



POLICY FRAMEWORK DOCUMENT

**PROCEDURES FOR DEVELOPING, INTRODUCING AND REVIEWING LISBURN &
CASTLEREAGH CITY COUNCIL POLICIES**

BUILDING ILLUMINATION POLICY FOR LCCC

TEMPLATE POLICY DOCUMENT

Building Illumination Policy for LCCC

Date
March 2021

Sponsoring HoS:	Head of Service Corporate Communications and Administration	
Director:	Cara McCrory	Date Approved: 05/03/2021
CMT Approved:	Date Approved:	
Council:	Date Approved:	
Review Date:	January 2021	
Screening/ Full Equality Impact Assessment:	Screened out without mitigation	
Equality Officer:	Date Approved: 5 th March 2021	
Policy Available from:	[Council intranet URL] Policy can be made available in alternative formats on request.	
Sensitivity Marking:		
New Policy? Y/N	No	
Review of Existing Policy? Y/N	Yes	
Reason for Review	Refresh – past due review date.	
Version Number:	2	

POLICY AMENDMENTS

Amendments to the Policy will be issued from time to time. A new amendment history will be issued with each change.

New Version Number	Issued by	Nature of Amendment	Approved CMT & Date	Date on Intranet
2	HoS Corporate Communications and Administration	Change to notice period for illumination requests, Addition of max no. of illumination days per annum, Application criteria updated, Policy name changed, Inclusion of Castle Gardens illumination at the discretion of Council, inclusion of illumination calendar presented to CSC annually.		

1 INTRODUCTION

This Statement refers to Lisburn and Castlereagh City Council's policy in relation to illumination requests.

The Council receives a number of requests each year to light the external façade of the Council Chamber at civic headquarters to promote awareness of a charity, highlight a particular cause or mark an event/anniversary of significance. Castle Gardens will also be lit up as part of a civic event or commemoration as agreed by Corporate Services Committee. External requests to light up Castle Gardens will not be accepted.

This policy aims to ensure that an effective procedure is in place for managing requests to light up the Council Chamber at the civic headquarters and to ensure they are considered in a consistent and transparent manner through an application process.

2 ENGAGEMENT

During the review, the policy was discussed with the Head of Service for Corporate Communications and Administration and the Administration Manager. Engagement with CMT, the Chair and Vice Chair of Corporate Services Committee and other NI Councils and organisations took place. A review of light up policies and practices developed by other councils and organisations was also completed with consideration given to the challenges some of these organisations have faced.

3 IMPACT ASSESSMENT

3.1 Equality

It is not identified that there will be any particular opportunities to promote equality across the Section 75 Groupings as a result of this policy refresh. The amendment of this policy in a more user friendly format aims to assist LCCC Officers managing building illumination requests through a transparent application process.

The policy does not differentiate or identify groupings, therefore there will be no direct adverse impact on any groups.

3.2 Sustainability

Not applicable to this policy.

3.3 Bribery Act 2010

Not applicable to this policy.

3.4 Rural Needs

No impacts were identified on rural communities, whether positive or negative as a result of this policy refresh.

4 SCOPE

This policy applies to LCCC CMT, Elected Members, Corporate Communications and Administration Officers, registered charities, formally constituted/registered groups and public bodies.

5 POLICY PURPOSE & AIMS

The purpose of the policy is to provide an effective procedure for managing requests to light up the Council Chamber at the civic headquarters and to ensure they are considered in a consistent and transparent manner through an application process.

The aims and objectives of the policy are:

- To outline a transparent procedure for managing requests to light the external façade of the Council Chamber at civic headquarters.
- To outline clearly, the specific criteria that must be met for illumination requests to be considered.
- To put in place measures that enable effective management of an illumination programme.
- To put in place a clear timeframe to enable the relevant approvals to be sought through Corporate Services Committee and Council in line with Council's governance procedures.
- To ensure that the light up programme reflects the diversity across the city and is inclusive of all.
- To set out arrangements for promotion of the illuminations and associated cause.
- To develop an annual calendar to be agreed by Corporate Services Committee in November each year for ratification at full Council in December.

6 DEFINITIONS & CLARIFICATIONS

There are no definitions identified to be added to the policy document. The policy is already in force. This is a review of an existing policy to include amendments to the building illumination request notice period to ensure reasonable timescales in line with Council governance procedures alongside a restriction implemented on the number of building illumination days per annum.

It also introduces a new annual calendar and a mechanism to consider requests that do not meet the eligibility criteria in exceptional circumstances.

7 ROLES / RESPONSIBILITIES / DUTIES

Roles & responsibilities are provided in full within the policy document. The policy is already in force, this is a review of an existing policy.

8 IMPLEMENTATION

Once agreed, the policy will be uploaded to the Council's intranet site for ease of reference. The superseded version will be removed from the site with a note to explain the actions taken. It will be the responsibility of Heads of Service to ensure that staff have access to the policy and are provided with an opportunity to understand and discuss the policy. The policy will be implemented consistently by the Corporate Communications and Administration Unit.

9 TRAINING & AWARENESS

Heads of Service will be informed of the revised policy and where to access it. Heads of Service are responsible for informing relevant staff of the revised policy and where it can be obtained. Training on the policy will be the responsibility of the Corporate Communications and Administration HoS where applicable.

10 MONITORING & AUDIT

All building illumination requests will be considered in line with the policy terms and conditions and eligibility criteria to ensure compliance with the policy objectives. Any identified breach will be reported to CMT and internal Audit.

11 POLICY REVIEW

This policy will be monitored annually. A formal review will take place at the end of three years. Earlier review may be required in response to exceptional circumstances or organisational change as instructed by the Sponsoring Head of Service responsible for this policy.

12 REFERENCES

The Building Illumination Policy is linked to another council policy: Photographic and Public Relations Protocol Policy.

13 APPENDICES

Appendix 1 - Equality Screening Template (infilled).

Appendix 2 – Rural Needs Impact Assessment Proforma (infilled).

Appendix 3 – Bribery Act Checklist.

