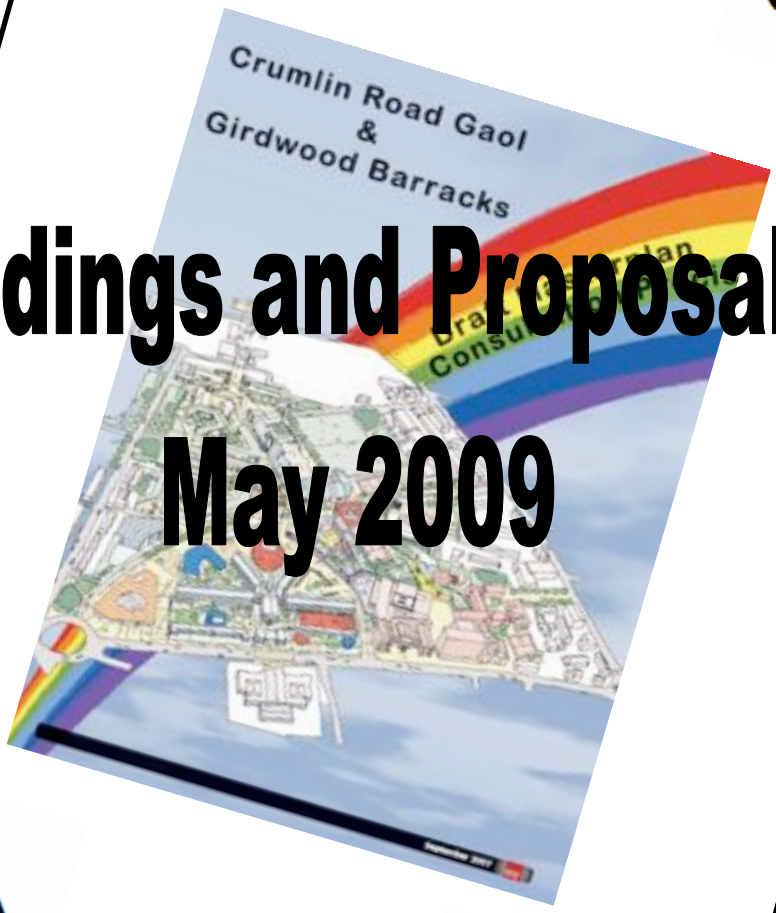
The Girdwood Gamble



Findings and Proposals

May 2009

Girdwood Residents' Jury

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Glossary of Terms

DSD	Department for Social Development
EQIA	Equality Impact Assessment
NBCAU	North Belfast Community Action Unit
NISRA	Northern Ireland Statistics and Research Agency
PPR	Participation and the Practice of Rights Project

gam·ble
v. **gam·bled**, **gam·bling**, **gam·bles**
v.intr.
1.
a. To bet on an uncertain outcome, as of a contest.
b. To play a game of chance for stakes.
2. To take a risk in the hope of gaining an advantage or a benefit.
3. To engage in reckless or hazardous behaviour



The Stakes

The regeneration of Girdwood Barracks and Crumlin Road Gaol is a £231 million investment into the most deprived areas in Northern Ireland. This investment is the one off opportunity to begin changing the patterns of inequality and deprivation which have produced unacceptable realities for these communities.

Since the 1994 ceasefire, north Belfast rates of workless households have not reduced. Housing waiting lists and inequality have increased. Educational attainment in the most deprived wards has shown no sign of turning. Suicide rates have skyrocketed in the north Belfast parliamentary constituency, rising from being ranked 319th to the 11th highest in the UK. Our society has produced a 'lost generation' of young people aged between the ages of 16-25 who have seen no tangible improvement in their social and economic opportunities.

The Girdwood Gamble

Nobody has the right to gamble this one-off opportunity "on an uncertain outcome". To do so, without question, would be to engage in "reckless or hazardous behaviour".

Yet the Draft Masterplan for Girdwood Barracks and Crumlin Raod Gaol, and the Draft Equality Impact Assessment, are 'gambles'. They are gambles because the supposed benefits to the community are vague, ambiguous, undefined and uncertain. Available detailed statistics and evidence of best practice were not used. These could and should have been used to put solid building blocks in place which would have enabled proposals to be developed, measured, and monitored to ensure effective change in the current conditions of local communities.

Yesterday's Losses

In January 2008, a report by Regional Forecasts (a division of Oxford Economic Ltd) described Belfast's economy as follows:

"The Belfast economy is growing, investment in the city centre continues, house prices rise and increased traffic flow reflects the city's increasing desirability as a place to both live and work. However, many parts of Belfast remain 'untouched' by recent growth…"

Yet the objective of this public expenditure was precisely to 'touch' and 'change' the realities in the most disadvantaged communities to produce a more healthy and sustainable society. Our rights were breached, our futures and public monies were 'gambled' in a 'game' where evidence and analysis of past mistakes were either

ignored or simply weren't considered. Banks and developers did very well. We didn't. As a result, the gap between the prosperous and the poor has widened.

Communities, such as the Markets, Lower Ormeau and Donegall Pass in south Belfast, were losers in processes which, according to law and policy, were supposed to promise them a better and different future.

Evidence given to the Residents' Jury from Ken Humphries of the Church and Community Work Alliance, who worked for the Mornington Project (Lower Ormeau) on the Gasworks regeneration, showed how the employment 'benefits' for the community only delivered more of the same. He cited:

- *18 local people were trained and interviewed for the jobs in Halifax but only one got a job.*
- *There are currently 4500 people employed in the Gasworks out of which 12 come from the local community; 3 call centre workers, 7 cleaners, 1 tea lady and a shop assistant.*
- *None of the business incubation units employ people from the community.*

Yet government sponsored evaluations are calling this a "success". The official post project evaluation for the site (2007) states: *"This [the Gasworks] was a very successful development for Laganside and the Belfast City Council…All key performance indicators have been achieved and exceed (sic) beyond all expectations - even though they were revised upwards following the 1998 review."*

So we are entitled to ask – Who set the indicators? Why did they not include targets to change disadvantage, eg long-term unemployment and economic inactivity?

We have been told by the Minister for Social Development that regeneration projects, such as Girdwood, will learn the lessons of the past through applying learning from such evaluations.

Yet a Freedom of Information request told us that the Gasworks regeneration was the only regeneration project which helped inform the development of the Girdwood regeneration plan.

Michael McGimpsey, MLA for south Belfast, said of the Gasworks regeneration:

"…there are strong lessons to be learned, particularly by City Hall but also by Government Departments and agencies, that local communities effectively, in my view, were let down by a process that was supposed to be very much a partnership with the local community and ended up ignoring the local community."

If the Department uses the same key performance indicators and methodology on Girdwood, there will be the same outcomes. "Success" will again be defined as failing us.

