



Barnardo's Northern Ireland Response to the Draft Race Relations Framework

Barnardo's NI is the largest children's charity in Northern Ireland. In the past year we worked with approximately 18,000 children, young people and families across more than 45 different services and programmes. We have over 25 years' experience supporting children and families who are new to Northern Ireland, some of whom are refugees or asylum-seekers. More recently, Barnardo's Ubuntu Project supports families arrived to the UK seeking sanctuary through a Youth Voice Network connecting young people and placing their voices in influential spaces; supports communities as they help families integrate into their local area; and connects statutory and voluntary services through a practitioner network with a focus on sharing best practice and collaborative advocacy. Our goal is to achieve better outcomes for more children. To achieve this, we work with partners to build stronger families, safer childhoods and positive futures. Our services and decades of experience supporting children and families seeking sanctuary have informed our response to this consultation.

We want to be clear that we are concerned that the draft Race Relations Framework will not make any difference to the lives of the children, families, and communities in Northern Ireland who are impacted by racial inequality. We have serious concerns that this Framework does not address the systemic barriers to equality across our public services, instead focusing on framing racism as an issue of "community cohesion" and does not represent the voices and lived experiences of minoritised people, especially children and young people. The decision to rename the Strategy to "Race Relations" clearly sets the tone of the framework and marks an intentional shift away from promoting and embedding equality and human rights standards into our society.

Barnardo's NI calls on the Executive Office to withdraw the Draft Framework for Race Relations and instead engage in meaningful co-design and co-production with people who have lived experience of racial inequality, discrimination, and harm, and produce a Race Equality Strategy that explicitly addresses the systemic barriers to equality in our public services, is fully costed and actioned to tackle the barriers, with clear and enforceable accountability mechanisms, and centres lived experience.



Executive Summary

The draft Framework fails to meet the fundamental structures required for a successful Strategy that will provide the crucial interventions and investments to support minoritised people in Northern Ireland.

The Executive Office commissioned a review of the implementation of the Racial Equality Strategy 2015-2025 to analyse its impacts, identify gaps, and inform future approaches. Sabir Zazai, CEO of the Scottish Refugee Council, was clear in his report that the aims of the TEO Racial Equality Strategy “*have been undermined by the lack of: an action plan; involvement of people with lived experience; and a process for ethnic monitoring; and could have been enhanced by more attention to governance*”¹. The report recommended several key actions to strengthen a Racial Equality Strategy and a call to turn the tide on a lack of progress- a call that does not seem to have been answered by this draft Race Relations Framework.

As we have noted in our submissions to the Disability Strategy², the Early Learning and Childcare Strategy³, and in the Anti-Poverty Strategy Group Recommendations Paper⁴, a Strategy cannot achieve its aims without clear actions attributed to each department and public body, enforceable accountability mechanisms, ring-fenced funding, and embedded lived experience co-design. We reiterate the importance of developing a clear action plan that informs TEO and Departmental actions, with clear timelines and responsibilities, and a budget that is ambitious and adequately resourced.

The draft Framework also lacks detail on the roles of TEO, each Department, and statutory bodies in carrying out the identified interventions. Joined-up working and cross-departmental collaboration is integral to the success of a whole-government strategy and places responsibility on each department and public body to embed strategic priorities into their work. In contrast, the framework’s outcomes, key issues and interventions do not adopt a whole-government approach and do not identify key points for each department to achieve the identified outcomes. There are no clear workstreams to address racism and embed race equality in education, in our health services, our communities, our economy, or our justice system. Housing, transportation, education, access to

¹ <https://www.executiveoffice-ni.gov.uk/sites/default/files/2024-12/independent-review-of-the-progress-on-the-implementation-of-the-racial.PDF>

² <https://www.barnardos.org.uk/research/consultation-response-ni-executive-disability-strategy-2025-2035>

³ <https://www.barnardos.org.uk/research/consultation-response-executive-early-learning-and-childcare-strategy>

⁴ <https://www.barnardos.org.uk/research/anti-poverty-strategy-group-recommendations-paper>

places of worship, businesses, and community planning are wholly missing from this Framework.

