



Comhairle Cathrach
Bhaile Átha Cliath
Dublin City Council



Culture, Recreation and Economic Services Public Sector Equality and Human Rights Duty Implementation Plan

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Contents

1	Introduction.....	4
2	Equality and Human Rights Values Statements.....	6
2.1	Introduction.....	6
2.2	Equality and Human Rights Values Statement.....	7
3	Assessment of Equality and Human Rights Issues.....	9
3.1	Introduction.....	9
3.2	Assessment of Equality and Human Rights Issues.....	10
4	Implementation.....	14
4.1	Enabling Implementation.....	14
4.2	Address Step.....	15
4.3	Priority Initiatives.....	16
4.4	Ongoing Implementation.....	17
4.5	Report.....	17
	Appendix 1: Evidence Book.....	18
	Appendix 2: Implantation Template.....	34

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.

CRES, DCC functions are:

- Service provision, in particular in the cultural field, through libraries, in the sport and recreation field, and through parks and green spaces;
- Economic development in support for entrepreneurship and employment;
- Undertaking research and developing policy proposals; and
- Development of infrastructure and facilities to enable this service provision.

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.

2 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 Culture, Recreation and Economic Services 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

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

The 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:

- promote a standard of dignity and respect; and
- engender a sense of wellbeing and of fairness among staff and among service-users from the identified groups.

Statement of Process: we work in a manner that:

- treats staff and service-users from the identified groups with fairness;
- creates safe spaces for these groups within the workplace and in the services provided;
- implements appropriate procedures to enable them to raise issues, be heard, and have any such issues addressed; and
- endeavours to protect all staff from abuse and unfair criticism.

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:

- develop and operate services and working arrangements that are flexible in enabling access and accommodating specific needs of service-users and staff from the identified groups;
- identify and endeavour to remove any access barriers for these groups; and
- develop and manage physical infrastructure to reflect and exceed the requirements of universal design.

Statement of Process: we work in a manner that:

- enables service-users and staff from the identified groups to feel safe in identifying as such;
- encourages them to raise and seek a response to their specific needs;
- enables them to be their true self in all their engagements with us; and
- enables all staff to have the skills and knowledge to respond and accommodate diversity appropriately.

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:

- secure the full participation of communities and of staff from the identified groups; and
- support and invest in their development such that they can effectively pursue and realise their aspirations and ambitions.

Statement of Process: we work in a manner that involves interlinked mainstreaming and targeting processes, where:

- general services and workplace processes are tested to ensure that service-users and staff from the identified groups can participate fully; and
- specific supports are provided and initiatives are taken to address the disadvantages experienced by service-users and staff from these 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 the influence of organisations and individuals from the identified groups, such that their voices are heard and given full consideration in decision-making processes.

Statement of Process: we work in a manner that provides processes of consultation with, and structures for participation by, organisations and individuals from the identified group to have their voice heard and given full consideration, ensuring such processes and structures function in a manner that enables an effective and safe engagement by these groups.

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 secure a range of offer in the services we provide and in the employment opportunities we offer, that gives real options to people from across the identified groups.

Statement of Process: we work in a manner that enables people from the identified groups to be informed of the range of offer that we have in place, and that outreaches to groups to encourage their engagement.

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 CRES or its 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 are relevant across the identified groups for the Duty and for groups at the intersections of the grounds identified, unless otherwise stated.

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:

- Societal and institutional racism, ageism, sexism, homophobia, transphobia, ableism, and sectarianism (Islamophobia and anti-Semitism).
- Discrimination, both individual and institutional, in particular the data point to:
 - High levels of workplace discrimination experienced by women, older people, disabled people, LGBTI+ people, and Black and minority ethnic people including Travellers and Roma.
 - High levels of discrimination in public service provision experienced by lone parents, disabled people, and Black and minority ethnic people including Travellers and Roma.
- Stereotyping and false assumptions, in particular the data point to:
 - Stereotypes that serve to diminish whole groups and limit opportunities, in particular of women, older people, young people, LGBTI+ people, minority religions, and Black and minority ethnic people including Travellers and Roma.
 - Conscious and unconscious bias.
 - Stereotypical representations of the identified groups.
- Hostile or unwelcoming environments in service provision, the workplace and the public realm, where people cannot be their true selves, in particular the data point to:
 - Experiences of sexual harassment and harassment in the workplace and in accessing services.
 - Feeling it necessary to hide one's identity at work for fear of negative consequences, in particular for LGBTI+ people, disabled people, and Travellers.
 - Experiences and fears of harassment, bullying and intimidation in public spaces for women, older people, LGBTI+ people, and Black and minority ethnic people, including Travellers and Roma, with a lack of confidence in occupying public spaces as a result.
- Isolation, in particular the data point to:
 - Issues for disabled people and older people living alone.
- High levels of under-reporting of discrimination due to lack of confidence, lack of information, fear of victimisation, and belief that nothing will change.
- Lack of complaints procedures in relation to discrimination, lack of access to complaints procedures that are in place, and lack of promotion of the procedure.

