

**Submission on the Draft Equality Impact Assessment on the Regeneration of
Crumlin Road Gaol and Girdwood Barracks**

Lower Shankill Community Association

Background on the LSCA

The Lower Shankill Community Association (LSCA) is a community development organisation that works to empower local residents and to advocate for policies that will benefit those living in the lower Shankill area of Belfast. It is primarily funded by the International Fund for Ireland.

Concerns and Issues with the Draft EQIA

Below, we have listed a number of concerns that relate to the Draft EQIA published by the DSD and currently out for public consultation for the Regeneration of Crumlin Road Gaol & Girdwood Barracks.

1. On page 53, we have been listed in the “formal consultation” section as having held a focus group on the Draft EQIA. This is not the case. We held an informal meeting with the North Belfast Community Action Unit at the Crumlin Road Gaol at which we discussed some issues, but this was not seen by us and should not be considered a focus group. At the meeting we explained the importance of consulting with local residents from the Lower Shankill.
2. We submitted a copy of the Lower Shankill Community Audit (July 2006) as part of the initial consultation for the Draft EQIA. This was designed to provide additional information about our area that might not be available from other, official sources as well as to provide context on some of the issues in the Lower Shankill. It also makes recommendations based on residents’ views for how to ensure the problems around education, health and employment could be solved. This information does not seem to have been reflected at all in the content of the Draft EQIA. Instead it is erroneously listed as a document that was submitted by the PPR Project, who emailed it on our behalf.
3. Our understanding of the Equality Impact Assessment is that it is designed to promote equality of opportunity among different section 75 groups. We do not see how this has happened through the current Draft EQIA. We have a number of specific concerns that are listed below.
4. In relation to education, the LSCA has specific concerns with the Draft EQIA. As the most deprived SOA (out of 890) for education in Northern Ireland, we find it worrisome that the only proposal considered in the Draft EQIA is the expansion of playing fields at St. Malachy’s. This combined with the fact that there has been very little consideration of available evidence is concerning.

As the Lower Shankill Community Audit points out, more than half of all respondents felt that some of their children were being failed by the schools in the area. It even offers suggestions for the types of programmes and opportunities that should be available to improve education for different groups (including parents, other adults, youth aged 14-16, younger children and children with special needs – all of which reflect section 75 groups).

5. In relation to health, the LSCA has specific concerns with the Draft EQIA. As the most deprived SOA (out of 890) for health in Northern Ireland, we find the statistics that have been gathered to be inadequate and that what is considered would not have allowed for better promotion of equality of opportunity in this area. For example, there is mention of mental health issues in the report but no consideration of how this could be addressed by the proposals on the site.

We also identify a number of specific “barriers to health improvement” in our community audit that could have been included or helped to inform the Draft EQIA.

At the time of our meeting at the Crumlin Road Gaol we were working on a Men’s Health Report that identifies some of the issues for men, aged 50+, in the Lower Shankill. This has now been published and we will send a copy in the post. This will provide additional information in relation to health for a specific, section 75 group that can be used in your final EQIA. We imagine that there are other groups who have completed similar surveys that would have been useful for this.

6. In relation to employment the LSCA has specific concerns. As the 7th most deprived SOA (out of 890) for employment, we find both the statistics gathered and the analysis of the issues around employment to be inadequate in the Draft EQIA.

As you will have seen in our Lower Shankill Community Audit, the community has identified regeneration as one of the key ways that they can improve employment in the community. This also relates to the regeneration at Crumlin Road Gaol & Girdwood Barracks. Currently, there are vague references to possibly including targets for employment from people in the local community, but we are concerned that this needs to be addressed more specifically in the Draft EQIA so that in the future there can be more accountability.

In our community audit, there is also specific information for young people in relation to employment.

We believe proposals to target unemployment should include outreach work, training, apprenticeships, jobs, etc., targeted at groups that need it most. Again, there are suggestions in the Lower Shankill Community Audit for how this could work better and why it has not worked in the past. None of this information has been considered or mentioned as mitigating measures or alternative proposals, nor has there seemed to be other, specific consideration for how unemployment and economic inactivity might be addressed for

specific groups.

Finally, we know that there is additional information available on employment from organisations around the Shankill and throughout Belfast. This does not seem to have been collected or used.

7. Overall, we find the Draft EQIA inadequate around issues relating to health, employment and education to address issues in the Lower Shankill and throughout North Belfast. We believe these issues need to be addressed.

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