To produce a robust, accountable, and strategic Framework, we make the following recommendations:

1. Develop an overarching action plan with an associated, ring-fenced budget
2. Flowing from the overall action plan, detail specific Departmental action plans with an associated budget
3. Establish an enforceable delivery mechanism which includes clear accountability for each Department and delivery partner
4. Embed an annual accountability review process, including engagement with Thematic Subgroups and lived experience panels
5. Develop a strategy for the meaningful engagement of people with lived experience, with specific emphasis on Section 75 groups
6. Establish programmes to involve groups that may not engage otherwise with initiatives due to multiple barriers including language, confidence and fear of authority
7. Provide more provision for supporting capacity building for minoritised groups

Addressing Systemic, Structural Issues

The draft Framework claims to focus on removing structural inequalities through key interventions such as “*embed cultural awareness and anti-racism training*”, “*expand educational opportunities*” and “*increase access to ESOL provision*”. These Key Issues and Key Interventions do not adequately address the barriers to equality that minoritised people face and places the onus on the individual experiencing racism to overcome said key issues; systemic barriers must be addressed with systemic actions.

Feedback from across our services, including practitioners, children and young people, and service managers, reflects that the focus of the Framework’s outcomes is misplaced:

Outcome 1- Elimination of Racial Inequality

The “key issues” wrongly attribute conditions of unemployment and “*academic underachievement*” to the individual, rather than recognising the structural barriers to employment, such as the inability to work sustainable hours or work at all due to restrictions relating to their immigration status, as well as obtaining certificates relating to academic achievements and language requirements. This “key issue” also does not consider the inaccessibility of ESOL classes, such as long waiting lists, lack of accessible location and transport, and challenges for people with caring responsibilities, which evidence demonstrates is predominantly undertaken by women. This further emphasises the need for intersectional, cross-cutting actions that contributes to a whole-systems approach to tackling racism, misogyny, and discrimination throughout all TEO’s strategies and the Executive’s Programme for Government.

These “key issues” also do not address barriers to education for many young people- the Department of Education has said that they do not have a statutory duty to educate beyond 16 years of age, therefore many young people who come to Northern Ireland seeking asylum receive little to no education or help with accessing courses⁵. This outcome does not address any barriers to education for children and young people.

Outcome 1 also says that they will “*embed racial equality across government and societal structures*” and “*Embed cultural awareness and anti-racism training across public services*” without any further detail on what racial equality in practice looks like, what the training entails, how often, and how TEO will know that racial equality and anti-racism approaches are being implemented.

Outcome 2- Combating Racism and Race Hate

Outcome 2 says that it will “*Enhance communications and education to dispel myths and stereotypes*” and “*Promote shared cultural awareness and understanding through education and awareness initiatives which includes tackling misinformation and harmful narratives where relevant*”. These “key interventions” do not specify where they are aimed or how they will be implemented. For example, will education and awareness initiatives take place in primary and secondary schools, in workplaces and public services? “*Enhancing communication*” is also vague and noncommittal; how will myths and stereotypes

⁵ <https://www.bbc.co.uk/news/uk-northern-ireland-67147183>

be addressed effectively, and how will communication initiatives be targeted and assessed?

Regarding hate crimes and engagement with the criminal justice system, the draft Framework does not address institutional barriers to justice and therefore does not propose specific anti-racism measures for the Police Service of Northern Ireland, Public Prosecution Service, NI Courts and Tribunal Service, and wider criminal justice system, instead focusing on the supposed gaps of understanding amongst minoritised communities.

Outcome 3- Equality of Service Provision

The draft Framework misdirects the “key issues” towards a personalisation of minoritised people’s experiences with public services, rather than acknowledging that our public services have not been designed to be inclusive. For example, simply reframing “*Difficulties in accessing public services*” to “*Inaccessible public services*” and “*Language barriers in access to services*” to “*Services do not meet multi-lingual needs*” demonstrates that the Executive Office recognises how our public services are not meeting the needs of minoritised people, and that the need for change lies within those structural reforms. But changing wording is not and cannot be enough, it must be accompanied by interventions designed to fundamentally change our public services responses and processes, with clear accountability and publicly available monitoring reviews.

We also have serious concerns with the framing of the following key issue: “*Perception by wider society that there is priority access to public services for certain communities and portrayal in the media*”. This “key issue” is worded in such a way as to legitimise these so-called concerns, irrespective of their falsehood. We agree that there is a serious need to address misinformation, disinformation, and malinformation, however the wording of this “key issue” does not convey the seriousness of the false information. For example, a key issue could be “*Prevalence of misinformation and disinformation perpetuated against minoritised people*”. A corresponding “key intervention” is also necessary; there is no response to this “key issue” currently under Outcome 3. This will require a whole-systems approach to anti-racism education, awareness, and accountability from our elected representatives to show leadership in their own actions and messaging.