Appendix 4 – 2020 REGISTER FOR LVI BUILDING ILLUMINATIONS

Appendix 1

Equality Screening

Screening Form (2010 Guidance) (Taken from Section 75 of the Northern Ireland Act 1998 – A Guide for public authorities April 2010, Appendix 1), as updated by the Equality Officer (August 2020).

Introduction – Notes to Aid Completion of the Screening Form

The following notes are included in Appendix 1 of the Guidance and are an aid to assist completion of the screening form:-

Part 1. Policy scoping – asks public authorities such as the council, to provide details about the policy, procedure, practice and/or decision being screened and what available evidence you have gathered to help make an assessment of the likely impact on equality of opportunity and good relations.

Part 2. Screening questions – asks about the extent of the likely impact of the policy on groups of people within each of the Section 75 categories. Details of the groups consulted and the level of assessment of the likely impact. This includes consideration of multiple identity and good relations issues.

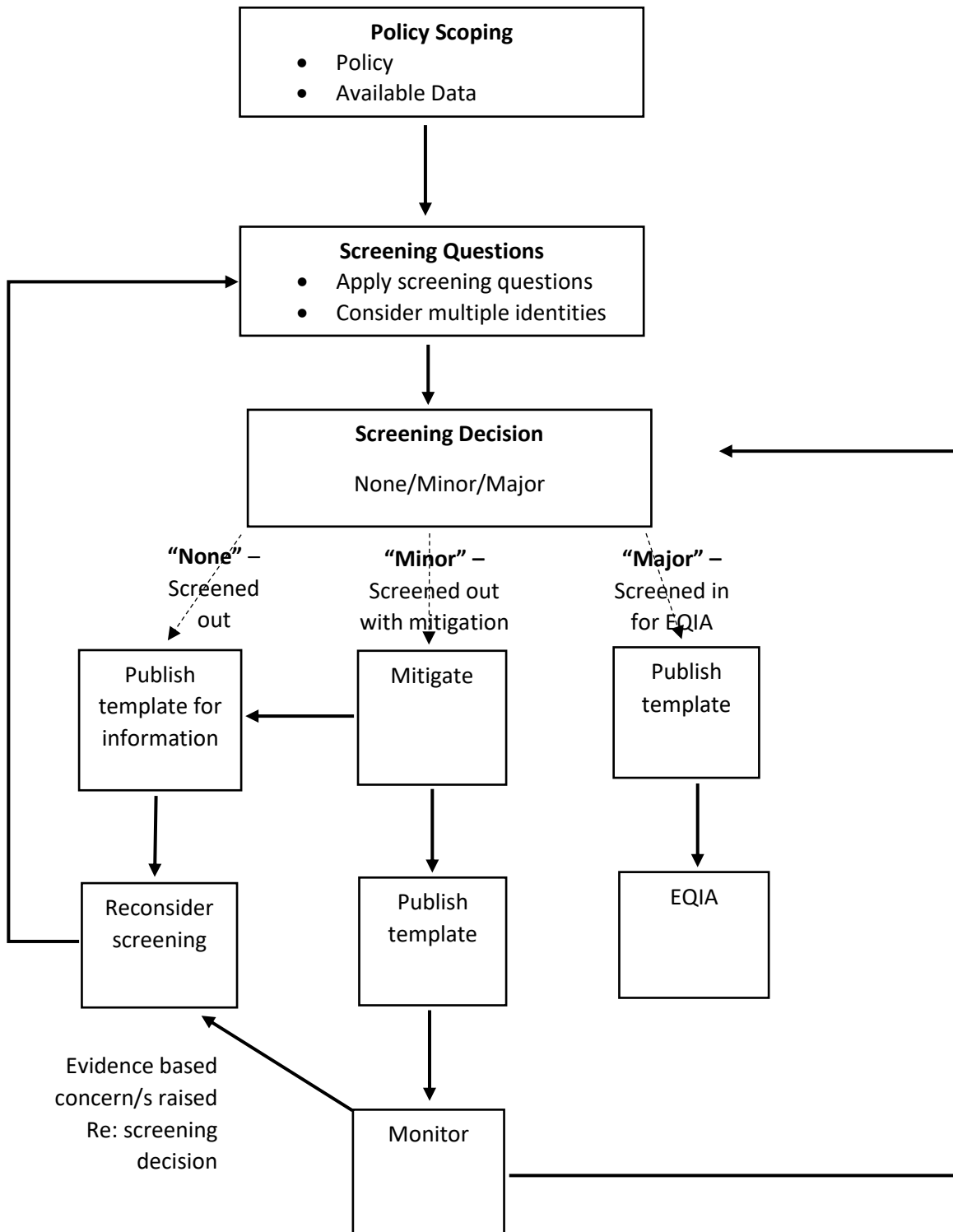
Part 3. Screening decision – guides a public authority such as the council in reaching a screening decision as to whether or not there is a need to carry out an equality impact assessment (EQIA), or to introduce measures to mitigate the likely impact, or the introduction of an alternative policy to better promote equality of opportunity and/or good relations.

Part 4. Monitoring – provides guidance to public authorities, such as the council on monitoring for adverse impact and broader monitoring.

Part 5. Approval and authorisation – verifies the approval of a screening decision by a senior manager responsible for the policy.

A screening flowchart is provided overleaf.

SCREENING FLOWCHART



Notes:

Part 1. Policy scoping

The first stage of the screening process involves scoping the policy under consideration.

The purpose of policy scoping is to help prepare the background and context and set out the aims and objectives for the policy, being screened.

At this stage, scoping the policy will help identify potential constraints as well as opportunities and will help the policy maker work through the screening process on a step by step basis.

Public authorities should remember that the Section 75 statutory duties apply to internal policies (relating to people who work for the authority), as well as external policies (relating to those who are, or could be, served by the authority).

Evidence to help inform the screening process may take many forms. Public authorities should ensure that their screening decision is informed by relevant data.

Part 2. Screening questions

Introduction

In making a decision as to whether or not there is a need to carry out an equality impact assessment, you should consider its answers to the questions 1-4 which form part of the screening form.