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 recognition of and adaptation for diversity and the specific needs that arise from diversity, in particular the data point to:
 - Lack of flexibility and adaptations in the workplace, encompassing job design, work arrangements, and supports, presenting particular barriers for women with caring responsibilities, disabled people, older people moving towards retirement, LGBTI+ people, and Black and minority ethnic people including Travellers and Roma.
 - Lack of flexibility and adaptations in the provision of services, encompassing service design and service delivery systems, presenting particular barriers for disabled people, LGBTI+ people, and Black and minority ethnic people including Travellers and Roma,
 - Lack of provision for language diversity in terms of interpretation, translation, and English language supports, presenting barriers for Black and minority ethnic people including Roma, and deaf people.
 - Lack of provision for Irish language speakers.
 - Lack of universal design of physical infrastructure, encompassing workplaces, service provision settings, outdoor facilities, and public realm, presenting particular barriers for disabled people.
 - Inaccessible IT systems, presenting particular barriers for disabled people.
 - Inaccessible communication channels, formats, and messaging.
- Lack of supports for Black and minority ethnic people, including Travellers and Roma to preserve and develop their cultures.
- Lack of visibility for diversity, in particular the data point to:
 - Lack of equality data to track and analyse diversity and diversity outcomes.
 - Communication formats, and messaging that do not reflect diversity.
- Lack of understanding of intersectionality, in particular the data point to:
 - Lack of recognition for diversity within the identified groups, in particular within targeted measures, and lack of knowledge of and response to the specific needs of intersectional groups.
- Lack of awareness, knowledge, capacity and competence to understand and respond to diversity among service providers and employers, in particular the data point to:
 - Lack of training for staff on diversity, the practical implications of diversity, and systems for making reasonable accommodation for these specific needs.

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:

- Unemployment and barriers to employment and to entrepreneurship, in particular the data point to:
 - Employment gaps, high levels of unemployment, over-representation in low paid work, and barriers of access to decent work.
 - Particular vulnerability to unemployment among Travellers and Roma, young people, older people, disabled people, and lone parents.
 - Women, lone parents, young people, migrants, ethnic minorities including Travellers, and disabled people face particular barriers of access to decent work.
 - Lack of recognition for foreign qualifications for migrants.
 - Lack of networks with limited contacts and information as a result.
- Limited participation in cultural activities, in particular the data point to:
 - Lack of presence from the identified groups as producers and as consumers of arts and culture.
 - Barriers to progressing careers as artists and in the arts, in particular for women.
- Limited participation in physical activities, in particular the data point to:
 - Low levels of and barriers to participation by women, disabled people and older people.
- Poverty, in particular the data point to:
 - Enforced deprivation, consistent poverty, and in-work poverty experienced in specific areas and in the identified groups.
 - Particular vulnerability to poverty among women, minority ethnic groups including Travellers and Roma, disabled people, lone parents, and unemployed people.
 - Lack of support for the additional costs of disability experienced by disabled people.
 - Barriers for Roma to access necessary services due to application of the Habitual Residence Condition and lack of documentation available to them.
- Digital inequality, in particular the data point to:
 - Barriers resulting from over-reliance of online systems for information provision and service provision for those without access to broadband, necessary equipment, and relevant skills, in particular older people, and people living in poverty.
- Unequal sharing of caring responsibilities between women and men and lack of an adequate and affordable care infrastructure.

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:

- Lack of opportunity or processes to have a say and be heard and to support and enable people to have a voice, in particular the data point to:
 - Lack of diversity on structures for governance and for participation in decision-making.
 - Lack of inclusive approaches to consultation.
 - Lack of consideration given to the voice of the identified groups.
- Lack of political representation and low levels of participation in representative politics.

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 options available in the range of services provided.
- Barriers to autonomy, in particular the data point to:
 - Expectations of and fear of discrimination and harassment in workplace and service provision settings.
 - Lack of knowledge on how to access support and to navigate the supports available.
 - Being confined to institutionalised care settings.
 - Lack of information on supported decision making for disabled people.
 - Lack of confidence among the identified groups and lack of time given to people in their engagement with service providers.
 - Time poverty.
 - Lack of transport.
 - Financial dependence.
 - Lack of financial understanding.

4 Implementation

4.1 Enabling Implementation

Leadership:

The working group would continue to be convened with a view to preparing an annual plan for the implementation of the Address step, tracking and supporting progress on this annual plan, enabling ongoing learning from implementing the Address step, and preparing a report on the progress made each year.

The risk assessment process would include a focus on implementing the Duty.

Those responsible for key moments when policies, plans, strategies, or programmes are being developed or reviewed would have access to training on the Address step of the Duty. This might be progressed centrally across DCC.

Communication:

Staff would have ongoing opportunities to be familiarised with the Duty and its potential, learn about its implications for their work, and be informed about the progress made in implementing the Duty.

SPC members would have ongoing opportunities to be familiarised with the Duty and its potential, learn about its implications for their work, and be informed about the progress made in implementing the Duty.

Building a supportive culture:

Staff communication through newsletters, meetings and events would have ongoing opportunities to be engaged with the equality and human rights values statement, and the values involved.

The PDP process would include a focus on the equality and human rights values statement and how this has been given practical expression.

