

# **Limerick City and County Council**

## **Public Sector Equality and Human Rights**

### **Duty Implementation Plan**



Comhairle Cathrach  
& Contae **Luimnigh**

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**Limerick** City  
& County Council

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## Contents

**Section 1: The Public Sector Equality and Human Rights Duty**

**Section 2: A Values-led Approach**

**Section 3 Assessment of Equality and Human Rights Issues**

3.1 Introduction

3.2 Assessment of Equality and Human Rights Issues

**Section 4 Enabling Implementation of the Duty**

4.1 Leadership

4.2 Capacity-building

4.3 Communication

**Section 5 Implementing the Duty**

5.1 The Address Step

5.2 Undertaking the Address Step

5.3 The Report Step

*Appendix A. Limerick City and County Council Equality and Human Rights Values Statement*

*Appendix B. Template for using the assessment to review a policy/procedure/plan*

## **Section 1      The Public Sector Equality and Human Rights Duty**

This Duty implementation plan establishes the ambition, approach, and steps to be taken by Limerick City and County Council to implement the public sector equality and human rights duty (the Duty), across all of our function areas.

Limerick City and County Council provide a wide range of services across the county: housing, community and leisure, environmental, planning and place-making, business and economy, education and learning, roads and travel, emergency services, major emergency management, water and drainage.

In addition, Limerick City and County Council is a key local employer in the county. All of these function areas are subject to the Duty therefore, a central focus of our work is to ensure equality of access, participation, and outcome for our service users and policy beneficiaries across all of these function areas. As an employer and service provider, we have a duty to ensure services, programmes, and a workplace that promotes equality and is free from all forms of discrimination.

Delivering on our statutory obligations to implement the Duty, provides an opportunity for Limerick City and County Council to mark our achievements, build on our work to-date, and apply the planned and systematic approach required, to strengthen and further evolve our work on equality and human rights.

The Duty requires public bodies to have regard to the need to eliminate discrimination, promote equality, and protect human rights for service users, policy beneficiaries, and employees, across all function areas of the organisation.

### **Section 42 Irish Human Rights and Equality Commission Act 2014.**

- (1) A public body shall, in the performance of its functions, have regard to the need to:
- Eliminate discrimination;
  - Promote equality of opportunity and treatment of its staff and the persons to whom it provides services; and
  - Protect the human rights of its members, staff and the persons to whom it provides services.

In implementing the Duty, public bodies are required to: undertake an “assessment of the equality and human rights issues” facing the identified groups for the Duty and that have most relevance to the specific functions of the public body; to identify the actions already in place, or proposed, to address the equality and human rights issues arising from that assessment; and to report annually on progress and developments in addressing these issues and implementing the Duty.

In summary, the three required steps in implementing the Duty<sup>1</sup> are:

**S42.2 (a) and (b) establish three key steps that public bodies should follow, in regard to implementing the Duty:**

- (2) (a) set out in a manner that is accessible to the public in its strategic plan (howsoever described) an assessment of the human rights and equality issues it believes to be relevant to the functions and purpose of the body and the policies, plans and actions in place or proposed to be put in place to address those issues, and
- (b) report in a manner that is accessible to the public on developments and achievements in that regard in its annual report (howsoever described).

**Step 1. Assess:** Undertake an evidence-based assessment of the equality and human rights issues for the identified groups for the Duty that have relevance to the functions of the public body.

**Step 2. Address:** identify the policy, plans, actions in place or proposed, to address the issues arising from the assessment.

**Step 3. Report:** report annually on developments and achievements in implementing the Duty.

The identified groups for the Duty are:

- Those groups covered by the nine grounds under equality legislation:
  - gender (including gender identity, gender expression and sex characteristics)
  - civil status
  - family status (including lone parents and others with family caring responsibilities)
  - age (people over 18)
  - disability (including physical, sensory, and intellectual disabilities, mental health issues, and chronic illness)
  - sexual orientation
  - race (encompassing skin colour, nationality and ethnic origin),
  - religion (including any or no religious belief), and
  - membership of the Traveller community.
- Those at risk of, or experiencing poverty and social exclusion<sup>2</sup> - which we identify as a tenth ground of 'socio-economic status'.

