

Appendix D – Consultation Responses

EQIA – GRANT AID FOR COMMUNITY ORGANISATIONS

CONSULTATION RESPONSES

Report Reference	Comments	BCC Response
<p>The Grant Aid Policy – pages 9-14</p>	<p><u>Equality Commission</u></p> <p>1. The policy being impact assessed is that approved in June 1999, although this has been reviewed and a revised policy approved in June 2003. Changes made to the policy as a result of the review are not included for assessment in this consultation document.</p> <p>2. The Commission notes that despite the stated aim of improving the quality of life of people in the more deprived areas of Belfast, no attention has been given in this EQIA documentation to identifying or defining these areas, or to considering actions taken or proposed under New TSN or PSI.</p> <p>3. There are references to other, unnamed, grant-making bodies but no information on whether, or how, the Council interfaces with them.</p>	<p>1. We appreciate that there is an issue concerning the timescale of this EQIA. However, we felt it was pertinent to continue with the EQIA despite the decisions made on the new policy. The new policy was screened and was the subject of preliminary consultation with community groups; in the light of responses it was determined that a further EQIA was not required.</p> <p>2. Noted .New TSN is an underlying principle of all actions taken under this policy.</p> <p>3. Noted.</p>

	<p>4. The EQIA Consultation document refers to grants being '<i>available from other sources</i>' but these sources are not identified and there does not seem to have been any attempt to obtain information from them, in relation to the take up of grants by groups in the Belfast area.</p>	<p>4. This information is not made available to the Council at this time but the DSD is in the process of establishing a database of grant recipients.</p>
<p>The Grant Aid Policy – pages 9-14</p>	<p>5. The amount of funds available or granted is not provided. The Consultation Document advises that Community Development Support Grants accounted for about half the funding the Council provided between 2000/01 and 2002/03 and went to a relatively small number of applications (p12), that Community Development Project Grants constitute only a small proportion of the total funding but a large number of organisations are supported (p12), that funding for Revenue Grants represented between a quarter and a half of the total money available (p12), and that there are a large number of applications for Playscheme grants each year (p13). It is very difficult to assess the implications of this information without greater detail of the level of funding or average grant size.</p>	<p>5. The information was not included in the EQIA report because of its size as we are keen to ensure that the report is accessible. The raw data is available in the Minutes of the Community and Leisure Sub-Committee which can be accessed through the Council's website.</p>
<p>Methodology of the EQIA – page 15</p>	<p><u>Equality Commission</u></p> <p>6. The EQIA states on page 15 that recommendations in the final EQIA report will "<i>include how the Council will monitor the effects of the policy in the future...</i>"</p>	<p>6. The Council is currently developing a comprehensive monitoring system and this matter will be addressed as part of the review of the EQIA</p>

	<p>However, there is no undertaking to annually publish the results of monitoring. There is a clear need to monitor applications refused, but this need has not been identified by the Council in the EQIA and there are no specific proposals to do so.</p>	<p>process.</p>
<p>Analysis of data – pages 16-21 and Tables 1-5</p>	<p><u>Equality Commission</u></p> <p>7. The Council found that there were no applications from groups in East Belfast for projects which focus on the needs of older people or women.</p> <p>8. Also there were more all female organisations applying for grants than all male groups.</p> <p>9. There were no applications for Revenue Grants from organisations in North Belfast.</p> <p>10. All applications for projects for people with disabilities were from West Belfast.</p> <p>11. Groups representing people of different sexual orientation, Travellers and carers are not considered</p>	<p>7-10. We recognise that some groups do not apply for grants but it is not our policy to seek applications from particular groups. We focus on ensuring that all groups are aware of the grants policy and are not deterred from making an application for whatever reason.</p> <p>9. There were in fact 28 groups in North Belfast who were funded over the period to which the data relates and this is stated in the EQIA report.</p> <p>10. As stated in the report, many projects are open to both people with disabilities and those without.</p> <p>11. Travellers groups are included in the figures for minority ethnic groups.</p>