"Insanity: doing the same thing over and over again and expecting different results." **Albert Einstein**

Gambling Outlawed

In Northern Ireland there are laws and policies which outlaw these 'gambles' by public bodies:

- Section 75 of the NI Act (1998)
- the tackling of objective need re-affirmed in the St. Andrew's Agreement
- Equality Commission and the Central Procurement Directorate's 'Equality of Opportunity and Sustainable Development in Public Sector Procurement' (2008)
- Northern Ireland Practical Guide to the Green Book (2003)
- NI Executive's Budget and Programme for Government 2008-2011

The responsibility is on the Minister for Social Development to show how these are being effectively used. All of these outline how the government should spend the public's money to create sustainable social and economic development.

Legislative and policy tools have not been applied, or have been mis-applied in a tick-box fashion, and there is no evidence of learning from other regeneration projects which failed disadvantaged communities.

The Girdwood Draft Masterplan was based on a bouyant housing market to finance the plans. The housing market has collapsed. The developer driven model of regeneration has crumbled before our eyes in the UK and Ireland. The hard evidence is that public monies delivered massive returns for the developers and little or no returns for disadvantaged communities.

The economic recession gives us breathing space to ensure that any proposals brought forward promote effective economic and social sustainability through the promotion of equality and addressing of need. We need to ensure that the mistakes that have already been made are corrected for the future so as to guarantee the most effective and efficient expenditure of public resources.

Planning Not Gambling

In the following report you will see that:

- Residents have sought out and documented best practice examples of national and international regeneration initiatives in order to apply the lessons to north Belfast. They have brought in expertise from Maryland and New York (USA), Dublin, and Belfast to inform their proposals;

- Residents have taken national laws and policy tools and attempted to apply them to the Girdwood regeneration process in a constructive, modest and patient fashion;

- Residents have creatively engaged in the equality impact assessment process for Girdwood;

- Residents have developed human rights indicators and benchmarks, in line with international human rights standards and government obligations, in order to steadily and systematically ensure the effectiveness of the regeneration process.

You will find the results of the Residents' Jury's monitoring the performance of the Department for Social Development and North Belfast Community Action Unit in meeting human rights through the Girdwood regeneration to date in this report. It reveals how little the approach of government has changed, even in the face of this economic crisis.

No More Gambles

In the first section of this report, we list a series of concrete steps that should be explored immediately to ensure value for money, the promotion of equality and tackling objective need through the Girdwood regeneration.

These steps would generate training opportunities and a skills base within our community.

These steps would generate employment.

These steps would generate ownership of the regeneration among the surrounding communities.

These steps would deliver on the promise of the peace dividend that has, to date, passed the communities surrounding Girdwood by.

Nothing About Us, Without Us, Is For Us

We are entitled to receive commitments from government that the gambling which damaged our past is no longer allowed to damage our future.

We are entitled to be part of making and measuring change.

We are entitled to a respectful and serious engagement by the Department with our rigorous and detailed work to do that.

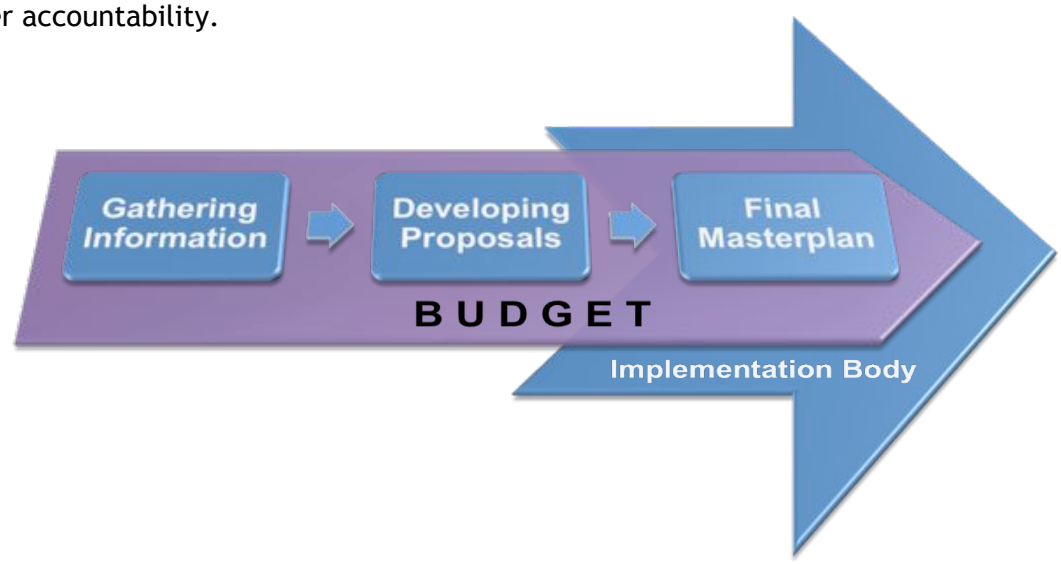
We are entitled to be shown how that engagement will influence and shape this ‘one-off’ opportunity to build a future different from our past.

That was the promise of peace. That was the promise of how we could begin to shape our future and rebuild our communities. We are trying to do our bit. It is long past time that government did theirs.

BACKGROUND

On the 28th May 2008 a Residents' Jury was convened in North Belfast to consider the regeneration of Girdwood Barracks and Crumlin Road Gaol. The Jury is composed of residents from the five wards surrounding the 27 acre site (Ardoyne, Crumlin, New Lodge, Shankill, Waterworks). They heard evidence and put questions to a wide range of local and international experts on equality, human rights and urban regeneration.

The Residents' Jury used the information from the Jury event to set human rights indicators to measure whether the regeneration fulfilled government's obligations under human rights law to improve their right and that of their communities to work, education, adequate housing and the highest attainable standard of health. The Girdwood regeneration is at a very early stage and is expected to take 10-15 years to complete, although this is very much dependent on financial circumstances. The Jury, therefore, wanted to focus on the regeneration **process**, *ie* how to ensure that the process itself ensures residents' participation, promotes equality, and that there is proper accountability.



The Jury launched their findings on the 30th October 2008 and have committed to monitoring the following parts of the early regeneration has been conducted by the NBCAU on behalf of the DSD. This has taken place through the Equality Impact Assessment process – which is a process public bodies go through to ensure that their actions promote equality.

The results of this monitoring are in the following pages.

PROPOSALS ON THE WAY FORWARD

1. Regeneration: Developing skills within the community

Substantial numbers of local people from the five wards surrounding Girdwood (New Lodge, Waterworks, Crumlin, Shankill, Ardoyne), and reflective of Section 75 groups (different age, gender, ability, religion, political opinion, sexual orientation, dependent status, marital status, race) should be trained to play an active role as data collectors and data analysts in the initial stages of the regeneration process in order to produce a baseline analysis of the nature and effect of inequality in the communities. This analysis would be used to assist in developing targeted proposals and, against which, to measure the success of proposals.