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<sup>1</sup> [Implementing the Public Sector Equality and Human Rights Duty](#), Irish Human Rights and Equality Commission, 2019.

<sup>2</sup> The Irish Human Rights and Equality Commission, in their guidance documents for the Duty, recommend this focus beyond the 9 protected grounds under equality legislation.

## Section 2      A Values-Led Approach

Limerick City and County Council takes a values-led approach to implementing the Public Sector Equality and Human Rights Duty (the Duty).

Organisational values are central to shaping organisational culture, which in turn, impacts on the priorities, processes, and practice of an organisation. A values-led approach to the Duty, therefore, can assist in embedding a focus on equality and human rights within the culture of an organisation and in mobilising that culture behind implementation of the Duty.

Five core values<sup>3</sup> have particular relevance as underpinning values in the pursuit of the broad goal of the Duty to promote equality, prevent discrimination, and protect human rights, these are the values of:

Dignity
Inclusion
Participation
Autonomy
Resources

To apply these core values in our work to implement the Duty, the Duty working group developed an equality and human rights values statement which will serve as a framework for our work to implement the Duty, in particular by:

- providing high-level benchmarks for our organisational ambitions to eliminate discrimination, promote equality and protect human rights for our staff, service users and policy beneficiaries, and
- offering an accessible language to support and communicate our work to implement the Duty to our staff, service users and policy beneficiaries.

The Equality and Human Rights Values Statement is set out in Appendix A.

Our Equality and Human Rights Values Statement sets out and defines each value, and identifies a high-level benchmark for each value, in regard to:

- **Priority:** the implication of the value for the organisational change we seek in addressing equality and human rights concerns.
- **Process:** the implication of the value in regard to how we do our work, processes include, but are not limited to: policies and procedures; codes of behaviour and conduct; staff recruitment, training and development; consultation processes; and internal and external communications.

The statements of priority and process will serve as useful benchmarks to guide our ambition for equality and human rights, and ensure our processes include a focus on eliminating discrimination, promoting equality and protecting human rights.

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<sup>3</sup> ["A Duty to Innovate: A Values-Led Approach to Implementing the Public Sector Equality and Human Rights Duty"](#), Rachel Mullen, Values Lab, 2019

## **Section 3      Assessment of Equality and Human Rights Issues**

### **3.1      Introduction**

Step one of the Duty (Assess) requires a public body to prepare an assessment of the equality and human rights issues for the identified groups for the Duty. The assessment provides a tool for the organisation to undertake Step two of the Duty (Address).

This ‘assessment’ is NOT an assessment of the functions or performance of Limerick City and County Council in regard to our work to address equality and human rights concerns. It is an assessment of the key equality and human rights issues facing the identified groups under the Duty, in particular, those equality and human rights issues that have relevance for the functions of a local authority.

The equality and human rights issues identified in our assessment, are drawn from up-to-date Irish research and data on the key equality and human rights issues facing the groups identified for the Duty.

Limerick City and County Council have used the following data sources to inform this assessment:

- Research conducted by: the Economic and Social Research Institute, and national organisations advocating on behalf of the identified groups.
- National policy strategies for specific identified groups.
- The Central Statistics Office.
- Submissions by the Irish Human Rights and Equality Commission, to the international UN human rights monitoring framework, and
- County-level reports and research.

The full equality and human rights assessment, including the evidence base, is contained in a separate document.<sup>4</sup> The assessment will be periodically updated by Limerick City and County Council to ensure that the most up-to-date data and information is informing our ongoing work to address equality and human rights concerns across our function areas.

The Irish Human Rights and Equality Commission guidance on implementing the Duty, recommends that public bodies consult with civil society organisations, advocating on behalf of the identified groups for the Duty, as part of the process to finalise the assessment of equality and human rights issues. Limerick City and County Council held a validation meeting with relevant local organisations, in January 2024. This process proved very beneficial in checking and enhancing the assessment, based on the local experiences of those organisations.

