evaluator has some reservations whether the applicant: • Understands the Council's requirements covered by this criterion; and / or • Will be able to satisfactorily complete the contract requirements covered by this criterion
3	The evaluator is reasonably confident that the applicant: • Understands the Council's requirements covered by this criterion; and • Will be able to satisfactorily complete the contract requirements covered by this criterion to a reasonable standard
4	The evaluator is confident that the applicant: • Understands the Council's requirements covered by this criterion; and • Will be able to satisfactorily complete the contract requirements covered by this criterion to a high standard
5	The response exceeds the expectations of the evaluator or is deemed to offer added value or where the criterion requires a 'yes' or 'no' response.

Comments and Final Decision:

Appendix 9: Causeway Coast and Glens population by Section 75 dimension

Usually resident population

The usually resident population of the Council area at the 2021 Census was 141,746.¹²

Religious belief

The following table provides a breakdown of the religious belief of residents in the Causeway Coast and Glens borough census day 2021.¹³

Census 2021	Causeway Coast and Glens Borough Council (%)	Northern Ireland (%)
Roman Catholic	40.1	45.7
Protestant and other Christian (including Christian related)	51.2	43.5
Other religions	0.8	1.5
None	7.9	9.3

Political opinion

The following table presents the results of the 2023 local government elections for Causeway Coast and Glens Borough Council.¹⁴

Party	Seats won
DUP	13

¹² Northern Ireland Statistics website, www.nisra.gov.uk. Crown copyright material is reproduced with the permission of the Controller of HMSO.

¹³ Source: NISRA

¹⁴ Source: www.causewaycoastandglens.gov.uk

Sinn Féin	12
Alliance	5
UUP	4
SDLP	3
TUV	2
PUP	1

Ethnicity

One Census Day 2021, nearly 99 per cent of the population of Causeway Coast and Glens Borough Council was from a white racial background.¹⁵

	Causeway Coast and Glens Borough Council (%)	Northern Ireland (%)
White	98.55	96.55
Irish Traveller	0.03	0.14
Roma	0.01	0.08
Chinese	0.22	0.50
Indian	0.15	0.52
Pakistani	0.03	0.08
Other Asian	0.10	0.28
Black African	0.12	0.42
Black other	0.04	0.16
Mixed	0.51	0.76

¹⁵ Source: NISRA

Other ethnic group	0.11	0.19
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Age

Causeway Coast and Glens Borough Council has a slightly older population than the Northern Ireland average based on 2021 Census results.¹⁶

	Causeway Coast and Glens Borough Council (%)	Northern Ireland (%)
Under 15	18.3	19.2
16–39	28.9	31.2
40–64	33.6	32.4
65 and over	19.3	17.2

Marital status

The following table shows the marital status of the Causeway Coast and Glens Borough Council population on Census day 2021.¹⁷

	Causeway Coast and Glens Borough Council (%)	Northern Ireland (%)
Single	32.6	33.1
Married	47.8	45.6
Civil partnership	0.1	0.2
Separated	3.3	3.8

¹⁶ Source: NISRA

¹⁷ Source: NISRA

Divorced or formerly in a civil partnership which is now legally dissolved	6.4	6.0
Widowed or surviving partner from a civil partnership	6.7	6.4

Sexual orientation

The 2021 census for the first time included a question on sexual orientation.¹⁸

	Causeway Coast and Glens Borough Council (%)	Northern Ireland (%)
Straight or heterosexual	91.3	90.0
Gay or lesbian	0.8	1.2
Bisexual	0.5	0.8
Other sexual orientation	0.1	0.2
Prefer not to say	3.9	4.6
Not stated	3.3	3.3

Gender

On Census day 2021, 49.3 per cent of the population of Causeway Coast and Glens Borough Council was male and 50.7 per cent female.¹⁹

¹⁸ Source: NISRA

¹⁹ Source: NISRA

	Causeway Coast and Glens Borough Council (%)	Northern Ireland (%)
Female	50.7	50.8
Male	49.3	49.2

Disabled people

On Census Day 2021, one in four Causeway Coast and Glens Borough Council residents had a long-term health condition or illness which limits their daily activities or the work they can do.

	Causeway Coast and Glens Borough Council (%)	Northern Ireland (%)
Does not have a long-term health condition	25.6	24.3
People without a disability	74.4	75.7

People with or without dependants

On Census day 2021, 29.2 per cent of households in the borough reported having dependent children and 21.9 per cent of residents provided long-term care to another because of long-term physical or mental ill-health/disability or problems related to old age.²⁰

	Causeway Coast and Glens Borough Council (%)	Northern Ireland (%)
Households with	29.2	30.7

²⁰ Source: NISRA.

dependent children		
Persons providing unpaid care	21.9	22.8

Appendix 10: Monitoring Returns for Causeway Coast and Glens Borough Council employees

