

Neutral citation number: [2024] UKFTT 00097 (GRC)

Case Reference: EA/2023/0009

First-tier Tribunal
General Regulatory Chamber
Information Rights IC-174101-Q3M4

Heard at: Royal Courts of Justice Belfast

Heard on: 15 January 2024 Decision given on: 1 February 2024

Before

TRIBUNAL JUDGE CHRISTOPHER HUGHES TRIBUNAL MEMBER JO MURPHY TRIBUNAL MEMBER SUSAN WOLF

Between

CONRADH NA GAEILGE

Appellant

and

INFORMATION COMMISSIONER BELFAST CITY COUNCIL

Respondents

Representation:

For the Appellant: Iryna Kennedy (barrister, instructed by Úna Boyd)

For the Respondent: no appearance

For the Second Respondent: Professor Gordon Anthony (barrister, instructed by Mark George)

Cases:

Bellamy v Information Commissioner & the Secretary of State for Trade and Industry (EA/2005/0023, 4 April 2006)

DBERR v O'Brien v IC , [2009] EWHC 164 QB

R (Morgan Grenfell) v Special Commissioners [2003] 1 AC 563,

Savic v IC, AGO & CO [2017] UKUT AACR 26

Decision: The appeal is Allowed

Substituted Decision Notice: The Second Respondent disclose the requested information (subject to the redaction of personal information of individuals named in the documents) within 42 days of the promulgation of the decision.

REASONS

- 1. Belfast City Council (the Council) adopted and published a language strategy in 2018 for the period 2018-2023. It built on previous work – a language policy adopted in 2006 in the light of guidance from the Department of the Environment (Local Government Division) on the implementation of the European Charter for Regional or Minority Languages ('the European Charter'). In 2017 the Council consulted on a draft policy on Linguistic Diversity and a Proposed Language Framework and after considering the results of consultation adopted the 2018 strategy. It was in part a response to the evolving legal framework, including legal advice that it should have a strategy for the implementation of the European Charter (even it was not required in law to act in accordance with the Charter) and a decision of the High Court in 2017 on a judicial review application brought by Conradh Na Gaeilge of the Executive Committee of the NI Assembly which found that it had failed to comply with obligations flowing form the NI Act 1998 requiring it to adopt a strategy in respect of the Irish language. The 2018 strategy recalled the provisions of the Good Friday Agreement which underpins the constitutional arrangements of Northern Ireland "All participants recognise the importance of respect, understanding and tolerance in relation to linguistic diversity, including in Northern Ireland, the Irish language, Ulster-Scots and the languages of the various ethnic communities, all of which are part of the cultural wealth of the island of Ireland." And aspired to "create a place where linguistic diversity is celebrated and respected, and where those who live, work and visit Belfast can expect to access what Belfast has to offer, using forms of language with which they are familiar and comfortable." As part of that strategy with respect to Ulster Scots the Council displays many signs across the city emphasising the importance of Robert Burns' poetry in the cultural life of the city over the last two hundred years.
- 2. In the implementation of its language strategy the Council decided on 11 October 2019 to have a city-wide consultation on the signage of the four leisure centres designated with a city-wide catchment. It received the results of its consultation on the proposal to erect "Bilingual/Multilingual External Naming and Internal Directional Signage Andersonstown, Lisnaharragh, Olympia and Templemore Leisure Centres" with an options paper on 22 January 2020 in its Strategic Policy and Resources Committee. The results of the consultation were marked not for publication by virtue of paragraph(s) 3 of Part 1 of Schedule 6 of the Local Government Act (Northern Ireland) 2014. At that meeting some decisions were made (including to have discussions with interested parties) and further consideration was deferred. Following the disruption caused by the Covid SARS2 pandemic the matter returned to committee in September 2021. A decision was made to approve Irish and English Welcome and Directional Signage at Olympia Leisure Centre which was then subject to "Call in" a mechanism in local government where, if there is sufficient opposition to a committee decision it may be brought before the full Council.
- 3. Reflecting the post-conflict issues affecting public administration in Northern Ireland the arrangements for Call in laid down by Section 41(1) of the Local Government Act (Northern Ireland) 2014 mean that a decision of the Belfast City Council or one of its Committees can

be called in for reconsideration if at least 15% (9 Members) of the total number of Members request it on the basis that the decision:

