

Report on	Consultations notified to Mid Ulster District Council
Date of Meeting	22nd June 2023
Reporting Officer	Joseph McGuckin, Head of Strategic Services & Engagement
Contact Officer	Ann McAleer, Policy Engagement and Equality Officer

Is this report restricted for confidential business?	Yes	
If 'Yes', confirm below the exempt information category relied upon	No	x

1.0	Purpose of Report
1.1	To update members on the consultations notified to Mid Ulster District Council for comment.
1.2	To provide members with copies of submitted consultation responded to by Mid Ulster District Council.
2.0	Background
2.1	Council is a consultee for many government departments, statutory agencies and other bodies, and as such receives consultation documentation inviting commentary on a wide range of issues that may be pertinent to council services and/or the District.
3.0	Main Report
3.1	Documentation relating to the aforementioned consultations can be accessed via the links provided in the table provided in Appendix A.
3.2	<p>In recent weeks 4 government departments have issued Equality Impact Assessment (EQIA) consultations in relation to their 23/24 budgets. The Council has responded to these consultations and copies are attached as below:</p> <ul style="list-style-type: none"> • Appendix B- Department for Communities Draft EQIA on the SOS's 2023-24 Budget Allocation (this response is subject to changes requested by June P&R Committee) • Appendix C-Department for Infrastructure Resource Budget 2023-24 Equality Impact Assessment Consultation • Appendix D-The Executive Office_2023/2024 Budget Consultation Response <p>As detailed in Appendix A, a consultation response is currently being developed for the Department for the Economy's 2023/2024 Budget Consultation. This response will be considered by P&R Committee in July.</p>

4.0	Other Considerations
4.1	Financial, Human Resources & Risk Implications
	Financial: N/A
	Human: N/A
	Risk Management: N/A
4.2	Screening & Impact Assessments
	Equality & Good Relations Implications: None
	Rural Needs Implications: None
5.0	Recommendation(s)
5.1	Members review and note consultations notified to and responded to by Mid Ulster District Council as well as noting the attached submitted response.
6.0	Documents Attached & References
	Appendix A- Details of Current Consultations
	Appendix B- Department for Communities Draft EQIA on the SOS's 2023-24 Budget Allocation (this response is subject to changes requested by June P&R Committee)
	Appendix C-Department for Infrastructure Resource Budget 2023-24 Equality Impact Assessment Consultation
	Appendix D-The Executive Office_2023/2024 Budget Consultation Response

Appendix A: Details of Current Consultations

Organisation	Consultation Title	Issue	Closing Date	Response Currently Being Developed
Executive Office	Draft Equality Scheme 2023-2028	The Executive Office is consulting on its draft Equality Scheme 2023-2028.	11 August 2023	No
	Link to Consultation	https://www.executiveoffice-ni.gov.uk/consultations/consultation-executive-office-draft-equality-scheme		
	Delegated Authority required to be granted to a Committee if Council agrees that a response should be made (where an extension is not given)?		No	
Organisation	Consultation Title	Issue	Closing Date	Response Currently Being Developed
Department for Infrastructure/ Department for Communities/ The Executive Office	Equality Impact Assessment for the 2023-24 Resource Budget	The Departments each separately called for comments on the equality implication of their Resource Budget 2023-24.	7 June and 12 June 2023	Responses Submitted via Delegated Authority. Copies are attached as additional appendices to this report.
	Link to Consultation	DFI: https://www.infrastructure-ni.gov.uk/consultations/dfi-resource-budget-2023-24-equality-impact-assessment-consultation TEO: https://www.executiveoffice-ni.gov.uk/consultations/consultation-executive-office-budget-allocation-2023-2024-equality-impact-assessment DFC: https://www.communities-ni.gov.uk/consultations/consultation-department-communities-budget-2023-24-allocations		

	Delegated Authority required to be granted to a Committee if Council agrees that a response should be made (where an extension is not given)?		DA granted to the CE at April Full Council meeting.	
Organisation	Consultation Title	Issue	Closing Date	Response Currently Being Developed
DVA	Consultation on Driving and Vehicle Test Fees	The Driver and Vehicle Agency (DVA) is running a public consultation on the proposed increase in fees for driving tests, vehicle tests and other services provided by the DVA.	3 August 2023 (at 5pm)	No
	Link to Consultation	https://www.infrastructure-ni.gov.uk/news/consultation-launched-driving-and-vehicle-test-fees		
	Delegated Authority required to be granted to a Committee if Council agrees that a response should be made (where an extension is not given)?		No	
Organisation	Consultation Title	Issue	Closing Date	Response Currently Being Developed
DFI	Consultation on changes to the NI Concessionary Fares Scheme Key point briefing	Dfi is consulting on a number of changes to the existing Concessionary Fares Scheme to ensure it is financially sustainable in the longer term and available for those who are most vulnerable, or liable, to social exclusion.	24 August 2023 (at 5pm)	No
	Link to Consultation	https://www.infrastructure-ni.gov.uk/consultations/driver-and-vehicle-agency-dva-consultation-changing-cost-driving-tests-and-vehicle-tests		
	Delegated Authority required to be granted to a Committee if Council agrees that a response should be made (where an extension is not given)?		No	
Organisation	Consultation Title	Issue	Closing Date	Response Currently Being Developed
DFE	EQIA Budget Consultation	The purpose of this Equality Impact Assessment (EQIA) is to present the proposed decisions required by DfE to live within its 2023/24	6 July	Yes

		Budget allocation and the potential impact to people in Section 75 categories.		
	Link to Consultation	https://www.economy-ni.gov.uk/sites/default/files/consultations/economy/Budget-EQIA-DfE-2023-24.pdf		
	Delegated Authority required to be granted to a Committee if Council agrees that a response should be made (where an extension is not given)?		Yes, DA sought for July P&R Committee.	
Organisation	Consultation Title	Issue	Closing Date	Response Currently Being Developed
H&SCTs	Consultation on Draft Equality and Disability Action Plans 2023-28	The Trust are currently consulting on their draft Equality and Disability Action Plans 2023-2028.	25 September 2023	No
	Link to Consultation	https://www.publichealth.hscni.net/news/consultation-events-hsc-equality-and-disability-action-plans-2023-2028		
	Delegated Authority required to be granted to a Committee if Council agrees that a response should be made (where an extension is not given)?		No	

01 June 2023



Comhairle Ceantair
Lár Uladh
Mid Ulster
District Council

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Ref: DFC Draft EQIA on the SOS's 2023-24 Budget Allocation

To whom it may concern

Mid Ulster District Council would like to take this opportunity to provide comments on the Department's EQIA 2023-24 Budget Allocation.