Religious belief/community background

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

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

Racial group/ethnic origin

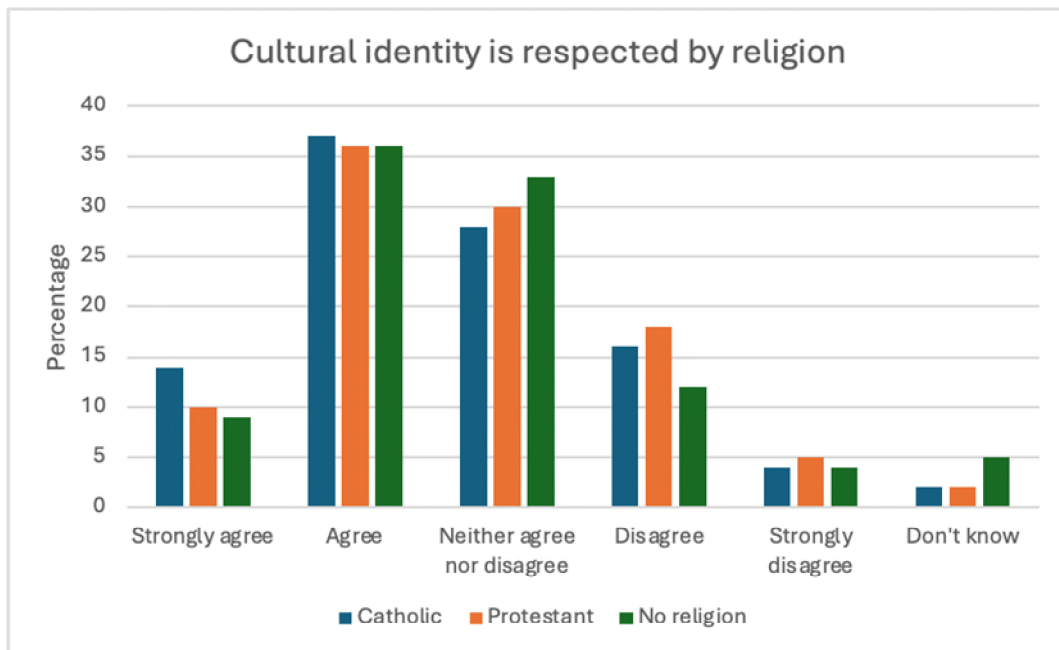
As at 21 October 2021, 89 per cent of Causeway Coast and Glens Borough Council employees were from White/White European racial group; 10 per cent were unknown; and less than 1 per cent were from an “other” or “mixed” ethnic background.

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

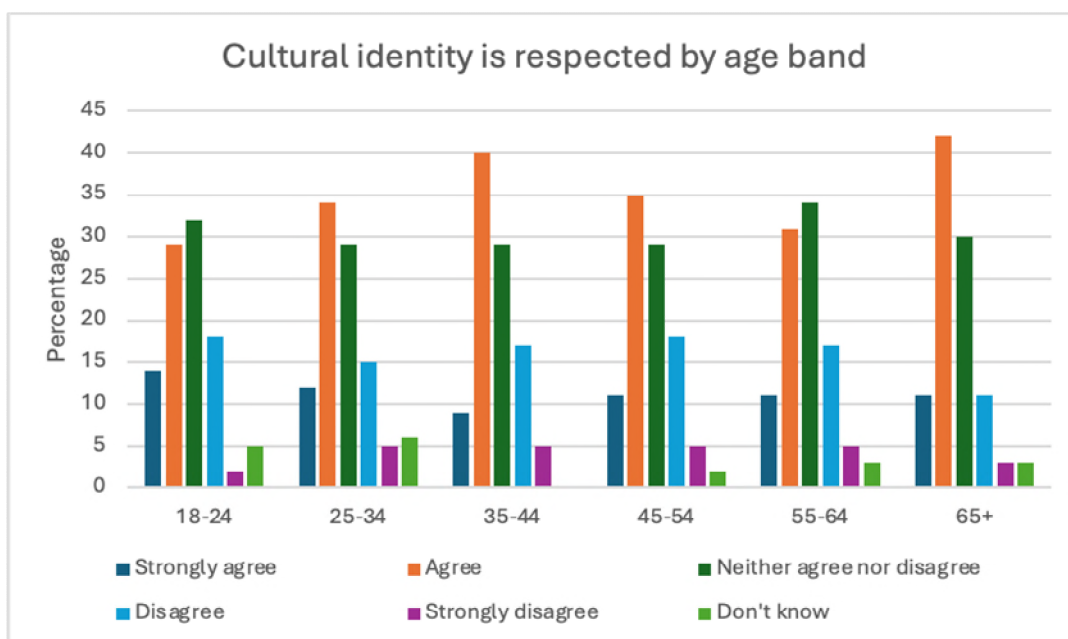
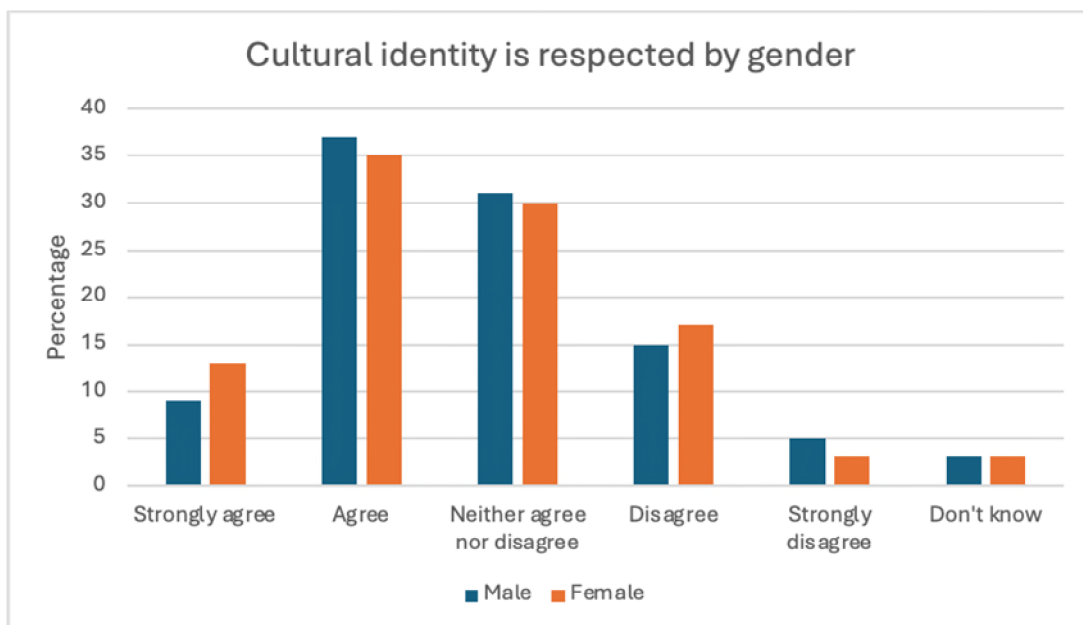
Appendix 11: NI Life and Times Survey