- (a) was not arrived at after a proper consideration of the relevant facts and issues; and/or
- (b) would disproportionately affect adversely any section of the inhabitants of the district
- 4. Where a request for a Call in meets the threshold of support required the Chief Executive is required to seek independent legal advice on the validity of the Call in. Where the opinion confirms that the Call in has merit the opinion is circulated to Council members and the decision of the Committee is included in the next meeting of full Council for decision; the matter under review is ground (b) then subject to decision by a qualified majority vote of at least 80% of the members present and voting to support the decision. On this occasion the request for a call in was made on both grounds. The independent legal advice was that ground (a) was not made out, but ground (b) the decision "would disproportionately affect adversely any section of the inhabitants of the district" was established.
- 5. While the decision was publicly known the legal opinion and the material considered by the lawyer was not available to the public. On 8 February 2022 the Appellant sought information. It argued that the Equality Commission had refined its objective of Promoting good relations: "Promoting good relations between different groups in society entails fostering mutual respect, understanding and integration while continuing to combat discrimination and intolerance" arguing that "This new definition clearly demonstrates that 'good relations' should not be deliberately misinterpreted in an attempt to veto anything politically controversial." The Appellant argued that an 'adverse impact' refers to something which immediately has or will lead to a discriminatory detriment to one or more groups of people, and that the erection of bilingual signage across all city-wide leisure centres is in keeping with the guidance outlined in the European Charter for Regional or Minority Languages. In the light of this the Appellant sought:

"1a. Full disclosure of the legal advice sought by Belfast City Council following the DUP call in regarding the erection of bilingual signage at Olympia Leisure Centre.

1b. Copies of documents captured by request 1a.

Classes of Documents: the request covers any proposal or policy or briefing documents plus any legal documentation, internal and external correspondence or communications relating to this matter.

Timeframe: The above request is time restricted from September 2021 until the present day."

6. The Council responded identifying s42 as an exemption. The Appellant submitted detailed arguments on this, noting that what the Council had received was not advice as we would normally understand (which can be ignored) but had the effect of binding the Council; in the event of a judicial review of the decision-making the Council would have to disclose the legal advice, it was undesirable that councillors' decision-making should be shrouded in secrecy, the call-in depended on the interpretation of statutory criteria, "adversely affect" and "disproportionate". Ms Nic Liam argued:-

Should legal opinions be kept confidential it is impossible to assess how the evolving interpretation of these concepts is being applied in practice, and indeed such a situation could lead to an entirely inconsistent approach to their interpretation. The disclosure of the opinions are therefore in the public interest to ensure legal certainty in interpretation

7. She argued for the need for legal certainty and that interpretations of statute law should be consistent with ECHR. The rights of members of the Irish speaking community were engaged. A public understanding of how the decision was reached was important and she raised concerns as to the reasoning in the opinion:

Whilst it is difficult to tell without seeing the Opinion (or others it may rely on) such a determination would appear to be significant departure from the concepts of 'adverse impact' (a concept in equality law closely related to actual discriminatory detriment) as is generally

understood. It is also not clear as to the basis for how the alleged adverse impact has been considered disproportionate, it is in the public interest that this is disclosed

- 8. The Council responded on 11 April upholding the refusal and identifying the specific reasons why the material should not be disclosed:
 - the specific circumstances of the case and the content of the information requested in relation to those circumstances;
 - the age of the information;
 - the timing of the request;
 - the significance and sensitivity of the information;
 - the amount of information already in the public domain, and
 - the need to safeguard confidentiality to ensure access to full and frank legal advice.
- 9. The Appellant sought an internal review arguing:

In particular instance of the current 'call in' over Olympia leisure centre: a legal opinion appears to have held that having to look at Irish (alongside English) on a sign in a leisure centre not only 'adversely affects' a section of the Belfast City population but that the adverse effect is 'disproportionate'. There is a clear public interest in examining how this determination has been reached. It cries out for explanation

- 10. The Appellant complained to the Information Commissioner who, after a cursory investigation, upheld the Council's position. The Commissioner's reasoning correctly identified the key issues: the importance of the client lawyer relationship to the administration of justice and the need to find a substantial public interest to outweigh that confidentiality:
 - 10. The general public interest inherent in this exemption will always be strong due to the importance of the principle behind LPP: safeguarding openness in all communications between client and lawyer to ensure access to full and frank legal advice, which in turn is fundamental to the administration of justice.
 - 11. In Bellamy v Information Commissioner & the Secretary of State for Trade and Industry (EA/2005/0023, 4 April 2006), the Tribunal explained the balance of factors to consider when assessing public interest test: "there is a strong element of public interest inbuilt into the privilege itself. At least equally strong countervailing considerations would need to be adduced to override that inbuilt public interest."
 - 12. The Commissioner considers that the balance of public interest lies in withholding the information and protecting the Council's ability to obtain free, frank, and high-quality legal

advice without the fear of disclosure. The Commissioner is not aware of any public interest arguments that are enough to outweigh or override the inbuilt public interest in the information remaining protected by legal professional privilege.