This would involve:

- allocating a budget for an accredited skills development programme including confidence building, research methodology and techniques, and analytical skills
- exploring possibilities with other government departments (for example the Department for Employment and Learning) of turning this process into a 'path to employment' programme for residents currently out of work

Examples of where a similar approach has worked elsewhere:

- Oakland Community Interviews (California, USA)
- SECO Pharmacy Suitability (Maryland, USA)

2. Regeneration: Developing effective and targeted proposals

Proposals must be targeted at the inequalities and needs in our community. No-one is better placed to explore these than residents themselves who have experience of previous governmental interventions which have both succeeded and failed. This would have to be carried out following the baseline analysis being conducted as above.

This would involve:

- allocating a budget for residents to be able to access training and technical assistance in urban planning with a view to producing effective proposals which have the capacity to promote equality and address need
- exploring possibilities with other government departments (for example the Department for Employment and Learning) of turning this process into a 'path to employment' programme for residents currently out of work

Examples of where a similar approach has worked elsewhere:

- Greenpoint Initiated Community Plan (NY, USA)
- South Bronx, Melrose (NY, USA)

3. Regeneration: Tackling long-term unemployment

In advance of the construction work, and in tandem with above processes, part of data collection would be taking an audit of the skills base within the surrounding communities and identifying obstacles to employment. Major training initiatives to enhance the skills base of those groups disproportionately affected by unemployment and economic inactivity in advance of any jobs on site would be required. This would also require targeted outreach. It would enable local people to be better placed to avail of procurement equality targets in advance of construction. Additionally once private sector investment has been secured, training should be carried out well in advance for the same reason as above.

This would involve:

- Gathering accurate information on employment statistics and carrying out a comprehensive skills audit in the surrounding communities as part of the data collection phase
- An outreach strategy to engage workless residents on barriers to employment and what elements need to be implemented to ensure training benefits the long-term unemployed
- Cross-departmental intervention with community based training and employment organisations to devise programmes which would develop the skills base of long term unemployed residents
- Effective and substantive measures to promote equality built into the procurement process

Examples of where a similar approach has worked elsewhere:

- Pilot Project on Utilising the Unemployed in Public Contracts (Sept 2005, Northern Ireland)
- West Belfast Greater Shankill Health Partnership

4. Regeneration: Ensuring Success

Local residents should be provided with the skills and knowledge to engage in monitoring the implementation and assisting in carrying out the evaluation of the Girdwood regeneration. As with the data collection/analysis and development of proposals, this would involve local people actively acting as 'evaluators' of the regeneration projects. Again, this is something which is often siphoned off at significant costs to private sector consultants. However if effective training was available, these skills would be created, and would reside, in the community.

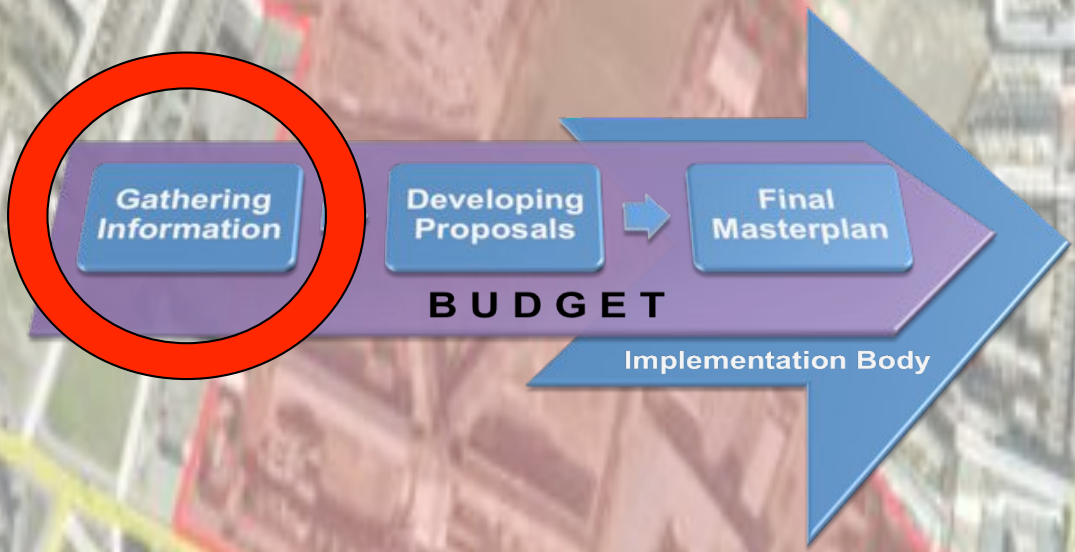
This would involve:

- allocating a budget for residents to be able to access training and technical assistance in participatory monitoring and evaluation
- exploring possibilities with other government departments (for example the Department for Employment and Learning) of turning this process into a 'path to employment' programme for residents currently out of work

Examples of where a similar approach has worked elsewhere:

- National Neighborhood Indicators Project (Maryland, USA)
- Seven Towers Monitoring Group (Belfast)
- NeighborWorks/DLN Success Measures Project (USA)

Girdwood Residents' Jury



Monitoring Results

Naming the groups experiencing inequality in north Belfast…

Has the indicator been met?

☐ Yes ☒ No

The following table shows what groups were identified in the EQIA as experiencing inequality and therefore in need of concrete proposals to address their problems:

ISSUE	GROUPS IN EQIA
employment	none
education	none
health	none
housing	catholic/nationalist

The Jury found that alot of the information collected through public sector bodies and community groups in north Belfast was not used for the EQIA.



The failure to identify groups in need of positive action across all issues except housing means that proposals for Girdwood cannot be targeted to specifically address their long standing issues.

What must be done:

It is important to realise that this indicator is essential if proposals for the regeneration are to successfully target vulnerable groups in our areas in order to promote equality. The DSD must identify who these groups are in north Belfast in the final EQIA.

A1
Have the most vulnerable groups in north Belfast been named in the EQIA through the gathering of statistical information on inequality and deprivation?

See Appendix Two for list of evidence considered when reaching this conclusion

Gathering people's experience of inequality in north Belfast…

Has the indicator been met?

☐ Yes ☒ No

Interviews should have been carried out and focus groups with residents held to reveal the affects of disadvantage and inequality on residents' lives and what the barriers are to overcoming these. This would then help to develop proposals to address the problems.

It is difficult to meet this indicator if residents experiencing inequality haven't even been identified by the DSD (A1).