Cultural identity

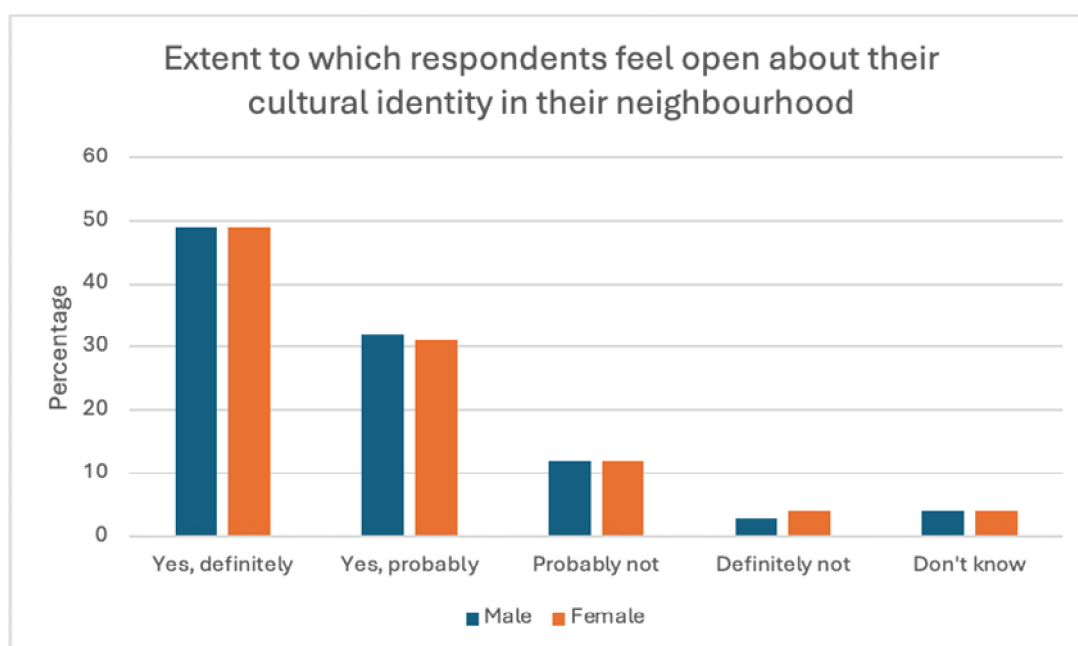
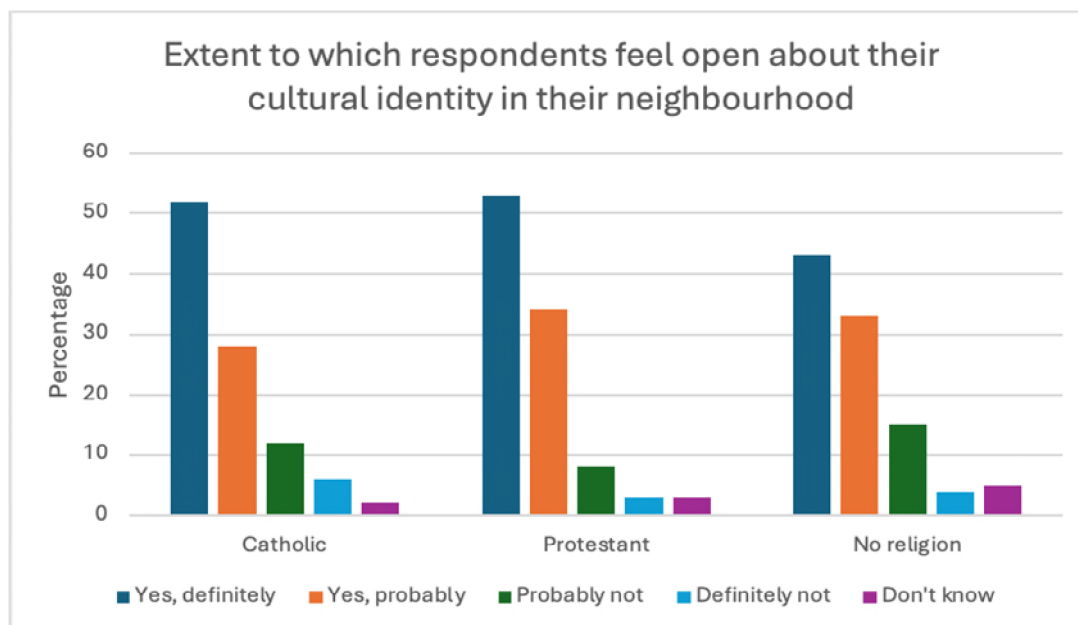
47 per cent of people surveyed in the 2022 NI Life and Times Survey²¹ felt that their own cultural identity is respected by society. People from a Catholic community background are most likely to agree, while those with “No religion” are least likely to agree.