- 11. The Appellant argued in applying to the tribunal that the effect of the legal opinion was that it constituted a binding adjudication as to whether the conditions for a call in were met; accordingly it should not be viewed as advice obtained in a solicitor client relationship but rather a step in a governmental process. Relying on legal privilege "precludes the public from seeing the basis on which council made its decision to allow a decision to be called in and does not give the public access to any basis upon which that decision could be vulnerable to legal challenge" and "it precludes developing precedents for when the call in process can or should be invoked leaving the standard of whether a decision disproportionately affects adversely any section of the inhabitants of the district up to the interpretation of a single individual in each instance without a check on the consistency of its interpretation and application. Even if this document is characterised as an opinion and is excluded under section 42 FOIA there is an overriding public interest in disclosing the information that underlies, in a significant way, legislative decision-making, which should be transparent"
- 12. The Appellant argued that the decision was inconsistent with UK obligations under the Charter for Regional or Minority Languages and the Framework Convention for National Minorities it further argued that the phrase "disproportionately affected adversely" had been interpreted in a way that is inconsistent with the U.K.'s treaty obligations. Without access to the opinion it was impossible to know whether the Council had met its obligations in relation to language rights and engaged in the necessary balancing of interests that would be appropriate given the nature of the decision that was the subject of the call in. The Appellant also criticised the ICO for failing to address adequately the public interest arguments.
- 13. In resisting the appeal the Commissioner reaffirmed the argument that the material in question was confidential communication between the Council and a lawyer for the purpose of seeking advice and accordingly met the criteria for attracting legal privilege. The Commissioner argued that since the 2014 Local Government Act did not require the Council to follow the advice the advice could not be seen as a binding decision. The limited circulation of the advice (to Council members) and the brief description of its contents meant that the advice had not lost its confidential character.
- 14. In considering the public interest the Commissioner emphasised the inbuilt weight of the privilege and relied on Lord Hoffman's comment in *Morgan Grenfell* that 'such advice cannot be effectively obtained unless the client is able to put all the facts before the adviser without fear that they may afterwards be disclosed and used to his prejudice' and noted that in *Savic* the significance of whether the advice "is relevant to, or might be or might have been of use in, existing, concluded or contemplated legal proceedings" noting that the process to which the advice related was continuing.
- 15. In resisting the appeal the Council emphasised the significance of legal privilege, that the advice was not determinative of the decision on signage and that the international agreements relied on by the Appellant were not enforceable in law.

Appellant's evidence

- 16. Cuisle Nic Liam a language rights co-ordinator for Conradh na Gailge (a forum of the Irish language community) works to promote the Irish language especially in the public services. The organisation views the use of bilingual signage as politically neutral and a method of promoting access to the language. She referred to critical comments by a Council of Europe body; the Advisory Committee on the Framework Convention for the Protection of National Minorities at paragraph 147 of its third report on the UK published 22 December 2011 which systematically addressed in detail a wide range of legislative, policy and other issues across the whole of the UK. (For completeness a number of relevant paragraphs of the third report together with extracts from the Fifth Report submitted by the United Kingdom in response to the fourth report of the Advisory Committee pursuant to Article 25, paragraph 2 of the Framework Convention for the Protection of National Minorities to the Council of Europe on 4 November 2021 are set out in an appendix to this decision).
- 17. Cuisle Nic Liam set out her concerns as to the significance of the issue:

"This legal opinion seriously impacts a community, but they have refused to release it to that community....The basis for objections to measures such as bilingual signage should be made clear by public bodies such as Belfast City Council. They must be able to demonstrate that they have not given weight to objections grounded in sectarianism and they have met their legal obligations.

The Irish speaking community feel frustrated, concerned and suspicious of this decision by Belfast City Council, it has negatively impacted the community's perception of the Council and undermine trust in their processes. Conradh na Gaeilge has worked hard to improve community engagement and trust in public bodies like Belfast City Council. The "Call in" and refusal to release the legal opinion has seriously undermined our work in restoring community confidence in public bodies and processes. People question their transparency and trustworthiness.