The DSD did carry out focus groups with the community, however they were not about developing targeted proposals, but were used to comment on existing ones – ones that had been develop without considering equality.

An indication of the outcomes of such a methodology is that despite widespread focus groups, no concrete or definite changes to the Masterplan are to be brought forward following the Draft EQIA other than possibly changing the design of the Arc Road. The DSD has not met this indicator.

What must be done:

Some of the focus groups carried out by the community groups and DSD have information relevant to this indicator. However only after groups have been identified (A1) can their experiences be collected properly. If carried out, it will give good insight into the effects of deprivation – but more importantly will show why government's past attempts to tackle these problems have failed and what is required to tackle the problems.

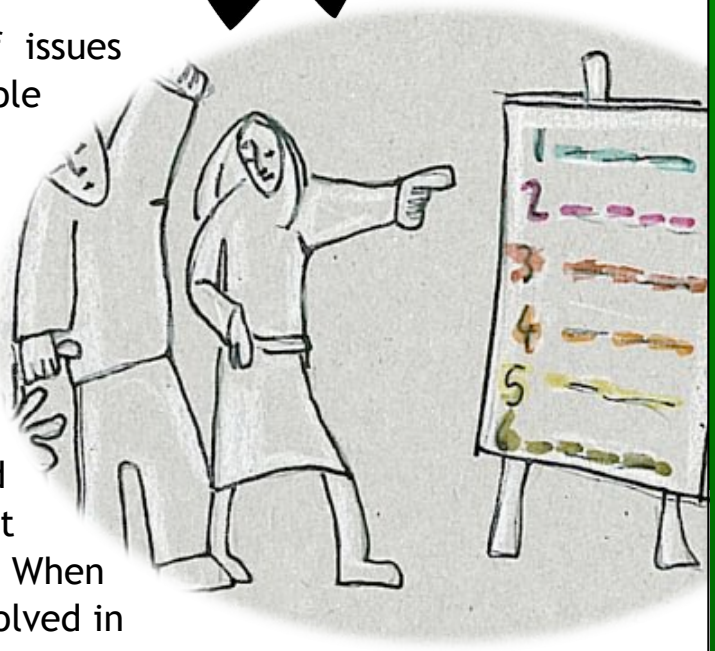
A2
Have the experiences of vulnerable groups living with deprivation and inequality been collected?

See Appendix Three for list of evidence considered when reaching this conclusion

Prioritising issues important to people in north Belfast…

Has the indicator been met?

☐ Yes ☒ No



There should be a list of issues and priorities which people experiencing inequality and deprivation say need to be addressed.

Again, however, it is extremely difficult to meet this indictor if those groups haven't been identified and their experiences haven't been gathered (A1 and A2). When vulnerable groups were involved in the process to date, they did not have the opportunity to meaningfully contribute to the development of proposals. Rather some were asked how proposals in the Draft Masterplan may or may not affect them. Proposals, issues, and priorities had already been developed elsewhere. This indicator was not met by the DSD.

What must be done:

Community organised EQIA focus groups involved vulnerable groups identifying and proposing issues. These, however, were not meaningfully included in the Draft EQIA. However this information is still of significant use. Once vulnerable groups have been identified (A1), there will be opportunities for vulnerable groups to name and prioritise issues. This should be done alongside indicator A2.

A3
Were identified vulnerable groups involved in naming and prioritising the issues which are most important to them?

See Appendix Four for list of evidence considered when reaching this conclusion

Making sure information is easy to understand…

Has the indicator been met?

☐ Yes ☒ No

Local residents should be able to understand the EQIA so that they can respond to it effectively.



The Jury found most of the information presented was full of technical language and very difficult to understand. This can be particularly challenging for people without experience with this sort of specialised language. More than that, the overall format, which does not link inequality with proposals, made the EQIA unclear.

Every practical attempt should be made to ensure local residents can meaningfully engage in the EQIA process. Making official documents clear is only a first step in this process.

What must be done:

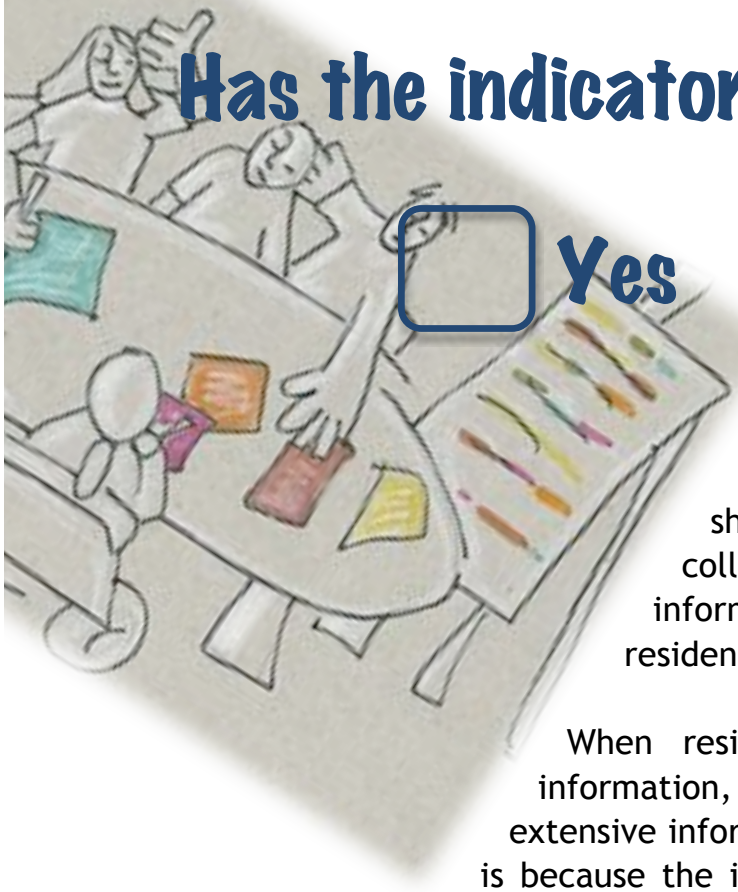
This indicator is not simply about 'style'. If an EQIA clearly shows who experiences inequalities and how proposals are targeted, it goes a long way towards making it understandable. This, however, has not been done.

That being said, the Jury found that the information itself could have been presented in a more interesting and user-friendly format without compromising detail. While the quality and rigour of the document should not be compromised, the production of a summary document using clear language would make it more accessible.

A4
Is the information on inequality and deprivation clear, accessible, and easily understood in the EQIA documents and in the consultation process?

See Appendix Five for list of evidence considered when reaching this conclusion

Involving residents in gathering and analysing the information…



Has the indicator been met?

☐ Yes ☒ No

Residents experiencing deprivation and inequalities should have been involved in collecting and analysing information from their fellow residents during the EQIA process.