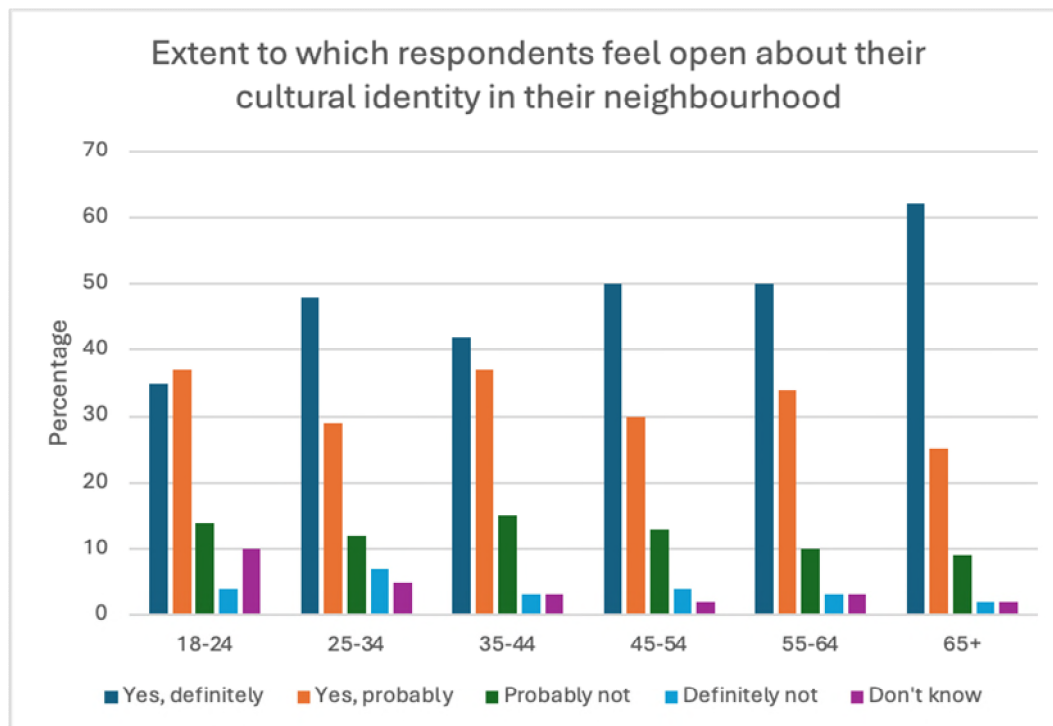


²¹ Source: www.ark.ac.uk/nilt/2022



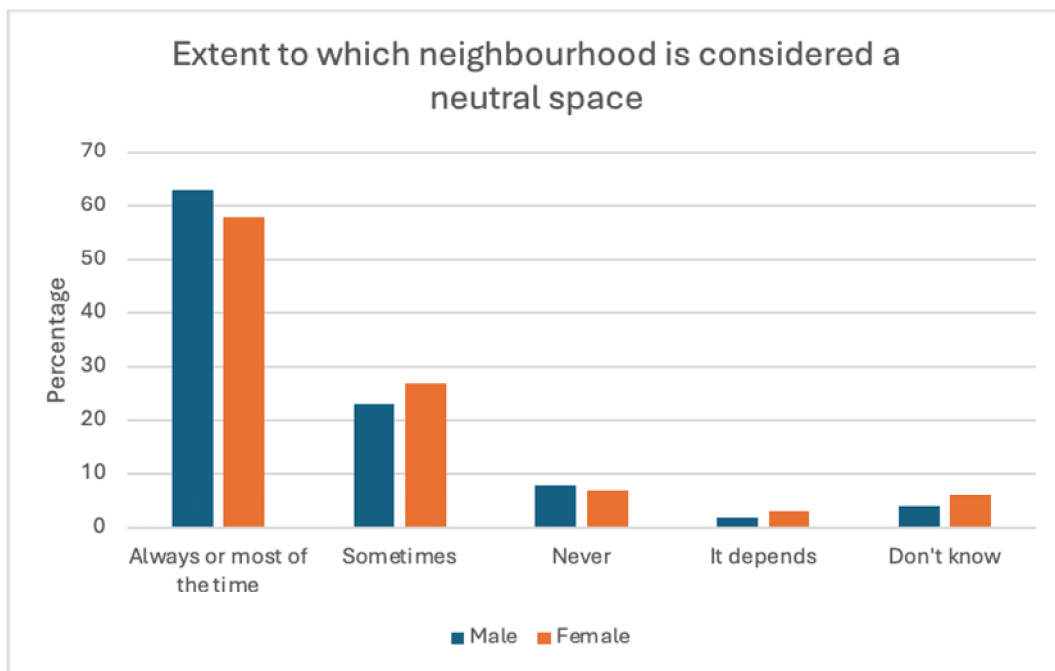
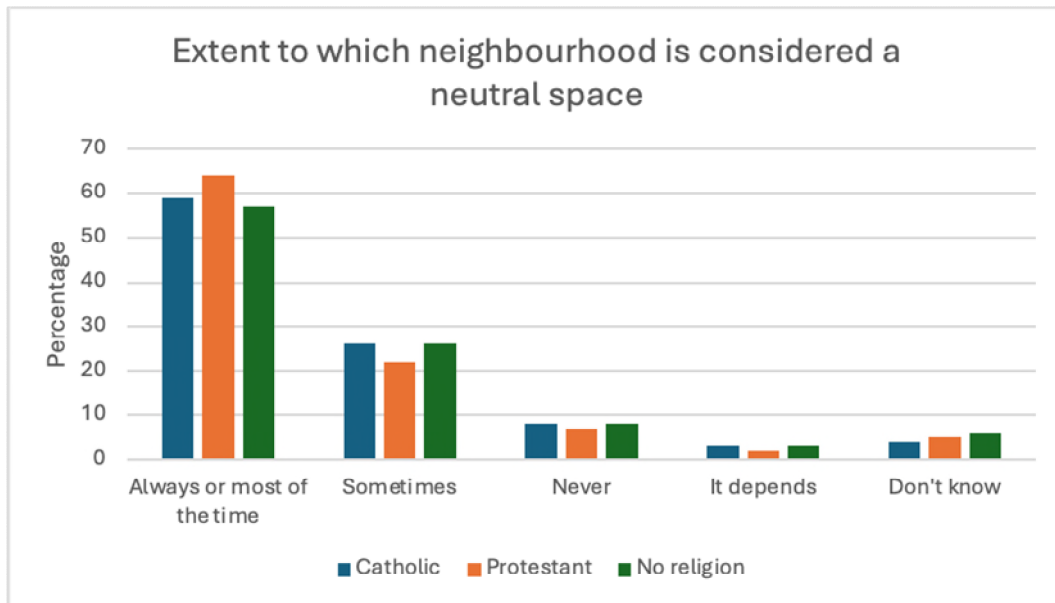
Respondents were also asked, “Thinking of the neighbourhood where you live, is it a place where you feel you can be open about your own cultural identity?” Older people and people from a Protestant community background were most likely to agree.