Internal communications within CRES would draw from the equality and human rights values statement and engage these values.

Tracking progress

Data gathering and analysis would be reviewed and developed to enable progress on addressing the equality and human rights issues to be tracked and reported on. Steps to capture data and insights to inform reflection and reporting on progress.

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 CRES, 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

A number of actions are to be taken with priority to address issues that emerge from the assessment of equality and human rights issues. These include actions to enable implementation of the Duty:

- Communication with staff in the Department, about the Duty and the work done in the Department to prepare for its ongoing implementation.
- Communication and initiatives with staff in the Department about the equality and human rights values, the identified groups for the Duty and the Department's commitment to address equality and human rights issues they face.

These include a number of key upcoming opportunities for implementation of the Address step of the Duty:

- Developing the Department's input into the DCC Corporate Plan.
- Developing the Arts Plan.
- Developing the Libraries Strategy.
- Completing the LECP.
- Completing the Sports Strategy.
- Parks Strategy.

4.4 Ongoing Implementation

Each year, key moments for implementing the Address Step are identified by the working group, 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:

- The annual service plan of CRES.
- CRES strategies, including in areas such as library strategy, sports strategy, arts plans, local economic and community plan, economic strategy, parks strategy, tree strategy, biodiversity strategy, greening strategy, night-time action plan, age-friendly and integration.
- Bye-laws.
- Departmental policies and procedures.
- Composition of and processes for enabling, citizen participation in initiatives and programmes.
- Programming of initiatives and events that mark and celebrate diversity.
- Procurement systems, developing an ask of contracted organisations to be included in tenders and contracts, with a view to passing on the Duty to contractors, in a manner that reflects their scale and functions.
- Grant aid or funding systems, developing an ask of funded organisations to be included in funding requirements and contracts, with a view to passing on the Duty to beneficiaries, in a manner that reflects their scale and functions.

4.5 Report

The working group will gather and analyse data and will organise a reflection process with a view to preparing an annual report on progress made in implementing the Duty and achievements in addressing the issues.

This reflection would: acknowledge achievements; strengthen the process for implementing the Duty as found needed, and further develop actions to address the equality and human rights issues, as found to be necessary.

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

Appendix 1: Evidence Book

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

- a DCC Plans and Strategies
- b National Policy Strategies
- c National Research
- d Submissions to International Human Rights Bodies

A: DCC Plans and Strategies

The [Dublin City Local Economic and Community Plan 2016-2021](#) points to and identifies issues of situation and experience across the identified groups.

In relation to **situation**:

- In the fourth quarter of 2015, the unemployment rate for Dublin stood at 7.6%, its lowest rate in six years, having peaked in 2012 at 13%. However, the youth unemployment rate remained persistently high at 15%.
- The distribution of affluence across the city is uneven, with 75% of residents in the Dublin City Council South East area ranked as affluent or very affluent while the same is true for just 5% of residents in both the South Central and North Central areas. 48% and 62% of residents in the North Central and North West areas respectively are categorised as marginally below average, disadvantaged or very disadvantaged. There are pockets of disadvantage within some of the most affluent areas of Dublin City.
- The EU Survey on Income and Living Conditions 2013, showed the proportions of the population of the Dublin region that were: at risk of poverty (9.1%), experiencing deprivation (28.1%) and living in consistent poverty (4.9%). Key influencing factors were: being unemployed, being unable to work due to a disability or illness, living in social housing, parenting alone or being a child (under 17 years).
- Traveller and Roma communities are particularly vulnerable to poverty and social exclusion and face barriers in accessing education, training, employment and services.
- A ComReg survey in June 2015 found that 89% of Dublin residents had access to fixed-line broadband. There were differences in access between higher socio-economic groups (86%) and lower socio-economic groups (70%).

In relation to **experience**:

- Harassment, bullying and intimidation (including that which is homophobic, gender-based or racially motivated) in the public realm create fear and the perception that Dublin is not safe.

- In the six-month period July to December 2014, the European Network Against Racism's iReport.ie system for reporting racist incidents was alerted to 125 racist incidents nationally, 59 of which occurred in Dublin.

The [Dublin City Council Integration Strategy 2016-2020](#) identifies issues of situation and experience for migrants.

In relation to **situation**:

- Difficulties in knowing how to access and navigate support to develop personal and economic potential.
- Low levels of migrant engagement in consultation structures such as PPN.
- Low participation in democratic processes.

In relation to **identity**:

- Service providers need to have an understanding of the differing needs of diverse communities and to develop intercultural competencies to reasonably meet their needs.
- Lack of English is the single most important barrier to long-term integration in Ireland. Lack of a centralised, readily available plain English migrant-specific information.

The Dublin City Council [‘Securing Roots: Integrating Minority Ethnic People into Local Community Services in the North East Inner City’](#) identifies issues of situation and identity for Black and minority ethnic people.

