

Evangelical Alliance NI's response to the 'Display of Flags and Emblems Bill' Call for Evidence

SEPTEMBER 2026

Introduction

The Evangelical Alliance represents and connects hundreds of organisations, thousands of churches, and tens of thousands of individuals across the UK. Representing our members since 1846, the Evangelical Alliance is the oldest and largest evangelical unity movement in the UK. United in mission and voice, we exist to serve and strengthen the work of the church in our communities and throughout society.

We have been working in Northern Ireland for almost 40 years and engage across a wide range of policy issues from poverty and reconciliation to issues of human dignity and education. We pursue public policies that seek the welfare and common good of our people and our place in line with our Christian understanding of the world.

Under the Good Friday Agreement, citizens in Northern Ireland are permitted to express both British and Irish national identities and constitutional aspirations. We celebrate the many civil and religious freedoms accorded to citizens in Northern Ireland and the fact that those with diametrically-opposed political and constitutional aims can now peacefully share governance here.

Unionist and Nationalist narratives and perspectives on the past, and the future can be very different, and people can consequently talk past one another. We therefore recognise that people may experience the same event, place or symbol through very different lenses and narratives. However, identity in Northern Ireland is neither static nor reducible to a binary and new identities and relationships are possible.

Relationships are what life is all about and we seek healthy relationships right across our community at every level. We have written extensively about reconciliation in our response to the Haass process, the TBUC strategy, and more recently in response to Westminster's inquiry on Reconciliation. Although our people and place are often known for the things that divide us, we see great hope and potential for reconciliation and restoration. We want to see Northern Ireland become known for celebrating the things that unite us, with mutual respect at the heart of our relationships.

General comments on the Bill

We see no biblical imperative towards a single moral solution, rather there are a variety of approaches. Legislation and regulation is important but the success of this bill will largely depend on our relationships and posture towards each other. This includes political leadership and local communities.

We appreciate and support the Bill's own emphasis on context, rather than assuming that the presence of a particular symbol has one objectively fixed meaning. We believe this is important in a society where people can hold fundamentally different understandings of identity, history and constitutional aspiration.

We also welcome the clarity provided by the Bill in identifying the Department for Infrastructure as the responsible body for removal. We believe it is important that there is clarity for members of the public wishing to raise concerns about flags, symbols, murals or other emblems. However, responsibility cannot solely lie with the DFI. Partnership with other public bodies and the PSNI is essential, especially when it comes to public order, security and operational considerations.

Our general approach is that people should be free to display flags from their own private property (or rented property subject to the lease), as long as the flag is not displaying a proscribed organisation etc.

However, it would seem wise that publicly-owned spaces and architecture, such as the lampposts etc referred to in this Bill, should be kept free of any flags and symbols. While *people* can identify as unionist or nationalist or want to express support for a particular cause, *public property* such as roads, kerbstones, lampposts etc should not be identified in this way, rather it belongs to everyone.

Exceptions could be made for a limited time to mark a specific event. This could be through licensing with permission and timescales agreed in advance from the relevant authority and responsibility ascertained for putting up and removing flags/banners/displays. Similarly or alternatively, requests could be facilitated for appropriate infrastructure to be installed in specific locations, such as a designated flag-pole, where an overwhelming majority of people want this and clear protocols are agreed.

Even though we would prefer no flags flying from any publicly owned street infrastructure, we recognise that it would not be a wise or proportionate use of time and money to remove one every time it is erected. Again, we would largely welcome authority residing with the DFI with local councils, other public bodies and the PSNI involved in the decision-making on a local operational basis.

Freedom to express identity is important in a plural society, but it is not unlimited. We recognise that there can be legitimate grounds for restricting expression where conduct

causes genuine harm, intimidation or a serious undermining of the dignity and rights of others. Equally, disagreement, discomfort or offence arising from different identities should not in itself be treated as evidence of such harm.

Responses to Specific Clauses

Please read more detailed comments below. We understand that some of our detail-oriented questions may be answered within the development of a Code of Practice.

Section 1(2)(a)

We agree in principle, subject to the terms being sufficiently clear and objectively applied.

