



Comhairle Cathrach
Bhaile Átha Cliath
Dublin City Council



Chief Executive's Office and Law Department, Public Sector Equality and Human Rights Duty Implementation Plan

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1 Public Sector Equality and Human Rights Duty

The Public Sector Equality and Human Rights Duty ('the Duty') requires public bodies to have regard to the need to eliminate discrimination, promote equality of opportunity, and protect human rights, for employees, service users, members and policy beneficiaries, across all their function areas¹. In developing this implementation plan, the guidance issued by the Irish Human Rights and Equality Commission has been followed².

Public bodies must undertake three steps in giving effect to this Duty:

- **Step 1. Assess:** Undertake an assessment of the equality and human rights issues facing the identified groups for the Duty (with particular focus on issues that have relevance to the specific functions of that public body) and to make that assessment publicly available.
- **Step 2. Address:** Identify and communicate the plans, policies and actions being taken or proposed, to address the issues identified in the assessment, in the plans, policies, programmes and services of the public body; and
- **Step 3. Report:** Report annually on developments and achievements in implementing the Duty.

The groups identified for the Duty are those covered by the grounds of gender (including gender expression, gender identity and sex characteristics), civil status, family status (including lone parents and carers), age, disability (broadly defined to include all impairment groups), sexual orientation, race, religion, membership of the Traveller community, and socio-economic status (at risk of or experiencing poverty and exclusion). They include those at the intersections of these grounds, and rights holders under relevant human rights instruments.

Chief Executive's Office functions are:

- Administrative support to the Chief Executive and to the Councillors.
- Management of the electoral register and education and communication to encourage registration.
- Work of and event management for the Lord Mayor's Office.

¹ [Section 42](#), Irish Human Rights and Equality Commission Act 2014.

² [Implementing the Public Sector Equality and Human Rights Duty](#), Irish Human Rights and Equality Commission, 2019.

Law Department functions are:

- Provision of legal advice to the Council, including on employment issues.
- Act in defence of the Council in legal proceedings, including judicial review proceedings.
- Act in prosecution proceedings on behalf of the Council.
- Provision of information on property and title and advice in relation to CPO.

2 Equality and Human Rights Values Statement

2.1 Introduction

This Equality and Human Rights Values Statement identifies the values that motivate our concern for equality and human rights in Dublin City Council (DCC), as set out and defined in the DCC implementation strategy and action plan for the Duty. The implications of each value for the priorities and work processes of the Chief Executive's Office and the Law Department are set out in a Statement of Outcome and a Statement of Process under each value, where the:

- Statement of Outcome establishes the implications of the value for the change we seek to contribute to; and
- Statement of Process establishes the implications of the value for the way we work in pursuing this change

The different nature of the two departments involved has implications for these statements and this is noted where relevant. In this regard, it is also noted that service-users for these departments can encompass Councillors, DCC staff, and general public from the identified groups.

These statements serve as benchmarks for our ambition in implementing the Duty and are specifically focused on the identified groups for the Duty.

This equality and human rights values statement frames our implementation of the Duty in that:

- the assessment of equality and issues is framed by these values to ensure the full scope of equality and human rights is addressed in this; and
- the statement of outcome and statement of purpose serve as benchmarks in our decision-making to establish and sustain our ambition for equality and human rights when implementing the address step.

2.2 Our Equality and Human Rights Values Statement

Dignity & Respect

People being treated in a manner that recognises their intrinsic human worth

Statement of Outcome: We strive to: sustain a high level and quality of engagement with staff and service-users, including staff from other departments, from the identified groups; and keep this engagement under review to enable continuous improvement.

Statement of Process: We work in a manner that: stimulates positive feedback from staff and service-users, including staff from other departments, from the identified groups; where people from the identified groups are treated with fairness, empathy and kindness, and their privacy is respected; and with policies, procedures and staff training to underpin this.

Diversity & Accessibility

Difference is welcomed and valued and diversity is accommodated in access to our services and in employment

Statement of Outcome: We strive to: have and implement effective systems and processes to ensure the specific needs and experiences of staff and service-users, including staff from other departments, from the identified groups, are identified, understood, and effectively responded to.

Statement of Process: We work in a manner that is: welcoming of the diversity of staff and service-users, including staff from other departments, from the identified groups; and flexible in adapting to take account of their specific needs and removing any barriers to effective engagement and communication; and with regular auditing in place to assess our accessibility.

Inclusion & Social Justice

The diversity of people has the resources and opportunities to participate fully in all aspects of life in the city

Statement of Outcome: We strive to: develop and provide internal advice that is informed by a concern for people from the identified groups to secure their rights (Law Department) and identify and take action to enable equal outcomes for people from the identified groups (Chief Executive's Office).

Statement of Process: We work in a manner that: encourages and supports staff from the identified groups to access and take advantage of in-work opportunities; and checks our initiatives to ensure they proactively contribute to equal outcomes for service users from the identified groups.

Participation & Engagement

The diversity of people has opportunities to have a say on matters and in decisions that affect them

Statement of Outcome: We strive to: enable and support an effective engagement by people from the identified groups in local democracy as participants and voters, and in engaging with elected representatives (Chief Executive's Office).