In relation to **situation**:

- The lack of recognition of migrants' qualifications often results in them depending on low income jobs rather than accessing employment in their field of expertise.
- Deterrents to participation in community services and organisations include: Lack of sufficient access to English language supports; the fear of racism; high level of anxiety and fear caused by increased police presence in response to gangland crime, violence and open drug dealing; inadequate supports to enable people participate in activities outside the home such as access to affordable childcare; and separate challenges for specific groups such as the Roma community.
- There is a low level of minority ethnic people participating in the governance of community organisations.

In relation to **identity**:

- A limited number of community organisations across the area have developed a variety of different approaches to providing information in other languages but generally have little or no resources for this.

The [Dublin City Council Age Friendly Strategy 2014-2019](#) identifies issues of situation and experience for older people.

In relation to **situation**:

- Opportunities for paid employment are practically non-existent. When employed, there are few opportunities for older people to upskill, and they are often overlooked for promotion.
- Lack of door-to-door transport makes it hard to access services and events.
- Physical activities targeting older people are patchy, and too often concentrated in one area.
- Although many of the city's larger parks are widely used by older people, smaller local parks are not, due to anti-social behaviour, poor or no seating, restricted access and lack of organised activities.
- Insufficient public toilets and on-street seating often result in older people curtailing their activities.
- Older people often feel voiceless and brushed aside. Their opinions are dismissed by services and businesses and their complaints are not taken seriously. They are not consulted on issues which affect their lives.

In relation to **experience**:

- There is an over-reliance on the internet in the provision of information. Many older people do not use computers or credit cards.
- There is no coordinated approach to the provision of information. Clear, concise information, devoid of jargon and suitable for those with literacy and sight issues, is required.

In relation to **identity**:

- Older people are not a single uniform group, as individuals experience older age differently depending on their gender, sexuality, ethnicity, socio-economic background, health, education and their own perception of what constitutes older age.

B: National Policy Strategies

The [Roadmap for Social Inclusion 2020-2025](#) identifies issues situation and identity on the socio-economic status ground.

In relation to **situation**:

- 21.1% of population at risk of poverty or social exclusion (2018).
- 5.2% of the population suffering severe material deprivation and 5.6% of the population in consistent poverty (2018).
- In-work at risk of poverty rate is 4.8% (2018).

In relation to **identity**:

- Marginalised groups who may be subject to unconscious and often conscious bias, include women, migrants, members of the Travelling and Roma communities, members of the LGBTI+ community, and former prisoners.
- One of the key factors which is perceived to give rise to a lower employment rate for women is the requirement, mainly carried by women, to care for children and the associated difficulties posed by the availability, and high costs, of early learning and care.

The [National Disability Inclusion Strategy 2017-2022](#) identifies issues of situation, experience, and identity for disabled people.

In relation to **situation**:

- 31% of disabled people are in paid employment compared with 71% of people without a disability being in employment
- 42% of disabled people live in a jobless household, at high risk of poverty

In relation to **experience**:

- Disabled people are more likely to live alone
- Lack of information and awareness among disabled people about their options for supported decision making
- Lack of training for staff working in sectors that interact with disabled people

In relation to **identity**:

- Access issues for disabled people in public buildings, public transport, IT systems used in service provision, and outdoor facilities, absence of universal design of built environment
- Lack of provision for Irish Sign Language users when accessing public services with free interpretation needed when accessing/availing of services

The '[Comprehensive Employment Strategy for People with Disabilities 2025-2024](#)' identifies issues of situation, experience, and identity for disabled people.

In relation to **situation**:

- People with disabilities in Ireland are only half as likely to be in employment as others of working age, due to: level of education and skills; fears around loss of benefits; employer know-how; low expectations; limited re-entry to work following onset of a disability; and higher incidence of ill-health. The 2011 census showed 33% of people with disabilities of working age in work, compared to 66% of non-disabled people.

In relation to **experience**:

- Fears also play a role in lowering the numbers interested in a job – a perception there are no suitable jobs available, fears of losing supports or benefits, worry about possible employer attitudes, possible isolation or discrimination.

In relation to **identity**:

- The main perceived barriers for those out of work who wish to work are: Flexible work arrangements (45%); Modified tasks (29%); Wage subsidy (24%); Transport/parking (17%); Accessible building (13%); Human support (7%); and Assistive technology or physical adjustments (4%).
- Universal design of workplaces would facilitate employees with disabilities to avail of employment opportunities without need for further adaptation.

The [National LGBTI Inclusion Strategy 2019-2021](#) identifies issues of situation and experience for LGBTI 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.
- LGBTI adults reported that significant barriers to workplace inclusion still persist for LGBTI+ employees.
- Mainstream services 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 highest rates of discrimination were reported by people who identify as LGBTI+ (33.2%), followed by persons from non-white ethnic backgrounds (33.1%), unemployed (30.2%) and non-Irish (26.7%).
- LGBTI people continue to experience unacceptable levels of harassment and discrimination in some workplaces.
- The need for increased and non-stereotypical representation of LGBTI+ identities arose as a consistent theme throughout the consultation process.