If the legal opinion which informed this decision was public it would ensure transparency and improve trust in the council. It would help us to clarify what legal arguments were made, we could provide reassurance that the decision was not rooted in intolerance and sectarianism or if we had concerns we could respond effectively as a community. Conradhe na Geailge can't consult or react appropriately as an advocate without all of the relevant information"

18. Claire Donnelly, the head of an Irish Language primary school gave evidence as to the value of dual language signage:

"Irish speaking children need recognition and assurances that there is a use and purpose to language outside of the school buildings. Bilingual signage is essential in supporting this, when bilingual signs are used you hear see and learn the language and bilingual signage opens the language up to everyone. People coming from other areas of Belfast would like to see the use of the language outside of the west of the city."

She emphasised the value to children at her school of seeing the introduction of the Irish language on one of the buses they use it "meant so much to the families in our school the kids are actively talking about seeing and using Irish words on a public bus". She claimed bilingual signs "pose no risk to a non-Irish speakers at worst they will not be able to read

some of the words at best they will learn a new word." She contrasted the position with Belgium where several languages are used in public spaces. She discussed the role of the Olympia leisure centre in the school's life:

"Scoil an Droichid uses Olympia leisure centre, we bring our children for swimming lessons, we have 162 Irish speaking children using the facilities during the year and speaking Irish in the space. We have always been made to feel very welcome by leisure centre staff and we have always felt welcome and comfortable using the Irish language there. We have never had any negative reaction including in the public areas I do not think the arguments against bilingual signs in the leisure centre reflect the reality of this shared, welcoming space."

- 19. Eoghan Ó Garmaile is a community projects worker involved in various projects intended to normalise the use of Irish including Turas, working on bringing the Irish language to Protestant communities. He commented:
 - "There is a lot of manufactured fear around the Irish language in Northern Ireland, but from my experience in my work with institutions like Queen's University Belfast when Irish language initiatives are put in place this fear doesn't exist and there are very few issues and complaints. Belfast City Council is refusing to meet international legal standards on the basis of a pretend issue. They have no evidence for this decision and won't let us see the legal reasons for the decision."
- 20. Seán Ó Heacháin is head of Irish language at Colaiste Feirste an Irish language secondary school with nearly thousand pupils less than a mile from the Olympia leisure centre. The pupils are conscious of their language and the extent of its use on signs around the city. He has promoted the Irish language to adult groups in many locations across Belfast. He is frustrated and has a sense of despair at the decision and unable to see how the signage can be offensive. As a citizen he feels that for elected representatives to vote for this, "it seems a strange thing to happen".

Consideration

21. While there has during this appeal been some confusion as to the scope of the request; by the time of the hearing that confusion had resolved itself. The request captured the material sent to the independent lawyer for consideration, the advice itself and certain other documents relating to this process. The Call in request itself was within scope of the request, however it was put into the public domain by the Council in response to another request in 2023. The Appellant in submissions relied on decisions of the European Court of Justice on "Regulation (EC) No 1049/2001 of the European Parliament and of the Council of 30 May 2001 regarding public access to European Parliament, Council and Commission documents" in which legal advice, which impacted on formal decisionmaking, was disclosed despite the Regulation having explicit protection from disclosure for legal advice. While (as Counsel for the Council emphasised to the tribunal) this is not binding on this tribunal, it is suggestive of the complexities arising from the different roles of legal advice and the different considerations which arise within a similar legal framework that grants rights of access to documents held by a public body where there is (as in FOIA) a protection of legal advice from disclosure. Similarly, while the international instrument on minority languages may not be binding on the tribunal, its existence and the obligation on His Majesty's Government to give an account of its implementation in the UK is a matter of some weight.