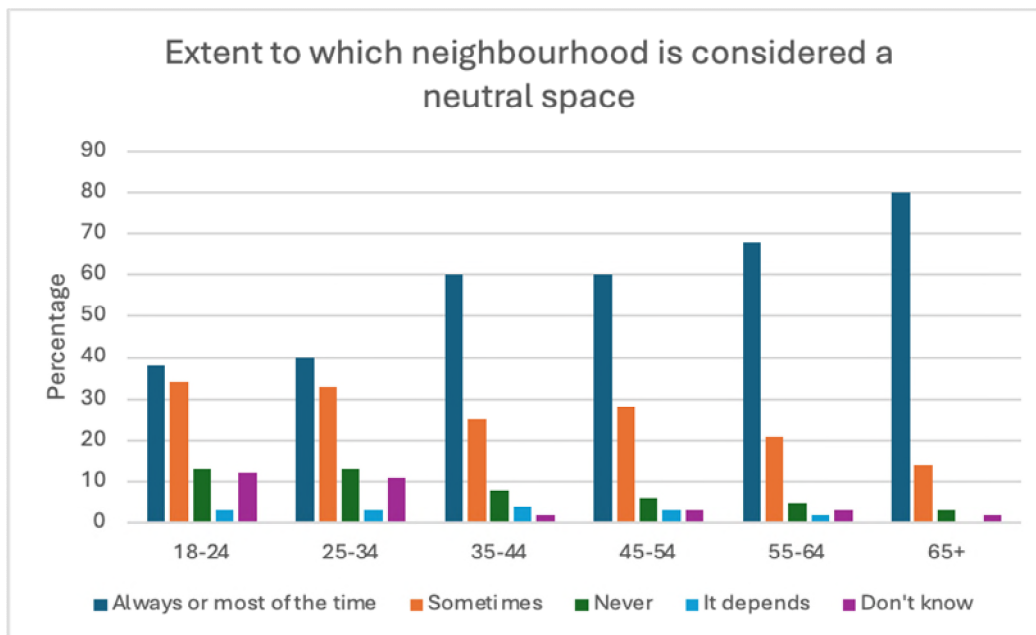




Neutral space

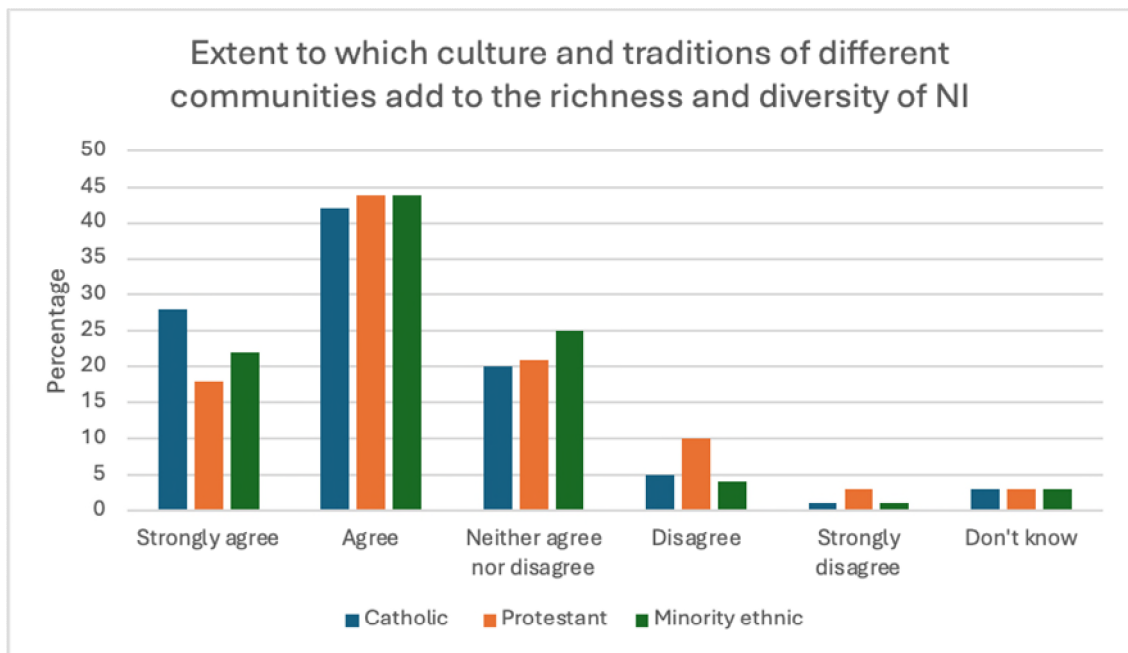
Participants were also asked, "Thinking of the neighbourhood where you live, would you say that it was a 'neutral space'?" Younger people and people of "No religion" were least likely to agree that their neighbourhood is a neutral space.





Culture and diversity

70 per cent of people agree that Catholic culture and traditions add to the richness and diversity of Northern Ireland; 62 per cent agree that Protestant culture and traditions add to the richness and diversity of Northern Ireland; and 66 per cent agree that minority ethnic culture and traditions add to richness and diversity.



Displays of flags and murals

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

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

Appendix 12: Relevant council policy and research

A Better Future Together

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

Equality Scheme

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

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

Issues identified through an audit of inequalities include:

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

Equal Opportunities Policy

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

- Promoting equality of opportunity for all persons;
- Promoting a good and harmonious working environment in which all persons are treated with respect;
- Preventing occurrences of unlawful direct discrimination, indirect discrimination, harassment and victimisation;
- Fulfilling all our legal obligations under the equality legislation and associated codes of practice;
- Complying with our own equal opportunities policy and associated policies;
- Taking lawful affirmative or positive action, where appropriate;
- Regarding all breaches of equal opportunities policy as misconduct which could lead to disciplinary proceedings.