While the Council appreciates that the Department for Communities (DFC) is facing a challenging financial year and that it will likely continue to face into a difficult economic context, it should be noted that the financial and other contributions provided by DFC are of great value to society generally, and particularly to district councils as they deliver essential statutory services within their district council areas.

DFC financial contributions to district councils, although supplemented by income from district Rates, are critical. The various amounts make a massive difference to the public and it is undoubtedly the case that material reductions in these amounts will produce significant negative impacts on the groups protected by Section 75. The DFC must have due cognisance for the consequences of the proposed funding reductions

and it would be unacceptable for the DFC to simply let the problem ‘flow downstream’; to do so would be unacceptable and morally unconscionable.

The Council will, in the following paragraphs, outline its reservations in so far as is practicable given the very short time allocated by the DFC for responses to the consultation. In this regard, notwithstanding the fact that the Council recognises the challenges that the DFC is facing, the Council is extremely disappointed that the time allocated for responses to be submitted and thereafter inform the DFC’s allocation of funds in 2023/24.

Quite simply, the reductions proposed are of such significance that the refusal of the DFC to consider responses received post 7th June 2023 is totally unacceptable. In addition, the Council asks if the DFC sought the views of the Equality Commission in relation to its approach in advance of prescribing the deadlines included within the Equality Impact Assessment that is being consulted upon? On the assumption that the DFC did consult the Equality Commission in relation to its proposal to apply differential treatment to responses received, the Council asks that the DFC, on publishing the outcome of this consultation exercise, expressly publishes what advice it received in relation to this matter prior to commencing the consultation exercise.

Rates Support Grant

The DFC is consulting upon this EQIA in the context of a very significant proposed reduction in Rate Support Grant, which follows on the back of a reduction in the previous year (2022/23) which of itself was of an unprecedented (in at least 25 years) scale when the amount distributed in 2021/22 (£21.924m) was reduced to £8.965m in 2022/23. For the avoidance of doubt, the DFC will be aware that the average amount of RSG distributed between eligible councils in each since 2011/12 prior to 2022/23 (2011/12 to 2021/22 inclusive) was £18,721,828.

The proposed further reduction to £4.9m in 2023/24 is simply unworkable. While the Council is aware of the (probably remote) *possibility* of additional monies being released prior to 31 March 2024, it is clear that the current proposal will see the Council seeing a massive reduction on a major source of income upon which the Council relies

to fund its statutory services. In short, as notified to the DFC (in the normal fashion) in February 2023, the Council struck its 2023/24 district Rate on the assumption that the DFC would distribute RSG in the amount of £15.865m. The DFC will be aware that this meant that the Council budgeted to receive £2,538,400 RSG in 2023/24; a senior DFC officer acknowledged this fact in correspondence to the Council shortly after receipt of the 'General Estimate of Rates Return for 2023/24'. Consequently, in proposing to reduce RSG to £4.9m, the DFC must acknowledge that it is consciously proposing an amount that will see the Council experience a reduction in RSG received in the amount of £1,754,400 (£2,538,400 less £784,000 (being the Council's share of the proposed £4.9m)). It must also acknowledge that this decision that it is aware that this shortfall immediately follows the reduction in RSG in the amount of £1,577,539 that the Council experienced in 2022/23 when the DFC reduced the RSG to £8.965m (see above).

The Council therefore challenges the DFC to explain how it is reasonable for it to knowingly reduce the Council's income by £3,331,939 (£1,577,537 plus £1,754,400) within 24 months without meaningful consultation and, at the very least, effective transitional relief.

In short, the DFC proposal to further reduce RSG to £4.9m is forcing the Council to either cut statutory services or fund those services from reserves or both. This is wholly unacceptable, undemocratic and will result in services to protected groups (both under Section 75 and those living in rural areas) being unreasonably reduced or withdrawn.

Quite clearly, the DFC is failing to have due regard to its statutory responsibilities and the DFC must not underestimate the overall detrimental impact on the protected groups. The Council urges the DFC to review information previously supplied by the Council in relation to groups protected by Section 75 and those envisaged by the Rural Needs Act (Northern Ireland) 2016.

Community Support Grant

The community support grant again is important to Council. The advice grant does require protecting particularly in the current climate of financial hardship. This is a

procured contract, via Council, and the contribution is matched more than 50% by the rate and allows for general advice support to those most vulnerable.

The further contribution to community support of £54,000 allows for an investment return on community activity and engagement of over £700,000 which is funded by Council. Whilst it may seem a small amount of funding it is important to allow Council to deliver its wider grants programme. This is a similar position with regard to the community festival grant, the contribution of £29,000 allows for an investment return and match contribution of over £150,000. A large percentage of this grant support is for Section 75 groups and activity, including women, race, religion, political opinion, disability, age, LGBTQ, and carers. Any reduction to this support will have a direct impact on these groups.

Neighbourhood Renewal

Neighbourhood Renewal is working to alleviate poverty in the most disadvantaged communities. Any reduction in support to the neighbourhood renewal programme would target the most vulnerable at a time of hardship and would have a direct impact on section 75 religious and political background.

Council has worked in partnership with the DFC Urban Regeneration team over the last number of years in driving regeneration in all our main towns. The investment impact to our towns due to the funding contribution has been significant. All of the public realms and urban regeneration grants have had a major impact on economic growth. The continuation of the urban regeneration grants and support remain critical as spending power has fallen and continues to fall, while businesses are forced to close, leaving towns having to reinvent themselves as leisure and event spaces.