There is legitimate public interest in addressing displays which are genuinely intimidatory or threatening. However, it is important that these terms are clearly defined and applied consistently. How will “intimidatory” and “threatening” be determined, and what evidential threshold will be required before a display is considered to meet either definition?

Section 1(2)(b)

We agree in principle but seek clarity around the evidential threshold for “likely”.

Again, we recognise the legitimate public interest in addressing displays which are likely to stir up hatred or arouse fear. However we wonder if the potential for offence or disagreement be conflated with hatred or fear? We would welcome greater clarity on how “likely” will be determined and what evidence will be required.

Legitimate expression of identity can be accommodated in appropriate ways within a plural society, while displays that genuinely intimidate, threaten, promote hatred or undermine community relations can properly be subject to restriction.

Section 1(2)(c)

We agree.

We recognise and support the legitimate public interest in removing displays which are flags or emblems of proscribed organisations.

Section 1(3)(a)

Agree – Subject to the points made above about the threshold for offensive and insulting.

Section 1(3)(b)

We seek clarity on this section s application, particularly in relation to places of worship.

Sections 1(4) and 1(5)

Again while we would prefer no flags to be flown on lampposts, we welcome the Bill s emphasis on considering the particular flag, place and time in context.

In particular, we welcome consideration of local views, the importance of living free from harassment or intimidation, the duration of a display, and whether it is associated with celebration or commemoration.

Given the different understandings of identity, history and place across Northern Ireland, it is important that these factors are genuinely considered.

Section 2 – Sensitive places

We seek clarity on the application of this definition, particularly in relation to places of worship.

We note and welcome that the definition of “sensitive place” expressly includes a place of worship. Given the number of churches represented by our membership, this is of particular significance to us.

We would welcome clarity on how “in the vicinity of” will be interpreted and how the Department will ensure that the designation of a place as sensitive does not infer that the expression of a particular national or cultural identity is always inappropriate.

Section 4 – Code of Practice

Agree, and welcome the proposed Code of Practice.

We believe the Code will be important in providing clarity and consistency in the application of the legislation, particularly around how flags, communities and events should be respected and how displays should be managed.

Given that places of worship are expressly included as sensitive places, **we would strongly encourage the Department to engage directly with churches and faith communities in developing the Code.**

The Code should also clearly distinguish legitimate cultural and national expression from displays which genuinely intimidate, exclude or undermine community relationships.

Section 6 – Request for assistance from police

Agree in principle, subject to proportionality.

We recognise that police assistance may be necessary where removal could result in a breach of the peace or an offence. Such intervention should remain proportionate, and police involvement should not become a substitute for community engagement and relationship-building which are essential to reconciliation. We would presume that the PSNI would remain free to ultimately decide on an operational basis (taking into account community tensions, officer safety etc) if, how and when the offending item is removed.

Section 7 – Interpretation

We seek clarity on the breadth of the definitions.

The definition of “flag or emblem” extends to bunting, posters, banners, billboards and any similar medium of display. Given the breadth of this definition, we would welcome clarity on its intended scope and how it will distinguish between ordinary political, religious or community expression and displays which fall within the purposes of this legislation.

We would value reassurance that legitimate religious events, community outreach, festivals and church activity would not be unintentionally affected.

The role of churches

We have encouraged churches to think very carefully about flying any national flags whether outside or inside their church building. This is partly due to questions about the relationship between Church and state, and the message it sends to the wider community.

We encourage churches to be welcoming spaces for everyone. Almost every congregation in Northern Ireland will have congregants who are victims/survivors, former paramilitaries or members of security forces – sometimes all three. We believe the Church could be an example to wider society of a radical community of honour, hope and healing.

This reflects our wider commitment to reconciliation: not simply removing things that divide us, but actively building relationships, creating spaces of welcome and finding ways for people with very different identities and experiences to live well alongside one another under the authority of Jesus Christ and within his kingdom which transcends national flags and borders.

Conclusion

We hope that this legislation, alongside the work of churches, communities and government, can contribute to a Northern Ireland where identity is respected, people are welcomed, and our public spaces increasingly reflect reconciliation, healing and hope rather than division.

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