Dignity and Respect at Work Policy 2018

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

Policy and Procedure for Dealing with Harassment

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

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

Good Relations Audit and Strategy

In December 2023, the Council agreed its Good Relations Audit and Strategy 2023–26. It adopts the Equality Commission NI's definition of good relations: that is:

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

Key themes and principles are mapped against T: BUC aims of Our children and young people; Our shared community; Our safe community; and Our cultural expression.

The strategy was informed by the results of an audit which consulted target partners, area-based communities, specific thematic groupings, elected members and the general public with stakeholders through workshops, interviews and a survey. In response to the survey that was used to develop the strategy,²² the Council found:

- The three most common good relations issues identified were sectarianism (80.3 per cent), cultural diversity (61.8 per cent) and racism (28 per cent).
- 88.5 per cent of respondents felt that addressing the legacy of the past is important or really important; 10.2 per cent felt it is not that important; and 2.5 per cent felt it is not important at all.
- 35.0 per cent of respondents felt racism is getting worse; 24.2 per cent felt it is getting better; and 42.0 per cent felt it is just the same.
- 83.4 per cent of respondents felt their identity was respected including 31.2 per cent who felt it was respected sometimes. 16.6 per cent felt their identity was not respected.
- 79.6 per cent of people felt safe in their community; 12.1 per cent did not.

Further qualitative analysis of survey findings in relation to cultural expression considered that:

“Actions to address contentious elements of cultural displays, parading, flag flying, marking of territory and ‘identity badging’ are suggested by a number of respondents.

²² n=151

“Programmes exploring culture, its dynamics and traditions and valuing cultural identity, traditions/influence are suggested. [...] There are suggestions for more cultural work and opportunities to develop awareness around cultures as well as opportunities for safe discussions around sectarianism, racism and unconscious bias.”

Research commissioned to develop the draft Public Memorials Policy Framework

In June 2021, the Council commissioned research to develop the draft Public Memorials Policy Framework. This included desk research involving relevant local, regional and international policy, legislation and research, and consultation and engagement, including with Elected Representatives, Council staff, other councils, policymakers and academics.²³

The research report considers that, “Across the world memorialisation and commemoration reflect cultural expression and help shape identity and belonging.” However, it continues that while:

“not all forms of cultural expression are contentious. They may become contentious when they are seen to invade place and space by:

‘(a) inscribing perspectives on past events into the landscape (temporarily or permanently) using signs and markers laden with symbolic meaning’;

‘(b) being part of a communicative performance and acts that are exclusive, and representative of a particular group or collective.’”

It identifies in particular that

“Northern Ireland has two dominant identities and cultures that present the potential for a clash of cultural expression through the mechanisms of memorialisation and commemoration.”

However, it continues that

²³ A list of research and organisations consulted is included at appendix 2.

“In building towards a shared future, context ought to be imagined in a way that engenders positive relationships into the future. The Decade of Centenaries, 1912–1922, offered the possibility of exploring the distant past through a prism that allowed for ethical analysis and critical thinking of a contentious period in Ireland’s historical past, taking account of the very different context of previous times. It also enabled people to begin to explore the recent past in a more critical and analytical way.”

“Setting Guiding Principles [...] enabled clear policy guidelines on how to sensitively and practically remember and commemorate”.

In implementing a memorials policy, the report recommends that initially, “it is important to factor into the decision-making process the demographics of the designated area”, but that the Council must also continue to monitor impact as, “Demographic and cultural landscape changes may result in confrontation and upset by emerging communities that no longer appreciate the representation of such acts or markers.”

Indeed, the report further considers that in the absence of government policy, individuals, families and groups, “create their own form of commemoration” which, if regarded as “exclusive”, political or impinging on shared, public space, are more likely to be vandalised, in turn causing distress to those who sought memorialisation.

In relation to employees, the report notes that,

“In NI, there have been incidents where workers have experienced discomfort or distress in their workplaces during times when politically charged events are being commemorated. Given the sensitivities around memorialisation and commemoration, Council must be mindful that maintaining a good and harmonious working environment includes taking into account the possible negative impacts on some workers during such occasions, and take appropriate action.”

Other recommendations in the report include:

- The establishment of a representative working group as, “Research has provided strong evidence that the setting up of a specific working group to discuss such requests has helped to remove party politics from decision-making.”

- Appropriate timeframes can, “give space and time before significant people/events are remembered, helping to lessen the ‘rawness’ and politicisation of proposals around commemoration.”
- In addition to equality of opportunity and the promotion of good relations, decision making should consider other factors such as costs, management and maintenance.
- Education provides significant opportunities to, “break the cycles of hate and mistrust and support a younger generation to think differently.”
- Public consultation can be, “a platform for hearing different perspectives and open up the possibilities for a range of alternatives” therefore increasing, “public awareness and understanding of a complex history and its more difficult aspects”.

Equality screening of draft Public Memorials Policy Framework

In line with its Equality Scheme, the Council carried out an equality screening of the draft policy framework to determine the likelihood of potential negative impacts and subsequent need to carry out a full EQIA.

The equality screening identified potential impacts specifically in relation to the following Section 75 dimensions:

- Religious belief/political opinion: “The policy is specifically for memorials which can often be requested to remember historical figures or incidents as a result of the ‘Troubles’ in Northern Ireland. It could therefore be felt that ‘Troubles’ related memorials could have an impact on some of these groupings [and] there is the likelihood of historical implications that may have a negative impact on these groups dependent on the memorial request.”
- Ethnic group: “The policy is specifically for memorials which can often be requested to remember historical events, figures or incidents. As a result, this can sometimes mean that there may be a negative impact on this particular group”.
- Sexuality: “The level of negative impact on these groups is likely to be low however the impact cannot be determined at this stage as it may be dependent on the nature of the request for a memorial to whom or what is being remembered. There may also be the likelihood of a positive impact in these groups should people or events providing recognition to these groups could positively

contribute to the area as welcoming of all regardless of sexual orientation.”