Affordable Warmth Scheme

Mid Ulster District Council has been delivering the Affordable Warmth Scheme within the Mid Ulster District Council area on behalf of the Department since 2014. The nature

of the Affordable Warmth scheme, targeting low income households who experience the effects of fuel poverty and energy inefficiency, means the impact upon vulnerable Section 75 groups will be profound. The targeted nature of the scheme is aimed at those areas where levels of fuel poverty are highest. This Scheme has been an extremely successful programme for Council and due to this Council has continued to lobby DFC for additional funding to meet the demand in the area. This is an increasingly important area of work as more people fall into hardship due to escalating energy costs. Any reduction to this programme would be targeting the most vulnerable people in society who avail of this means tested support, during a time when they are trying to cope with rising energy costs and a cost of living crisis.

Labour Market Partnership

Labour Market Partnership are correctly described within the EQIA as a ‘critical intervention to help people with a disability or health condition to remain in work’. Pausing the funding for this vital service represents a huge negative impact on a number of Section 75 groups and will disproportionately impact negatively upon people with a disability, women and people with dependents who are all statistically more likely to be economically inactive.

The aims of the LMP rightly includes targeted action to address the gender and disability employments gaps. These gaps are at significant levels in the Mid Ulster DC area. At 24%, Mid-Ulster District Council has the lowest employment rate for disabled people in Northern Ireland. There is a large and significant difference between Mid-Ulster and other Council areas – the highest ranked Council (Lisburn & Castlereagh) has double (48%) the disability employment rate of Mid Ulster. Therefore the ‘pausing’ of this project has a direct negative impact on people with a disability who require support to enter the labour market. This seems like a particularly punishing removal of a service which has been long requested by organisations who support people with a disability and knowing the release the negative impact of long term isolation from the labour market can have for people with a disability.

In 2021 Mid-Ulster had the lowest employment rate for women in Northern Ireland. At 61% it is considerably below the Northern Ireland average of 68%. Therefore, it is hard to justify the 'pausing' of the project that directly aims to have a positive impact upon economically vulnerable groupings.

Consideration of Mitigations

Any level of mitigation would need to be swift and substantial in order to be able to even mildly address the potential impact on the Section 75 groups negatively impacted upon by the groups identified.

Conclusion

The primary function of this EQIA is to assess whether these budgetary proposals will have a differential impact and in particular, an adverse differential impact on the categories of persons listed in Section 75, and any subgroups within those categories. From examination of the information presented in this EQIA it is clear that there are numerous adverse impacts in relation to the majority of the Section 75 groups. In particular a potential negative impact upon:

- People of different ages
- Men and women generally
- People with or without a disability
- People with or without dependents
- People with different religious beliefs

The proposals set out within the EQIA also fail to reflect upon the DFC duty under the Rural Needs Act (Northern Ireland) 2016 and goes against the DFC previously stated commitments in relation to the four cross-cutting themes of Anti-Poverty, Wellbeing & Inclusion, Sustainability & Inclusive Growth and Agility & Innovation. The DFC Audit of Inequalities also set out the required actions needed to meet the needs of the various Section 75 groupings.

As previously stated, Mid Ulster District Council appreciate the difficult choices faced by the DFC. However, as the Council objects to the unnecessary hardship that the proposed budget reductions will have on the most vulnerable, and in particular all Section 75 groups and rural dwellers.

As referenced above, the Council also requests detailed clarification in relation to the way this EQIA consultation is being conducted. The consultation arrangements stated are that the Department's Scheme allows for a two-tier consultation of an initial 4 weeks to provide feedback on the overall budget allocation for 2023/24, while responses received in weeks 5-12 will impact on the mitigation aspect only. The Council considers that this is both inconsistent with the statutory requirements contained within the Northern Ireland Act 1998 and the Rural Needs Act (Northern Ireland) 2016, and more generally with the DFC stated responsibility to take all steps necessary to ensure and support a strong local government sector – an aspiration that was (and continues to be) often voiced prior to, and after local government reform in April 2015. The proposed budget reductions undermine local government services, district councils as democratically elected bodies, and vulnerable groups within society.

From examination of the proposals set out in the Department's EQIA of the proposed Budget (2023/24) it is evident that a number of Section 75 Groups will be directly and negatively impacted as a result of these decision's no matter how robust the DFC opine that the proposed mitigation measures are.

The Council also contends that the NI Executive should also consider the cumulative impact of simultaneous cuts effected across numerous central government departments, many of whom either directly support, or contribute to the support of some of the most vulnerable (and often statutorily protected) people within society.


The Council strongly opposes the budget consulted upon and sees it as neither, equitable, practicable, or defensible. Initiatives that have taken years to develop,

implement and bring to fruition must not be cast aside in this crude manner, particularly when they are exactly what are needed to help and support vulnerable individuals during the current cost of living and climate crises.

These are unprecedented times, and it is essential that the Department finds a way to continue to support local government to both deliver its statutory services and continue to make essential and effective interventions within their local communities.

In the case of Mid Ulster District Council, the Council urges the Department to recognise in particular the extent to which statutorily protected groups will be disadvantaged and negatively impacted if the proposed RSG reduction is implemented. In doing so, the Department should immediately announce that the proposed reduction in RSG will not be delivered upon.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Adrian McCreesh', with a stylized, cursive script.

Adrian McCreesh

Chief Executive

Appendix C

4 June 2023



Financial Planning & Management Team
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Reference: DfI Resource Budget 2023-24 Equality Impact Assessment Consultation

To whom it may concern

Mid Ulster District Council would like to take this opportunity to provide comments on DfI Resource Budget 2023-24 Equality Impact Assessment. It's Mid Ulster Council's understanding that the outcome of the implementation of this proposed budgets cut would lead to:

- Turning off street lights
- No winter gritting of road network
- Cuts to funding of Community and Voluntary sector organisations
- Reduction of funding to arms length bodies
- A reduction in Public transport provision;
- Impacts on water and wastewater services;
- Road maintenance and flood risk management operational activities reduced to emergency-only services;

Transport

Mid Ulster District Council is a vastly rural area, consequently residents rely heavily on transport. As such Community Transport plays a key role for several Section 75 groups located in the District. This service not only plays a vital role in keeping people socially and economically connected to their community but it also supports health service and wellbeing appointments via providing transport to medical appointments and collection of medicines. Therefore it is clear that a reduction in this service will increase isolation and loneliness for rural older people. Mid Ulster District Council fear that this could significantly impact upon both the mental and physical health in this group of residents, at a time when waiting lists and access to primary health care is at an unprecedentedly time low.