	anywhere in this EQIA.	
	<p>12. The Policy itself is not provided with this EQIA. The EQIA states on page 21 that <i>“the Grant Aid Policy is published as a Guide for Community Organisations which is widely disseminated.”</i> This document does not appear to be available in the Council’s website, nor does an internet search locate it.</p> <p>13. The data analysis for the EQIA is included at pages 16 – 21. There are further tables of data on pages 25 – 29. It is not clear if other information has been used. References to comments by Engage with Age and to suggestions that applications are made to other grant-making bodies are not explained. Information relating to pre-consultation or discussion with affected groups, or obtained via the Inter-Agency Forum, is not referenced or included in the EQIA documentation.</p>	<p>12. The policy is summarised in the EQIA report and is widely distributed to community groups in Belfast. The guide to the policy is easily accessible on the Council’s website.</p> <p>13. Noted. The Council endeavours to make EQIA reports as accessible and easy to read as possible and so detailed information is always included.</p>
Analysis of data – pages 16-21 and Tables 1-5	<p>14. Under paragraph (c) of the Data Analysis section of the EQIA, the Council states <i>‘Engage with Age have told us that many organisations catering for the needs of elderly people prefer to seek funding from the South & East Belfast HSS Trust...’</i> There is no evidence that the Council has contacted the Trust to obtain information to support this suggestion.</p>	<p>14. Noted.</p>

	<p>15. The Census data for religious belief in Table 4 is not the same as the percentages given on p17.</p> <p>16. The Council 'collected and analysed information about grants made by the Council to community organisations over the 3 years from 2000/01 to 2002/03 under the policy approved in June 1999.' This consists of the proportions of perceived Protestant and Catholic organisations receiving grants in the North, South, East and West of Belfast city for three of the types of grant (no numbers are provided in the body of the EQIA documentation so this information is of limited value), plus percentages of Protestants and Catholics in 'the overall population of the city'. The source of the latter is not specified.</p> <p>17. Table 5 gives numbers of 'Protestant' and 'Catholic' Council-run community centres and playschemes in each geographical quarter of Belfast. The information included in this table is not used in the body of the EQIA.</p>	<p>15. Noted. This has been amended in the final report.</p> <p>16. Noted. The source was the 2001 Census and this has been ammended.</p> <p>17. The tables are intended to be an integral part of the report and are presented at the end of the document to make it easier to read.</p>
<p>Analysis of data – pages 16-21 and Tables 1-5</p>	<p>18. Census data for religious belief in each of the four geographical areas of Belfast has not been considered. The definition of these areas, as used in</p>	<p>18. Noted.</p>

	<p>this document, is not explained.</p> <p>19. No data has been provided in relation the Section 75 categories or particularly marginalised sub-categories of sexual orientation, political opinion, marital status, Irish Travellers or people with dependents (e.g. carers).</p> <p>20. An analysis of applications against awards, by s75 category, type of grant and geographical area would have been useful.</p> <p>21. There is no evidence of contact with representative or umbrella groups to obtain qualitative or evaluative information in relation to how the policy affects the LGB community, Irish Travellers, BMEs, those addressing mental health issues etc.</p> <p>22. The EQIA Consultation Document does not identify any gaps in information, though there clearly are gaps... The document states “It was not possible to categorise the organisations whose applications were refused under the groups set out in Section 75...” yet there are no proposals in the document to collect this information either retrospectively or in the future.</p>	<p>19. Noted. Apart from Travellers (who are included in the figures for minority ethnic groups) these categories are not currently monitored under this policy. This will be addressed under the new monitoring system currently being developed by the Council.</p> <p>20. Noted.</p> <p>21. During the screening of policies the Council consulted widely with representative groups and there was also consultation with community groups during the revision of the policy. The Council is endeavouring to improve its approach to the collection of both quantitative and qualitative data in relation to all Section 75 groups.</p> <p>22. See 21</p>
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<p>Analysis of data – pages 16-21 and Tables 1-5</p>	<p>23. There is no indication that the collection of new data is proposed, although the EQIA states on page 15 that recommendations in the final EQIA report will <i>“include how the Council will monitor the effects of the policy in the future...”</i> It is our understanding from our discussions with the Council that a Section 75 monitoring project is planned – this could have been mentioned in the EQIA as a means of obtaining new data.</p> <p>24. There is no reference to such sensitivities (ie awareness that particular issues of sensitivity and confidentiality may arise in relation to disability and sexual orientation), and sexual orientation issues are not considered at all.</p> <p>25. The analysis in the main body of the document is mainly presented as proportions, with no numbers given. This information is included in the tables at the end of the document but these are not clearly referenced - the document states “the results of the analysis are shown in the following tables” but the tables do not follow. It would have been helpful if they were included in an “Appendix” and the reader directed to it.</p>	<p>23. See 21</p> <p>24. Noted.</p> <p>25. See 17</p>

