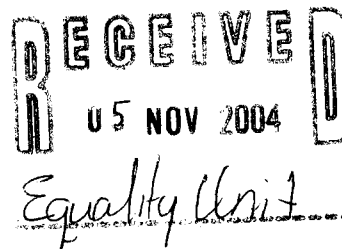


# COLERAINE BOROUGH COUNCIL

4 November 2004

Single Equality Bill Team  
Office of the First Minister and  
Deputy First Minister  
Room E3.18  
FREEPOST NAT17679  
Belfast  
BT4 3BR



Dear Sir

## Discussion Paper on the Single Equality Bill (SEB)

At a recent meeting of Council, members offered the undemoted comments on the Discussion Paper on the Single Equality Bill (SEB).

- The Discussion Paper usefully highlights the inconsistencies in the current legislation addressing discrimination.
- The Paper equally illustrates the complexities in consolidating existing levels of protection into a SEB, more so rationalising upwards from existing levels of protection and even more so extending existing protection.
- Council welcomes protection against discrimination in all fields of endeavour but has concerns about the potential complexity and bureaucracy that the SEB may give rise to, as illustrated by the Discussion Paper.
- Council queries if it may be more effective to re-address protection on the basis that discrimination in general should be addressed, rather than extending protection to specific groups in society; then to concentrate on the hopefully smaller task of managing appropriate exceptions to that general rule. This approach, with help from Codes of Practice, supported by mediation, conciliation and arbitration and finally backed up by law, may be as effective both in terms of protection and administration as the possibilities outlined in the Discussion Paper. Unfortunately there are no certainties either way.
- For either the more radical suggestion above or for the SEB as potentially defined in the Discussion Paper, Council would emphasise that early drafts should be rigorously and formally proofed, and debated, by a wide range of informed bodies in our society to ensure that the purpose and principles outlined in Section 2 of the Discussion Paper are likely to be achieved in a balanced manner.

Yours faithfully

**Town Clerk and Chief Executive**

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