If you conclude there is **none** in respect of all of the Section 75 equality of opportunity and/or good relations categories, then you may decide to screen the policy out. If a policy is 'screened out' as having no relevance to equality of opportunity or good relations, you should give details of the reasons for the decision taken.

If you conclude there are **major** impacts in respect of one or more of the Section 75 equality of opportunity and/or good relations categories, then consideration should be given to subjecting the policy to the equality impact assessment procedure.

If your conclusion is **minor** in respect of one or more of the Section 75 equality categories and/or good relations categories, then consideration should still be given to proceeding with an equality impact assessment, or to:

- Measures to mitigate the adverse impact; or
- The introduction of an alternative policy to better promote equality of opportunity and/or good relations.

In favour of a 'major' impact

- a) The policy is significant in terms of its strategic importance;
- b) Potential equality impacts are unknown, because, for example, there is insufficient data upon which to make an assessment or because they are complex, and it would be appropriate to conduct an equality impact assessment in order to better assess them;
- c) Potential equality and/or good relations impacts are likely to be adverse or are likely to be experienced disproportionately by groups of people including those who are marginalised or disadvantaged;

- d) Further assessment offers a valuable way to examine the evidence and develop recommendations in respect of a policy about which there are concerns amongst affected individuals and representative groups, for example in respect of multiple identities;
- e) The policy is likely to be challenged by way of judicial review;
- f) The policy is significant in terms of expenditure.

In favour of ‘minor’ impact

- a) The policy is not unlawfully discriminatory and any residual potential impacts on people are judged to be negligible;
- b) The policy, or certain proposals within it, are potentially unlawfully discriminatory, but this possibility can readily and easily be eliminated by making appropriate changes to the policy or by adopting appropriate mitigating measures;
- c) Any asymmetrical equality impacts caused by the policy are intentional because they are specifically designed to promote equality of opportunity for particular groups of disadvantaged people;
- d) By amending the policy there are better opportunities to better promote equality of opportunity and/or good relations.

In favour of no impact

- a) The policy has no relevance to equality of opportunity or good relations.
- b) The policy is purely technical in nature and will have no bearing in terms of its likely impact on equality of opportunity or good relations for people within the equality and good relations categories.

Taking into account the evidence presented above, consider and comment on the likely impact on equality of opportunity and good relations for those affected by this policy, in any way, for each of the equality and good relations categories, by applying the screening questions (questions 1-4) given in the screening form (Part 2) and indicate the level of impact on the group i.e. minor, major or none.

Multiple identity

Generally speaking, people can fall into more than one Section 75 category. Taking this into consideration, are there any potential impacts of the policy/decision on people with multiple identities?

(For example; disabled minority ethnic people; disabled women; young Protestant men; and young lesbians, gay and bisexual people).

Part 3. Screening decision

All public authorities’ equality schemes must state the authority’s arrangements for assessing and consulting on the likely impact of policies adopted or proposed to be adopted by the authority on the promotion of equality of opportunity.

The Commission recommends screening and equality impact assessment as the tools to be utilised for such assessments. Further advice on equality impact assessment may be found in a separate Commission publication: Practical Guidance on Equality Impact Assessment.

Timetabling and prioritising

Note: The Total Rating Score should be used to prioritise the policy in rank order with other policies screened in for equality impact assessment. This list of priorities will assist you in

timetabling. Details of the Equality Impact Assessment Timetable should be included in the quarterly Screening Report.

Part 4. Monitoring

You should consider the guidance contained in the Equality Commission's Monitoring Guidance for Use by Public Authorities (July 2007). The Equality Officer will be able to assist if required.

The Equality Commission recommends that where the policy has been amended or an alternative policy introduced, the council should monitor more broadly than for adverse impact (See Benefits, P.9-10, paras 2.13 – 2.20 of the Monitoring Guidance).

Effective monitoring will help us identify any future adverse impact arising from the policy which may lead the us to conduct an equality impact assessment, as well as help with future planning and policy development.

Part 1. Policy scoping: Information about the policy

Name of the activity/policy

Building Illumination Policy for LCCC

1. Is this activity/policy...?

An existing activity/policy A revision of an existing activity/policy A new activity/policy?

2. What are the intended aims/outcomes the activity/policy is trying to achieve?

The purpose of the policy is to operate an effective procedure for managing requests to light up the Council Chamber at the civic headquarters and to ensure they are considered in a consistent and transparent manner through an application process.

The policy aims:

- To outline clearly, the specific criteria that must be met for illumination requests to be considered.
- To put in place measures that enable effective management of an illumination programme.
- To put in place a clear timeframe to enable the relevant approvals to be sought through Corporate Services Committee and Council in line with Council's governance procedures.
- To ensure that the light up programme reflects the diversity across the city and is inclusive of all.
- To set out arrangements for promotion of the illuminations and associated cause.
- To develop an annual calendar to be agreed by Corporate Services Committee in November each year for ratification at full Council in December.

3. Are there any expected benefits to the Section 75 categories/groups from this activity/policy? If so, please explain.

It is not identified that there will be any particular opportunities to promote equality across the Section 75 Groupings as a result of this policy refresh. The amendment of this policy in a more user friendly format aims to assist LCCC Officers managing building illumination requests through a transparent application process.

The policy does not differentiate or identify groupings, therefore there will be no direct adverse impact on any groups.

4. Who initiated or wrote the activity/policy?

The policy was written by Corporate Communications and Administration Unit.

5. Who owns and who implements the activity/policy?

The policy is owned by the Corporate Communications and Administration Unit of LCCC. It is implemented by the Corporate Communications and Administration HoS, Administration Manager, Civic Events Officer and Marketing and Communications team.

Implementation factors

6. Are there any factors which could contribute to/detract from the intended aim/outcome of the aim/outcome of the activity/policy/decision?

YES NO

If yes, are they:-

Financial?

Legislative?

Other?