- 22. The tribunal was satisfied that the material fell within s42 for the reasons stated by the Commissioner. However, s42 is a qualified exemption subject to a public interest test. Too frequently public bodies and the Commissioner regard the inbuilt weight of the exemption as tantamount to an absolute exemption. It is not and the detailed circumstances may mean that the balance lies with disclosure. In this case the Appellant's arguments that the material is not privileged are more properly considered as an exploration of public interest factors supporting disclosure.
- 23. The Council did not call any witnesses or submit any witness statements in support of its case. It relied on the Commissioner's decision and the statutory exemption from disclosure contained in s42 FOIA. In its submission to the Information Commissioner (which was uncritically accepted) it listed the matters going against disclosure but did not explore them in depth:-
 - the specific circumstances of the case and the content of the information requested in relation to those circumstances;
 - the age of the information;
 - the timing of the request;
 - the significance and sensitivity of the information;
 - the amount of information already in the public domain, and
 - the need to safeguard confidentiality to ensure access to full and frank legal advice.
- 24. With respect to circumstances, information which had been used by the Council to make a decision was submitted to a lawyer to determine whether a threshold condition had been The lawyer determined on one limb of the test it had not, and on the other disproportionately adversely affecting a section of the community - it had. Despite the protestations of the Council to the contrary this had a significant effect and, given the divisions in the Council it was close to a de facto determination of the outcome of the process which was different from the outcome in the absence of the Call in. It is not entirely unreasonable to suggest that the significant decision which originally been made by councillors to introduce the signs has been made (in the short term – now over two years during which a substantive decision has not been made) by a lawyer. While in principle a tribunal might, on a personal level, not find this inappropriate; a relevant distinction is that a tribunal issues its reasoning (which may be accessed by any concerned individual) based on evidence considered in public. Analogous processes, for example a legal assessor advising a regulatory disciplinary committee or the Clerk to the Magistrates advising a bench of Lay Justices give advice which is (or ought to be) available to the parties. In this case the provision of advice in a certain direction requires the Council administration to conduct the decision-making on the basis of 80% of members supporting the proposal rather than the usual more than 50%, without public evidence or reasoning.
- 25. With respect to the age of the information and the timing of the request, the request was made soon after the issue became apparent in order to advance public information on a significant issue. If (as is perhaps hinted by the Appellant) there is an argument that the advice is deficient then it is clearly in the public interest that either concerns are allayed by publication or an error is rectified. The *Savic* relevance to current events or possible

- litigation is paradoxical, but for the advice it is likely that the process would now be over, because of the advice there is continued uncertainty.
- 26. The significance and sensitivity of the information was clear to the tribunal from the evidence of the Appellant's witnesses and the Council's language strategy. While this consideration may well, in cases relating to commercial questions, point towards non-disclosure, in this case it does not arise and the question of public confidence in decision-making takes centre stage.
- 27. The amount of information already in the public domain was a question the tribunal explored with Counsel for Belfast Council. There was a paucity of information, he identified the Council's language strategy (discussed in paragraph 1) and speeches in Belfast Council (the extent to which they are reported was not explored). An extensive consultation on signage had not been disclosed; the details of the Call in were not released until long after the refusal.
- 28. Whilst the Tribunal recognise the need to safeguard confidentiality to ensure access to full and frank legal advice; in these circumstances Lord Hoffman's comment in *Morgan Grenfell* is of little relevance; the Council would not be discouraged from obtaining advice; the Council has a statutory obligation to seek advice on the Call in, like Martin Luther it can do no other. If it were disclosed it would still have to seek advice on the next occasion; the possibility of publicity for the advice would if anything be an incentive to ensure that the advice was as robust as possible.
- 29. While there is significant inbuilt weight in non-disclosure of legally privileged material the factors identified by the Respondents as supporting non-disclosure do very little in that direction.
- 30. In assessing the balance of public interest the Council has not established significant interest in withholding the information beyond the inbuilt interest in the protection the relationship between the client and the legal adviser. The circumstances of the case, the fact that the legal advice effectively overturned the majority vote in the Council points towards the value of a public explanation. The Appellant's witnesses stressed the positive aspects of the use of the Irish language for its speakers and their aspiration to use it as a means of reaching out to other communities. The Council's language strategy recites the Good Friday Agreement "All participants recognise the importance of respect, understanding and tolerance in relation to linguistic diversity" and sets out the aspiration to "create a place where linguistic diversity is celebrated and respected". In respect of its duties the guidance of the Equality Commission indicates what it should be doing: "Promoting good relations between different groups in society entails fostering mutual respect, understanding and integration while continuing to combat discrimination and intolerance". This resembles the aspiration of Robert Burns "For a' that, an' a' that, It's comin yet for a' that, That Man to Man the warld o'er, Shall brithers be for a' that."
- 31. The concern expressed by a Council of Europe body (Advisory Committee on the Framework Convention for National Minorities) in 2011 (see paragraph 28 in the appendix) sets out as a policy objective a public interest in protecting and promoting minority languages and a rejection of the proposition that promoting the Irish Language is discrimination against the majority population. Against that background the Appellant finds it difficult to comprehend the legal and evidential basis for a decision that erecting Irish

Language signs in leisure centres would cause a disproportionate adverse effect on a part of the population. While the agreements relating to Minority Languages may not be directly enforceable in UK courts they are a significant matter of public interest.

