



Comhairle Chontae na Gaillimhe
Galway County Council

Galway County Council:

Implementing the Public Sector Equality and Human Rights Duty

Implementation Plan

March 2025

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1. Public Sector Equality and Human Rights Duty

The Public Sector Equality and Human Rights Duty (the Duty) is set out in Section 42 of the Irish Human Rights and Equality Commission Act 2014.¹ This involves two separate but interconnected Duties.

Section 42(1), the overarching Duty, is an ongoing requirement on public bodies to 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.

Section 42 (2), the strategic Duty, is a requirement on public bodies, as part of their strategic, planning and reporting cycle to undertake three steps:

- **Step 1. Assess:** Undertake an assessment of the equality and human rights issues facing the identified groups for the Duty that have relevance to the functions of that public body, and to make that assessment publicly available, through its Corporate Plan.
- **Step 2. Address:** Identify and communicate, through its Corporate Plan, the plans, policies and actions being taken or proposed, to address the equality and human rights issues identified in the assessment; and
- **Step 3. Report:** Report annually on developments and achievements in implementing the Duty, and to make this report publicly available through its annual report.

The identified groups for the Duty are:

- Those groups covered by the nine protected grounds under equality legislation: gender (including gender expression, gender identity and sex characteristics); civil status; family status (including lone parents and people with caring responsibilities); age; disability (including mobility, sensory, and intellectual disabilities, mental health issues, and chronic illness); sexual orientation; race (encompassing skin colour, nationality and ethnic origin); religion (any or no religious belief), and membership of the Traveller community;
- Those groups at risk of or experiencing poverty and social exclusion, a ground of 'disadvantaged socio-economic status'; and
- Rights holders under the various international human rights instruments.

The Duty covers all functions of a public body. The functions of Galway County Council encompass: employment; service provision; promotion; regulator; policy making; and corporate affairs.

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

² The implementation plan is aligned with the guidance issued by the Irish Human Rights and Equality Commission

2. Equality and Human Rights Values Statement

2.1 Introduction

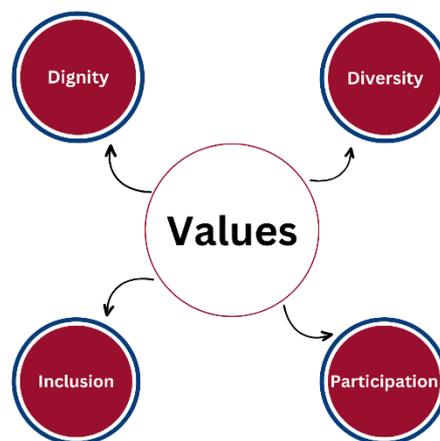
Galway County Council has developed an equality and human rights values statement to support a values-led approach to our implementation of the Duty. This statement identifies and defines the four values that motivate our ambitions for the Duty: dignity; diversity; participation; and inclusion. For each of these values we establish:

- **a statement of priority** – the implications of the value for the change we seek to contribute to and the priorities we pursue as an organisation, so as to take account of equality and human rights; and
- **a statement of process** – the implications of the value for the way we work in pursuing this change, so as to take account of equality and human rights.

This equality and human rights values statement provides a framework for our implementation of the Duty in that:

- The assessment of equality and issues, the first step required under the Duty, is framed by these values to ensure the full scope of equality and human rights is addressed; and
- The statement of priority and statement of purpose for each value serve as benchmarks in our decision-making to sustain and remain aligned with our ambition for equality and human rights under the Duty, in particular when implementing the Address step of the Duty.

2.2 Equality and Human Rights Values Statement



Dignity

Dignity is about respect, courtesy, fairness, and belonging. It involves equal treatment, and being responsive to individual needs.

Statement of Priority: Galway County Council promotes and supports a model of social cohesion where people and communities from the identified groups hold a status and standing as valued members of society and enjoy interactions with the wider community of respect and courtesy.

Statement of Process: We work to create an organisational environment where customers, staff and policy beneficiaries from the identified groups are treated fairly, enjoy a sense of belonging, and experience relationships and interactions of respect, and where privacy is respected. We have policies in place that set standards in this regard and implement these effectively.

Diversity

Diversity is about an organisation being reflective of the society it serves and being accessible in all its functions. It involves adapting for the specific needs of the diversity of people.

Statement of Priority: Galway County Council promotes and supports an accessible environment for the identified groups, and strives to advance, apply and enable principles and practice of universal design for infrastructure and the public realm, and for service provision and workplaces.

Statement of Process: We work in a manner that is accessible and flexible in making reasonable accommodation for the diversity of customers, staff and policy beneficiaries from across the identified groups, making adaptations for their specific needs within the resources available, and ensuring the systems are in place for reasonable accommodation to be implemented, and effectively communicated.