If 'other', please detail below:-

Not Applicable

Main stakeholders affected

7. Who are the internal and external stakeholders (actual or potential) that the activity/policy will impact upon?

Staff

Service Users

Other Public Sector Organisations

Voluntary/Community/Trade Unions

Other e.g. Elected Members

8. If other, please detail below

Registered charities, formally constituted/registered groups and public bodies are the main external stakeholders.

9. Other documents/activities/policies with a bearing on this activity/policy. [This is to include both internal & external documents/activities and policies. Should there be an internet link or other linkage to any of items listed, please provide these also.]

Name of document/activity/policy	Who owns or implements document/activity/policy?
1. Corporate Plan	Chief Executive
2. Photographic and Public Relations Protocol Policy	HoS Corporate Communications and Administration

Available Evidence

10. What evidence/information (both qualitative and quantitative) have you gathered to inform this activity/policy? Specify details for each of the Section 75 categories.

Sec 75 Category	Details of evidence/information
Religious Belief	<p>The existing external lighting procedure has been in place for 17 months. In implementing the policy there has been no deviation that would show any bias or impact across any one of the specific Section 75 groupings.</p> <p>During the period the current policy has been in place, there have been no instances of complaint or query over a section 75 grouping being impacted as a result of the policy terms and conditions. The new policy update does not fundamentally deviate from the original policy. The Policy has been amended to ensure a transparent procedure for managing illumination requests to outline clearly the specific criteria that must be met for illumination requests to be considered, to put in place measures that enable effective management of an illumination programme and to put in place a clear timeframe to enable the relevant approvals to be sought through Corporate Services Committee and Council in line with Council governance procedures which will benefit all applicants. It also provides for requests that do not meet the eligibility to be considered in exceptional circumstances.</p> <p>Evidence: For an indication of the Section 75 groups covered please see appendix 4 –‘2020 REGISTER FOR LVI BUILDING ILLUMINATIONS’</p>
Political Opinion	
Racial Group	
Age	
Marital Status	
Sexual Orientation	
Men & Women Generally	
Disability	
Dependants	

Needs, Experiences and Priorities

11. Taking into account the information referred to above, what are the different needs, experiences and priorities of each of the following categories, in relation to the particular activity/policy/decision? Specify details for each of the Section 75 categories

Sec 75 Category	Details of needs/experiences/priorities
Religious Belief	<p>The policy has a number of terms and conditions in place to manage an open and transparent application process for building illumination requests. These are applicable to all applicants and therefore not detrimental to any one group in particular.</p>
Political Opinion	
Racial Group	
Age	
Marital Status	

Sexual Orientation	
Men & Women Generally	
Disability	
Dependants	

Part 2. Screening Questions

1. What is the likely impact on equality of opportunity for those affected by this activity/policy, for each of the Section 75 equality categories? (Minor/major/none)*.

Sec 75 Category	Details of policy impact	Level of impact (minor/major/none)*
Religious Belief	The policy does not differentiate or identify groupings, therefore there will be no direct adverse impact on any groups.	None
Political Opinion		None
Racial Group		None
Age		None
Marital Status		None
Sexual Orientation		None
Men & Women Generally		None
Disability		None
Dependants		None

2. Are there opportunities to better promote equality of opportunity for people within the Sec 75 equality categories?

Sec 75 Category	Yes <input type="checkbox"/> (Provide details below)	No <input checked="" type="checkbox"/> (Provide details below)
Religious Belief	N/A	Particular opportunities to promote equality across the Section 75 Groupings as a result of this policy have not been identified. The review of this policy aims to implement a transparent procedure for managing Illumination
Political Opinion	N/A	
Racial Group	N/A	
Age	N/A	
Marital Status	N/A	
Sexual Orientation	N/A	

Men & Women Generally	N/A	requests. The policy does not differentiate or identify groupings, therefore there will be no direct adverse impact on any groups.
Disability	N/A	
Dependants	N/A	

3. To what extent is the activity/policy likely to impact on good relations between people of different religious belief, political opinion or racial group? (Minor/major/none).

Good Relations Category	Details of policy impact	Level of impact (minor/major/none)*
Religious Belief	The policy should not impact adversely on Good Relations between the three categories the policy does not differentiate or identify groupings, therefore there will be no direct adverse impact on any groups.	None
Political Opinion		None
Racial Group		None

4. Are there opportunities to better promote good relations between people of different religious belief, political opinion or racial group?

Good Relations Category	Yes <input type="checkbox"/> (Provide details below)	No <input checked="" type="checkbox"/> (Provide Details below)
Religious Belief		The policy does not differentiate or identify groupings, therefore there will be no direct adverse impact on any groups.
Political Opinion		
Racial Group		

Additional Considerations

5. Multiple identity

Provide details of data on the impact of the policy on people with multiple identities. Specify relevant Section 75 categories concerned.

Council recognises that no one individual sits exclusively within just one of the nine designated groups and this has been given consideration at this time

*** Major impact:**

- a) The policy is significant in terms of its strategic importance;
- b) Potential equality matters are unknown, because, for example, there is insufficient data upon which to make an assessment or because they are complex, and it would be appropriate to conduct an equality impact assessment in order to better assess them;
- c) Potential equality and/or good relations impacts are likely to be adverse or are likely to be experienced disproportionately by groups of people including those who are marginalised or disadvantaged;
- d) Further assessment offers a valuable way to examine the evidence and develop recommendations in respect of a policy about which there are concerns amongst affected individuals and representative groups, for example in respect of multiple identities;
- e) The policy is likely to be challenged by way of judicial review;
- f) The policy is significant in terms of expenditure.

Minor impact

- a) The policy is not unlawfully discriminatory and any residual potential impacts on people are judged to be negligible;
- b) The policy, or certain proposals within it, are potentially unlawfully discriminatory, but this possibility can readily and easily be eliminated by making appropriate changes to the policy or by adopting appropriate mitigating measures;
- c) Any asymmetrical equality impacts caused by the policy are intentional because they are specifically designed to promote equality of opportunity for particular groups of disadvantaged people;
- d) By amending the policy there are better opportunities to better promote equality of opportunity and/or good relations.