The '[National Positive Ageing Strategy](#)' identifies issues of situation, experience and identity for older people:

In relation to **situation**:

- Barriers (legislative, attitudinal, custom and practice) to continued employment and training opportunities.
- Underdeveloped IT skills constitute a significant barrier to accessing information for some people as they age.
- Need for a better awareness of the needs and preferences of our ageing society during policy and service development is necessary by adopting more comprehensive and inclusive approach to consultation

In relation to **experience**:

- Ageism and age discrimination.

- Age related stereotypes: based on myths and misinformation about older people's competencies, beliefs and abilities.

In relation to **identity**:

- Need for particular attention to the needs of more marginalised, vulnerable, hard- to-reach and minority groups of older people such as older migrants and people from different ethnic backgrounds; older people with specific physical and intellectual disabilities; Travellers; and lesbian, gay, bisexual and transgender older people.
- Need for options for gradual retirement.

The '[National Youth Strategy 2015-2020](#)' identifies issues of situation for young people.

In relation to **situation**:

- In 2014, 23.9% of young people aged 15-24 years were unemployed. 16.7% of young people aged 15 to 24 years were not in education, employment or training.
- In 2013, 14% of young people aged 15-24 years were living in consistent poverty.

The '[National Traveller and Roma Inclusion Strategy 2017-2021](#)' identifies issues of situation and identity for Traveller and Roma people.

In relation to **situation**:

- Travellers and Roma are among the most disadvantaged and marginalised people in Ireland.
- Travellers stand out as a group that experiences extreme disadvantage in terms of employment, housing and health and that faces exceptionally strong level of prejudice.
- The All Ireland Health Study of 2010, found that 84% of Travellers during the study were currently unemployed. Census 2011 reveals that out of a total labour force of 4,144 Traveller women, 81.2% were without work.
- The Fundamental Rights Agency (2016) noted that 80% of Roma interviewed are at risk of poverty compared with an EU average of 17%.

In relation to **identity**:

- Recognition of the distinct heritage, culture and identity of Travellers and their special place in Irish society would be hugely important to Traveller pride, to Traveller self-esteem and to overcoming the legacy of marginalisation and discrimination that the community has experienced.

The [Arts Council Equality, Diversity & Human Rights Strategy](#) identifies issues of situation across the identified groups.

In relation to **situation**:

- Many inequities still exist within the arts and there is a substantial number of people who continue to experience barriers to engaging with and participating in the arts because of their socio-economic background, their ethnicity or religion, their sexual orientation or gender identity, their family status, their age, their membership of the Traveller Community, or through lack of accommodation of a disability.
- Women artists across a range of artistic disciplines continue to encounter serious impediments to advancing their careers and repertoire in a way that equates with their male peers.
- There is a need to ensure recipients and beneficiaries of awards and funding programmes better reflect the population profile of contemporary Ireland, inclusive of the most disadvantaged groups.
- There is a need to ensure that boards, staff, advisers and panellists, best reflect and represent the diversity of contemporary Ireland.

C: National Research

The 2017 report by IHREC and the ESRI, [Who Experiences Discrimination in Ireland, IHREC & ESRI, 2017](#) identifies issues of situation, experience and identity across the identified groups.

In relation to **situation**:

- The models also control for other characteristics related to the educational and financial resources people may have available, such as economic status, education qualifications and housing tenure. The relationship between these resources and discrimination is complex. On one hand, these factors affect individuals' exposure and response to discrimination (since they may have less economic power). On the other hand, resource inequalities can be partially the outcome of discriminatory processes.

In relation to **experience**:

- In 2014, 12 per cent of the population in Ireland reported experiencing some form of discrimination in the previous two years. Discrimination rates were highest in relation to seeking work (7 per cent), followed by the workplace (5 per cent), private services (5 per cent), and public services (3 per cent).
- Women report higher discrimination in the workplace - 6.7% of women, compared to 4.1% of men.
- Older workers (45–64 years) perceive more discrimination than younger workers in seeking work – 12% of those aged 45–64 years said they experienced discrimination in job searching compared to 5.2% of those aged 18–24 and 5.9% of those aged 25–44.
- Compared to White Irish respondents, Black respondents report higher discrimination in the workplace, in public services and in private services. Asian respondents report more discrimination than White Irish in private services.

- Irish Travellers report very high rates of discrimination in seeking work, where they are ten times more likely than White Irish to experience discrimination, and extremely high rates of discrimination in private services, where they were over 22 times more likely to report discrimination, particularly in shops, pubs and restaurants.
- Compared to Catholics, members of minority religions report somewhat higher discrimination rates in the workplace and in public and private services.
- Never-married lone parents are more likely to experience discrimination in public and private services than single childless adults.
- Those with a disability experience higher rates of discrimination than those without a disability in all areas – in the workplace, while seeking work, in private services and public services. Just over 7% of respondents with a disability reported experiencing discrimination when using public services, compared to 2.8% of those with no disability.

In relation to **identity**:

Given the experience of different ethnic groups, measuring ethnicity to monitor outcomes in surveys and administrative data would be very informative. Irish Travellers in particular, who report very high levels of discrimination, are often not identified in surveys, which highlights the importance of making use of census data and adding an ethnic identifier to administrative data to monitor outcomes.