<p>Analysis of data – pages 16-21 and Tables 1-5</p>	<p>26. No information is provided about the size of the Grants Fund, the level of individual grants, or the amount of money allocated by area. While this may be a product of the service rather than part of the policy, it is difficult to consider the equality impacts of grant distribution and therefore the impact of the policy in the absence of this information.</p> <p>27. We would expect the Council to encourage the provision of accessible premises by voluntary organisations, and would be of the view that applications for grants for this purpose should be considered.</p> <p><u>NICVA</u></p> <p>28. The Council’s obligations under Section 75 should lead it to expect all organisations in receipt of council grants to operate an equal opportunities policy and to comply with the DDA. At a time when many voluntary and community organisations are finding it difficult to fund the necessary adjustments, it might be helpful for the Council to consider assistance in this area.</p> <p>29. The EQIA states that the Council chairs an Inter-Agency Funders’ Forum, but later states that ‘we do</p>	<p>26. Noted.</p> <p>27. The Council is currently seeking legal advice on this issue.</p> <p>28. See 27</p> <p>29. The IAFF currently provides information in general terms on what funding is available but no details of</p>

	<p>not have access to information about grants received from other sources and have no influence on how they are awarded.’ NICVA would be grateful for clarification about this apparent discrepancy.</p>	<p>grants given.</p>
<p>Assessment of impacts – page 22</p>	<p><u>Equality Commission</u> 30. Given that there is no reference to or analysis of applications by or awards to groups representing Travellers, sexual orientation sector groups or carers, it could be assumed that there were no such applications or awards from these groups, and that they are therefore not accessing the grants. This would indicate a differential, and adverse, impact.</p> <p>31. There is insufficient data from which to draw meaningful conclusions; the data that has been considered has not been fully analysed.</p> <p><u>NICVA</u> 32. It is difficult to understand the reason for trying to assess impacts on unsuccessful projects after providing the data about organisations which were allocated funds.</p>	<p>30. We do not accept that a lack of information leads to a conclusion that there is a differential impact. The Council is currently developing an approach to monitoring to improve the collection of information.</p> <p>31. Please refer to Tabel 4 (Pg. 30) Community Services Grants – by ward showing areas of greatest need.</p> <p>32. We used information regarding unsuccessful applications to determine whether any group was being refused for a reason connected with a Section 75 category.</p>

<p>Consideration of alternative policies and mitigating actions – pages 23-24</p>	<p><u>Equality Commission</u></p> <p>33. What are the consequences for the group concerned and for the public authority of not adopting an option more favourable to equality of opportunity? Continued marginalisation and/or adverse impact on groups such as Travellers, carers, groups in East Belfast.</p> <p>34. Some mitigating measures in relation to communication and advertising of the policy appear to already have been made.</p>	<p>33. See 30</p> <p>34. Noted. The mitigating actions would more accurately be referred to as service improvements.</p>
<p>Consideration of alternative policies and mitigating actions – pages 23-24</p>	<p><u>NICVA</u></p> <p>35. It is difficult to understand the reason for outlining mitigating actions when the EQIA states that ‘we have not identified any specific adverse differential impacts for particular Section 75 groups.’</p>	<p>35. See 34</p>
<p>Consultation – page 24</p>	<p><u>Equality Commission</u></p> <p>36. It is not clear if information has been obtained through discussions or pre-consultations, but no details of such information has been made available to those being consulted.</p>	<p>36. Noted.</p>

	<p>37. Only one public meeting is publicised in the covering letter to the EQIA Consultation Document. Three EQIAs were to be discussed at this meeting, at least one of which – the Strategic Review of Indoor Leisure Facilities – is of great public interest. It is not unlikely that discussion of this policy would dominate a meeting.</p> <p>38. There is no reference to pre-consultations. There is reference to comments by Engage with Age and statements regarding the possibility of some groups applying to other funders or to their stage of development, but the EQIA Consultation Document does not indicate the source of these.</p> <p>39. The Commission would prefer a firmer commitment (to offering the text in languages other than English and in disability-friendly formats).</p>	<p>37. The public meeting was arranged to consider three EQIA in order to make it easier for those groups with an interest in all three policies. The Council was prepared to discuss any issue raised in respect of any of the policies.</p> <p>38. Noted.</p> <p>39. We would appreciate clarification of the type of statement that the Commission would prefer.</p>
<p>Consultation – page 24</p>	<p>40. Some such media are used to advertise grants, but it is not stated that these were used to advertise the EQIA Consultation.</p> <p>41. There is no reference in the Consultation Document to information or comments received through the screening exercise</p>	<p>40. The Council followed the process set out in its Equality Scheme.</p> <p>41. Noted.</p>