No (none) impact

- a) The policy has no relevance to equality of opportunity or good relations;
- b) The policy is purely technical in nature and will have no bearing in terms of its likely impact on equality of opportunity or good relations for people within the equality and good relations categories

Part 3. Screening Decision

There are 3 screening decision outcomes, as noted below**.

Choose only 1 of these and provide reasons for your decision outcome and ensure evidence is noted/referenced for any decision outcome reached.

Screening Decision Outcomes Options	Reasons/Evidence
<p>Option 1</p> <p>Screen out without mitigation <input checked="" type="checkbox"/></p>	<p>The policy provides detailed terms and conditions for registered charities, formally constituted/registered groups and public bodies for council illuminations requests as well as a criteria on how all applications should be assessed. The procedures do not identify specific section 75 groupings and criteria are to be applied to every application request received.</p>
<p>Option 2 (see "Mitigation" section, below)</p> <p>Screen out with mitigation <input type="checkbox"/></p>	<p>N/A</p>
<p>Option 3 (see "Timetabling & prioritising section below)</p> <p>Screen in for a full EQIA <input type="checkbox"/></p>	<p>N/A</p>

Mitigation (Relevant to Option 2)

Should you conclude that the likely impact is 'minor' and an equality impact assessment is not to be conducted, you may consider mitigation to lessen the severity of any equality impact, or the introduction of an alternative policy to better promote equality of opportunity or good relations.

Can the activity/policy/decision be amended or changed or an alternative activity/policy introduced to better promote equality of opportunity and/or good relations?

If so, give the **reasons** to support your decision, together with the proposed changes/amendments or alternative activity/policy.

[Click here to enter text.](#)

Timetabling and Prioritising (Relevant to Option 3)

Factors to be considered in timetabling and prioritising activities/policies for equality impact assessment.

If the activity/policy has been '**screened in**' for equality impact assessment, then please answer the following questions to determine its priority for timetabling the equality impact assessment.

On a scale of 1-3, with 1 being the lowest priority and 3 being the highest, assess the activity/policy in terms of its priority for equality impact assessment.

Priority Criterion	Rating (1-3)
Effect on equality of opportunity and good relations	1
Social need	1
Effect on people's daily lives	1
Relevance to the council's functions	1
Total Rating Score	4

If the decision is not to conduct an equality impact assessment you should consider if the policy should be mitigated or an alternative policy be introduced.

Is the activity/policy affected by timetables established by other relevant public authorities?

YES NO

If yes, please provide details:-

****** The following documentation (**as a minimum**) should be available to support the screening outcome decision:-

- A written copy of the activity/policy in question;
- The screening template duly completed with the screening decision made explicit;
- All evidence utilised/referenced to support the screening decision to be available;

Part 4. Monitoring

On behalf of the council, you should consider the guidance contained in the Commission's Monitoring Guidance for Use by Public Authorities (July 2007).

The Equality Commission recommends that where the activity/policy has been amended or an alternative policy introduced, the council should monitor more broadly than for adverse impact (See Benefits, P.9-10, paras 2.13 – 2.20 of the Monitoring Guidance).

Effective monitoring will help the council identify any future adverse impact arising from the activity/policy which may lead the us to conduct an equality impact assessment, as well as help with future planning and activity/policy development.

Who will undertake and sign-off the monitoring of this activity/policy and on what frequency?

Please give details below:-

Will be undertaken by: Name & Position/Job Title:	Frequency (eg. Annually):
Civic Events Officer	Annually
Will be signed-off by: Name & HoS Title:	Frequency:
Corporate Communications and Administration HoS	Annually

Part 5 - Approval and authorisation

Screened by:	Position/Job Title	Date
Carole Hamilton	Civic Events Officer	05/03/2021
	Manager	
Stephen Malcolm	Equality Officer	05/03/2021
Approved by:		
Frances Byrne	Head of Service	05/03/2021

Note: A copy of the Screening Template, for each activity/policy screened should be 'signed off' and approved by a senior manager responsible for the activity/policy, made easily accessible on the council's website as soon as possible following completion and made available on request.

RURAL NEEDS ASSESSMENT FORM

SECTION 1: Defining the Activity subject to section 1 (1) of the Rural Needs Act NI (2016)

1a. Please provide a short title that describes the activity being undertaken by you, your Service Unit or Department, that is subject to section 1 (1) of the Rural Needs Act (NI) 2016.

A refresh of the 'Building Illumination Policy for LCCC' to include and update of the notice periods required for applications and additional measures to enable effective management of the annual building illumination calendar.

1b. Please specify which category the activity specified in section 1a, above, relates to:-

- Developing a: Policy Strategy Plan
- Adopting a: Policy Strategy Plan
- Implementing a: Policy Strategy Plan
- Revising a: Policy Strategy Plan
- Designing a Public Service:
- Delivering a Public Service:

1c. Please provide the official title (if any) of the policy, strategy, plan or public service document or initiative relating to the category indicated in section 1b, above.

Building Illumination Policy for LCCC.

1d. Please provide details of the aims and/or objectives of the policy strategy plan or public service document or initiative.

This policy aims to ensure that an effective procedure is in place for managing requests to light up the Council Chamber at the civic headquarters and to ensure they are considered in a consistent and transparent manner through an application process.

Castle Gardens will only be lit up as part of a civic event or commemoration as agreed by Corporate Services Committee. External requests to light up Castle Gardens will not be accepted.

Objectives:

- To outline a transparent procedure for managing requests to light the external façade of the Council Chamber at civic headquarters.
- To outline clearly, the specific criteria that must be met for illumination requests to be considered.
- To put in place measures that enable effective management of an illumination programme.

- To put in place a clear timeframe to enable the relevant approvals to be sought through Corporate Services Committee and Council in line with Council’s governance procedures.
- To ensure that the light up programme reflects the diversity across the city and is inclusive of all.
- To set out arrangements for promotion of the illuminations and associated cause.
- To develop an annual calendar to be agreed by Corporate Services Committee in November each year for ratification at full Council in December.

1e. What definition of “rural” is being used in respect of the Policy, Strategy, Plan or Public Service?