Statement of Process: We work in a manner that: ensures decision-making involves staff and service users, including staff from other departments, from the identified groups and that their viewpoints are equally considered.

Choice & Autonomy

The preferences and choices of the diversity of people are acknowledged with appropriate options available in service delivery and employment where possible

Statement of Outcome: We strive to: enable and support informed choice by staff and service users, including staff from other departments, from the identified groups.

Statement of Process: We work in a manner that: allows choice in relation to digitalised services to access the service on-line or in-person (Chief Executive's Office).

3 Assessment of Equality and Human Rights Issues

3.1 Introduction

The public sector equality and human rights duty requires public bodies to undertake an assessment of the equality and human rights issues that are relevant to their functions. These are issues that face the groups identified for the Duty and that are relevant to the functions of the Departments. These issues relate to the:

- **Situation** of the group in terms of their access to resources and any particular disadvantage they experience.
- **Experience** of the group in terms of the quality of their interaction with employers and service providers and the wider society.
- **Identity** of the group in terms of how they chose to give expression to their identity and the specific needs that arise from this.

This assessment has been compiled from an evidence base of current equality and human rights research and reports. This evidence base is provided in an appendix to this document, identifying sources used, and key relevant data from each. **It is not an evaluation of the Chief Executive' Office or of the Law Department or their current actions to eliminate discrimination, promote equality and protect human rights.**

The five values identified by Dublin City Council that motivate our ambitions for equality and human rights in implementing the Duty: Dignity & Respect; Diversity & Accessibility; Inclusion & Social Justice; Participation & Engagement and Choice & Autonomy dignity, are used as a framework to set out this assessment of the equality and human rights issues.

The issues identified in this assessment have been established as relevant by the Chief Executive's Office and the Law Department. Each have their own distinct functions. As such, some of the issues are relevant to both and others are only relevant to one. However, the one assessment can be used, given the approach being taken to the Address step.

The issues identified in this assessment are relevant across all the identified groups for the Duty and for groups at the intersections of the grounds identified, unless otherwise stated. In each case, the core issue is established and then illustrated with text drawn from the evidence base examined.

3.2 Assessment of Equality and Human Rights Issues

Dignity & Respect: People being treated in a manner that recognises their intrinsic human worth.

Priority equality and human rights issues facing the identified groups and of relevance for the work of the two Departments:

- Preconceived notions, stereotypes, and false assumptions across the identified groups. In particular the data point to:
 - Negative attitudes towards Roma and Travellers.
 - Stereotypical representations of LGBTQI+ people.
 - Ageism and stereotypical representation of older people and of young people.
 - Gender stereotypes and rigid gendered roles.
- Unequal treatment and discrimination both at a structural and an individual level across the identified groups. In particular the data point to:
 - Discrimination in-work, in accessing work and in accessing services experienced to a high level across the identified groups with particularly high levels reported among Black and minority ethnic people, including Roma and Travellers, among LGBTQI+ people, people with disabilities
 - Discrimination at an intersectional level for people who are members of more than one of the identified groups.
- Harassment across the identified groups and sexual harassment. In particular the data point to:
 - Sexual harassment at work predominantly experienced by women.
 - Abuse experienced by older people.
 - Harassment experienced by LGBTQI+ people.
 - Bullying experienced by young people.
- Political discourse that is hostile to minority groups.
- Lack of active engagement by service providers for not being seen as a valued service user, including absence of in-person service provision.
- Under-reporting of incidents of discrimination across the identified groups.
- Feeling one has to hide one's identity at work and failure to create work environments that are welcoming to and safe for the diversity of employees across the identified groups. In particular the data point to:
 - LGBTQI+ people hiding their identity at work and facing barriers to workplace inclusion.
 - Travellers and Roma hiding their identity to seek and participate in work.

Diversity & Accessibility: Difference is welcomed and valued and diversity is accommodated in access to our services and in employment.

Priority equality and human rights issues facing the identified groups and of relevance for the work of the two Departments:

- Lack of understanding of diversity and failure to take appropriate action on diversity and the specific needs that arise from diversity.
- Lack of systems or processes to inform about one's diversity and specific needs, to encourage people to inform about this, and to respond adequately to specific needs that arise from diversity. In particular the data point to:
 - Failure to respond to the specific needs that arise from Traveller ethnicity.
 - Failure to adapt workplaces to be inclusive of LGBTQI+ people.
 - Failure to adapt services to enable access, including for people with disabilities, people with learning difficulties.
 - Lack of family-friendly processes and arrangements in work, in service provision, and in local democracy, in particular for women and for lone parents.
 - Failure to take account of language diversity and to communicate in an accessible manner, including plain English and Irish Sign Language.
- Lack of provision and availability of resources, including technology, to enable participation in the workplace and in services.
- Inaccessible premises that fail to respect universal design principles, with particular barriers experienced by people with disabilities.
- Lack of accessible information for people across the identified groups.
- Fear and negative experiences that lead to a fear of engaging with authorities. In particular the data point to:
 - Particular barriers in this regard experienced by Roma.
- Lack of data and of data disaggregation in relation to the identified groups, to inform evidence-based decision-making.