Outcome 4- Community Cohesion

Community cohesion has been framed in this Outcome as a failure of minoritised communities, disregarding the very real barriers such as access to community spaces, transportation, housing precarity, and the lived realities of racism, racial violence, and paramilitarism. Outcome 4 does not explicitly take responsibility for the circumstances that minoritised people are confronted with in some of our communities in Northern Ireland, which we have clearly seen over the past few years⁶⁷⁸⁹.

In contrast, Scotland's Race Equality Framework deliberately frames the vision for "Community Cohesion and Safety" as "*We build good race relations and community cohesion across all communities, and all minority ethnic individuals feel safe, protected and included, and experience less racism*". The Scottish Framework also clearly highlights that

*"The relationship between community cohesion, safety and discrimination was clearly underlined throughout the evidence gathered for the development of the Framework. In particular, individuals from both community groups and public bodies who took part in involvement activities stressed that the day-to-day realities of discrimination and racism are the key underlying factors which negatively impact on a sense of togetherness, add to isolation and weaken bonds"*¹⁰.

Meanwhile, this proposed draft Framework is underpinned by the assumption that anyone who is minoritised needs to be integrated, rather than by a commitment to creating a society that is safe and inclusive.

The draft Framework also does not address the role of paramilitarism in perpetuating racism and racist violence in Northern Ireland. The Independent Reporting Commission (IRC) was clear in its 2024/2025 report that paramilitary intimidation, coercive control, and threats persist, and that "*a particularly serious manifestation of that reality over the last two years has been the link between paramilitarism and racist violence connected to the issue of immigration*"¹¹. The IRC also raised serious concerns that paramilitaries are exploiting children by encouraging them to take part in racist riots¹².

⁶ <https://www.bbc.co.uk/news/articles/c05er149mepo>

⁷ <https://www.bbc.co.uk/news/articles/cedv5y9pv3lo>

⁸ <https://www.amnesty.org.uk/latest/northern-ireland-year-hate-and-fear-racist-crimes-hit-record-high/>

⁹ <https://www.irishnews.com/news/northern-ireland/man-charged-over-attack-on-larne-leisure-centre-J674TO3G3NAUJALE3ICWOH63B4/>

¹⁰ <https://www.gov.scot/publications/race-equality-framework-scotland-2016-2030/pages/10/>

¹¹ <https://www.gov.uk/government/publications/independent-reporting-commission-irc-eighth-report>

¹² *ibid.*

The evidence is clear that paramilitary violence and exploitation has played a key role in exacerbating racist violence and intimidation, therefore anti-racism actions must also include partnership and collaboration with efforts to dismantle paramilitarism and the growing anti-immigrant organising. A Race Equality Framework should clearly acknowledge this state of emergency and commit to immediate action.

Governance Mechanisms and Delivery Plan

We have several concerns with the proposed Governance Mechanisms and Delivery Plan, namely:

1. A Five Year “Temperature Check” will not be sufficient to address gaps as and when they emerge.
2. There is no mechanism for continuous and effective co-design and delivery with key stakeholders. Regular engagement with the Racial Equality Subgroup, whilst welcomed, does not fully utilise the expertise and lived experience of the group's membership. Engagement must be clearly defined as collaborative, constructive, and accountable forums for review, monitoring, and goal setting. There is also no commitment to regular and effective engagement with any other lived experience forum, nor the Roma and Travellers Thematic Groups.
3. There is no detail here regarding Departmental responsibility and governance over key areas of intervention, such as health and education.
4. The Delivery plan will not be effective without any funding, budgeting, timelines, concrete actions and targets, or accountability

Impact Assessments

We are concerned that this Framework will not significantly support people with intersecting identities and experiences. For example, there are no specific interventions addressing the additional barriers for minoritised women, children, people with disabilities, and people who do not live in urban areas. The Impact Assessments are insufficient in identifying equality and Section 75 gaps- they reduce likely impacts on protected categories based on the assumption that the Framework outcomes will have a positive impact on all people, regardless of

intersectional identities and experiences. Approaching equality duties with a homogenous, all-encompassing assessment thereby reduces the efficacy of the Framework.