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

In relation to **situation**:

- Data demonstrate that the disability employment gap increased from 39.8% to 41.3% between 2014 and 2021.
- There has been a reduction in the number of people with disabilities in receipt of Rehabilitative Training (RT) compared to the profiled targets of 2021 and 2020.
- People living in congregated settings have a lower quality of life, experience poorer quality services and have fewer opportunities to exert their rights and choices.
- 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.
- 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. The NDA are unaware of any existing data that would give information on the levels of accessibility and/or who has achieved compliance in public buildings.

- Public bodies have exceeded the 3% minimum target related to employing disabled people for the 11th year in a row with 3.6% of employees reporting a disability in 2021. While this is very positive, it is important that public bodies continue improving as a new minimum target of 6% will be introduced by 2025.

In relation to **identity**:

- A study commissioned by the Department of Social protection (2021) examined the additional costs of disability and highlights there is an annual average additional cost of disability ranging from €11,734 to €16,284, depending on a persons' degree of limitation.
- Implementation of the Irish Sign Language Act 2017 was described as poor across most sections of the Act, with many public bodies appearing unprepared for the activities needed to achieve compliance.

The 2016 GLEN and BeLonGTo report [The LBGTIreland Report: national study of the mental health and wellbeing of lesbian, gay, bisexual, transgender and intersex people in Ireland](#) identifies issues of experience for LGBTI people.

In relation to **experience**:

- Study findings suggest that LGBTI people continue to experience incidents of victimisation, discrimination and harassment outside of school: 75.2% reported that over their lifetime they had experienced being verbally hurt, with approximately one fifth of participants having experienced physical attacks due to being LGBTI.
- Participants' comfort levels decrease around public displays of same-sex affection, with a greater percentage of participants indicating discomfort with a male couple kissing (39%) and a female couple kissing (30%) compared to a heterosexual couple (17%) kissing in public.

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**:

- 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. Most people in their 70s are not in paid work.
- Ageism in the labour market makes it hard for older people to access work.

In relation to **experience**:

- Stereotypical and ageist understandings of older persons.
- Mandatory retirement at age 65 persists in many employment contracts and is upheld by the law.

- Retaining personal independence becomes a concern for many older people in their 80s, including independent living at home or maintaining autonomy in a care setting. Almost all older people in their 70s want to “age in place” in the communities where they have built their lives.

The 2018 Pavee Point and Department of Justice report: [Roma in Ireland A national needs assessment](#), points to issues of situation, experience and identity for Roma.

In relation to **situation**:

- 20% of respondents are completely marginalised from services and supports.
- 60% of respondents reported experiences of consistent poverty, including not always having enough fuel, food or heat. 20% of respondents stated that they are experiencing poverty that would be considered extreme. In 50% of the households with children, respondents reported that they do not always have enough food.
- Only 16.7% of respondents reported that they are in employment.

In relation to **experience**:

- The major barriers that respondents identified in accessing services are not being eligible for supports such as medical cards, training and employment schemes, homeless supports, or social protection payments. This was either due to not having the right to reside or not meeting the habitual residence condition. 19.8% of respondents reported that they do not have a PPS number which is vital for accessing a wide range of services, including applying for a medical card and social protection.
- Barriers outlined by respondents were lack of documentation to prove residency, language barriers, not knowing about services or how to access them, and experiences of discrimination.
- The research finds a high prevalence of experiences in relation to discrimination identified by most respondents. Respondents reported feeling discriminated against at both an institutional and individual level. The highest rates of perceived discrimination were reported in accessing accommodation (93%) and social protection (84.3%). 78.9% of respondents reported feeling discriminated against in getting hired or getting a job. 81.1% of respondents also reported experiencing racism and verbal abuse in public spaces with women being identified as particularly vulnerable.

In relation to **identity**:

- The Roma population is diverse with a range of nationalities, languages and religion. Roma culture is diverse and ever-changing. For service providers, this means there should not be one 'Roma approach'.
- The findings show that there is a wide diversity of languages spoken among Roma in Ireland. 61% of respondents reported usually speaking Romani at home. This was followed by Romanian at 14.3%, Czech at 10.4%, English at 9.7% and Slovakian at 4.5%.

- Across all services language and communication between Roma and service providers emerged as a challenging issue.
- The research shows a low proportion of respondents are accessing professional interpreters, with the majority of respondents relying on friends and children to interpret for them.

The 2017 [Report of the Joint Committee on Social Protection on the Position of Lone Parents](#)

identifies issues of situation and identity in relation to 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%).
- Only 42.5 per cent of lone parents were in employment, compared with 69.3 per cent for heads of two-parent families. Of lone parents, 14.4 per cent were unemployed compared with 11.8 per cent of couples.

In relation to **identity**:

- Lone parents devote more of their time to caring responsibilities, responsibilities which impinge on their availability for work.
- 86.4% of lone parents were female and 13.6% were male.

The 2017 ESRI Report (Watson D., Kenny O., & McGinnity) [A Social Portrait of Travellers in Ireland](#)

identifies issues of situation and experience for Travellers.