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<sup>4</sup> Limerick City and County Council Implementing the Public Sector Equality and Human Rights Duty: Assessment of Equality and Human Rights Issues and Evidence Book. November 2023.

### 3.2 Assessment of Equality and Human Rights Issues

*The equality and human rights issues identified below relate to all of the identified groups for the Duty, unless otherwise indicated. In some instances, specific examples are given for particular groups where national data indicate: a unique experience for that group in regard to the issue(s); or that the group(s) experience a significant /persistent inequality/ discrimination/ human rights violations in regard to the issue(s).*

#### Dignity

Dignity is about being respectful and non-judgemental. It involves empathy and compassion.

**The equality and human rights issues to be addressed** in implementing the Duty, relevant to this value are:

- Employment-related discrimination<sup>5</sup> for all of the identified groups (when seeking work and/or in the workplace). In particular, the data point to:
  - higher levels of discrimination, *when seeking employment*, for: Travellers and other minority ethnic groups, disabled people, and transgender people; and
  - higher levels of in-work discrimination for minority ethnic groups, women, disabled people, and transgender people.
- Discrimination when trying to access key services<sup>6</sup> for all of the identified groups. In particular, the data point to:
  - higher levels of discrimination, when accessing accommodation, for Travellers and other minority ethnic groups, lone parents, and people with disabilities.
- Identity-based abuse and harassment, and sexual harassment<sup>7</sup>, which prevents access to and participation in employment, services and in society generally. In particular, the data point to:
  - high levels of sexual harassment experienced by women in the workplace,
  - high levels of identity-based harassment experienced by LGBTI+ people and Travellers in the workplace,
  - domestic violence preventing women's access to/continuing in employment.
- The impact of identity-based harassment/abuse and/or sexual harassment on victims: negative impact on their mental and physical health; negative impact on their confidence and performance in work (including leaving employment); LGBT+ people and some minority ethnic groups feeling unsafe in public spaces; older people and some minority ethnic groups feeling unsafe/vulnerable in their homes/communities.
- Hate crimes and hate speech against minority ethnic groups and LGBTI+ people (in public spaces, on social media), and a significant underreporting of racist incidents, to the Gardaí.

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<sup>5</sup> As defined under the Employment Equality Acts.

<sup>6</sup> As defined under the Equal Status Acts.

<sup>7</sup> As defined under equality legislation (the Employment Equality Acts and the Equal Status Acts).



- Perceived and/or actual lack of understanding and/or capacity of employers and service providers to effectively prevent and address issues of discrimination, harassment and sexual harassment for employees and service users.
- Stereotypes, biases and prejudices that affect decision-making that impacts on employment and service provision for identified groups, including individual and institutional racism, sexism, homophobia, ableism, transphobia, and ageism:
  - gender stereotyping of women in relation to: caring roles and capacities; employer assumptions about the availability and/or commitment of women of childbearing age/ with children; and bias in the evaluation of performance and career progression of women, which impact negatively in regard to employment outcomes;
  - stigma and prejudice in relation to the agency and capacity of disabled people and older people.
- Lack of recognition and/or respect for the ethnic and cultural identity of Travellers and other minority ethnic groups.

### **Inclusion**

Inclusion is about belonging, community, and embracing diversity. It involves accessibility and adaptiveness.

**The equality and human rights issues to be addressed** in implementing the Duty, relevant to this value are:

- Failure, by employers/ service providers/ policy makers, to make adaptations for diversity in order to address the specific needs arising from this diversity. In particular the data point to:
  - failure to provide reasonable accommodation<sup>8</sup> for disabled people, in regard to employment and service provision.
  - inflexibility in the design and provision of services and supports for: people with disabilities; people with literacy issues; people whose first language is not English; people who experience digital exclusion; and on the basis of the cultural diversity of Travellers and other minority ethnic groups.
  - limited capacity and knowledge (among employers and service providers) to understand and respond to the practical implications of diversity for: disabled people, people from minority ethnic groups; transgender people;
  - inadequate understanding and consideration of issues of intersectionality for people with diverse identities, from across the identified groups, which can give rise to experiences of multiple and compounding discrimination and inequalities.