We would also like to raise critical consideration of the language used in this Framework:

- As noted in our introduction, the title “Race Relations” presents diversity in a negative light. To reflect a commitment to equality, inclusion, and diversity, the Framework should be renamed to “Race Equality Framework”.
- Language should also be updated to better represent the experiences of racism and racial inequality. Engaging with people with lived experience informs how language and terms can best represent their experiences¹³.
- Repeatedly referring to “community cohesion” rather than addressing structural barriers to building community and naming the systemic issues once again limits the scope of the Framework and ignores the role and responsibilities of existing communities.

The Voice of Children and Young People

Critically, this Framework is missing the voice of children, young people, their families and carers. We know that children and young people experience racism, racist violence, and feel the impact of racial inequality¹⁴¹⁵¹⁶¹⁷ and should be viewed, respected, and heard as rights holders within their own right in the design of any Race Equality Framework. The “key issues” and “key interventions” in the draft Framework do not meet the standards of children’s rights as detailed in the United Nations Convention on the Rights of the Child¹⁸ (UNCRC).

¹³ <https://raceequalityfoundation.org.uk/blog/finding-consensus-on-race-and-ethnicity-terminology-in-conversation-with-janine-la-rosa-and-adeola-agbebiyi/>

¹⁴ <https://www.bbc.co.uk/news/articles/cew0llp5r1o>

¹⁵ <https://www.bbc.co.uk/news/articles/c3e5ljx2wjlo>

¹⁶ <https://www.irishnews.com/news/northern-ireland/racist-graffiti-outside-school-and-nursery-condemned-KMWPADXT2BAMTFWE3NOXAQON3I/>

¹⁷ <https://www.bbc.co.uk/news/articles/cg4yezz3v1po>

¹⁸ <https://www.unicef.org/uk/what-we-do/un-convention-child-rights/>



Barnardo's NI hosted several engagement sessions with children and young people from across our services to ask them, 'What Does a Society Free from Racial Inequality Look Like?'

These are some of their ideas:

- No discrimination, including the practise of banning people from spaces because of stereotyping racial and cultural backgrounds
- Stronger laws against racism, including racialised bullying
- Facilitating and encouraging learning about different religions in school
- Society has a better understanding of diversity and what it's like to belong to a different community, religion, etc.
- Public services are diverse and represent different groups of people, so that their experiences are better- like in hospital, where people can feel like they are listened to and relatable.
- End racial policing and profiling, including private security guards
- Specialist programmes for minoritised people to feel safe and express their cultures
- Education in public services to teach people about different cultures and why racism is wrong
- Purpose-built spaces, housing, and communities that are inclusive of all different cultures and ways of living, especially for Traveller communities
- Everywhere has access to all different kinds of food for different backgrounds or religious requirements
- Prayer rooms in all hospitals for all different religions
- A society that respects everyone, doesn't resort to violence, and respects all living beings
- Remove barriers to inclusion in schools, like uniforms, which single children out from their peers and remove creativity and diversity

Young people also told us that the Framework was not accessible and, therefore, they could not see themselves represented in it; the format of both the original and Easy-Read versions were difficult to understand, especially for anyone their age and therefore was not accessible for young people.

Whilst they agreed with the goals of ending racial inequality, stopping racist hate crime, strengthening communities, and ensuring fairer access to services, the young people stressed that they did not see how the Framework would achieve these goals and that there was a lot of missing information. They also told us that it was very important to engage with communities affected by racism to make sure that the outcomes and actions would make a meaningful difference. As well as this, the young people expressed disappointment that these goals weren't already part of Government's work.

What we can see from our engagement with children and young people is that they want a Framework that is ambitious, targeted, and clearly plans for creating a society free from racism and discrimination.

Examples of Best Practise

For an example of a robust, focused, and accountable Race Equality Strategy, the Scottish Government produced a Race Equality Framework and accompanying Anti-racism delivery plan, recognising that tackling racism is multifaceted, as shown in their key principles¹⁹:

- Developing a society-wide awareness that this is not a marginal issue for Scotland, that society is undermined when racial discrimination and racism are allowed to persist, and that action to promote race equality benefits the whole of society
- Accepting that understandings of racial inequality and approaches to tackle racism in society need to be nuanced, contextual and fluid; and that an approach is required that tackles structures, behaviours and attitudes which contribute to or sustain inequality and discrimination in all its forms, including institutional, social and personal
- Acknowledging that racial inequality is a product of discrimination and disadvantage, measuring progress on race equality therefore means

¹⁹ <https://www.gov.scot/publications/race-equality-framework-scotland-2016-2030/pages/6/>

measuring the impact that current and historical racism and discrimination have on the groups of people who have been affected by this