Inclusion & Social Justice: The diversity of people has the resources and opportunities to participate fully in all aspects of life in the city.

Priority equality and human rights issues facing the identified groups and of relevance for the work of the two Departments:

- Poverty and consistent poverty. In particular the data points to:
 - Poverty experienced by women, people with disabilities, older people, young people, lone parents, and Black and minority ethnic people including Travellers and Roma.
- Barriers to career progression and lack of opportunities and of access to supports and training. In particular the data point to:
 - Young people reporting the lack of development and promotion opportunities at work.
 - People with disabilities facing barriers to career progression.

- Women being confined to middle management in terms of career progression in the public service.
- Failure to make allowances in career progression for issues of educational and employment disadvantage experienced.
- Digital inequality, including lack of skills and lack of access to necessary devices. In particular the data point to:
 - Digital barriers experienced by older people.
 - Lack of choice in relation to digital services.

Participation & Engagement: The diversity of people has opportunities to have a say on matters and in decisions that affect them.

Priority equality and human rights issues facing the identified groups and of relevance for the work of the two Departments:

- Not having a say and not being represented in spaces and structures for this purpose, experienced across the identified groups.
- Exclusion from local democracy across the identified groups, including through fear of engagement. In particular the data points to:
 - Barriers of childcare, cash, culture, confidence, and candidate selection experienced by women
 - Barriers to voter registration and electoral participation experienced by Black and minority ethnic groups, including Travellers and Roma.
 - Younger people losing faith in democratic systems.
 - Lack of role models.
- Lack of recognition and support for civil society organisations, across the identified groups, to act in an advocacy role.

Choice & Autonomy: The preferences and choices of the diversity of people are acknowledged with appropriate options available within service delivery and employment where possible.

Priority equality and human rights issues facing the identified groups and of relevance for the work of the two Departments:

- Lack of awareness among the identified groups of options that are available.

4 Implementation

4.1 Enabling Implementation

Responsibility

The senior management team in each department is responsible for the ongoing implementation of the Duty, on the basis of this implementation plan. In taking on this responsibility, the senior management team:

- Prepares an annual action plan of the steps to be taken for implementing the Duty and enabling its implementation.
- Includes the Duty as an agenda item for departmental meetings on a quarterly basis.
- Prepares a report on progress made each year.
- Promote and give leadership for our equality and human rights values, and ensure that decision-making is aligned with these values.

Communication

Senior management team members would bring their work on the Duty to their team meetings as an agenda item for discussion on a quarterly basis.

The Chief Executive's Office private page on the City Desk Portal and the Law Department's internal web page, will include updates and information on the Duty and its ongoing implementation.

Capacity

Staff training within each department will include a focus on equality, human rights and the Duty at appropriate moments.

4.2 Address Step

Public bodies, under the Address step of the Duty, are required to address the issues that have been identified in their assessment of equality and human rights issues facing the identified groups, in their plans, policies and actions.

The Address Step first involves an identification of the plans, policies or actions that are seen as being required to immediately respond to particular equality and human rights issues as assessed that are prioritised by the Chief Executive's Office and by the Law Department, DCC.

The Address step of the Duty is also an ongoing obligation on the organisation and, in this, it is implemented as an integral part of the development and review of plans, policies, programmes and

strategies – where these are identified as key moments for implementing the Duty. This is, in effect, a process for an equality and human rights impact assessment.

At the commencement of the development/review process:

- Review the assessment of equality and human rights issues to establish those issues that are relevant to the particular plan, policy, strategy or programme, and tailor the assessment in this way for use in this process.
- Gather the data and information available in relation to the equality and human rights issues identified as relevant.
- Review the equality and human rights values statement to extract the statements of outcome or statements of process that are relevant to this plan, policy, programme or strategy.

In implementing the development/review process:

- Include a focus on the relevant equality and human rights issues in any evaluation or contextual review undertaken as part of the development or review process.
- Transmit the obligations under the Duty to any external consultants contracted for the process and ensure they are fully briefed in this regard.
- Track the relevant equality and human rights issues to ensure they are addressed and keep the values benchmarks in mind to ensure they are respected during the development/review process.

At final draft stage of the development/review process:

- Convene a meeting of relevant staff to check that the draft adequately and appropriately addresses each of the equality and human rights issues identified as relevant, and that it is aligned with the relevant statements of outcome and process in the equality and human rights values statement.
- Conduct a participative exercise, for initiatives of scale, with the working group for the Duty and, possibly, with representatives of the identified groups to check that the equality and human rights issues are adequately and appropriately identified and addressed.

After the development/review process:

- Establish and/or use existing monitoring systems to track progress on the equality and human rights issues identified as relevant.
- Report annually on progress made in implementing the Duty and the achievements in addressing the equality and human rights issues – the Report step of the Duty.
- Use this annual report to reflect on progress in implementing the Duty, to strengthen the procedures for implementing the Duty as found to be necessary, and on the achievements in addressing the equality and human rights issues, to strengthen the plan, policy, programme or strategy, as found to be necessary.

4.3 Priority Initiatives

No specific initiatives are deemed to be required to address the assessment of equality and human rights issues. An initial action plan has been drawn up as the priority response to the initiatives identified.