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<sup>8</sup> As defined under equality legislation: Employment Equality Acts and Equal Status Acts.

- Issues of isolation for particular groups. In particular the data point to:
  - people with 'hidden' disabilities, Travellers, and LGBTI+ people feeling compelled to hide their identity in seeking employment and in the workplace, due to fear of negative treatment, which increases their isolation;
  - migrants, particularly those whose first language is not English, isolated from local community services and supports;
  - older people living alone, in particular those in rural areas;
  - people in rural areas with lack of access to/ limited choice in regard to public transport (in particular for older people, people with mobility impairments, and people living in poverty); and
  - people living in direct provision centres, where there are barriers to their participation in the local community and in accessing local services.
- Invisibility of diversity and a lack of equality data to measure diversity and monitor progress in regard to progressing equality outcomes for specific groups.
- Negative and racist attitudes about minority ethnic groups, and minority ethnic migrants to Ireland, which has implications for the social inclusion of minority ethnic migrants and those seeking international protection.

### **Participation**

Participation is about meaningful engagement and consultation, and openness. It involves people having a voice and being empowered to use their voice.

**The equality and human rights issues to be addressed** in implementing the Duty, relevant to this value are:

- Lack of spaces and opportunities for the diversity of voices, of identified groups, to be effectively articulated. In particular the data point to:
  - failure by service providers and employers to ensure the perspective and lived experience of people experiencing inequality, discrimination, and social exclusion is informing priorities and approaches in employment and service provision.
- Barriers to participation for identified groups. In particular the data point to:
  - gender-based violence a key barrier to women's full participation in society;
  - racist motivated abuse and violence preventing the participation of minority ethnic groups in their community/ public spaces;
  - social exclusion/ isolation for: older people living alone, people with disabilities, Travellers and other minority ethnic groups, and lone parents.
  - digital exclusion/inequality as a barrier to participation, for: people living in poverty, people living in overcrowded accommodation, older people; young people not in employment, education or training (NEETS); and low levels of digital skills among older people;
  - low literacy levels as a barrier to participation for: older people and some minority ethnic groups (Roma, Travellers).

- Under-representation of identified groups in decision-making positions and in structures to shape and make decisions. In particular the data point to:
  - under-representation of women in decision-making structures: at organisational level (all levels); and in regard to regional and national decision-making structures and politics.
  - under-representation of minority ethnic groups in regional and national decision-making structures and politics.
- Barriers to engaging with and participating in the arts for a number of identified groups.

### **Autonomy**

Autonomy is about empowerment and choice. It involves people having capacity to advocate for themselves and within their community.

**The equality and human rights issues to be addressed** in implementing the Duty, relevant to this value are:

- Limited articulation of individual perspectives and preferences by members of the identified groups. In particular the data point to:
  - low levels of confidence in making choices and accessing options available, and in exercising rights due to, for example, the impact of discrimination, identity based abuse and harassment, and social exclusion;
  - barriers to communicating with service providers and support services that require online communication, for: people with literacy issues; people who experience digital exclusion; people whose first language is not English;
  - problematic application of a 'medical model' lens to disability (rather than a social model lens) resulting in a disempowering of people with disabilities, and failing to centre disabled people as the experts in regard to their situation and needs;
  - being unable to articulate issues and needs due to having to hide one's identity, for fear of negative treatment in employment/service provision (Travellers, LGBTI+ people, and people with hidden disabilities); and
  - lack of information, and barriers to accessing information on options available and to ensure choices are informed.
- Significant under-reporting of discrimination (in employment and/or service provision) and sexual harassment in the workplace.
- Barriers to independent living from some identified groups. In particular, the data point to:
  - lack of housing, health and wellbeing, transport, and other supports to enable older people to 'age in place';
  - lack of housing provision and related supports to ensure disabled people can live independent lives; and
  - lack of agency for people living in direct provision accommodation.

## Resources

Resources/ Social Justice is about fairness, transparency and openness. It involves being proactive and evidence-based in our use of resources.