- Population settlements of less than 5,000 (default definition)
- Other definition (please provide details below)
- A definition of rural is not applicable in this case

Details of alternative definition of “rural” (if used)

Not Applicable

Details of why a definition of “rural” is not applicable in this case (if selected)

Not Applicable

SECTION 2: Understanding the Impact of the Policy, Strategy, Plan or Public Service.

2a. Is the Policy, Strategy, Plan or Public Service likely to impact on people in rural areas?

- Yes
- No (If the response is **NO**, go to question **2e**)

2b. Please provide a brief explanation how the Policy, Strategy, Plan or Public Service is likely to impact on people in rural areas.

[Click here to enter text.](#)

2c. If the Policy, Strategy, Plan or Public Service is likely to impact on people in rural areas differently from people in urban areas, please explain how it is likely to impact on people in rural areas differently.

[Click here to enter text.](#)

2d. Indicate which of the following rural policy areas the Policy, Strategy, Plan or Public Service is likely to primarily impact on:

- Rural Business
- Rural Tourism
- Rural Housing
- Broadband or Mobile Communications in Rural Areas
- Jobs/Employment in Rural Areas

- Education/Training in Rural Areas
- Transport/Infrastructure in Rural Areas
- Health/Social Care Services in Rural Areas
- Poverty in Rural Areas
- Deprivation in Rural Areas
- Rural Crime or Community Safety
- Rural Development
- Agri – Environment
- Other (Please specify below)

[Click here to enter text.](#)

If your response to **2a** was **YES**, now go to **SECTION 3, Question a**

2e. Please provide a brief explanation as to why the Policy, Strategy, Plan, or Public Service is NOT likely to impact on people in rural areas.

This is a refresh of the Building Illumination policy with the aim of putting in place measures that enable effective management of an illumination programme. In this regard, it has no bearing on people in rural areas.

SECTION 3: Identifying the Social & Economic Needs of Persons in Rural Areas

3a. Have you taken steps to identify the social & economic needs of people in rural areas that are relevant to the Policy, Strategy, Plan or Public Service?

Yes No (If the response is **NO**, go to Question **3e**)

3b. Please indicate which of the following methods or information sources were used by you to identify the social and economic needs of the people in rural areas.

- | | |
|--|---|
| Consultation with Rural Stakeholders <input type="checkbox"/> | Published Statistics <input type="checkbox"/> |
| Consultation with Other Organisations <input type="checkbox"/> | Research Papers <input type="checkbox"/> |
| Surveys/Questionnaires <input type="checkbox"/> | Other Publications <input type="checkbox"/> |

3c. Please provide any additional details of the methods and information sources used to identify the social & economic needs of people in rural areas (include relevant dates, names of organisations, individuals, titles of publications, website references, details of surveys or consultations undertaken etc.).

Not Applicable

3d. Please provide details of the social & economic needs of people in rural areas which have been identified by you commensurate with this Policy, Strategy, Plan or Public Service.

Not Applicable

If the response to question **3a** was **YES**, go to question **4a** now.

3e. Please give the reasons no steps were taken by you, your Service Unit or Department to identify the social & economic needs of people in rural areas in relation to this Policy, Strategy, Plan or Public Service.

This is a refresh of the existing policy. Implementation of this policy has no bearing on people in rural areas.

SECTION 4: Considering the Social & Economic Needs of Persons in Rural Areas.

4a. Please provide detail of the issues considered in relation to the social & economic needs of people in rural areas.

As this is a refresh of the existing policy, no social or economic issues were considered.

SECTION 5: Influencing the Policy, Strategy, Plan or Public Service

5a. Has the development, adoption, implementation or revising of the Policy, Strategy or Plan, or the design or delivery of the Public Service, been influenced by the rural needs identified?

YES

NO (If the response is **NO**, go to question **5c**).

5b. Please explain how the development, adoption, implementation or revising of the Policy, Strategy or Plan, or the design or delivery of the Public Service, **HAS** been influenced by the rural needs identified.

[Click here to enter text.](#)

If the response to **5a** was **YES**, go to question **6a** now.

5c. Please explain why the development, adoption, implementation or revising of the Policy, Strategy or Plan, or the design or delivery of the Public Service, **HAS NOT** been influenced by the rural needs identified.

As this is a refresh of the existing building illumination policy, it was not considered necessary for rural needs to be identified.

SECTION 6: Documenting & Recording

6a. I confirm that the Rural Needs Impact Assessment template will be retained by me, this Service Unit or Department and that the information compiled within it has been compiled in accordance with paragraph 6.7 of the guidance.

Name: Carole Hamilton

Section: Corporate Communications and Administration

Date: 5th March 2021

APPENDIX 3

Practical Guide to the Workings of the Bribery Act 2010

Background

The UK Bribery Act came into force on 1 July 2011. It breaks new ground in the governance field by introducing an offence of corporate failure to prevent bribery. The only defence for an organisation against this liability is to prove that it had 'adequate procedures'.

The Ministry of Justice has issued guidance and case studies to clarify the meaning of 'adequate procedures' following an extensive consultation process that began in September 2010. The guidance is high level, principles-based and non-prescriptive in character formulated around six "principles":

1. Proportionate procedures
2. Top level commitment
3. Risk assessment
4. Due diligence
5. Communication
6. Monitoring and review

The objective of the Bribery Act is not to bring the full force of the criminal law to bear upon well run commercial organisations that experience an isolated incident of bribery.

Organisations are encouraged to develop preventative procedures appropriate and proportionate to their circumstances taking into account their size, structure, complexity and risk exposure. This involves applying a risk-based approach to focus effort according to the organisation's jurisdictions, business sectors, business partners and transactions.

Offences

The Bribery Act contains two general offences (under section 1 and 2). These are:-

1. Offering, promising or giving of a bribe (known as active bribery) and;
2. Requesting, agreeing to receive or accepting of a bribe (known as passive bribery).

There are two further specific offences which relate to bribing foreign officials (section 6) and, importantly, failing to prevent bribery (section 7).