Current thinking in relation to this annual plan suggests a focus on:

- Law Department: rights letter
- Chief Executive's Office: flags policy; standing orders for Councillors; making representations policy

4.4 Ongoing Implementation

Each year, key moments for implementing the Address Step are identified in the annual plan prepared by the senior management team in the Chief Executive's Office and in the Law Department, in terms of development and review processes for policies, plans, strategies and programmes. These key moments include, but are not limited to the development and review of:

- Departmental business plans and team plans that flow from these.
- New projects being taken on by each Department.
- Departmental policies and procedures – with a number of these chosen each year for implementation of the Duty.
- Procurement or tender processes being engaged in by each Department.

4.5 Report

The senior management team in each department will prepare an annual report on progress made in implementing the Duty and achievements in addressing the issues.

This report will serve a process of reflection to acknowledge achievements, strengthen implementation of the Duty, and develop further actions are found needed to address the equality and human rights issues.

This report would form part of a wider annual DCC report on the Duty and its impact.

Appendix 1: Evidence Book

This assessment of equality and human rights is evidence-based in drawing from:

- a Public Policy
- b National Research
- c Submissions to Human Rights Bodies

A: Public Policy

The 2024 [National Traveller and Roma Inclusion Strategy 2024-2028](#) identifies issues of situation, experience and identity for Travellers and for Roma.

In relation to **situation**:

- According to Census 2022, the unemployment rate for Travellers aged 15-65 years was 61%, broken down between a female unemployment rate of 58% and a male unemployment rate of 63%.
- Census 2022 separately identified Roma as an ethnicity. Based on the principal economic status question, an employment rate of 61% and an unemployment rate of 17% are indicated for members of the Roma community, which is substantially worse than the national rates.

In relation to **experience**:

- In the 2020 FRA survey, 38% of Irish Travellers interviewed reported experiencing discrimination while job-seeking in the six months prior to being surveyed. This figure rose to 70% within five years. Most survey respondents did not report or file a complaint about the discrimination they experienced. The proportion of Irish Traveller respondents who reported or filed a complaint (28%) was among the highest from all survey groups.
- The 2018 Roma Needs Assessment outlined that 78.9% of the respondents reported feeling discriminated against in attempting to access employment and, for many, hiding their Roma identity felt like being the only option to secure and keep work.
- IPSOS (2023) found that attitudes towards Travellers and Roma were still significantly less positive than they were towards other diversity groups.
- The Roma are widely recognised as among one of the most discriminated ethnic groups and the community continues to experience misunderstanding, intolerance, discrimination and racism across EU member states. Evidence suggests that poor engagement of Roma in Irish society is attributable to marginalisation, discrimination, poor access to health and social services, and lack of a political voice.
- There was also a reluctance and fear for some Roma to engage with statutory agencies, due to experiences of discrimination, lack of trust in the State and fear of the State.

In relation to **identity**:

- In March 2017, the State recognised Travellers as a distinct ethnic group within the Irish nation. The recognition of Traveller ethnicity acted to counter stigma, increase Travellers feelings of self-esteem and inclusion, and to generate mutual recognition and respect between Travellers and the wider community; however, six years later, the Traveller community is still one of the most marginalised and discriminated groups in Ireland, facing extreme disadvantage and inequalities across a wide range of indicators, including in terms of health, education, employment and accommodation.

The 2023 [National Policy Framework for Children and Young People 2023-2028](#) identifies issues of situation and experience for children and young people.

In relation to **situation**:

- 19.9% of 0-17 year olds experience deprivation, 15.2% are at risk of poverty, and 7.5% experience consistent poverty (SILC 2022).

In relation to **experience**:

- Increases in housing costs, higher costs of care and changing access to occupational pensions ... these issues have created a sense of unfairness that should not be ignored. Faced with these and other challenges, younger people appear to be losing faith in democratic systems, as evidenced by measures of trust in government, increasing the potential for the breakdown of social cohesion, through the rise of extremist politics and civil unrest. Some argue that younger people's interests are not well represented in our democracies, and have expressed deep concern about intergenerational inequality.
- Children also raised issues with the extent to which their voice was heard, and their views taken seriously . As the report summarises, "children described their dissatisfaction with not having a voice or choice on matters that affect them.
- The responses within this theme captured children's descriptions of bullying by peers, siblings, or older teenagers . This also captured adults shouting at them and "bossing them about ."

The 2019 [National LGBTI Inclusion Strategy 2019-2021](#) identifies issues of situation, experience and identity for LGBTIQI+ people.

In relation to **situation**:

- Many of the issues which prevent LGBTI+ people from achieving their full potential in Irish society are structural in nature.
- Significant barriers to workplace inclusion still persist for LGBTI+ employees.

- Mainstream services will need to adapt to ensure that they are inclusive of LGBTI+ service users and that LGBTI+ people are confident that their needs will be addressed by these services.