When residents collect and analyse information, it allows more accurate and extensive information to be gathered. This is because the information can be gathered from residents' neighbours and friends – people who are often defined as 'hard to reach'. This is invaluable access which government department's don't have. Additionally, by involving residents experiencing inequalities and deprivation in gathering information, a greater ownership of the regeneration scheme is created among the community.

Residents were involved in EQIA focus groups to provide information, but they were never given the opportunity to collect or analyse that information for themselves. The DSD did not meet this indicator.

What must be done:

As part of the Final EQIA, local residents must be recruited to collect information from other residents on how inequality affects their lives, and ways in which barriers can be removed through proposals for the Girdwood regeneration.

A5
Were residents from identified vulnerable groups involved in collecting and analysing the information during the EQIA process?

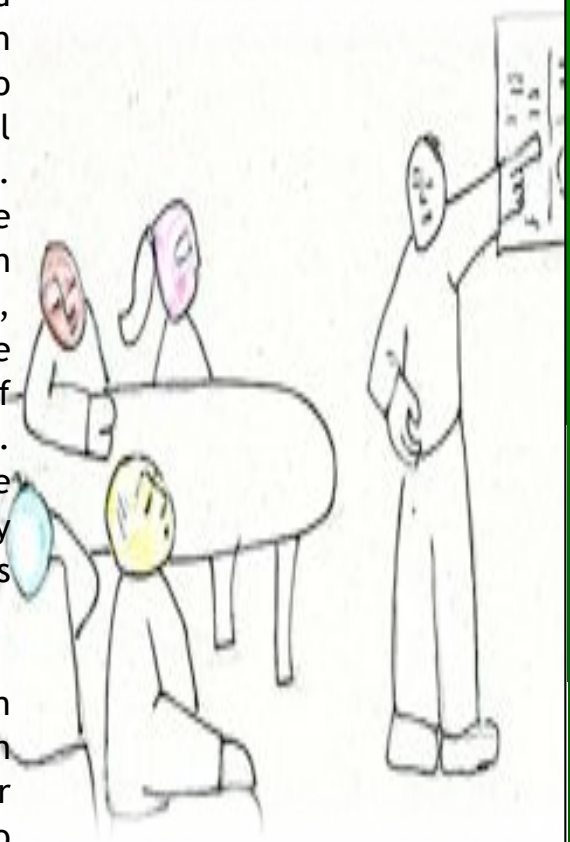
See Appendix Six for list of evidence considered when reaching this conclusion

Providing training and assistance to local residents…

Has the indicator been met?

☐ Yes ☒ No

Residents experiencing inequalities and deprivation should be provided with independent training and assistance so that they can play a more meaningful role in decisions about regeneration. For the EQIA, this should relate to the collecting and analysing of information that is useful for the EQIA. In this way, more residents would become active participants in the process, instead of being treated merely as observers. They would be able to engage meaningfully in a process which – by law – should benefit the communities most in need.



Because residents were not involved in gathering and analysing information (A5), the DSD cannot meet an indicator which requires those same residents to be trained.

What must be done:

Once vulnerable groups have been identified and recruited (A5), these individuals would then need to receive training and assistance to equip them with the skills required to gather the experiences of local people living with inequality and deprivation.

A6
Was there training and assistance resourced and made accessible by government to enable vulnerable groups to provide, collect and analyse information during the EQIA process?

See Appendix Seven for list of evidence considered when reaching this conclusion

Making proposals based on local needs and inequalities…

Has the indicator been met?

☐ Yes ☒ No

There should be evidence of how local deprivation and inequality is being tackled through the proposals for Girdwood. It is not enough to say 'a rising tide lifts all boats' or that certain proposals won't affect different groups badly. All proposals should be targeted at specific inequalities and problems. They must be capable of being monitored for effectiveness. This will make sure our tax monies are spent efficiently and effectively.

As has already been mentioned, the draft EQIA does not include anywhere near enough evidence regarding local deprivation and inequalities to produce a proper understanding of the needs of our communities. How can inequalities be tackled if the same inequalities have not even been identified? The DSD did not meet this indicator.

What must be done:

It is critical that this indicator be met if public resources are to be spent in an effective and efficient way. All proposals for Girdwood must be targeted at tackling some inequality in the community. This requires developing alternative proposals as required by the EQIA process. The following method should be used to develop these proposals:

Specific Inequality (around health, employment, etc.)

⬇

Specific proposal to tackle inequality

⬇

Targets developed to test whether proposal is effective

A7
Is the evidence regarding local deprivation and inequality being used by government to form proposals?

See Appendix Eight for list of evidence considered when reaching this conclusion

APPENDIX ONE

HOW DID THE JURY ARRIVE AT THESE FINDINGS?

The Residents' Jury deliberated on the following evidence when developing their findings:

1. **The Draft Masterplan for Girdwood Barracks and Crumlin Road Gaol**
2. **The Draft Equality Impact Assessment for Girdwood Barracks and Crumlin Road Gaol**
3. **Evidence Collecting Session with two officials from the North Belfast Community Action Unit (13th January 2009)**
4. **Freedom of Information request to the DSD to reveal full details of all focus groups and meetings which took place in the community regarding the Draft EQIA (January 2009)**
5. **Contact with Northern Ireland Statistics and Research Agency**
6. **Contact with Shankill Job Assist Centre and the Ashton Employment Club**
7. **Analysing the Dunlop Report and work of the Girdwood Advisory Panel**
8. **Analysing Draft EQIA submissions from the Committee on the Administration of Justice, Participation and the Practice of Rights Project, Lower Shankill Community Association, Cliftonville Antrim Road CEP, Cliftonville Community Regeneration Forum, Brucevale Residents, North Belfast Interface Network, Community Relations Council, North Belfast Partnership Board**
9. **Equality Commission's 'Practical Guidance on Equality Impact Assessment' (2005)**
10. **Evidence Provided at the Girdwood Residents Jury (28th May 2008)**
11. **PPR Report 'Unlocking the Potential: Human Rights, Equality and the Draft Masterplan for Girdwood Barracks and Crumlin Road Gaol' (January 2008)**
12. **PPR Report 'Changing the Patterns of the Past: Putting People First in the Regeneration of North Belfast' (August 2008)**

In the following pages we outline the evidence which the Girdwood Residents' Jury considered for each indicator.

APPENDIX TWO

A1. Have the most vulnerable groups in north Belfast been named in the EQIA through the gathering of statistical information on inequality and deprivation?