**The equality and human rights issues to be addressed** in implementing the Duty, related to this value are:

- Unemployment and under-employment of some identified groups. In particular, the data point to:
  - low levels of labour market participation for: young people (particularly young people not in employment, education or training (NEETS); people with disabilities; Travellers and other minority ethnic groups; and lone parents;
  - inter-generational unemployment.
  - under-employment of women and higher concentration of women in part-time and precarious work, due to caring responsibilities;
  - lack of employment and training-related networks and connections for Travellers, to aid their progressing into employment;
  - barriers to accessing employment/social protection and state-funded employment supports for migrants with insecure immigration status, including the application of the Habitual Residence Condition.
- Lack of access to promotion and career opportunities. In particular the data point to:
  - higher rates of in-work promotion-related discrimination for women and older people; and
  - impact of caring responsibilities and limits on promotion and other career opportunities, for women.
- Poverty. In particular the data point to:
  - the intersection of socio-economic disadvantage with identity-based inequality and discrimination for a number of the identified groups for the Duty: women parenting alone, Travellers and other minority ethnic groups, disabled people, older people (particularly older women), young people with lower socio-economic status, some migrants, and transgender people;
  - the added costs associated with having a disability;
  - application of the Habitual Residence Condition as a key barrier to some migrants being able to access social protection income and benefits.
- Homelessness and housing disadvantage. In particular the data point to:
  - higher risk of experiencing disadvantage across multiple housing dimensions (discrimination in accessing accommodation, quality of accommodation (including for example over-crowding), and risk of becoming homeless, for: Travellers and other minority ethnic groups; people with disabilities; and lone parents;
  - a disproportionate number of Travellers, one parent families, and people with disabilities in the homeless population and a high number of those involved in street sex work in the homeless population;
  - Travellers, Roma, and older people more likely to be living in substandard /unsuitable accommodation;

- Travellers and some minority ethnic groups and migrants more likely to be living in overcrowded accommodation;
  - The application of the Habitual Residence Condition and/or Circular 41/2012 to EEA and non-EEA nationals' access to social housing and homeless services;
  - unsuitability of direct provision accommodation for families, and lack of accommodation options for those exiting direct provision; and
  - unsuitability of nursing home settings for accommodating young disabled people.
- Low income for many of the identified groups. In particular the data point to:
    - women, in particular lone parents, and minority ethnic groups more likely be in part-time/ lower paid/ precarious work;
    - the gender pay gap and gender pension gap; and
    - dependence on social protection supports to access/continue in education and employment (Travellers, disabled people, lone parents).
- Inadequate response to caring responsibilities, to allow women and men to participate equally in employment and education. In particular the data point to:
    - the unequal sharing of caring responsibilities between women and men;
    - the lack of affordable and accessible childcare which acts as an employment and education barrier, particularly for lone parents; and
    - the absence of adequate flexible/ work-life balance employment options.
- Unequal health status for some of the identified groups. In particular the data point to:
    - high incidence of mental health issues among young people, young Travellers, and LGBTI+ youth; and high suicide and attempted suicide rates in the Traveller community and among transgender people;
    - the negative impact of identity-based harassment and abuse on the mental and physical health and wellbeing of victims;
    - the negative health impact, on children and adults, of living in unsuitable/ substandard housing and accommodation, including direct provision;
    - barriers to accessing health services for: people living in poverty; people with disabilities; minority ethnic groups and some migrants; and
    - application of the Habitual Residence Condition preventing some migrants from accessing health services and supports, including access to a medical card.

## **Section 4      Enabling Implementation of the Duty**

### **4.1      Leadership to drive implementation of the Duty**

Limerick City and County Council has established an internal Public Sector Duty Working Group to support and drive the implementation of the Duty and ensure its implementation to a high standard. The group is cross-organisational in nature to ensure all function areas are included.

The Public Sector Duty Working Group will play a role in supporting the ongoing implementation of the Duty, including:

- Working with the senior management team to identify actions annually on the Duty.
- Tracking that the actions set out each year in this implementation plan (Section 6) are implemented and reported on by the relevant action leads.
- Supporting the development of annual reporting on LCCC's work on the Duty (the required Step three of the Duty) based on outputs and outcomes from the identified actions for the Duty.