In relation to **experience**:

- The need for increased and non-stereotypical representation of LGBTI+ identities arose as a consistent theme throughout the consultation process.
- LGBTI+ people do not always feel safe in the public space. They continue to experience unacceptable levels of harassment, discrimination in some workplaces. The highest rates of discrimination were reported by people who identify as LGBTI+ (33.2%) (CSO). 'Ending sexuality and gender oppression' (encompassing workplace discrimination) was the highest rated issue in the second Burning Issues survey, results of which were published in 2016. LGBTI+ people continue to experience unacceptable levels of harassment and discrimination in some workplaces.

In relation to **identity**:

- There is a risk that Irish society may consider that LGBTI+ people have achieved full equality and inclusion, now that marriage equality has been achieved and that the Gender Recognition Act 2015 has been enacted - however, challenges still remain.
- Being able to work in an environment where a person can be fully open about their sexuality and gender identity and bringing their authentic self without fear of discrimination was rated the most important issue by respondents in the first 'Burning Issues' survey of LGBT people carried out by the National LGBT Federation in 2009.
- Older people, migrants, Travellers, people with disabilities, and prisoners among the LGBTI+ community are at higher risk of multiple discrimination and marginalisation.

B: National Research

The 2023 National Disability Authority report [Final Review of Progress on Indicators of the National Disability Inclusion Strategy](#) identifies issues of situation, experience and identity for disabled people.

In relation to **situation**:

- The disability employment gap increased from 39.8% to 41.3% between 2014 and 2021. Public bodies have consistently exceeded the 3% target for employing disabled individuals, with 3.6% of employees reporting a disability in 2021. A new minimum target of 6% will be introduced by 2025.
- People with disabilities report poorer general health, higher levels of depression, less participation in physical activity and higher rates of consistent poverty compared to non-disabled people.

In relation to **experience**:

- The CSO's 2019 Equality and Discrimination survey found that 24.1% of adults with a disability reported discrimination compared to 16.7% of those without. Findings indicated that 18.3% of persons with a disability reported they had experienced discrimination accessing services compared to 10.9% of persons without a disability, and 12.3% of adults with a disability experienced discrimination in the workplace and/or while looking for work compared to 9% of those without.
- The reviews conducted demonstrated that there is large variance in levels of compliance with the EU Web Accessibility Directive across public sector websites and mobile apps in Ireland. Within the in-depth reviews, no website achieved full compliance with the accessibility standard.
- The review, although based on engagement with a small number of public bodies, found that there was low awareness, enforcement and understanding among public bodies of their obligations under Section 25 of the Disability Act, particularly of the obligation to bring public buildings into compliance with the Building Regulations, Part M 2010 by 2022.

In relation to **identity**:

- There is a need for more robust equality data collection. There remain many indicators where sufficient data on people with disabilities are not available or not recent.
- There was an annual average additional cost of disability ranging from €11,734 to €16,284, depending on a person's degree of limitation (Department of Social protection, 2021).
- The Irish Sign Language (ISL) Act 2017 was passed and a report on the operation of the first three years of the Act found implementation was poor across most sections of the Act, with many public bodies appearing unprepared for the activities needed to achieve compliance.

The 2022 Age Action report [Reframing Ageing: the State of Ageing in Ireland 2022](#) identifies issues of situation and experience for older people.

In relation to **situation**:

- The Positive Ageing National Indicators Report 2016 found that 61% of people aged 55-65 had low literacy and 63% had low numeracy.
- Age Action estimate that two-thirds of older persons (65%) are digitally excluded. This is either because they are not using the internet or because they lack the digital devices and/or necessary skills to navigate the internet safely. This limits their ability to access public services online. The CSO found that 22% of those aged 60-74 are not using the internet. This is true for more than half (51%) of those aged 75 or older.
- Many people in their 60s withdraw from the labour market. This is in part due to long-term illness or disability, or a decision to retire, but also due to a lack of opportunities. Many contracts of employment have a mandatory retirement age of 65. Often work contracts force people into retirement when they are not ready or wish to retire. A person in their 60s who is unemployed is more likely to be long-term unemployed. Most people in their 70s are not in paid work.

- More than a sixth (17.3%) of older adults (aged 65+) are at risk of poverty or social exclusion. Women (19.7%) are more at risk than men (13.9%). 42.8% of older persons (aged 65+) living alone are at risk of poverty. Three in every five (59.9%) single persons aged 65+ have incomes in the bottom 30% of society.
- Low income makes accessing services more difficult for older people. Health issues also make accessing services more difficult.

In relation to **experience**:

- Stereotypical and ageist understandings of older persons. Ageism in the labour market makes it hard for older people to access work.
- Isolated housing, lack of transportation, lack of income, digital exclusion or abuse can all be equally if not more constraining than many forms of illness or disability.
- Move to online services is isolating for some older persons as to access them requires training and devices which may be unavailable to older people due to lack of funds

In relation to **identity**:

- There are many examples of gender inequality in the outcomes experienced by older women compared to men. Older women's incomes tend to be lower than men's, women carry out more care work and older women are less likely to have a car or to drive, even in rural areas. Women tend to live longer than men, which is why older people living alone (often those with the lowest incomes) are more likely to be women. They are often carers in the older years and don't get remunerated for these duties.
- Lack of adequate provision for in person services when accessing public services with free interpretation Over 13,000 people aged 65+ speak a language other than English or Irish at home. The most common languages are French (2,805), German (1,857) and Spanish (1,132), plus the recent addition of Ukrainian. The most common non- European languages are Arabic (250) and Chinese (239).
- In total, over sixty languages are spoken at home by people over 65. For those aged 65+, 3,209 people report their ability to speak English as "not well" or "not at all. It is estimated that we have many older persons in the country with language barriers than our documents and this will increase as our society gets more diverse.