- 32. The ability and preparedness of UK bodies to explain to their own population how they are (or are not) meeting their aspirations is a substantial matter of public interest far outweighing the public interest of legal privilege and, given the circumstances, doing no harm to that interest.
- 33. The decision of the Information Commissioner is not in accordance with the law and the appeal is allowed.

Signed Hughes Date: 1 February 2024

Appendix Council of Europe European Charter for Regional or Minority Languages

Extracts from documents

Advisory Committee on the Framework Convention for National Minorities (Third Opinion on the UK) ACFC/OP/III(2011)006 (adopted 30 June 2011)

Paragraph 147 (conclusion – cited in evidence) ... The Advisory Committee was disconcerted to hear that some representatives of the authorities consider that promoting the use of the Irish language is discriminating against persons belonging to the majority population. Such statements are not in line with the principles of the Framework Convention, and in particular with the provisions of Article 10. It also reiterates that, in line with Article 4.2 and Article 4.3 of the Framework Convention, implementation of minority rights protected under the Framework Convention are not be considered as discriminating against other persons.

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126.....the Advisory Committee has been informed that, in some instances, the need for keeping good relations has been used as justification for not implementing provisions in favour of persons belonging to minorities, such as the erection of bilingual signs

. . .

146. The Advisory Committee is deeply concerned by the failure to adopt legislation on the Irish language due to a lack of political consensus in the Northern Ireland Assembly, notwithstanding the fact that this was a commitment taken by the Parties to the St Andrews Agreement of 2006. It also finds it worrying that some of the authorities in Northern Ireland have expressed their opposition to the preparation of a bill on the Irish language or of an overall strategy to promote the use of the Irish

language, invoking a potentially harmful effect on community relations and budgetary considerations....

147. Moreover, the Advisory Committee regrets that, in addition to a lack of clear legal guarantees for the use of the Irish language, there is a lack of promotion of the Irish language and culture. It understands that, in practice, very little is done to promote the use of Irish in the public sphere and that, although some Irish language officers have been appointed in a few municipalities, the possibilities to use this language in relations with local administrative authorities remain limited. It is also concerned that the overall climate in Northern Ireland does not encourage Irish speakers to use and develop their language freely...(for remainder of paragraph see above).

. . .

Recommendation

149. The Advisory Committee urges the responsible authorities at all levels to take resolute measures to protect and implement more effectively the language rights of persons belonging to the Irish-speaking community. To this effect, they should develop new, comprehensive legislation, in line with the commitments taken in the St Andrews Agreement and their obligations under the Framework Convention.

UK Report responding to the Council of Europe's recommendations arising from the UK's fourth report

Para 112. The Advisory Committee calls for a closer dialogue on signage among the government and local authorities in Northern Ireland to identify pragmatic and flexible solutions that accommodate the demands of the population in line with the principles contained in Article 11 of the Framework Convention.

This is a transferred matter in Northern Ireland, meaning that these issues are for the Northern Ireland Executive to consider and where appropriate for the Northern Ireland Assembly to legislate. Responsibility for street signage falls under the Local Government councils in Northern Ireland which are bound by the Local Government (Miscellaneous Provisions) (Northern Ireland) Order 1995. Article 11 of this legislation provides for Local Government councils to erect bilingual street signs. Each of Northern Ireland's 11 Local Government councils has the authority to develop and implement a policy for street signage.

Belfast City Council has recently updated its policy on street signage. The policy change will make it easier for residents to apply for a bilingual street sign where they live. It requires one resident or their local councillor to come forward with the request to erect a bilingual street sign. If this gains the support of 15% of residents on the electoral register it would go forward for approval by the council. Although Irish is the most popular choice for an alternative language in Belfast, applications can be made for any language. The language, culture, and identity legislation, as agreed in the New Decade new Approach deal in January 2020, when in place, will provide for the creation

of an Office for Identity and Cultural Expression and an Irish Language Commissioner. These bodies will have responsibility for issuing best practice guidance in relation to respecting cultural diversity and supporting the Irish language respectively, which Northern Ireland Government Departments and Local Government councils will be subject to.