Participation

Participation is about being heard and having a say, and about engagement and collaboration. It involves being open, informing, listening to, and involving the diversity of people, and their representative organisations, in consultation and decision-making processes and in partnership endeavours.

Statement of Priority: Galway County Council works to promote and support representative organisations across the identified groups, and to establish and engage in, participative structures and partnership ways of working that involve people from the identified groups and their representative organisations in the development of the County.

Statement of Process: We work in a manner that listens to customers, staff and policy beneficiaries from the identified groups through a range of channels, ensures that they are heard, and gives consideration to and feedback on, their views. We engage people from the identified groups and their representative organisations in our decision-making and consultative processes and structures.

Inclusion

Inclusion is about the distribution of and access to resources and improving wellbeing and quality of life for the diversity of people. It involves targeting people experiencing inequality and enabling their progress and change for the better in their circumstances.

Statement of Priority: Galway County Council strives to promote and support the full and effective participation of people and communities from the identified groups in the social, economic, political and cultural life of the County.

Statement of Process: We work in a manner that targets and provides assistance and resources to improve the situation and experience of people and communities from the identified groups.

3. Assessment of Equality and Human Rights issues

3.1 Introduction

The assessment required under Section 42(2) of the Duty establishes the equality and human rights issues facing the groups identified for the Duty that have a relevance for the functions of Galway County Council.

This assessment is not an assessment of Galway County Council nor its performance. It is the foundation for implementing the Duty, both the overarching Duty under Section 42(1) and the strategic Duty under Section 42(2), enabling a planned and systematic approach to equality and human rights. It serves as the basis from which to sustain and further develop progress on equality and human rights issues.

The four values that motivate our ambitions for equality and human rights in implementing the Duty - dignity; diversity; inclusion; and participation - are used as a frame within which to set out the assessment.

This assessment is evidence-based, with the evidence base provided in the Appendix to this implementation plan.

3.2 Assessment of Equality and Human Rights Issues

Addressing the equality and human rights issues identified below reflects a commitment to respond to the specific oppressions involved in racism, classism, ableism, homophobia, transphobia, sectarianism, sexism, and ageism.

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

Dignity

Dignity is about respect, courtesy, fairness, and belonging. It involves equal treatment, and being responsive to individual needs.

The equality and human rights issues to be addressed in implementing the Duty, related to this value and relevant to the functions of Galway County Council, are:

- Bias, false assumptions, and stereotypes, including:
 - comparatively high levels of stereotyping of older people, Travellers, migrants, women, and LGBTI+ people; and

- stigma experienced by LGBTI+ people.
- Discrimination, systemic and individual, including:
 - seeking work, in the workplace and in accessing public and private services, including housing;
 - pregnancy related discrimination, discrimination based on criminal conviction, and discrimination when transitioning gender identity at work; and
 - comparatively high levels of discrimination experienced by Black and minority ethnic groups, including Travellers and Roma, people with disabilities, and LGBTI+ people.
- Harassment, sexual harassment, micro-aggressions, bullying, abuse and violence, including:
 - gender-based violence with repercussions at work, in becoming homeless, and with lack of support services; and
 - lack of safety and insecurity for older people and LGBTI+ people in public spaces.
- Having to hide one's identity for fear of discrimination or harassment at work, in accessing services, and in public spaces, including:
 - for Travellers, Roma, LGBTI+ people and people with hidden disabilities in the workplace.
- Hate speech, incitement to hatred, the spreading of fear in relation to diversity, and public debate that normalises such positions, including:
 - for migrants and asylum seekers, with a lack of intercultural initiative to prevent the emergence of such phenomena; and
 - for LGBT people.
- Limitations on independence and autonomy, including:
 - institutionalisation of people with disabilities and failure to enable choice and control over where they might live;
 - lack of support and provision for assisted decision making for people with disabilities;
 - institutionalisation of older people and failure to enable people to age in place;
 - financial dependence for young people;
 - application of the Habitual Residence Conditions in relation to Roma;
 - direct provision for refugees and asylum seekers in accommodation centres; and
 - lack of access to information and failure to enable informed choices.
- Isolation, including:
 - for Travellers, in terms of the location of their accommodation;
 - for LGBTI+ people, in coming out and in living in rural areas;
 - young people, in terms of lack of facilities and spaces to meet; and
 - older people and people with disabilities living alone.
- Lack of policies and procedures to respond to and resolve issues of discrimination, harassment and sexual harassment that arise and failure to adequately apply such policies and procedures when such issues arise.

- Under-reporting of discrimination for fear of victimisation, lack of awareness of rights, perspectives that change is not possible, and lack of information on policies and procedures in place.



Diversity is about an organisation being reflective of the society it serves and being accessible in all its functions. It involves adapting for the specific needs of the diversity of people.