The 2024 NYCI report [The State of Our Young Nation: A report into the lives of Irish 18-29 year olds](#) identifies issues of situation, experience and identity for young people:

In relation to **situation**:

- The working lives of young people have changed dramatically in a short space of time, and despite positive changes which offer greater flexibility in the workplace and a general perception of good availability of employment opportunities, satisfaction with pay, benefits and development opportunities is relatively low.

In relation to **experience**:

- Despite surface level satisfaction, there is an undercurrent of discontent that often pervades this generation, particularly when they are directed to think about their future.

In relation to **identity**:

- Compared with young men, young women reported worse mental and financial wellbeing, lower satisfaction with pay and conditions, were coping worse with the cost-of-living, are more likely to have made cutbacks in spending and to feel they are worse off than their parents' generation.
- Differences also emerge between social class when it comes to satisfaction with working life; 51% of young people from a middle class background (ABC1) are satisfied with working life compared to only 37% for those from a working class background (C2DE).
- Young people with a disability tend to be more dissatisfied with 'promotion opportunities' in their workplace; 70% are dissatisfied with this compared to average of 57%.

The 2018 ESRI and IHREC report [Disability and Discrimination in Ireland: Evidence from the QNHS Equality Modules 2004,2010, 2014](#), identifies issues of situation and experience for people with disabilities.

In relation to **situation**:

- People with disabilities are more likely to be in poverty and outside the labour force. The labour market participation of people with disabilities remains far lower than participation rates in the general population, even when controlling for age and other personal characteristics.

In relation to **experience**:

- People with disabilities experience higher rates of discrimination than people without disabilities. On average, 15% of people with disabilities experience discrimination compared to 11% of those without a disability.
- Our findings show that when people with disabilities are looking for work, or in the workplace, the odds of experiencing work-related discrimination was twice as high compared to those without disabilities.
- Focussing on discrimination in the public services (such as education, health, transport), the findings also show that people with disabilities were three times more likely to experience discrimination compared to those without disabilities.
- Need to increase awareness among both employers and staff with disabilities of their legal obligations, entitlements and protection.

The 2017 [Report of the Joint Committee on Social Protection on the Position of Lone Parents](#) identifies issues of situation and identity for lone parents:

In relation to **situation**:

- Lone parent families consistently face greater levels of deprivation, risk of poverty and consistent poverty. One parent families have the highest consistent poverty of 26.2% rate of any group in Irish society. Lone parents suffer higher rates of deprivation at 57.9% compared to 25.5% in the general population. Children in one-parent families are three times as likely (26.2%) to live in 'consistent poverty' than families with two adults with one to three children (7.7%). (SILC 2015).
- Unemployment for lone parents has remained above 50% since 2009, with 53% deemed not working, 23.9% deemed working part-time in 2014.

In relation to **identity**:

- 25.4% of all families are lone parented (Census 2016). There is a higher proportion of female lone parents than male: 86.4% of lone parents were female and 13.6% were male (Census 2016).
- Lone parents devote more of their time to caring responsibilities, responsibilities which impinge on their availability for work. Childcare costs in Ireland are among the highest in the OECD (reference). Lone parents, as the sole carers of their children, are more strongly affected by these costs.

The 2014 European Agency for Fundamental Rights report [Being Trans in the European Union Comparative analysis of EU LGBT survey data](#) identifies issues of experience and identity for trans people.

In relation to **experience**:

- One in three trans respondents felt discriminated against because of being trans when looking for a job (37%) or at work (27%) which is more than twice the equivalent percentage of lesbian, gay and bisexual respondents.
- Stereotypes and ignorance about the reality of the daily lives and rights of trans persons perpetuate negative public attitudes and maltreatment of varying intensity; from idiotic jokes and offensive language to serious harassment and exclusion.
- Only very small numbers of respondents reported the most recent incident of discrimination. 30% did not know how or where to report. More than three in five respondents did not report the incident because they were convinced that nothing would happen or change and half of them because they thought it was not worth reporting it.

In relation to **identity**:

- One third of all trans respondents avoid expressing their gender – or their desired gender – through physical appearance and clothing for fear of being assaulted, threatened or harassed. One in five respondents avoid being open about being trans even in their own home, and six in ten avoid being open in public transport.

C: Submissions to Human Rights Bodies

The 2017 IHREC [Submission to the United Nations Committee on the Elimination of Discrimination Against Women on Ireland's combined sixth and seventh periodic reports, IHREC, 2017](#), identifies issues of situation, experience and identity for women:

In relation to **situation**:

- Women are prevalent in minimum wage jobs. Women are concentrated at middle management in the civil service. There is a gender pay gap of 14% and a pension gap of 38% in favour of men.
- Women, especially women from already marginalised groups, have been particularly susceptible to entrenched poverty, social exclusion and gender-based violence.
- The Commission welcomes the increase in women's representation in local government and in parliament following the elections in, respectively, 2014 and 2016. While these elections resulted in record highs, participation rates in Ireland are still below the European Union average rates. Barriers to female political participation of childcare, cash, confidence, culture and candidate selection. Low levels of women's participation in public life, particularly in relation to Traveller and migrant women.