In relation to promoting good relations between people of different religious beliefs or political opinion, the reports notes

“A request for a ‘Troubles’ related memorial could be a point to facilitate discussion with regards to religious opinions and this may strengthen individuals resolve to work together and avoid a return to historical scenarios. It could also provide an opportunity to educate children and young people on the past history of the Borough’s events.”

The equality screening concluded:

“The policy is specifically for memorials which can often be requested to remember historical figures or incidents as a result of the ‘Troubles’ in Northern Ireland. It could therefore be felt that ‘Troubles’ related memorials could have an impact on good relations. Public consultation on the policy is therefore recommended and should be done so through full EQIA.”

Equality impact assessment on commemorative stained-glass window

In 2022, Causeway Coast and Glens Borough Council conducted a public consultation and EQIA on its proposed design of a stained-glass window commemorating the 100th anniversary of the creation of Northern Ireland (NI100).

The design included themes such as civic history, military/naval history and government, and the EQIA was carried out in recognition, “that some of the images may be associated with particular political opinions or may not have the support of all political groups”.

The final report on the EQIA considered that the, “overall response to the EQIA on the stain glass window was very low. However, the views of the respondents [...] were clearly divided [and] there is evidence to suggest that the proposed window could be regarded as potentially divisive”.

The report continues:

“while the principle of celebrating NI100 in itself may not be problematic, the manner in which the anniversary is

celebrated becomes of critical importance. Equally, while the placing of a stained-glass window in Coleraine Town Hall is not generally seen as contentious [...], it is the images contained within the proposed window, separately and in combination, that raise concerns [...]

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

Consultation on the installation of a memorial to those who lost their lives in the 1973 Coleraine bomb

In 2020, the Council commissioned a consultation to gauge public opinion on the installation of a structural memorial to those who lost their lives in the 1973 Coleraine bomb.

Evidence was collected through a series of mechanisms including interviews with family members of those who were killed; interviews with those who were injured and impacted by the bomb; a workshop and engagement with Elected Representatives; engagement with victims’ and survivors’ groups; and public surveys.

In relation to the proposed memorial itself, the report recommends:

“the council may wish to explore international examples of processes which were mindful of the sensitivities of respectful remembrance, in spite of their potential to incite conflict or impact on community relations. It is also worth noting that memorial projects tend to be initiated by victims and survivors. As such, Council can ensure acknowledgement, due care and ‘future-proofing’ through engagement with victims and survivors as well as reflecting upon community relations.”

The proposed memorial could also be supported by a good relations project, such as a memorial book at the Town Hall, reflecting on those who lost their lives.

In relation to future policy, the report recommends that the:

“Council should reflect upon any Section 75 implications that could arise as a result of engaging with

memorialisation and commemoration more broadly [and] considers the development of a policy which relates specifically to memorialisation and commemoration on the basis that: Council staff and the broader public would benefit from clarity, guidance and specific policy that relates to memorialisation and commemoration, so moving forward there is consistency surrounding advice, information, public engagement and general decision-making on this sensitive issue.”

It continues:

“The findings also suggest that the Council should be mindful of balancing reputational risk and upholding good community relations in any future process, whilst placing victims and survivors front and centre. For example, some survey respondents questioned the Council’s involvement in this process, and some even suggested that it may exacerbate a view that the Council is biased towards one section of the community.”

Appendix 13: Other relevant legislation, policy and research

Fair Employment and Harmonious Working Environment

Fair Employment and Treatment Order 1998

The Fair Employment and Treatment Order 1998 includes the duty to promote a good and harmonious working environment in which no worker feels under threat or intimidated because of his or her religious belief or political opinion.

Fair Employment Code of Practice

The ECNI's Fair Employment Code of Practice²⁴ provides general guidance to employers with regard to good practice in the promotion of equality of opportunity. In relation to the working environment the code states that employers should:

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

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

The Equality Commission guidance on promoting a good and harmonious working environment²⁵ states that

²⁴ www.equalityni.org/FairEmployment

²⁵ “Promoting a Good and Harmonious Working Environment, A Guide for Employers and Employees”, Equality Commission for Northern Ireland, October 2009

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

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

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

It continues:

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

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

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

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

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

However, it also notes:

“At the same time, there may be occasions where the display of a particular item may be inappropriate for reasons relating to a genuine occupational requirement (e.g., health and safety) and these other factors must also be taken into account.”

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

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

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

The guidance continues:

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

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

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

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

Other Equality Commission guidance

Equality Commission Advice on Good Relations in Local Councils

In its Advice on Good Relations to Local Councils, ECNI presents eight key points for councils to consider when developing a good relations policy framework. This includes point six, whereby councils are to consider cumulative impacts on good relations and put in place appropriate mitigations. It provides an example:

“a particular emblem or decision may have little adverse impact on the promotion of good relations when viewed in isolation or in the context of an environment that is otherwise generally welcoming to everyone, but might have a greater adverse impact if displayed in an environment in which it is merely one amongst a large number of similar items that are directed towards the interests of one particular community to the exclusion of others.”

Advice to Belfast City Council

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

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

It continues:

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

Other local council policies and practice

Mid and East Antrim Borough Council

Research commissioned by the Council in 2021 to inform the development of the Public Memorials Policy Framework found that while several other district councils had carried out relevant research, only Mid and East Antrim Borough Council had a directly comparable policy in place.

Mid and East Antrim Borough Council's Memorials and Commemorations: A Policy Framework²⁶

“recognises the need to have in place robust decision-making procedures for dealing with contentious issues that can arise locally and can disrupt good relations within and across local communities.”