To be liable under section 7, a commercial organisation must have failed to prevent conduct that would amount to the commission of an offence under sections 1, 2 or 6. Where the prosecution cannot prove that an offence has been committed the section 7 offence will not be triggered. The precise nature of what is an offence and what is not, is quite complex so further reading of the detailed explanations and case studies within the government's guidance is recommended.

Principles

The detail of how organisations might apply these principles will vary but the outcome should always be robust and effective anti-bribery procedures. The principles operate as a whole so there is a degree of overlap.

1. Proportionate Procedures	
<p>“A commercial organisation’s procedures to prevent bribery by persons associated with it are proportionate to the bribery risks it faces and to the nature, scale and complexity of the commercial organisation’s activities. They are also clear, practical, accessible, effectively implemented and enforced.”</p>	
An organisation’s policies should explain:	Commentary
<p>The organisation’s commitment to bribery prevention</p> <p>Involvement of the organisation’s top-level management</p> <p>An overview of the strategy to implement bribery prevention policies.</p>	<p>Policies articulate the council’s anti-bribery stance, show how it will be maintained and help to create an anti-bribery culture.</p>
The procedures needed to implement policies include:	Commentary
<ul style="list-style-type: none"> • Assessment of bribery risks. • Mitigation of bribery risks. • Due diligence of existing or prospective associated persons. • Governance of business relationships with all other associated persons including pre and post contractual agreements. • Gifts, hospitality and promotional expenditure; charitable and political donations; or demands for facilitation payments. • Direct and indirect employment, including recruitment, terms and conditions, disciplinary action and remuneration. 	<p>Bribery prevention procedures may be stand alone or form part of wider guidance.</p> <p>An initial assessment of risk across the Council, department, or Service unit is a necessary first step.</p> <p>Proportionality is key. Small organisations are unlikely to need procedures that are as extensive as those of a large multi-national organisations, for example.</p>

<ul style="list-style-type: none"> • Financial and commercial controls such as adequate bookkeeping, auditing and approval of expenditure. • Transparency of transactions and disclosure of information. • Decision making procedures, such as delegation of authority, separation of functions and the avoidance of conflicts of interest. • Enforcement, detailing discipline processes and sanctions for breaches of the organisation's anti-bribery rules. • The reporting of bribery including 'speak up' or 'whistle blowing' procedures. • The detail of the process by which the organisation plans to implement its bribery prevention procedures, for example, how its policy will be applied to individual projects and to different parts of the organisation. • The communication of the organisation's policies and procedures, and training in their application. • The monitoring, review and evaluation of bribery prevention procedures. 	
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2. Top Level Commitment	
<p>"The top-level management of a commercial organisation (be it a board of directors, the owners or any other equivalent body or person) are committed to preventing bribery by persons associated with it. They foster a culture within the organisation in which bribery is never acceptable."</p>	
Statements of intent to include:	Commentary
<ul style="list-style-type: none"> • A commitment to carry out business fairly, honestly and openly. • A commitment to zero tolerance towards bribery. • Consequences of breaching the policy for employees and managers. • For other associated persons the consequences of breaching contractual provisions relating to bribery prevention (this could include a reference to avoiding doing business with others who do not commit to doing business without bribery as 'best practice'). 	<p>Those at the top of the council are in the best position to foster a culture of integrity and accountability.</p> <p>A formal statement appropriately communicated can be very effective in establishing an anti-bribery culture within local government.</p>

<ul style="list-style-type: none"> • Articulation of the business benefits of rejecting bribery (reputational, customer and business partner confidence). • Reference to the range of bribery prevention procedures the commercial organisation has or is putting in place, including any protection and procedures for confidential reporting of bribery (whistle-blowing). • Key individuals and departments involved in the development and implementation of the organisation's bribery prevention procedures. • Reference to the organisation's involvement in any collective action against bribery in, for example, the same business sector. 	<p>Discussing ethical values and behaviour as part of top level meetings raises the profile and commitment to preventing bribery and corruption.</p> <p>Senior managers have a responsibility to lead by example.</p>
<p>Providing leadership through:</p>	<p>Commentary</p>
<ul style="list-style-type: none"> • Selection and training of senior managers to lead anti-bribery work. • Key measures such as a code of conduct. • Endorsement of all bribery prevention related publications. • Awareness raising and encouraging transparent dialogue throughout the organisation so as to seek to ensure effective dissemination of anti-bribery policies and procedures to employees, subsidiaries, and associated persons, etc. • Engagement with relevant associated persons and external bodies, such as sectoral organisations and the media, to help articulate the organisation's policies. • Specific involvement in high profile and critical decision making where appropriate. • Gaining assurance on the effectiveness of risk assessment. • General oversight of breaches of procedures and the provision of feedback to the board or equivalent, where appropriate, on levels of compliance. 	<p>Effective leadership in bribery prevention will take a variety of forms appropriate for and proportionate to the size, management structure and circumstances of your area.</p>

<p>3. Risk Assessment</p>
<p>“The commercial organisation assesses the nature and extent of its exposure to potential external and internal risks of bribery on its behalf by persons associated with it. The assessment is periodic, informed and documented.”</p>

Risk assessment characteristics to include:	Commentary
<ul style="list-style-type: none"> • Oversight of the risk assessment by top level management. • Appropriate resourcing to reflect the scale of the organisation’s business and the need to identify and prioritise all relevant risks. • Identification of the internal and external information sources that will enable risk to be assessed and reviewed. • Due diligence procedures and enquiries. • Accurate and appropriate documentation of the risk assessment and its conclusions. 	<p>This will form part of a general risk assessment carried out in relation to business objectives, with more specific standalone bribery risk assessment being produced as required.</p> <p>The ‘adequate procedure’ guidance provides examples of commonly encountered risks – external and internal.</p>

