



Submission on

**Draft Equality Impact Assessment of the
Crumlin Road Gaol and Girdwood Park
Draft Masterplan**

January 2009

Introduction

UNISON is Northern Ireland's leading trade union, representing nearly 40,000 workers delivering essential public services in areas such as health; social services; education; local government; private companies providing public services; and the community and voluntary sector.

Alongside the Committee on the Administration of Justice we are co-Convenor of the Equality Coalition and have worked for many years to promote equality of opportunity and human rights within Northern Ireland. Our membership reflects all categories of groups designated under Section 75 of the NI Act 1998.

Our key test for the Masterplan is whether it will promote equality of opportunity across the section 75 categories.

Whilst we welcome the publication of this EQIA on the Crumlin Road Gaol and Girdwood Park Draft Masterplan it would have been much more useful in January 2008 when the original proposals were being consulted upon.

This submission details our concerns that the current document does not comply with Equality Commission Guidance about how an EQIA should be conducted, in particular the key requirement for the development of detailed alternative policy options.

Relevant data: The presentation of data by ward area or parliamentary constituency has proven to be a very unsatisfactory measure of deprivation.

NISRA itself uses the measure of 'super output area' which allows for a more comprehensive and detailed analysis of deprivation by socio-economic status.

'Assessment of impacts': In the EQIA the DSD fails to adhere to the Equality Commission's "Practical Guidance on Equality Impact Assessment" that requires the consideration of *alternative policies* and *mitigating measures* which would better promote equality. As a result, the DSD not only fails to comply with Section 75 procedural requirements but fails in its primary duty to have "due regard to the need to promote equality of opportunity".

When the DSD concludes "no adverse impact" on a series of issues between pages 31 and 51, without outlining possible alternatives and options, the EQIA appears to be primarily a vehicle to justify decisions already taken. For example it is relatively meaningless to state that everyone will benefit from "*the attraction of tourists into North Belfast*" and "*skills training*" as a result of the plan. There is no discussion of how existing barriers to employment and training be overcome.

It is thus essential that the DSD comply with their Section 75 obligations and develop the detailed alternative options as envisaged by the Practical Guidance.

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