It continues:

“The guide aims to provide employers and employees with practical advice to assist in promoting and sustaining a good and harmonious working environment. While the primary focus of the guide is on religious belief and political opinion in the workplace, there can be read-across to other contexts and other protected aspects of identity including race, gender, disability, sexual orientation and age.”

By way of example, it considers:

“the potential to raise significant legal challenges in relation to decisions on memorials or commemorations [...] if a request to erect a memorial or hold a commemorative event is refused, will that refusal constitute unlawful discrimination? Alternatively, if the memorial is put in place or the commemoration event goes ahead, could members of the public or Council employees reasonably claim to be harassed?”

The policy continues to outline a process whereby applications for a memorial or commemoration are considered first by a cross-party Equality Working Group, which then reports to the Council's Policy and Resource

²⁶

https://www.midandeantrim.gov.uk/downloads/Commemorations_and_Memorials_Policy_Framework.pdf

Committee prior to final decision making. The Council will consult with relevant stakeholders when reaching any decision. Each decision will be screened to identify potential adverse impacts, and where appropriate, an EQIA will be carried out.

The policy does not list potentially permissible memorials or commemorations, “Given the large number of contested or politically sensitive issues in Northern Ireland” considering in particular that, “local circumstances may dictate which memorials or commemorations are seen as contentious.” Rather, the Council will exercise discretion in line with due process as outlined in the policy.

Newry and Mourne District Council

In April 2014, ECNI found that Newry and Mourne District Council had failed to comply with its Equality Scheme when deciding to retain the name of a Council-owned children's play park, which was named after Raymond McCreesh, a member of the IRA who died on hunger strike.

In 2020, the Council agreed its Policy on Naming Council Facilities,²⁷ under which the, “Council will not accept requests to memorialise a deceased person (or family)” in relation to new or existing facilities, buildings, rooms, benches or plaques.

Ards and North Down Borough Council

In 2019, Ards and North Down Borough Council carried out an EQIA in response to a request to locate Ulster Scots Agency Operation Lion²⁸ plaques at Bangor and Donaghadee harbours.

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

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

- religious belief

²⁷ www.newrymournedown.org/corporate-policy-and-equality

²⁸ Operation Lion is the name of the 1914 Ulster Volunteer Force gunrunning, commonly considered to be the birth of Unionism.

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

Belfast City Council

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

Its principles are:

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

Other relevant policies and research

Good Friday Agreement 1998

The Good Friday/Belfast Agreement recognises:

"that victims have a right to remember as well as to contribute to a changed society. The achievement of a peaceful and just society would be the true memorial to the victims of violence."

Northern Ireland Human Rights Commission

The Northern Ireland Human Rights Commission's 2013 report *The Display of Flags, Symbols and Emblems in Northern Ireland*²⁹ notes that:

²⁹ <https://nihrc.org/publication/detail/the-display-of-flags-symbols-and-emblems-in-northern-ireland2>

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

Together: Building a United Community (T: BUC)

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

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

T: BUC’s aims are:

1. Our children and young people: to continue to improve attitudes amongst our young people and to build a community where they can play a full and active role in building good relations.
2. Our shared community: to create a community where division does not restrict the life opportunities of individuals and where all areas are open and accessible to everyone.
3. Our safe community: to create a community where everyone feels safe in moving around and where life choices are not inhibited by fears around safety.

4. Our cultural expression: to create a community, which promotes mutual respect and understanding, is strengthened by its diversity and where cultural expression is celebrated and embraced.

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

Commission on Flags, Identity, Culture and Tradition

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

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

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

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

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

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

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

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

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

It continues:

“The interface between shared space and good relations is therefore about the right to access areas, and the opportunity to experience the space together with other members of our diverse society. It does not deny or disallow differences, but rather provides for areas of commonality and binding ideas of citizenship. It is a place where expressions of cultural identity (that may have previously been grounds for threat or dispute) become grounds for tolerance and even celebration.”

UN Special Rapporteur in the field of cultural rights

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

In her 2019 Report on the importance of public spaces for the exercise of cultural rights,³⁰ the UN Special Rapporteur’s definition of public space is space that is:

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

³⁰ www.ohchr.org/en/calls-for-input/reports/2019/report-importance-public-spaces-exercise-cultural-rights

A potential problem is identified:

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

Recommendations include:

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

Report on memorialisation processes in post-conflict and divided societies

The 2014 report on the field of cultural rights addressed memorialisation processes in post-conflict and divided societies³¹ considers memorialisation as

“a long-term process in which the State must play an active and decisive role. The authorities that adopt and implement memory policies should ensure that such policies properly represent the views of the victims and are established in

³¹ https://documents-dds-ny.un.org/doc/UNDOC/GEN/G14/105/01/PDF/G1410501.pdf?OpenElement%20EN/HRBo dies/HRC/RegularSessions/Session25/Documents/A_HRC_25_49_ENG.DOC&action=default&DefaultItemO%20pen=1

collaboration with civil society, especially human rights organizations.”

Public policy should be “multidimensional”, including memorials, parks and public space with education and other “steps [...] taken to build a culture of peace”.

The UN Special Rapporteur continues:

“The memorialization of past times defined by violations of human rights and international humanitarian law provides an opportunity to reflect on the present and identify contemporary problems related to exclusion, discrimination, marginalization and abuses of power, which are often linked to toxic political cultures. Memorialization promotes the development of a culture of democracy and respect for human rights [...] In transitional contexts, memorialization processes can be effective only if they pursue the political goal of establishing democracy and a culture of peace.”

However, it also considers that “too much memory, especially if presented in the form of irreconcilable versions of the past, might hurt rather than help a society” and that there is a need to establish, a “delicate balance between forgetting and remembering.”

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

Complaints

There have been no complaints about memorials or commemorations during the lifespan of Causeway Coast and Glens Borough Council.