

Diversity impact assessment

Appendix 2

TITLE – Flag Flying Protocol for Council Buildings
DATE – October 2025
LEAD OFFICER – Wayne Hemingway, Head of Democratic Services and Celia Glynn-Williams, Head of Communications and Marketing
1 Summary description of the proposed change What is the change to policy / service / new project that is being proposed? How does it compare with the current situation?
<p>To set out clear, fair, and inclusive guidelines for the flying of flags on Council buildings, ensuring compliance with UK law and promoting community cohesion and awareness.</p> <p>The protocol aims to:</p> <ul style="list-style-type: none"> • Mark key awareness days, months, and cultural celebrations • Foster civic pride • Respond to national and global events. • Promote inclusion, visibility, and belonging for all communities. • Demonstrate organisational commitment to equality, diversity, and inclusion. • Foster a culture of respect and understanding.
2 Summary of evidence used to support this assessment E.g. Feedback from consultation, performance information, service user. E.g. Comparison of service user profile with Medway Community Profile
<p>Equality Act 2010 requires public bodies to have due regard to the need to:</p> <ul style="list-style-type: none"> • Eliminate unlawful discrimination, harassment, and victimisation. • Advance equality of opportunity between people who share a protected characteristic and those who do not. • Foster good relations between people who share a protected characteristic and those who do not. <p><u>Guidance: Public Sector Equality Duty: guidance for public authorities</u></p> <p>Planning: The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (as amended) sets out which flags can be flown without planning permission and under what conditions.</p> <p>Government Guidance: The Department for Culture, Media and Sport (DCMS) encourages the flying of the Union Flag and other national/local flags and provides guidance to ensure this is done in a way that is respectful and inclusive.</p>

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Flying flags: a plain English guide

Union Flag flying guidance for UK government buildings

College of Arms provides further information in relating to flying the Union Flag, including, for example, those occasions where flags shall be flown half-mast.

3 What is the likely impact of the proposed change?

Is it likely to:

Adversely impact on one or more of the protected characteristic groups

Advance equality of opportunity for one or more of the protected characteristic groups

Foster good relations between people who share a protected characteristic and those who don't.

(insert Yes when there is an impact or No when there isn't)

Protected characteristic groups (Equality Act 2010)	Adverse impact	Advance equality	Foster good relations
Age			
Disability	N	Y	Y
Gender reassignment	N	Y	Y
Marriage/civil partnership			
Pregnancy/maternity			
Race	N	Y	Y
Religion/belief	N	Y	Y
Sex			
Sexual orientation	N	Y	Y
Care experience			
Other (e.g. low-income groups)			

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4 Summary of the likely impacts

Who will be affected?

How will they be affected?

Positive Impacts

Promotes National Identity and Unity

- Flags are powerful symbols of national pride and shared values.
- Displaying them on public buildings reinforces a sense of belonging and unity among citizens.
- It can be especially meaningful during national holidays, commemorations, or times of crisis.

Marks Significant Events and Observances

- Flags can be used to commemorate historical events, celebrate cultural festivals, or honour public service (e.g. Armed Forces Day).
- This helps educate the public and raise awareness about important causes.

Celebrates Diversity and Inclusion

- Flying flags for different communities (e.g. Pride flag, Black History Month, Disability Awareness) shows public support and recognition.
- It fosters a more inclusive environment and signals that all citizens are valued.

Enhances Civic Engagement

- Seeing flags on public buildings can spark curiosity and conversations about their meaning.
- It encourages people to learn more about their heritage, rights, and responsibilities.

Strengthens Public Sector Identity

- Flags can represent the identity of the Council.
- They help distinguish public buildings and reinforce their role in serving the community.

Demonstrates Solidarity and Support

- Flying flags in response to global events (e.g. humanitarian crises, international solidarity) shows empathy and global awareness.
- It can be a simple but powerful gesture of support.

Adverse Impacts

Political or Social Controversy

- Flags can become symbols of political ideologies or movements, which may not be universally supported.
- Flying certain flags may be seen as taking sides, leading to public backlash or division.

Perceived Tokenism

- Displaying flags for awareness days or months without meaningful action can be viewed as superficial or performative.

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- Communities may feel that their issues are being acknowledged symbolically but not substantively addressed.

Exclusion or Oversight

- Choosing which flags to fly (and which not to) can unintentionally exclude certain groups.
- Lack of representation or inconsistent practices may lead to feelings of neglect or marginalisation.

Misinterpretation or Lack of Context

- Without proper explanation, some flags may be misunderstood by the public.
- This can lead to confusion or misinformation.

Operational and Logistical Challenges

- Managing flag protocols (e.g. when to fly, how to display, which flags to include) can be complex.
- Mistakes in flag etiquette (e.g. flying a flag upside down or at the wrong time) can cause offence.

5 What actions can be taken to mitigate likely adverse impacts, improve equality of opportunity or foster good relations?

What alternative ways can the Council provide the service?

Are there alternative providers?

Can demand for services be managed differently?

Develop a Clear Flag Flying Protocol

- Create a written Protocol outlining which flags can be flown, when, and why.
- Include criteria for flag selection (e.g. national significance).
- Ensure the Protocol is publicly accessible and consistently applied.

Ensure Transparency

- Clearly communicate the reasons for flying a particular flag, including dates and context.
- Use signage, websites, or social media to explain the significance of the flag.

Be Consistent and Inclusive

- Apply the same standards to all groups to avoid perceptions of favouritism or exclusion.
- Consider a calendar of observances to ensure diverse representation throughout the year.

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Avoid Endorsements

- Refrain from flying flags that represent political parties or ideologies unless mandated by law.
- Focus on flags that promote unity, awareness, or public service.

Train Staff on Flag Protocols

- Ensure staff understand proper flag etiquette (e.g. order of precedence, half-mast rules).
- Prevent errors that could be seen as disrespectful or offensive.

Monitor and Review Regularly

- Periodically review the Protocol to ensure it remains relevant and respectful.
- Be open to feedback and willing to adapt based on community needs.

Prepare for Sensitive Situations

- Avoid reactive decisions - base actions on Protocol and values.

6 Action plan

Actions to mitigate adverse impact, improve equality of opportunity or foster good relations and/or obtain new evidence

Action	Lead	Deadline or review date
Review Flag Flying Protocol on annual basis	HDS and HCM	October 2026
Monitor Government guidance on flag flying	HDS and HCM	Ongoing

7 Recommendation

The recommendation by the lead officer should be stated below. This may be: to proceed with the change, implementing the Action Plan if appropriate, consider alternatives, gather further evidence.

If the recommendation is to proceed with the change and there are no actions that can be taken to mitigate likely adverse impact, it is important to state why.

Proceed to seek approval of the Flag Flying Protocol for Council Buildings.

8 Authorisation

The authorising officer is consenting that the recommendation can be implemented, sufficient evidence has been obtained and appropriate mitigation is planned, the Action Plan will be incorporated into the relevant Service Plan and monitored

Assistant Director

Bhupinder Gill, Assistant Director, Legal and Governance

Date of authorisation

October 2025