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Shopmobility Mid Ulster is another key service that this budget will impact on negatively. Shopmobility Mid Ulster has long provided opportunities for local residents and visitors to the District, especially to the towns of Cookstown and Dungannon, where they provide equipment to allow people to have an enjoyable shopping and visitor experience which may be curtailed if not available. In recent times the need for the service within Mid Ulster has grown significantly and this has been demonstrated by additional equipment being purchased to meet demand for the service. Consequently larger premises for the service have recently been secured in Cookstown. The growth of the services is testament to the local service available and need for equipment to improve the life of people from all ages and exclude social isolation.

Shopmobility Mid Ulster is also an integral consultee and advisor in the design of the Public Realm Schemes across Mid Ulster; particularly in relation to the Cookstown, Magherafelt, Coalisland schemes as well as the current roll out of Pomeroy and the initial designs currently prepared for Maghera. Expertise in relation to public realm scheme colours, finishes, dropped kerb locations and disabled parking bays have proved invaluable to the design of access spaces across the District. Shopmobility Mid Ulster have also been involved in tourism attraction development; including Castledawson pathways and Seamus Heaney Trails. The completion of access and inclusion reports for Mid Ulster District Council sites including Leisure Centres, Tourist Information Centres and sites including Ballyronan Marina and Knockmany Forest park have also proved immensely beneficial for improvement of accessibility across the District.

In addition, Shopmobility Mid Ulster have also demonstrated the added value of Go Mobility by providing on the go access to equipment at Mid Ulster Council corporate events. Therefore it is evident that the removal of this service as well as the removal of Community Transport provision will impact negatively upon elderly people, people with a disability, men and women generally and people with dependents.

Mitigations

While the Council appreciate that it is difficult to make funding cuts across any area removal of which will have a significantly negative impact across Section 75 groupings. Any level of mitigation required will be, but the EQIA outcomes would need to be swift and substantial in order to be able to even mildly address the potential impact on the Section 75 groups negatively impacted upon.

Consultation Timeline

The Council would like to seek clarity in relation to the consultation period which states that any views received after the initial four week period will only be used to consider mitigations. This timeline is at odds with what is stated in DfI's Equality Scheme. If 'exceptional circumstances' are the Department's rationale for this approach it would be useful if that was stated within the consultation documentation.

The consultation timeline does not seem to offer the option of face-to-face consultations or any public meetings. It is the opinion of the Council that the extremely short time frame during which this consultation is being carried out would have benefited immensely from opportunities to fully discuss the budget proposals and their implications. These additional consultation opportunities would have also allowed impacted groupings to ask questions and seek clarifications.

Cumulative Negative Impact

It cannot be ignored that this consultation is not being held in isolation. A plethora of NI Assembly Departments are currently consulting across short timeframes on drastically reduced budgets. It is clear that each of these budget focused EQIAs identify negative impacts across Section 75 groups. The overall result is a devastating cumulative impact on some of the most vulnerable people in society.

Overall there is a lack of joined up thinking in relation to the proposals made across four Departments. Each Department seems to be viewing only their budgets in isolation without documenting the issues created by multi-sectoral cuts that will directly negatively impact upon some of the most vulnerable and most marginalised in society.

Therefore, as a Council we would object in the strongest terms to the removal of support services that are currently provided to some of most vulnerable and to the vast majority of Section 75 groups.

General Comments

While this EQIA fulfils the necessary requirements of Department's Equality Scheme it could be more detailed and thorough and robust to reflect the catastrophic nature of the spending recommendations that it is linked to be implementing. If further budget becomes available or not, DfI are advised that the Section 75 duties are continuing duties, and the Department is required to equality assess any changes to circumstances. It is important that the Department demonstrates that it has paid the

appropriate level of regard to its promotion of equality and good relations in its budget decisions, as required by the duties.

Rural Needs

In relation to this consultation Mid Ulster District Council believe that the Department has failed to demonstrate that due regard has not been provided to the Rural Needs Act 2016. The cuts can be clearly demonstrated to have a more significant impact on those in rural areas.

Conclusion

Mid Ulster District Council strongly oppose the outlined budget and see it is as neither workable nor practicable. Initiatives that have taken years to develop, implement and bring to fruition should not be cast aside in this crude manner, particularly when they are exactly what are needed to help to support vulnerable individuals during the current cost of living and climate crises.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Adrian McCreesh', with a stylized flourish at the end.

Adrian McCreesh
Chief Executive

4 June 2023



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Reference: 2023/2024 TEO Budget Consultation Responses

To whom it may concern

Mid Ulster District Council would like to take this opportunity to provide comments on The Executive Office's (TEO) 2023/2024 Budget. Appendix A of this letter focuses specifically on the six main consultation questions listed in the consultation document, however Mid Ulster District Council would also like to make the following additional points in relation to the EQIA:

- Cross Cutting Negative Impacts
- Mitigation
- Consultation Timeline
- Cumulative Negative Impacts

Each of these areas are to be examined in turn overleaf:

Cross Cutting Negative Impacts

The primary function of this EQIA is to assess whether these budgetary proposals will have an adverse differential impact on the categories of persons listed in Section 75, and any subgroups within those categories. From examination of the information presented it is clear that there are numerous adverse cross cutting impacts in relation to the majority of the Section 75 groups. In particular a potential negative impact can be identified upon the following groupings:

- People of different Religious Beliefs
- People of different Political Opinions
- People of different Racial groupings
- People of different Ages
- People of different Sexual Orientation
- Men and women generally
- People with or without a disability
- People with or without dependents

The cross-cutting nature of these negative impacts clearly demonstrates the scale of these budgetary proposals. These proposals have the potential to undermine and greatly diminish Good Relations Departments within Councils with a lasting detriment to the division, weakening the priority of Good Relations.