4. Due Diligence	
<p>“The commercial organisation applies due diligence procedures, taking a proportionate and risk based approach, in respect of persons who perform or will perform services for or on behalf of the organisation, in order to mitigate identified bribery risks.”</p>	
Implementation of procedures:	Commentary
<ul style="list-style-type: none"> • Conduct due diligence using a risk-based approach. • Direct interrogative enquiries, indirect investigations, or general research on proposed associated persons. • Specific due diligence for prospective third party intermediaries, acquisitions and mergers. • Appraisal and continued monitoring of recruited or engaged ‘associated’ persons proportionate to the identified risks. 	<p>The purpose of this Principle is to encourage organisations such as the council to put in place due diligence procedures designed to prevent persons associated with them from bribing on their behalf. Due diligence procedures are therefore a form of bribery risk assessment and a means of mitigating a risk.</p>

5. Communication	
<p>“The commercial organisation seeks to ensure that its bribery prevention policies and procedures are embedded and understood throughout the organisation through internal and external communication, including training that is proportionate to the risks it faces.”</p>	
Characteristics of communication and training:	Commentary

<ul style="list-style-type: none"> • Internal communications should convey the ‘tone from the top’ • Focus on the implementation of the organisation’s policies and procedures and the implications for employees. • Internal communications establish secure, confidential and accessible means for internal or external parties to raise concerns about bribery, for requesting advice and making suggestions for improvement of bribery prevention procedures and controls. • External communication of bribery prevention policies through a statement or codes of conduct. • Training tailored to the specific risks associated with specific posts. Training is continuous, and regularly monitored and evaluated. 	<p>Communication and training provides the knowledge and skills needed to deploy the council’s procedures and deal with any bribery related problems or issues that may arise.</p> <p>Training may need to be mandatory for specific posts and individuals at specific times such as induction.</p>
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6. Monitoring and Review	
<p>“The commercial organisation monitors and reviews procedures designed to prevent bribery by persons associated with it and makes improvements where necessary.”</p>	
<p>Implementation of procedures:</p>	<p>Commentary</p>
<ul style="list-style-type: none"> • Assurance on the effectiveness of anti-bribery procedures. • Monitor the ethical quality of transactions to provide insight into the effectiveness of procedures designed to prevent bribery. • Staff surveys, questionnaires and feedback from training can provide an important source of information on effectiveness and a means by which employees and other associated persons can inform continuing improvement of anti-bribery policies. 	<p>Managers should consider how to monitor and evaluate the effectiveness of their bribery prevention procedures and adapt them where necessary.</p>

The final principle in ‘adequate procedures’ that relates to monitoring and review clearly recognises the need for assurances on the effectiveness of anti-bribery procedures.

There are two basic options in providing assurances:-

1. A specific and detailed audit engagement based upon an agreed scope and terms of reference.
2. A focussed audit on defined areas of importance.

Likely areas of focus for internal audit reviews include procurement, finance, marketing, vetting of authorised persons, due diligence arrangements and general application of council policies.

FRAUD PROOFING CHECKLIST

Questions	To be completed by Sponsoring HoS
Have you identified and understood what the new system/policy/programme actually is?	
Have you identified the risks associated with such an activity?	
Have you identified who may try to abuse/defraud the system/activity?	
Have you considered the controls that we need to put in place to prevent this?	
Have you engaged with relevant experts to assist us in this process?	
Has this process been formally documented and approved?	
Have the risks associated with the system/activity been included in relevant registers?	
Has the need to run a pilot been sufficiently considered?	
Has responsibility for reviewing the activity been allocated:- <input type="checkbox"/> To a specific post holder? <input type="checkbox"/> Within a specific timeframe?	
Has feedback from pilots or short term operation of the activity been considered and remedial action taken where required?	
Are there arrangements in place for the results of such reviews in place to report back to senior management?	

APPENDIX 4

2020 REGISTER FOR LVI BUILDING ILLUMINATIONS

DATE	ORGANISATION	CAUSE	COLOUR
28/03/2020	Endometriosis Support NI	Endometriosis Awareness Month	Yellow
02/05/2020	LCCC	To mark the date of the annual Garden of Reflection Service held at Lagan Valley Island.	Pink
08/05/2020	Royal British Legion – Lisburn Branch	VE DAY 75	Blue
09/05/20 & 10/05/20	LCCC	VE 75 Weekend	Blue
12/05/2020	The Department of Health	International Nurses Day	Blue
01/06/2020	Volunteer Now	Volunteers' Week	Purple
21/06/2020	Motor Neurone Disease Association	MND Awareness Day	Blue
22/06/2020	LCCC	Children's Hospice Week	Purple
05/07/2020	LCCC	NHS 72 nd Birthday	Blue
07/09/2020	Public Health Agency	Organ Donation Week	Pink
09/09/2020	Air Ambulance NI	UK Air Ambulances Week	Red
10/09/2020	LCCC	World Suicide Prevention Day	Orange

DATE	ORGANISATION	CAUSE	COLOUR
12/09/2020	LCCC	Foetal Alcohol Spectrum Disorders Awareness Day	Red
13/09/2020	LCCC	Mitochondrial Awareness Week	Green
21/09/2020	LCCC	Recycle Week	Green
25/09/2020	Marie Curie	Twilight Walk – “Light up the night”	Yellow
27/09/2020	LCCC	National Police Memorial Day	Blue
30/09/2020	LCCC	Childhood Cancer Awareness Month	Gold
01/10/2020	LCCC	Dyslexia Awareness Month	Red
05/10/2020	Huntington’s Disease Association NI	Huntington’s Disease Awareness Month	Blue
10/10/2020	AMH New Horizons	World Mental Health Day	Purple
15/10/2020	SANDS (Stillbirth & Neonatal Death Charity)	Baby Loss Awareness Week	Blue
19/10/2020	Parenting NI	Parenting Week	Purple
24/10/2020	UNA Northern Ireland	United Nations – 75th Anniversary	Blue
29/10/2020	The Stroke Association	World Stroke Day	Purple
11/11/2020	LCCC	Remembrance Day	Red

DATE	ORGANISATION	CAUSE	COLOUR
17/11/2020	Tiny Life	World Prematurity Day	Purple
19/11/2020	Pancreatic Cancer UK	World Pancreatic Cancer Awareness Day	Purple
03/12/2020	Disability Action	International Day for Disabled People	Purple