The role of the senior management team will be essential in supporting the organisation's ongoing work to meet our statutory obligations under the Duty. This will include: ensuring that the Duty is a scheduled item of management team meeting agendas; ensuring buy-in across the management of the organisation; and ensuring staff are facilitated to develop their capacity on the Duty.

#### **4.2 Capacity-building to enable implementation of the Duty:**

Successful implementation of the Duty, across our functions, will require a building of staff capacity to:

- ensure an organisation-wide familiarisation with the Duty and how it might apply to different function areas;
- ensure that staff with specific roles in regard to the development and/or review of policies, procedures, plans, programmes and services of Limerick City and County Council, understanding of the Duty and its requirements, and how to use the assessment in regard to those development and review processes; and
- ensure that relevant staff have a grounding in and understanding of the legal requirements of the Employment Equality Acts 1998 to 2015 and the Equal Status Acts 2000 to 2018.

In building staff capacity to implement the Duty, the Council will:

- Encourage staff to undertake the [IHREC online e-learning modules](#),
- Ensure that staff across the organisation are familiar with the Duty and its requirements,
- Ensure that staff with responsibilities for the development/review of plans, strategies, policies, programmes, services are familiar with the Duty and its requirements and are familiar with Limerick City and County Councils Assessment of Equality and Human Rights Issues and how to use the Assessment in these development/review processes.

### **4.3 Communication**

Limerick City and County Council will build awareness about the Duty across the organisation and with our key stakeholders.

Key communication channels and systems will be used to regularly communicate to staff and service users on: the Duty and its requirements; our progress in addressing equality and human rights issues as identified in our assessment of these issues; as part of our work to address under the Duty. These channels and systems include:

- Council's Website
- Staff portal and staff app
- Workplace partnership
- Senior Forum
- Team and department-level meetings

## **Section 5 Implementing the Duty**

### **5.1 The Address Step**

Step two of the Duty (Address) is the core of the ongoing work to address equality and human rights concerns in compliance with the goal of the Duty. The assessment of equality and human rights issues will be a core tool in this work to ensure that our policies, procedures, plans, services and programmes are sufficiently robust to address relevant equality and human rights issues across our function areas.

In summary, this work will involve:

- identifying where Limerick City and County Council is currently responding to the equality and human rights issues, identified from the assessment, in our policies, procedures, plans, services and programmes, and addressing any gaps in this regard.
- action to respond adequately and appropriately to the equality and human rights issues identified, from the assessment, in current or required policies, procedures, plans, services and programmes.

The Corporate/Strategy statement of a public body is identified as a core document for establishing the actions proposed to implement the Duty within the organisation. In Limerick City and County Council, therefore, our work on the Duty will be integrated within the strategic planning cycle of the organisation.

There are a number of key moments within the strategic planning cycle of Limerick City and County Council, where we include a focus on addressing equality and human rights issues, from the assessment. These key moments include:

- Preparation of Limerick City and County Council corporate plan, annual service delivery plans, and team plans.
- Development of the Local Economic and Community Plan
- Development of LCCC Development Plan
- Development of the Housing Strategy

- Development of the Housing for All Action Plan
- Development of the Disability Housing Strategy
- Development of the Homeless Action Plan
- Development of the Culture & Arts Strategy
- Development of the Climate Adaptation Strategy
- Development of the Migrant Integration Strategy
- Development of the Age Friendly Strategy
- Development of the Traveller Accommodation Programme
- Development of the Enterprise Strategy
- Development of the Rural Development Strategy
- Development of Regeneration Plans

In addition to the above, there are other development/ review moments that occur within a given strategic planning cycle where it would be appropriate to ensure a focus on the Duty. These include:

- Scheduling of staff training and Continuing Professional Development initiatives
- Development/review of human resources policies and procedure
- Development/review of customer/service-user-focused policies/charters
- A one-off development/review of a specific service/programme of Limerick City and County Council.