Mitigations

While the Council appreciate that it is difficult to make funding cuts across any area, and the removal of this funding will have a significantly negative impact across Section 75 groupings. Any level of mitigation required should be considered but the EQIA outcomes would need to be swift and substantial in order to be able to even mildly address the potential impact on the Section 75 groups who are negatively impacted upon.

Consultation Timeline

Mid Ulster District Council would also request clarification upon the timeline during which this EQIA consultation is being conducted. Do the consultation arrangements stated in the TEO's Scheme allow for a two-tier consultation of an initial 4 weeks to provide feedback on the overall budget allocation for 2023-24, while response received in weeks 5-12 will impact on the mitigation aspect only? If not, this would seem to be a breach of TEO's Equality Scheme and therefore could be subject to challenge via Paragraphs 10 and 11 of Schedule 9 of the Northern Ireland Act 1998.

Cumulative Negative Impact

It cannot be ignored that this consultation is not being held in isolation. A plethora of NI Assembly Departments are currently consulting across short timeframes on drastically reduced budgets. It is clear that each of these budget focused EQIAs identify negative impacts across Section 75 groups. The overall result is a devastating cumulative impact on some of the most vulnerable people in society. As a Council we would object in the strongest terms to the removal of support services that are currently provided to some of most vulnerable and to the vast majority of Section 75 groups.

Conclusion

While Section 75 legislation does not require TEO to consider treating everyone in the same way, it does require the promotion of equality of opportunity for people who may have particular needs that would go unmet if everyone was treated the same. These cross-cutting budget cuts do not seem to conder the promotion of equality of opportunity.

Therefore, as previously stated, Mid Ulster District Council appreciate the difficult choices to be made in any reduction in funding. However, as a Council we would object to these budgets proposals on the basis of the deep and long-lasting negative impact that would be unleashed upon some of the most vulnerable people in society.

Yours sincerely



Adrian McCreesh

Chief Executive

Enc: Appendix A: Completed Consultation Questionnaire



Consultation on the Executive Office Budget Allocation 2023-2024 EQIA Responses

The Executive Office has undertaken an Equality Impact Assessment on the Department's budget allocation for 2023-2024.

The process aims to avoid any adverse impacts and, where possible, take action to mitigate against specific adverse impacts. The Equality Impact Assessment examines potential options for funding reductions and the potential equality impacts of these options. Please use this form to share any views you have.

Confidentiality of Information

The Executive Office processes personal data in accordance with the General Data Protection Regulation and in most circumstances, this means that personal data will not be disclosed to third parties.

Name:	Oliver Morgan
Position:	Manager
Organisation:	Mid Ulster District Council
Address:	Circular Road Dungannon BT71

Question 1

Do you agree that TEO has gathered the necessary data to inform its decisions around the allocation of its budget?

Mid Ulster District Council understands the decision taken to cut budgets but would disagree with the level of cuts anticipated within District Council Good Relations Action Plans.

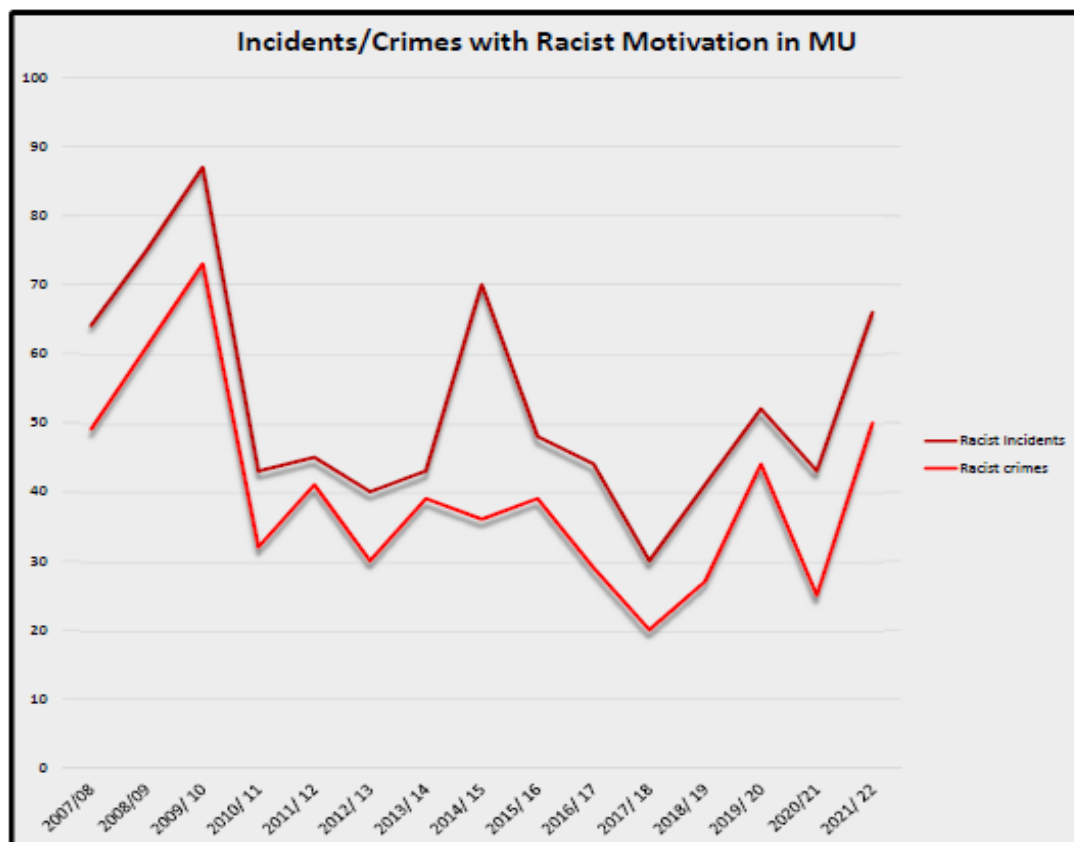
This is also at a time when Hate Crime statistics are showing an increase across the region as noted below.