In relation to **situation**:

- There is still a need to address barriers in the labour market, since the employment gap persists even after taking account of education, region, age, gender and family circumstances.
- The main difference between Travellers and non-Travellers in employment terms is their very high levels of unemployment. Among those aged 25–64 years, the unemployment rate was 82 per cent for Travellers in Census 2011, compared to 17 per cent for non-Travellers. Travellers also had a lower rate of labour market participation, that is, being either in employment or unemployed. The labour market participation gap was not as large, however: 61 per cent of Travellers were in the labour market compared to 79 per cent of non-Travellers.

In relation to **experience**:

- Although not directly measured here, prejudice and discrimination are likely to play a significant role in accounting for the remaining employment gap.

- A background and history of extreme prejudice and discrimination against Travellers. This negative attitude towards Travellers is documented. MacGréil reports that 60 per cent of the population in Ireland would not welcome a Traveller as a member of the family; 64 per cent reject Travellers based on their 'way of life' and 18 per cent would deny Irish citizenship to Travellers.

In relation to **identity**:

- Along with affirming the distinct cultural identity of Travellers, recognition of Traveller ethnic identity would create a positive platform for engagement by Travellers and public authorities together in addressing key issues facing the community on the basis of mutual respect.
- Recognition of Traveller ethnic identity could be of considerable benefit in ensuring respect for the cultural identity of Travellers in the context of targeted services.
- This recognition of Traveller ethnic identity would also facilitate the routine use of an ethnic identifier on administrative databases, which would allow the monitoring of progress towards equality for Travellers.

D: Submissions to International Human Rights Bodies

The 2021 IHREC submission [Ireland and the International Covenant on Economic, Social and Cultural Rights](#) identifies issues of

In relation to **situation**:

- Women, lone parents, young people, migrants, ethnic minorities, including Travellers, and disabled persons experience significant barriers in meeting their right to decent work.
- 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.
- Travellers and Black people experience particularly high rates of labour market discrimination, both when seeking work and in the workplace.
- Travellers continue to experience systemic discrimination in employment, education, health, and housing, with many living in poverty.
- 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).
- 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. By household composition, individuals living in households where there was one adult and one or more children aged under 18 had the highest consistent poverty rate at almost 22%.
- Those most at risk of experiencing poverty in 2020 were those unable to work due to disability or illness (33.7%), and the unemployed (32%).

- 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.

In relation to **experience**:

- Racist attitudes can be found across Irish society and across all social classes.
- Significant barriers to the enjoyment of equal rights for disabled persons remain, pointing to structural and institutional ableism across Irish society.

In relation to **identity**:

- Funding and infrastructure are required to preserve and develop Traveller culture and identity.
- Considerable shortfalls in equality data in Ireland.

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](#) Submission to the United Nations Committee on the Elimination of Discrimination Against Women on Ireland's combined sixth and seventh periodic reports identifies issues of situation and experience for women.

In relation to **situation**:

- There is a clear gender dimension to the incidence of low pay, with women accounting for 60% of low paid workers.
- The gender employment gap gets wider as women age. The participation rate of disabled women in full-time employment in Ireland is the worst in the EU, highlighting the level of ableism in Irish society. Travellers face intense discrimination in the labour market, and the participation rate of Traveller women was last estimated to be 30%. Although there is limited data disaggregated by gender, research evidence documents the existence of attitudinal barriers to the employment of a number of other ethnic minority communities, including racism and micro-aggressions at the point of recruitment. Structural barriers are built into the Irish employment landscape, including the lack of recognition of foreign qualifications, resulting in complex hurdles faced by migrants and international/temporary protection applicants seeking employment. Research on the Roma community highlights barriers to employment such as language and literacy, access to training, the social determinants of health, as well as the lack of appropriate transport and childcare supports for Roma women in particular.
- In 2022, 5.7% of women were living in consistent poverty, 13.2% were considered 'at risk of poverty', and 19.1% experienced enforced deprivation.
- The poverty rates among structurally vulnerable groups are of particular concern, including older people living alone, unemployed people, people unable to work due to health complications, Travellers, Roma and other ethnic minority groups. Furthermore, one-parent families, 86.4% of which are headed by women, disproportionately experience poverty, with 14.1% living in consistent poverty and 31% at risk of poverty.

- We are concerned about women's participation at all levels of sport, including playing, coaching, officiating and leadership. The legacy of historical underfunding of women's sports is stark, impacting players from grassroots to elite levels.
- Women's participation in all aspects of political, public and cultural life is impacted by care inequality. Women shoulder a disproportionate burden of unpaid care work, including significant child and family care responsibilities.
- Lower levels of female representation on boards of Small and Medium Enterprises is particularly concerning, as this experience is a crucial pathway for future career development. Similarly, women's representation in key leadership roles, including Chairs, Chief Executive Officers and Chief Financial Officers, fall significantly short, with disappointing trends between 2022 and 2023

In relation to **experience**:

- Due to persistent gender stereotyping in the labour market, women predominate in lower paid sectors such as hospitality, childcare and adult social care, and are more likely to be in receipt of the National Minimum Wage.
- Women are more likely to experience discrimination in the workplace, including in relation to pregnancy and maternity, menstrual health, and menopause.
- Non-Irish nationals face particular obstacles to accessing decent work and are more likely to have less advantageous working conditions than White-Irish nationals.
- We also note the issues experienced by disabled people in relation to decent work, including higher rates of work-related illnesses, and failures to put reasonable accommodations in place for disabled employees.