1. Analysing the Draft Equality Impact Assessment for Girdwood Barracks and Crumlin Road Gaol
According to legislation, information should have been collected regarding inequalities between the following groups in our community: Persons of different -

- Age
- Gender
- Religious Belief
- Dependent Status
- Marital Status
- Political Opinion
- Sexuality
- Race
- With / without disability

The Residents' Jury found that very little information was collected by the North Belfast Community Action Unit during the Draft Equality Impact Assessment to identify inequalities between the named groups under law. In the following table you will see what information was and was not collected which should have assisted in identifying groups experiencing inequality:

	EMPLOYMENT	HEALTH	EDUCATION	HOUSING
Age	NO INFORMATION	NO INFORMATION	NO INFORMATION	P38-40
Gender	p.16 , 17, 25	p.25	NO INFORMATION	NO INFORMATION
Religious Belief	NO INFORMATION	NO INFORMATION	NO INFORMATION	p.38-40
Dependent Status	NO INFORMATION	NO INFORMATION	NO INFORMATION	p.38-40
Marital Status	NO INFORMATION	NO INFORMATION	NO INFORMATION	p.38-40
Political Opinion	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
Sexuality	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
With / without disability	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION
Race	NO INFORMATION	NO INFORMATION	NO INFORMATION	NO INFORMATION

The only group identified as experiencing inequality were catholics and nationalists in terms of being disproportionately affected by housing stress.

2. Evidence Collecting session with two officials from the North Belfast Community Action Unit
During an Evidence Collecting session with the NBCAU (13th January 2009), evidence provided by officials from the North Belfast Community Action Unit pointed to mitigating circumstances and explanations as to why statistical data on inequality was not presented:

a. Statistics were not readily accessible. The NBCAU relied on NISRA and staff within the DSD for information on inequality and deprivation. According to the NCBAU, there were 'gaps in the statistical data', and in order to address these gaps the NBCAU: i) wrote out to over 500 groups, and ii) held focus groups with communities.

b. The collection of data on inequality has been a long process including: the Dunlop Report, the MacKenzie Report, and included the work of the Advisory Panel

c. It was not the appropriate stage of the regeneration process to identify groups to target through employment proposals:

"The Draft Masterplan actually makes it clear that there's a need to provide training and employment opportunities for local people. Now the detail of that, of trying to address those at most at need, is then when we start to implement the Masterplan. So that's a very relevant point [nb. this answer was provided in response to question by the Residents' Jury asking how the statistics in the Draft EQIA relate to the proposals in the Masterplan] but its probably further down the line." (emphasis added)

3. **Equality Commission's 'Practical Guidance on Equality Impact Assessment'**

Schedule 9, para 4 (3) of the Northern Ireland Act (1998) states that equality schemes must conform with the Equality Commission's Guide to the Statutory Duties, which outlines the mandatory aspects of the legislation for public bodies.

Annex 1, para 2.1 is quite clear in terms of what public bodies should do when there is insufficient data available on inequalities:

- *"Identify gaps in available information for equality categories and where more detailed data are needed take steps in order to have the optimum information on which to consult and base subsequent decisions;*

- *If necessary, commission new data (qualitative or quantitative). As outlined above co-operation within and between sectors should be considered…"*

Despite openly stating that there were "gaps in statistical data", it does not appear that the Department for Social Development did not take any steps to commission new data. It is the Jury's opinion that this would be essential in order to have "optimum information" on which to decide how £231 million would be spent by a public authority.

4. Northern Ireland Statistics and Research Agency (NISRA)

Through contact with the NISRA (19th January 2009), the Residents Jury were able to identify some statistics readily available in relation to Section 75 groups that were not included in the Draft EQIA:

- New Deal 25+ (2007) – Age (North Belfast Assembly Area)
- Higher Education Enrolments (2006/07) – Age and Gender (Across North Belfast Wards)
- Disability Living Allowance Recipients (2007) – Age and Gender (Across North Belfast Wards)
- Income Support Claimants (2007) – Age, Gender, Disability Status, with/without Dependents, martial status (Across North Belfast Wards)

Therefore, even without having to commission further research, or instruct statutory agencies or government departments to present data in certain fashions, there were statistics on inequality and employment, health, and education readily available through the internet. Despite this availability, these were not used in the Draft EQIA by the Department for Social Development.

5. Shankill Job Assist Centre and the Ashton Employment Club

The Residents Jury were aware that local community organisations, specifically those providing services, collected information on residents in relation to employment and health. In order to see what type of information was available from these sources and which could be of use to an EQIA, the Jury contacted the

Shankill Job Assist Centre and the Ashton Employment Club. The Jury found that these organisations collected information on the profile of service users' (such as age, gender, etc) which is submitted to the Department for Employment and Learning and could be gathered to assist in identifying inequalities between the named groups under the legislation.

Furthermore the Jury is aware that an abundance of information is collected when people fill in Jobs Seekers Allowance claims, housing benefit, etc. This information, specifically about north Belfast, should be extracted in order to name vulnerable groups in our community. While some of this data may not be available at Super Output Area level due to data protection, it should be available at Ward level. If we as a Jury can access this information through Freedom of Information requests, then this information should be sought and collected by the DSD as an essential part of this £231 million project.

6. The Dunlop Report and work of the Girdwood Advisory Panel

The NBCAU during our Jury session (13th January 2009) stated that the Dunlop Report and work of the Advisory Panel had assisted in gathering information to identify vulnerable groups. Having analysed these documents, the Residents' Jury is only able to locate Socio-Economic Profiles of the North Belfast Constituency. While Socio-Economic Profiles are a useful part of an EQIA, they do not dig deep enough to indentify inequalities between groups, and this is precisely the purpose of an EQIA. Instead they tend to take a 'catch all' approach, and do not properly analyse which specific groups are experiencing inequality in our community. It is our understanding the EQIAs were brought into law precisely because this approach has not allowed groups in need of equality to be targeted.

7. Evidence Provided at the Girdwood Residents Jury (28th May 2008)

The Jury found it extremely alarming that the NBCAU during the Evidence Collecting session stated, in relation to identifying vulnerable groups in relation to employment, that the EQIA stage was not the appropriate stage of regeneration process to name groups who must be targeted. Rather the NBCAU stated that this is something which should be considered during the tender stage for construction.

It was helpful that the NBCAU have stated that they are aware of the failings of the Gasworks site, in particular failings around employment, however they do not seem to have addressed this in their current approach. As Joe McNeely (Central Baltimore Partnership) said at the Residents' Jury:

"We have learned over the years that a plan is not a worthy tool unless it has its implementation plan already in place and that includes concrete steps for achieving the human rights and social objectives. It is not enough to make general references to the deprivation of the community, there have to be specific mechanisms and time tables spelled out…" (p.54)

"Finally, what are the goals? What are the indicators that will be used to find out if we've achieved them? We can collect some baseline information right now but if it's not going to be these statistics then what are they? While, as Tim said [Tim Losty – Director of NBCAU], the statistics change over time, there needs to be some agreement about which set of cards we're playing with at the beginning so we know where the change went. (p.69)

NBCAU's statement about the chronology of identifying vulnerable groups is factually incorrect. The EQIA is precisely supposed to identify vulnerable groups.