Table 2.13 Incidents with a racist motivation by policing district, 2004/05 to 2021/22^{1,2}

Policing district	2007/08	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	Numbers change 2020/21 to 2021/22
Mid Ulster	64	75	87	43	45	40	43	70	48	44	30	41	52	43	68	23
N. Ireland	978	990	1,034	842	694	748	976	1,336	1,215	1,044	1,025	1,124	937	993	1,334	341

Table 2.14 Recorded crime with a racist motivation by policing district, 2004/05 to 2021/22^{1,2}

Policing district	2007/08	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	Numbers change 2020/21 to 2021/22
Mid Ulster	49	61	73	32	41	30	39	38	39	29	20	27	44	25	50	25
N. Ireland	757	771	711	531	458	470	688	916	851	654	609	699	629	718	931	213



Statistics taken from <https://www.psni.police.uk/about-us/our-publications-and-reports/official-statistics/hate-motivation-statistics>

Table 5.6 Incidents with a faith/religion motivation by policing district, 2009/10 to 2021/22^{1,2}

Numbers														change 2020/21 to 2021/22
Policing district ^{1,2}	2009/ 10	2010/ 11	2011/ 12	2012/ 13	2013/ 14	2014/ 15	2015/ 16	2016/ 17	2017/ 18	2018/ 19	2019/ 20	2020/ 21	2021/ 22	
Mid Ulster	3	0	0	2	1	1	3	2	3	2	1	1	4	3
Northern Ireland	32	24	15	28	33	84	59	65	90	56	41	39	68	29

Table 4.10 Incidents with a sectarian motivation by policing district, 2005/06 to 2021/22^{1,2}

Table 4.10: Incidents with a criminal conviction by policing district, 2005 to 2022																		Numbers
Policing district ^{1,2}	2005/ 06 ²	2006/ 07 ²	2007/ 08	2008/ 09	2009/ 10	2010/ 11	2011/ 12	2012/ 13	2013/ 14	2014/ 15	2015/ 16	2016/ 17	2017/ 18	2018/ 19	2019/ 20	2020/ 21	2021/ 22	change 2020/21 to 2021/22
Mid Ulster	-	-	109	79	85	79	92	67	53	72	61	55	53	57	61	60	95	36
Northern Ireland	1,701	1,695	1,584	1,595	1,840	1,437	1,344	1,372	1,284	1,517	1,352	965	879	865	868	934	1,067	133

Table 4.11 Recorded crime with a sectarian motivation by policing district, 2005/06 to 2021/22^{1,2}

Policing district ^{1,2}	Numbers																	change 2020/21 to 2021/22
	2005/ 06	2006/ 07	2007/ 08	2008/ 09	2009/ 10	2010/ 11	2011/ 12	2012/ 13	2013/ 14	2014/ 15	2015/ 16	2016/ 17	2017/ 18	2018/ 19	2019/ 20	2020/ 21		
Mid Ulster	54	78	94	63	69	65	69	50	47	47	49	46	38	39	51	43	85	42
N Ireland	1,469	1,217	1,056	1,017	1,264	1,000	885	889	961	1,044	1,002	695	576	622	639	674	780	106