The 2019 IHREC report on [Ireland and the Convention on the Elimination of Racial Discrimination](#), identifies issues of situation and experience for Black and minority ethnic people, including Roma and Travellers.

In relation to **situation**:

- The employment rate of 'African nationals' is 45%, compared to an average of 70% for other minority national groups. The employment rate of African women is 38%, 17% below the average female employment rate in Ireland.
- 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'.
- Only 17% of Roma respondents were in employment, and 79% felt that they had been discriminated against in getting a job.
- The recognition of qualifications acquired abroad is also 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 in place.

- Difficulties in obtaining recognition in Ireland of qualifications acquired abroad can give rise to situations of under-employment and over-qualification. The over-qualification rate for migrant workers in Ireland is 41%, compared to 29% for workers born in Ireland.
- Minority ethnic groups are often confronted with issues in the workplace such as precarious contracts, a lack of progression, unequal treatment, and exploitation.
- To protect the social and cultural life of the Traveller community, the Commission is of the view that the State must invest in the necessary infrastructure. While the funding provided to date to promote Traveller culture is welcome, it has been criticised for its ad hoc and project-based character.

In relation to **experience**:

- Compared to 'White Irish' respondents, 'Black' people are three times more likely to experience discrimination in access to public services and almost five times more likely to experience discrimination in access to private services such as shops, banks, and housing. 'Asian' respondents also report more discrimination in private services.
- The CSO published data in July 2019 demonstrating that compared to 16.3% of 'Irish persons', 26.7% of persons of other nationalities and 33.1% of 'persons from non-White ethnic backgrounds' reported experiencing discrimination in the previous two years.
- There is a demonstrable history of chronic racism and discrimination against the Traveller community in Ireland. 90% of Travellers have experienced discrimination over their lifetime, while 77% experienced discrimination in the previous year.
- High levels of discrimination faced by Roma on the street or other public settings (81% of respondents) when accessing social welfare (84%) and in shops, restaurants, pubs, or other social venues (74%). This report highlighted that Roma women are particularly vulnerable to on-street racism, including because of their identifiable and traditional dress.
- Research co-funded by the Commission and published in 2018 demonstrated the common use of Islamophobic and anti-Semitic racist discourse in the Irish online sphere.
- 'Just under half of adults born in Ireland believe some cultures to be superior to others. It also found that 45% believe that some races/ethnic groups were born harder working.' It was found that 17% of adults born in Ireland believe that 'some races were born less intelligent.'
- One study that analysed reported racist incidents found that the shaming of and discriminatory behaviour towards people of African descent are frequent and highly visible in Ireland.
- Victims of racism report a lack of confidence in occupying public spaces and engaging with strangers, as well as fears for their other family members.

Appendix 2: Implementation Template

Purpose of plan, policy, project or strategy

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Dignity & Respect

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

Statement of Outcome: we strive to:

- promote a standard of dignity and respect; and
- engender a sense of wellbeing and of fairness among staff and among service-users from the identified groups.

Statement of Process: we work in a manner that:

- treats staff and service-users from the identified groups with fairness;
- creates safe spaces for these groups within the workplace and in the services provided;
- implements appropriate procedures to enable them to raise issues, be heard, and have any such issues addressed; and
- endeavours to protect all staff from abuse and unfair criticism.

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:

- develop and operate services and working arrangements that are flexible in enabling access and accommodating specific needs of service-users and staff from the identified groups;
- identify and endeavour to remove any access barriers for these groups; and

- develop and manage physical infrastructure to reflect and exceed the requirements of universal design.
- Statement of Process: we work in a manner that:
- enables service-users and staff from the identified groups to feel safe in identifying as such;
- encourages them to raise and seek a response to their specific needs;
- enables them to be their true self in all their engagements with us; and
- enables all staff to have the skills and knowledge to respond and accommodate diversity appropriately.

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:

- secure the full participation of communities and of staff from the identified groups; and
- support and invest in their development such that they can effectively pursue and realise their aspirations and ambitions.

Statement of Process: we work in a manner that involves interlinked mainstreaming and targeting processes, where:

- general services and workplace processes are tested to ensure that service-users and staff from the identified groups can participate fully; and
- specific supports are provided and initiatives are taken to address the disadvantages experienced by service-users and staff from these 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 the influence of organisations and individuals from the identified groups, such that their voices are heard and given full consideration in decision-making processes.

Statement of Process: we work in a manner that provides processes of consultation with, and structures for participation by, organisations and individuals from the identified group to have their voice heard and given full consideration, ensuring such processes and structures function in a manner that enables an effective and safe engagement by these 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

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 secure a range of offer in the services we provide and in the employment opportunities we offer, that gives real options to people from across the identified groups.

Statement of Process: we work in a manner that enables people from the identified groups to be informed of the range of offer that we have in place, and that outreaches to groups to encourage their engagement.

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



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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.