In relation to **experience**:

- Gender stereotypes and rigid gender roles persist and are perpetuated, encompassing multiple forms for Traveller, Roma, and migrant women.
- Women experience pregnancy-related workplace discrimination with job offers rescinded, reduced hours, negative impact on performance rating, and lack of promotion.
- Trans women experience high levels of discrimination in employment for expressing trans identity.

In relation to **identity**:

- Intersectional issues for specific women including Traveller women, women with disabilities, women in rural areas, and women in direct provision.
- Women with a disability are less likely than men with a disability to be active in the labour market, and more likely to work on a part-time basis. 81.2% of Traveller women are unemployed.

The 2019 IHREC submission [Ireland and the Convention on Racial Discrimination, Submission to the United Nations Committee on Racial Discrimination on Ireland's Combined Fifth to Ninth Report](#), identifies issues of situation, experience and identity for Black and minority ethnic people:

In relation to **situation**:

- The 2018 Monitoring Report on Integration reports that the employment rate of ‘African nationals’ is 45%, compared to an average of 70% for other minority national groups. In 2016, the unemployment rate for Travellers was 80.2%, compared to 12.9% for the general population. Census 2016 also highlighted that only 10.1% of Traveller women and 12.6% of Traveller men list their principal economic status as ‘at work’.
- There is a lack of representation of people from minority ethnic groups in employment across the public sector.
- The data demonstrates that the consistent poverty rate for people who do not identify as being an Irish citizen or national is significantly higher than the general population (12.7% compared to 8.2% respectively).
- Possible barriers to registering to vote include access to information about voting rights and the complexity of the registration process, including electoral registration forms.
- Fifty-three ‘naturalised/non-Irish citizen’ candidates contested the 2019 local elections, with eight being elected. Analysis suggests that some 86 people would need to have been elected in the 2019 local elections for this group’s political representation at local government level to be proportionate. The Commission further notes the low levels of Traveller and Roma participation as electoral candidates.
- Minority ethnic women face additional barriers to political participation, including due to language and gender-based discrimination, sexist stereotyping, political inexperience, limited access to campaign funding, work commitments, and the lack of childcare provisions.
- To an increasingly large extent, the relationship between the State and civil society organisations is focused on arrangements relating to the subcontracting and delivery of services. However, the advocacy role of such organisations in democratic discourse and in the promotion of human rights needs to be fully recognised and protected.

In relation to experience:

- Compared to ‘White Irish’ respondents, ‘Black’ people are three times more likely to experience discrimination in access to public services. Second-generation minority ethnic Irish people are reported as experiencing particular racism, including being specifically targeted with online racial abuse due to their perceived lack of any ‘biological’ or ‘ethnic’ connection to Ireland.
- Other available research indicates that 90% of Travellers have experienced discrimination over their lifetime, while 77% experienced discrimination in the previous year. Compared to ‘White Irish’ respondents, Travellers are almost ten times more likely to experience discrimination in seeking work.
- Roma face high level of discrimination. Roma women are particularly vulnerable to on-street racism, because of their identifiable traditional dress.

- The 2018 study, *Ethnicity and Nationality in the Irish Labour Market*, found that, in comparison to ‘White Irish’ people, Black people of Irish nationality were twice as likely to experience discrimination when seeking employment and 3.4 times as likely to experience discrimination in the workplace. Black people of other nationalities were five times more likely to experience discrimination when seeking employment, and over 2.5 times more likely to experience discrimination in the workplace.
- There are concerns held by the Commission about political discourse in Ireland that may serve to exclude minority groups from public life.

In relation to **identity**:

- Victims of racism in Ireland report experiencing both physical and mental health issues, including anxiety, depression, and nausea. They also report a lack of confidence in occupying public spaces and engaging with strangers, as well as fears for their other family members
- The recognition of qualifications acquired abroad is an issue. A European directive on the recognition of foreign qualifications only applies to people from the EU, and there are often lengthy and complicated procedures.
- Unavailability of disaggregated statistical data on the issues faced by Black and minority ethnic groups in Ireland, Irish data collection instruments do not collect information on ethnicity as standard.

The 2021 IHREC [Submission to the UN Committee on Economic, Social and Cultural Rights for the List of Issues on Ireland’s Fourth Periodic Report](#), identifies issues of situation and experience across a number of the identified groups.