## **5.2 Undertaking the Address Step**

In preparation for the development/review process for a policy, procedure, plans, service, or programme, those staff<sup>9</sup> responsible for the review/development process should:

1. Use the assessment of equality and human rights issues to identify the equality and human rights issues that are relevant to the particular policy, procedure, plans, service, or programme.
2. Gather any relevant additional data and information available in relation to the equality and human rights issues identified as relevant, to further inform how these issues might be addressed in the policy, procedure, plans, service, or programme<sup>10</sup>.
3. Establish what the organisational benchmark is, across each value that has relevance for the policy, procedure, plans, service, or programme, from the equality and human rights values statement (Appendix A.).

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<sup>9</sup> Any external consultants that are commissioned to undertake such a review/development process on behalf of the organisation should be made familiar with and requested to use this approach.

<sup>10</sup> The evidence base for the Assessment is a useful source of such additional data/information and also contains links to relevant research reports.



In undertaking the development/review process for a policy, procedure, plans, service, or programme, those staff responsible should consider the following:

1. *For processes to develop/review a policy, procedure or plan:* set out how each of the relevant issues identified from the assessment, should be addressed within the policy, procedure, or plan. A template is provided (Appendix B.) to assist with this process.
2. *For processes to develop a new programme or service area:* an equality and human rights impact assessment may be required to fully assess whether and to what extent the draft design of this programme or service has adequately and appropriately addressed the relevant issues identified from the assessment.
3. *For processes to review/evaluate a current programme or service area:* relevant processes (for example, consultations with service-users and staff; review of programme/service outputs and outcomes; review of how resources are allocated) should an assessment of whether and to what extent the programme or service is adequately and appropriately addressing the relevant issues identified from the assessment.
4. *Use the equality and human rights values statements of priority and process to:* establish what the organisational benchmark is, across each value that has relevance for the policy, procedure, plans, service, or programme. These benchmarks could be used as follows, in the review/development process: use the benchmarks to extract language that could be inserted into the relevant policy, plan, procedure under review/being developed; use the benchmarks to develop key performance indicators for new plans, programmes or services or to evaluate current plans, services or programmes; use the benchmarks to develop consultation/feedback questions (for staff and service users), when evaluating a service or programme.

**At final stage of the development/review process** for a policy, procedure, plans, service, or programme, those staff responsible should:

1. 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 is aligned with the equality and human rights values benchmarks.
2. Conduct a participative exercise, for initiatives of scale and where relevant, 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 the organisation should:

- Establish and/or use existing monitoring systems to track progress on the equality and human rights issues identified as relevant: this will be particularly important for complying with step three of the Duty (Report).
- Use this information to reflect on this progress and to strengthen the plan, policy, procedure, service or programme as found to be necessary.

### **5.3. The Report Step**

Public bodies are required to report on progress and developments in implementing the Duty, within the annual report of the organisation. As the annual report is a high-level document, it may not be possible to report in detail on all of the work being carried out to implement the Duty in Limerick City and County Council, however, such detail will be important to capture for ongoing institutional learning going forward.

Limerick City and County Council's annual report will give an overview of developments and achievements in implementing the Duty and a separate, more detailed, report will seek to capture the following:

- the outputs and outcome from applying the Duty to identified areas each year and key learning from this work, to inform future work on the Duty;
- any training/awareness-raising undertaken with staff to build their capacity to implement the Duty;

This more detailed report will be used as a basis for extracting the information to go into our annual report.

## **Appendix A. Limerick City and County Council Equality and Human Rights Values Statement**

### **Dignity**

Dignity is about being respectful and non-judgemental. It involves empathy and compassion.

**Statement of Priority (the outcome we seek):** Limerick City and County Council seeks to build and maintain a workplace and service provision culture underpinned by equality of treatment, where people feel valued, respected, listened to and understood.

**Statement of Process (how we do our work):** Limerick City and County Council will ensure person-centred approaches to developing and delivering our services and in our employment processes. This will include: meeting people where they are at, active listening, and providing safe and welcoming spaces, responding to people in a timely manner, being courteous and professional.