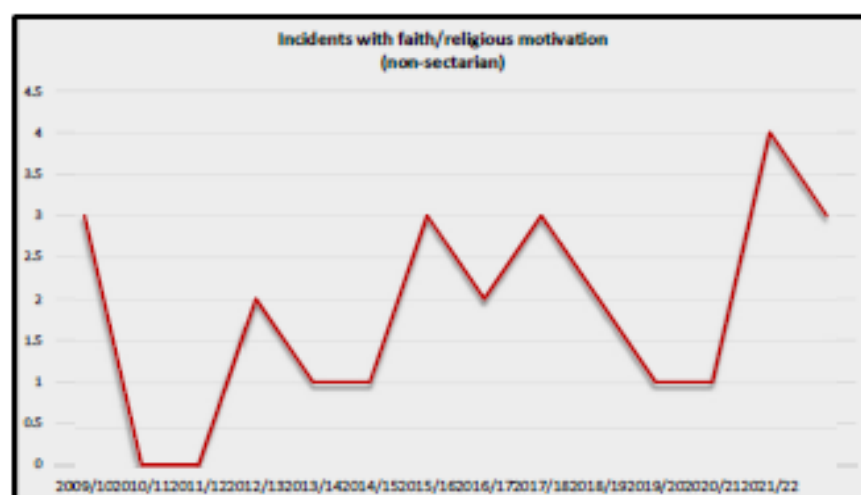
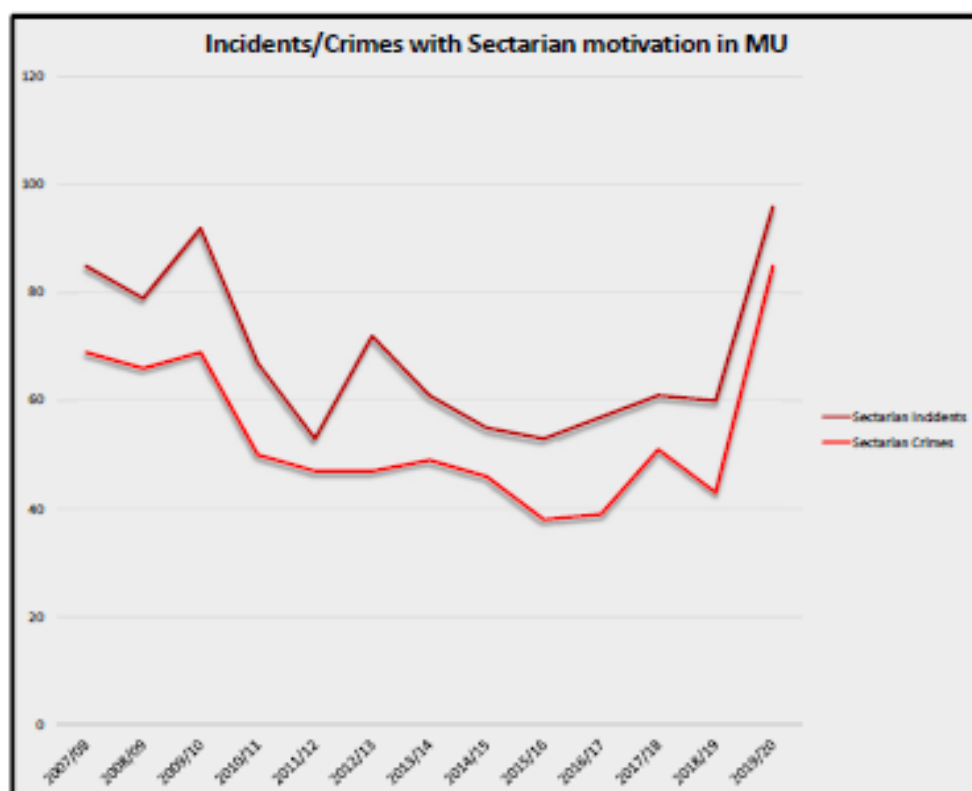
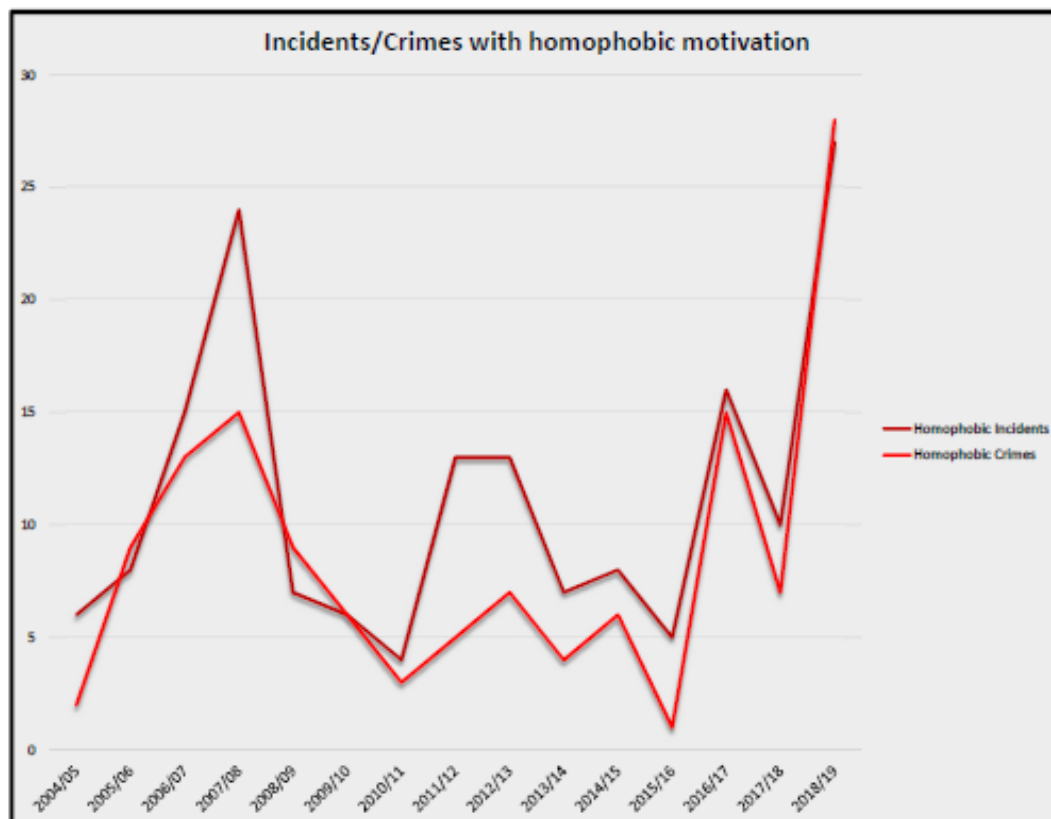


Table 3.10 Incidents with a homophobic motivation by policing district, 2004/05 to 2021/22^{1,2}

Policing district ^{1,2}	2004/05 ²	2005/06 ²	2006/07 ²	2007/08	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	Numbers change 2020/21 to 2021/22
Mid Ulster	-	-	-	6	8	15	24	7	6	4	13	13	7	8	5	16	10	27	17
N Ireland	196	220	155	160	179	175	211	201	246	280	334	343	279	267	281	272	366	462	96

Table 3.11 Recorded crime with a homophobic motivation by policing district, 2004/05 to 2021/22^{1,2}

Policing district ^{1,2}	2004/05	2005/06	2006/07	2007/08	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	Numbers change 2020/21 to 2021/22
Mid Ulster	1	6	9	2	9	13	15	9	6	3	5	7	4	6	1	15	7	28	21
N Ireland	151	148	117	114	134	112	137	121	149	179	209	210	162	163	201	195	246	336	90



Statistics taken from <https://www.pni.police.uk/about-us/our-publications-and-reports/official-statistics/hate-motivation-statistics>

1. The budget allocation will have a detrimental & disproportionate effect on our 'Children & Young People' projects across Mid Ulster – Our current 'Youth Voice' (partner project with EA) will be impacted to such an extent that it will probably cease, impacted further by EA budget cuts. Youth Voice engages 28 young people keen to become involved in civic society & make a difference in our community. This will detract from their development, education and reduce sustained & meaningful cross community activity.
2. The cultural programmes will be severely affected & curtailed. They bring over 500 children together during term time to explore our shared culture, marching band heritage & develop a lifelong understanding of our cultural values, history

& conflict. If this programme is curtailed or cancelled over 20 primary schools will be directly disadvantaged.

3. Section 75 Groups – Mid Ulster has a large migrant & Traveller community. These groups, together with LGBTQ+ ME are already impacted by rising racism & discrimination, which will be affected further by these budget cuts.
4. Mid Ulster is experiencing rising reported racism/sectarian crimes, as per above graphs.
5. No information was provided on the review of DCGRP, or DCGRP statistics.