In relation to **situation**:

- The consistent poverty rate was 5% in 2020, the ‘at risk of poverty’ rate was 13.2% and 15.6% of the population experienced enforced deprivation.
- Minority ethnic groups are over-represented among those living in consistent poverty, and have been found to experience cumulative disadvantage and discrimination in accessing education, employment, housing, and other areas such as social assistance.
- Research has found evidence that women, lone parents, young people, migrants, ethnic minorities including Travellers, and disabled persons experience significant barriers in meeting their right to decent work.
- Ireland continues to have amongst the lowest employment rates for disabled persons in the EU (32.2% compared to 50.6% in the EU in 2017)
- Women are significantly over-represented amongst employees who avail of reduced hours in order to facilitate the combination of care and paid work, contributing to gender inequality in the labour market. The provision of support for combining paid and unpaid work remains well behind that seen in Scandinavia and other European states, and is not commensurate with the dramatic rise in women’s paid employment in Ireland.

In relation to **experience**:

- Racist attitudes can be found across Irish society and across all social classes and Travellers and Black people experience particularly high rates of labour market discrimination, both when seeking work and in the workplace. The Commission also highlights that racism is experienced in different ways and to different degrees, often intersecting on multiple grounds of discrimination, including religion, age, disability, gender, sexual orientation and socioeconomic status.
- Travellers continue to experience systemic discrimination in employment, education, health, and housing, with many living in poverty.
- Significant barriers to the enjoyment of equal rights for disabled persons remain, pointing to structural and institutional ableism across Irish society.

Appendix 2: Implementation Template

1. Purpose of plan, policy, project or strategy

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2. Address Step

Dignity & Respect

People being treated in a manner that recognises their intrinsic human worth

Statement of Outcome: We strive to: sustain a high level and quality of engagement with staff and service-users, including staff from other departments, from the identified groups; and keep this engagement under review to enable continuous improvement.

Statement of Process: We work in a manner that: stimulates positive feedback from staff and service-users, including staff from other departments, from the identified groups; where people from the identified groups are treated with fairness, empathy and kindness, and their privacy is respected; and with policies, procedures and staff training to underpin this.

Relevant equality & human rights issues	Addressed in current draft of plan, policy, project or strategy?	Relevant section(s) of plan, policy, project or strategy	Comments / how you might address

Diversity & Accessibility

Difference is welcomed and valued and diversity is accommodated in access to our services and in employment

Statement of Outcome: We strive to: have and implement effective systems and processes to ensure the specific needs and experiences of staff and service-users, including staff from other departments, from the identified groups, are identified, understood, and effectively responded to.

Statement of Process: We work in a manner that is: welcoming of the diversity of staff and service-users, including staff from other departments, from the identified groups; and flexible in adapting to take account of their specific needs and removing any barriers to effective engagement and communication; and with regular auditing in place to assess our accessibility.

Relevant equality and human rights issues	Addressed in current draft of plan, policy, project or strategy?	Relevant section(s) of plan, policy, project or strategy	Comments / how you might address

Inclusion & Social Justice

The diversity of people has the resources and opportunities to participate fully in all aspects of life in the city

Statement of Outcome: We strive to: develop and provide internal advice that is informed by a concern for people from the identified groups to secure their rights (Law Department) and identify and take action to enable equal outcomes for people from the identified groups (Chief Executive’s Office).

Statement of Process: We work in a manner that: encourages and supports staff from the identified groups to access and take advantage of in-work opportunities; and checks our initiatives to ensure they proactively contribute to equal outcomes for service users from the identified groups.

Relevant equality and human rights issues	Addressed in current draft of plan, policy, project or strategy?	Relevant section(s) of plan, policy, project or strategy	Comments / how you might address

Participation & Engagement

The diversity of people has opportunities to have a say on matters and in decisions that affect them

Statement of Outcome: We strive to: enable and support an effective engagement by people from the identified groups in local democracy as participants and voters, and in engaging with elected representatives (Chief Executive’s Office).

Statement of Process: We work in a manner that: ensures decision-making involves staff and service users, including staff from other departments, from the identified groups and that their viewpoints are equally considered.

Relevant equality and human rights issues	Addressed in current draft of plan, policy, project or strategy?	Relevant section(s) of plan, policy, project or strategy	Comments / how you might address

Choice & Autonomy

The preferences and choices of the diversity of people are acknowledged with appropriate options available in service delivery and employment where possible

Statement of Outcome: We strive to: enable and support informed choice by staff and service users, including staff from other departments, from the identified groups.

Statement of Process: We work in a manner that: allows choice in relation to digitalised services to access the service on-line or in-person (Chief Executive’s Office).

Relevant equality and human rights issues	Addressed in current draft of plan, policy, project or strategy?	Relevant section(s) of plan, policy, project or strategy	Comments / how you might address

3. Alignment with Duty and DCC Values-led Approach

What further text to refer to the Duty and its implementation should be included in the Plan, Strategy, Policy or Programme?

What further text to refer to the Department’s equality and human rights values statement, and the values and their statement of outcome or process as relevant, should be included in the Plan, Strategy, Policy or Programme?

Does the Plan, Strategy, Policy or Programme align with the statement of outcome/statement of process for each value in the Department’s Equality and Human Rights Values Statement, as appropriate? If not, what further amendment is required?

Are the KPIs identified for the Plan, Strategy, Policy or Programme sufficient to track progress and report on achievements in addressing the equality and human rights issues identified as relevant? If not, what further amendment is required?





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Please contact the Equality, Diversity and Inclusion Office if you require a copy of this policy in large print, high-contrast print, Braille or audio format.