APPENDIX THREE

A2. Have the experiences of vulnerable groups living with deprivation and inequality been collected?

As the DSD did not meet indicator A1, then fulfilling A2 is impossible. The identification of groups experiencing inequality is a necessary pre-requisite to engaging with them.

1. Equality Commission's 'Practical Guidance on Equality Impact Assessment'
Annex 1, para 2.1 of the Guide states:

"Relevant, reliable and up-to-date information is essential. Statistics alone do not provide reasons or explanations for differences. Public authorities must therefore institute a system of information gathering across all nine equality categories to supplement available statistical and qualitative research."

2. Freedom of Information request to the DSD revealing details of all focus groups and meetings which took place in the community regarding the Draft EQIA
The methodology used by the DSD to engage with members of the communities, and community workers, was about verifying the current proposals in the Draft Masterplan. These proposals were developed in the absence of looking at any inequalities. This was therefore not about the experiences of vulnerable groups in our community with a view to developing targeted proposals, but about seeing if the proposals would 'do any harm' to our community.

This difference between these approaches was outlined to the NBCAU in advance of the 'focus groups' being carried out in the community during a meeting with the PPR Project on 8th August 2008. A 'focus group' format was presented to the Director of the NBCAU as a method of fulfilling statutory requirements, however this was turned down. Subsequently community groups, in conjunction with PPR Project, carried out eight focus groups across north Belfast using the community developed methodology which sought to extract qualitative evidence from residents to supplement and help understand statistical data.

***3.* Draft EQIA submissions from the Committee on the Administration of Justice, Participation and the Practice of Rights Project, Lower Shankill Community Association, Cliftonville Antrim Road CEP, Cliftonville Community Regeneration Forum, Brucevale Residents, North Belfast Interface Network, Community Relations Council, North Belfast Partnership Board**

The Residents Jury also found alarming information when reading the Lower Shankill Community Association's response to the Draft EQIA, which would lead us to question the quality of the 'focus groups' carried out by the DSD:

"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."

And further:

"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."

4. Draft Equality Impact Assessment for Girdwood Barracks and Crumlin Road Gaol

The Jury, when analysing the Draft EQIA and the Focus Group sessions received through Freedom of Information, also found selective use of evidence provided by groups. For example the Draft Masterplan makes proposals for high rise housing. The Draft EQIA cites a particular focus group with youth (under 16) as saying:

"A cross-community focus group of young people (under 16) expressed the view that residential accommodation was important and that apartments would be preferable to houses." (p.42)

Yet the submission by community organisations and PPR based on focus groups with the following organisations: Women United, Girdwood Residents Jury Group (Disability), Brucevale residents, Manor Street, Ardoyne residents, CARCEP Youth Group, New Lodge residents, and Silver Threads, stated:

"The suitability of the housing in the areas was also an important issue – the Silver Threads group pointed out that high rise flats were unsuitable for families and the elderly. New Lodge group noted that high rise living adversely impacts vulnerable groups, and those with mental illness, as it compounds isolation and loneliness. New Lodge also noted that high rise accommodation has not proven suitable for families with children."

These two groups – in particular the New Lodge residents – were particularly important as the Draft EQIA identified catholics and nationalists as experiencing inequality by being disproportionately represented on the social housing waiting list. Yet the DSD have omitted their experience of social housing high rise from consideration of available data and research. It is extremely concerning that high rise development is a proposal included in the Draft Masterplan without any analysis of the impact of this on residents, or suggestions of alternatives which could better promote equality.

Bruceale Residents response to the Draft EQIA outlined this point:

"The final EQIA needs to provide details of how housing inequality will be reduced and how equality of opportunity will be promoted between persons with dependants and persons without. We believe that this should include a breakdown for the construction of a targeted number of 2, 3, 4 bedroom homes for small and large families. These homes need to be provided as social housing units as the provision of private housing will not reduce these inequalities and as the EQIA already demonstrates in detail, existing inequality in housing will increase"

This selective citation of evidence which supported existing proposals in the Draft Masterplan and ignores the experiences of those who have actually experienced high rise accommodation again calls into question the weight given to particular evidence.

APPENDIX FOUR

A3. Were identified vulnerable groups involved in naming and prioritising the issues which are most important to them?

As the DSD did not meet A1 or A2, then meeting A3 is impossible as vulnerable groups, other than catholics or nationalists on the social housing waiting list, have not been identified in the Draft EQIA. However, residents were involved in direct meetings with the NBCAU during the EQIA process through the focus groups.

1. The Draft Masterplan for Girdwood Barracks and Crumlin Road Gaol
The only engagement between the consultants who drew up the proposals in the Draft Masterplan and potential vulnerable groups were during official information and consultation sessions held across communities during the Masterplan development phase. This was not meaningful engagement with a view to establishing a process of ensuring social and economic inequalities were addressed and rights progressed, rather they were predominately 'report back' and 'information' sessions for residents.

2. Freedom of Information request to the DSD revealing details of all focus groups and meetings which took place in the community regarding the Draft EQIA;
3. The Draft Equality Impact Assessment for Girdwood Barracks and Crumlin Road Gaol
As described in both A1 and A2, the methodology used by the DSD to carry out EQIA focus groups did not include opportunities for groups experiencing inequality to prioritise issues they wanted to see addressed in the regeneration in a meaningful way. Indeed, where the DSD did actually identify an inequality – *ie* social housing for catholics and nationalists – it does not seem that any specific attempt was made to engage residents on the social housing waiting list to explore what would be required in terms of housing type. In contrast, as displayed in the previous section, their priorities were submitted to the DSD during the EQIA consultation but omitted from the Draft EQIA.

4. Evidence Provided at the Girdwood Residents' Jury (28th May 2008)
During the Residents Jury event, the Jury heard evidence from international regeneration experts on the necessity of meaningful resident participation in the design, delivery and evaluation stages of regeneration process. Ron Shiffman, and urban planner and founder of the Pratt Centre for Community Development (NY, USA) stated the importance of fulfilling this indicator:

"Let's remember that there isn't an architect or a planner that knows your community and your needs better than you know them, and what you need to do is make sure that when working with them that it is a two way educational process. They learn from you. You learn from them." (p.50)

This constructive dialogue and partnership cannot be progressed if a key partner in the regeneration process has effectively been excluded from prioiristing their issues.