- Encouraging interventions based on robust information about what works to tackle racial inequality and racism, and which build in evaluation from the start
- Undertaking additional, targeted work where needed to address the impact of current and historical disadvantages faced by minority ethnic people
- Encouraging asset-based approaches that recognise the capabilities and capacities of minority ethnic individuals and communities, and which value diversity and discourage stereotyping
- Accepting that capacity building can only go so far towards tackling inequality, and must be complemented by action to tackle the social, institutional and structural factors that underpin racism and disadvantage
- Understanding that individuals and communities have dynamic, fluid identities and world views which relate to many facets of their lives, and that racism and racial inequality can combine with other types of discrimination and disadvantage to affect people's life experiences, needs and perspectives

The Welsh Government updated their Anti-Racist Action Plan in 2024 to reflect governmental commitments to “building an inclusive and equitable society for all our Black, Asian and Minority Ethnic people and communities in Wales”²⁰. The refreshed plan emphasises the changes required to deliver on their commitment to make Wales an anti-racist nation by 2030:

- A logic model for the Anti-Racist Wales Action Plan that represents the shared relationships among the resources, activities, outputs, outcomes, and impact for the Plan. The model connects how the delivery of actions will lead to the overall intended effect of the Plan
- Lived experience impact measures will provide more comprehensive, fair, and impactful findings, focussing on people’s experiences and not just overall numbers.

²⁰ <https://www.gov.wales/anti-racist-wales-action-plan-2024-update-html#157065>

- Actively co-producing solutions with Black, Asian and Minority Ethnic people.
- Ensuring our work aligns with statutory responsibilities set out in the Equality Act 2010, the Public Services Equality Duty, the Well-being of Future Generations (Wales) Act 2015, and the Cymraeg 2050 strategy, as well as other equality commitments.

The Anti-Racist Wales Action Plan includes specific Outcomes across housing, social care, education, local government, employability, culture, sport, and leadership, with responsibility in each Department and public body to deliver on these outcomes.

The Republic of Ireland published its National Action Plan Against Racism in 2023, recognising the importance of meaningful action to address racism and the need for a whole-of-government approach to achieve this, necessitating action by Government, public bodies, private bides, communities, and individuals. There is a Special Rapporteur on Racial Equality and Racism, who will monitor progress towards the objectives of the Action Plan. The priority actions in this Action Plan comprehensively address the impacts of racism and plan for a “shared journey” to racial equality, including detailed actions, timelines, and implementing bodies responsible for the actions underpinning each outcome²¹.

Within the Executive Office’s own remit, the Strategic Framework to End Violence Against Women and Girls (EVAWG) provides a good example of a collaborative, cross-departmental Framework²²:

- Dedicated section to identify the root causes of violence against women and girls, the impact, and the role society plays in tackling gender-based violence
- Use of data, research, and lived experience to provide a better understanding of violence against women and girls
- Co-design partners are authentically included in the Framework, with an emphasis on continuous and ongoing work with key stakeholders

²¹ <https://www.gov.ie/en/department-of-children-disability-and-equality/publications/national-action-plan-against-racism/#monitoring-oversight-and-review-framework>

²² <https://www.executiveoffice-ni.gov.uk/sites/default/files/publications/execoffice/strategic-framework-evawg.pdf>



- Actions to achieve Outcomes are clear, targeted, and range from institutional changes to community activities
- Specific oversight and accountability structure, with a whole-systems approach to responsibility for the delivery of the framework

Concluding Thoughts

We know that some children, families and communities face challenges because of structural inequalities and discrimination in society. Barnardo's Northern Ireland is committed to driving positive change and giving them a place where they feel like they belong. We strongly believe in working with other charities, with governments, local agencies, businesses, individuals, and communities to eliminate racism and foster an inclusive and diverse Northern Ireland. It is in this commitment that we call on the Executive Office to withdraw this current Draft Race Relations Framework and recommit to producing a co-designed, trauma-informed, systemically challenging Race Equality Framework with actionable targets, clear measurables, informed by ethnic equality monitoring and qualitative data, ring-fenced funding, and enforceable accountability mechanisms. We have seen how the Scottish Government and TEO's own EVAWG Framework can meet the needs of people affected by violence, racism, and inequality, which is why we know the same can be done for a Northern Ireland Race Equality Framework. Barnardo's NI is committed to working together with our partners in the sector and in Government to ensure that children, families, and communities are happy, safe, and hopeful.