### **Inclusion**

Inclusion is about belonging, community, and embracing diversity. It involves accessibility and adaptiveness.

**Statement of Priority (the outcome we seek):** Limerick City and County Council seeks to promote belonging by ensuring that the diversity of people in the county can participate fully in the economic, social and cultural life of the community, in particular, those groups who are most distanced from employment, services and supports and those who experience social exclusion.

**Statement of Process (how we do our work):** Limerick City and County Council will develop and maintain accessible employment and service provision pathways by identifying and removing barriers of access and participation for the diversity of groups in the city and county. This will involve: staff capacity-building to understand and respond to the diversity of groups that experience inequality and exclusion; outreach processes; accessible and intercultural spaces.

### **Participation**

Participation is about meaningful engagement and consultation, and openness. It involves people having a voice and being empowered to use their voice.

**Statement of Priority (the outcome we seek):** Limerick City and County Council seeks to ensure the meaningful participation of our staff, service users, and policy beneficiaries to drive positive employment, service, and community outcomes.

**Statement of Process (how we do our work):** Limerick City and County Council will support, develop and sustain inclusive, collaborative, meaningful participation and engagement processes with our staff, service users, and policy beneficiaries. In this, we will ensure attention to diversity and developing methods of engagement to take account of this diversity, including: bottom-up approaches and targeted consultations to hear the voices of those who are not always heard.

**Autonomy**

Autonomy is about empowerment and choice. It involves people having capacity to advocate for themselves and within their community.

**Statement of priority (the outcome we seek):** Limerick City and County Council seeks to ensure that our staff, service users, and policy beneficiaries have agency, and capacity to fulfil their potential.

**Statement of Process (how we do our work):** Limerick City and County Council will **engage a diversity of** processes to empower our staff, service users, and policy beneficiaries to have ownership and power in regard to their work, the development of their communities, and the design and delivery of their local services and spaces. In this, we will ensure attention to: capacity-building; recognising individuals and communities as the experts in problem-solving and finding solutions to issues affecting them; and supporting a work culture of innovation, testing, and learning from mistakes.

**Resources**

Resources is about fairness, transparency and openness. It involves being proactive and evidence-based in our use of resources.

**Statement of priority (the outcomes we seek):** Limerick City and County Council seeks to ensure the best use of our resources to ensure: a good quality of life for the community, including educational and employment opportunities, sustainable homes and communities, and cultural enrichment; and progression and development opportunities for our staff.

**Statement of Process (how we do our work):** Limerick City and County Council will undertake needs analysis to ensure an effective targeting of our resources where they are most needed. In this, we will ensure an open and transparent approach, in regard to the use of our resources.

## Appendix B. Template<sup>11</sup> for using the assessment to review a policy /procedure/ plan

Use the template to answer questions 1 to 3:

1. Extract the equality and human rights issues relevant to this policy/procedure/plan, from the assessment of equality and human rights issues for identified groups. Also, refer to the evidence-base section of the assessment, for further information/detail in regard to these issues, where necessary. Note each relevant issue in column 1 of the template.
2. Examine the policy/procedure/plan to determine whether these relevant issues are addressed in the current draft and gaps in that regard. Note in column 2. whether each identified issue is fully, partially, or not addressed in the policy/procedure/plan.
3. Identify whether and how these issues could be appropriately addressed in the policy/procedure/plan (column 3.)

Additional questions to consider:

4. Is there anything in the current policy/procedure/plan that could run counter to addressing the relevant equality and human rights issues (from the assessment)? If yes, how should this be addressed?
5. Does the policy/procedure/plan align with the ambition set in our Equality and Human Rights Values Statement (statements of process and priority)?

Relevant equality and human rights issues identified (from the assessment)	Is this issue addressed in the current draft of the policy/plan? (fully/ partially (gaps)/ no)	Relevant section(s) of policy/plan	How this issue will be addressed in the policy/plan

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<sup>11</sup> This template was developed by Values Lab and used with Limerick City and County Council to support us to review two policy areas.