5. Draft EQIA submissions from the Committee on the Administration of Justice, Participation and the Practice of Rights Project, Lower Shankill Community Association, Cliftonville Antrim Road CEP, Cliftonville Community Regeneration Forum, Brucevale Residents, North Belfast Interface Network, Community Relations Council, North Belfast Partnership Board

An instance of where a community organiation provided first hand evidence of the issues affecting vulnerable groups was in the Lower Shankill Community Association response to the Draft EQIA. However, they stated:

"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."

APPENDIX FIVE

A4. Is the information on inequality and deprivation clear, accessible and easily understood in the EQIA documents and in the consultation process?

The Residents Jury found the information presented in the Draft EQIA, and the format in which information was presented, to be extremely complex and difficult for residents not versed in the EQIA process to understand and follow.

1. **Equality Commission's 'Practical Guidance on Equality Impact Assessment'**
    - *"the accessibility of the language and the format of information must be considered to ensure that there are no barriers to the consultation process." Section 4 para 2 (c)*

Furthermore:

"5.13 Written papers which are made available to consultees should:

- *Use plain language and be jargon-free;*
- *Convey specialist information in as simple a format as possible. For example, there will be occasions when documents need to include fairly detailed statistics or very specialised information. It is crucial that such material is translated into language which non-experts can understand;*
- *Include an executive summary;"*

The Jury found that none of these were done in the Draft EQIA.

APPENDIX SIX

A5. Were residents from identified vulnerable groups involved in collecting and analysing the information during the EQIA process?

Again, without identification of vulnerable groups (A1), this indicator is impossible to fulfill.

The NBCAU and DSD were solely responsible for collecting and analyzing information during the EQIA process. While community groups along with the PPR Project held a eight focus groups with residents, the official analysis of this information, and its subsequent bearing on any of the regeneration proposals, were left entirely to the DSD.

1. Evidence Provided at the Girdwood Residents Jury (28th May 2008)

The importance of residents being involved in the collection and analysis of information on deprivation and inequality was highlighted by Ron Shiffman at the Residents' Jury event who, drawing on international best practice, stated:

"Reason is dependent on a rational, systemic analysis – a way of looking at things, looking at the charts, looking at the data and beginning to collect that data. But participation becomes crucial because what that data means is different to different people. How you interpret that data and what it really means comes out of a dialogue that engages people in the long run. Democracy is critically dependent on the participation of the people and the two are synergistic, they interrelate and they become really important." (p.35)

"The result out of this effort is a much more informed and engaged civil society where process is as important, if not more important than the outcome because the process here often leads to what really becomes the development and the building of community." (.36)

Joe McNeely, Director of the Central Baltimore Partnership (Maryland, USA) elaborated on the methodology required:

"We observe and collect data. We reflect on and analyse that data. The community alone needs an opportunity to analyse that data and then there needs to be a common analysis and reflection with other partners." (p.54)

2. Equality Commission's 'Practical Guidance on Equality Impact Assessment'

The Residents' Jury found that this participatory approach is compliant with Section 75 guidance:

Annex 1, para 2.1 of the Guide states:

"Relevant, reliable and up-to-date information is essential. Statistics alone do not provide reasons or explanations for differences. Public authorities must therefore institute a system of information gathering across all nine equality categories to supplement available statistical and qualitative research."

Furthermore the same section of the Guidance instructs public bodies to:

"Use qualitative or evaluative research or information gathered by government and bodies such as voluntary, community and trade union organizations."

APPENDIX SEVEN

A6. Was there training and assistance resourced and made accessible by government to enable vulnerable groups to provide, collect and analyse information during the EQIA process?

'Vulnerable' residents experiencing inequality were not identified (A1), and residents were not involved in the collection or analyzing of information which would impact the regeneration proposals (A5). Therefore, training and assistance was not offered, nevermind being resourced.

1. Evidence Provided at the Girdwood Residents Jury (28th May 2008)

Joe McNeely emphasized the importance of this role for residents:

"capacity building is crucial to participating in implementing and in accountability. These are skills that are not automatic for any of the parties, so we need the resources, time and the commitment at each stage to build the capacity of all of the partners. What are those particular skills? We need to call on those who want to take the process forward to make the investment in that kind of capacity building." (p.55)

Furthermore, Mr McNeely went on to cite a practical example of where this approach had proven successful and a best practice model:

"In Oakland, California they trained community residents to be expert interviewers of people in the community. They trained the same people to bring the tapes back from those interviews and to be the expert 'de-briefers' of the data. They then worked with people at the University on the analysis of the community, which was producing a highly textured analysis of it's own community. The side effect of that was all of those interviewers became community leaders around the issues that they had interviewed on and they were able to get an implementation of the plan, resources for self organised solutions to problems that people had identified in the process that built the capacity of people." (p.57)

Tim Losty, Director of the NBCAU, when referring to the importance of capacity building and community engagement stated that:

" ...[during the] pre-concept stage, six public meetings and a series of individual meetings took place. We also provided briefings with our colleagues in the community empowerment partnerships. I think Joe [McNeely] was talking about building capacity in the community and that's what we have tried to do with the 13 CEP's over the last number of years." (p.66)

The Residents' Jury feel it is important to note that the CEPs were specifically funded as an intervention programme in north Belfast to assist in addressing social and economic need and deal with a vast array of dedicated programmes much broader than the Girdwood regeneration. There was no specific intervention to educate and train local residents to be meaningful participants in the design, delivery or evaluation stages of the Girdwood regeneration.

APPENDIX EIGHT

A7. Is the evidence regarding local deprivation and inequality being used by government to form proposals?

1. Evidence Provided at the Girdwood Residents Jury (28th May 2008)
Virginia Bras Gomes, Portuguese member of the United Nations Committee on Economic, Social and Cultural Rights emphasised that for regenerations to be evaluated effectively, the link between inequality and regeneration proposals was essential:

"In order to ascertain how successful the proposals would be at targeting inequalities and deprivation in the area, they would have to be subject to an ongoing assessment on the part of the residents to monitor compliance with qualitative and quantitative targets." (p.29)

Furthermore, Joe McNeely stressed that the inclusion of both inequality and deprivation statistics in any Masterplan which are targeted through detailed proposals is also essential:

"We have learned over the years that a plan is not a worthy tool unless it has its implementation plan already in place and that includes the concrete steps for achieving the human rights and social objectives. It is not enough to make general references to the deprivation of the community, there have to be specific mechanisms and time tables spelled out, which include piecing where the indicators are going to be in the future." (p.54)

2. **The Draft Equality Impact Assessment for Girdwood Barracks and Crumlin Road Gaol;**
3. The Draft Masterplan for Girdwood Barracks and Crumlin Road Gaol
Both the Masterplan and the Draft Equality Impact Assessment for Girdwood Barracks and Crumlin Road Gaol omit detailed analysis of inequality and deprivation, and subsequent targeted proposals to address the same.