DCGRP is based on a needs analysis through the development of the 3 year audit and strategy, and annual action plans that are approved by local Government Elected Members with a mandate to represent local residents.

A current review of the importance of promoting respect and challenging Hate through our Good Relations program revealed the following findings:

- Respondents agreed that the advertising has the potential to get people thinking about other cultures, traditions and communities and how their behaviour affects such groups.
- Messaging in the style of the Hate Hurts campaign was felt to be particularly impactful.
- There was a strong sense that there is a cohort of people within Mid Ulster whose opinion regarding diversity will not be changed by any advertising campaign.
- All respondents agreed that embracing diversity is a good thing and that Mid Ulster has made some improvements in this regard; however, respondents were unanimous in feeling that more needs to be done.
- Further advertising, the provision of opportunities for **mixing outside school and work, the hosting of events celebrating other cultures, and promotion from the Council** were all suggested as things that could be done to help embrace diversity and increase awareness of other cultures, traditions and communities in Mid Ulster.

Ref: (COGNISENSE, May 2023)

Question 2

Do you agree with TEO's assessment of the options for budget reductions?

Mid Ulster District Council does not agree with assessment of the options for budget reductions noting that other programs such as Social Housing Good Relations under TBUC have been ring-fenced for 5 years. The District Council Good Relations Program is the only evidence based program across a suite of TBUC programs and as such can identify the areas of concern through Audits of the ongoing challenges within integration and inclusion across our geographical spread.

- Match funding and in kind contributions not included in considerations.
- Valid rational in regards to protected groups however disproportionate cut across ALB's and DCGRP/Central GR.
 - Is there an opportunity to review ALB and or consolidate delivery / methods?
 - Is there a balanced spread of delivery by ALB across NI Council Areas?
- Other department cuts range from 5-15%, why is 47% cut to DCGRP?
- Already working within strained budgets alongside the 'cost of living crisis'

Question 3

Do you agree with TEO's assessment of equality impacts of the options considered for budget reductions?

Mid Ulster District Council would highlight a disproportionate cut across our section 75 groupings, having adverse impact on programs targeting areas of work within Ethnic Minorities and LGBTQ+ causing barriers to delivery. Mid Ulster Pride was supported to establish a support mechanism to allow people in a rural area to afford themselves the opportunity of integration and feeling together and inclusive. This program will be deeply affected and again potentially destroy the build-up of confidence that has been allowed to develop.

- Equality impacts not fully included with the report
- Limited response on Section 75 groups targeted through DCGRP
 - Young people
 - LGBTQI+
 - Older people
 - Interface areas
 - Refugees
 - Asylum seekers
 - Most vulnerable in communities

- Rural communities
- Are other TEO programmes reaching individuals equally across NI Council areas? With the reduction in DCGRP are individuals within Council areas with a low uptake of other TEO funding programmes at a greater disadvantage due to this reduction?

Question 4

Do you agree that TEO has correctly identified all relevant mitigations that could help reduce the adverse equality impacts of the budget reductions?

Mid Ulster District Council would disagree that the adverse equality impacts of the budget reductions in any way are mitigated. Housing groups for example and arms lengths bodies have been ring fenced for funding. There has been a variation of budget reductions across other departments in the region of 5-15%, yet the DCGRP budget has been reduced by 47%. It is noticeable this programme is no longer deemed a priority, as noted within the EQIA report. This budget cut also goes wider, with other areas such as culture, leisure and arts being disaffected with a lack of directly targeted programmes, specifically to those who historically have had little or no access to these areas of society.

Question 5

Do you agree with TEO's overall assessment of the business areas where budget reductions will need to be made?

Mid Ulster District Council does not agree with the overall assessment of the business areas where budget reductions will be need to be made. There is a real danger in whereby Councils may well take a decision to reduce GR staffing and therefore minimise the importance of Good Relations across Council areas. This at a time when we highlight Hate Crimes and incidents on the up and on the bedrock of no political agreement, we could see the widening of fractious tensions across communities when continuing dialogue and programs through Good Relations funding would be at their most critical.

- Other department cuts range from 5-15%, why is 47% cut to DCGRP?
- Potential for split in Good Relations staff time if delivery funded through a cocktail of funding streams to mitigate against the reduction.
- Wider impact across other Council Areas; Arts & Culture, Leisure
- Differential impact
- Impact of loss of opportunities
- Underinvestment in GR to date
- Demonstrate the positive impact of GR to date
- Reference to our action plans; target groups impacted

Question 6

Do you have any other comments you would like to add about this consultation?

Mid Ulster District Council would hope that any budget cut is short term in nature and is alleviated in real terms by the Autumn. This is necessary to allow the priority of Good Relations to remain as a permanent fixture within Council and continue the development of community cohesion across the region. Failure to do so could shrink Good Relations Departments within Councils with a lasting detriment to the division, weakening the priority of such work.

CONSULTATION RESPONSE

This consultation has been issued by the Executive Office and is also available online here

<https://consultations.nidirect.gov.uk/teo/teo-budget-2023-2024-eqia-responses>

The Department looks forward to receiving your comments.

Completed copies of survey questionnaires and general written responses can be sent to us by:

Reference: 2023/2024 TEO Budget Consultation Responses

Finance Branch
The Executive Office
Block B5
Castle Buildings
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BELFAST BT4 3SR

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You can also use the above details to contact us if you have any enquiries or require the consultation document in an alternative format.

We ask you to exercise care and refrain from the inclusion of any potentially defamatory material as we may publish responses on the Departments website. Should we do so, we will not publish the names or contact details of respondents but will include the names of organisations responding.

Your opinions are valuable to us. Thank you for taking the time to read this document and respond. Responses should be returned by 7 June 2023; however any responses received before the consultation closure date on 2 August 2023 will still be considered. These may be used to consider further mitigation measures, to inform in-year budget reallocation processes or to direct any additional funding (or further reductions) that emerge over the course of the financial year. Submissions made after this date cannot be considered.