The equality and human rights issues to be addressed in implementing the Duty, related to this value and relevant to the functions of Galway County Council, are:

- Failure to make reasonable accommodation and adapt for specific needs in employment and in service provision, including:
 - making accommodations and flexibility in adapting the workplace and service provision for people with disability;
 - lack of language interpretation and translation in the workplace and in service provision, including sign language;
 - failure to adapt for and resource cultural difference across minority ethnic groups, including lack of recognition for and accommodation of the distinct identity and culture of the Traveller community;
 - lack of culturally appropriate accommodation available to the Traveller community;
 - lack of gradual and flexible retirement arrangements for older people;
 - lack of recognition for same sex couples and lack of provision of gender neutral services to accommodate LGBTI+ people; and
 - lack of flexible working arrangements and of flexibility in the delivery of services to enable access for those with caring responsibilities
- Lack of supports and services to meet specific needs of people from the identified groups, including:
 - supports and services required by disabled employees or service users;
 - supports required by older people for independent living; and
 - lack of supports to Black and minority ethnic groups including Travellers and Roma to preserve, sustain and maintain their distinct cultures.
- Failure to plan by design for diversity and its practical implications and absence of the systems required for such planning and development.
- Lack of understanding of diversity, lack of knowledge on how to make reasonable accommodation, lack of training on diversity and addressing its practical implications, absence of a policy on adapting for diversity, and lack of capacity to put in place the systems required to accommodate and adapt for diversity.
- Lack of information made available and accessible on the reasonable accommodation available and how to get access to this.
- Unwelcoming institutional environments, workplace and service provision settings, including:
 - situations that preclude or fail to encourage and enable people to be fully open about their identity; and
 - situations where there is no positive visibility for diversity.
- Inaccessibility of the public realm, buildings, IT systems, and transport services, including:

- barriers of access faced by people with disability;
- lack of age friendly public spaces;
- absence of universal design principles and their application; and
- lack of adaptability of residential units for the life-course.
- Communication and consultation and participation processes failing to take account of specific needs and barriers, including:
 - literacy;
 - language diversity;
 - failure to protect Irish language rights;
 - the need for plain English;
 - rural locations; and
 - digital inequality.
- Lack of outreach to the identified groups.
- Lack of spaces and opportunities for meeting, interaction, learning and initiative across diversity, including:
 - intergenerational spaces; and
 - intercultural spaces.
- Failure to take account of intersectionality and the diversity within the identified groups, and to respond adequately and appropriately to this diversity, in particular in targeted initiatives.
- Lack of equality data on the identified groups, including in particular Black and minority ethnic groups, including Travellers, and LGBTI+ people.

Inclusion

Inclusion is about the distribution of and access to resources and improving wellbeing and quality of life for the diversity of people. It involves targeting people experiencing inequality and enabling their progress and change for the better in their circumstances.

The equality and human rights issues to be addressed in implementing the Duty, related to this value and relevant to the functions of Galway County Council, are:

- Homelessness, including:
 - particular relevance to the socio-economic status group;
 - over-representation of Black and minority ethnic people including Travellers, Roma, lone parents, migrants, people from minority religions, and young people; and
 - under-representation of people with disabilities among housing applicants.
- Housing disadvantage, including:
 - particular relevance to the socio-economic status group;
 - overcrowding in housing in particular for Black and minority ethnic people including Travellers, Roma, people with disabilities and young people;
 - sub-standard accommodation and living conditions, in particular for Travellers, Roma, lone parents and people with disabilities;
 - housing insecurity and poor conditions for the identified groups in the private rented sector; and
 - lack of financial support for home adaptations for people with disabilities.
- Poverty and low income

- particular relevance to the socio-economic status group;
- comparatively high levels of poverty for lone parents, people with disabilities, Roma, Travellers, and refugees;
- low incomes, in particular for women and for people with disabilities;
- additional costs of disability not catered for; and
- pay and pension gaps, in particular for women.
- Unemployment, under-employment and precarious work, including:
 - comparatively high levels of unemployment among young people, Black and minority ethnic people including Travellers and Roma, lone parents, and people with disabilities;
 - lack of access to decent work, in particular for women, lone parents, migrants, minority ethnic people including Travellers and people with disabilities;
 - lack of recognition for qualifications of migrant people;
 - concentration in part-time and precarious work, in particular for women and lone parents;
 - limited diversity in public sector employment; and
 - employment segregation including predominance of women in care work.
- Lack of promotion and career progression, including:
 - barriers to promotion experienced by women and by people with disabilities.
- Digital inequality, lack of infrastructure, equipment and skills, including
 - significant inequalities for older people, people living in poverty, and Travellers; and
 - increase in online service provision and information provision in a context of digital inequality.
- Inequalities within the arts, including:
 - barriers to engaging with the arts and participating in the arts as consumers and as producers; and
 - barriers to advancing careers within the arts, in particular for women.
- Inadequate care infrastructure, including:
 - high cost of childcare;
 - inadequate provision of childcare;
 - lack of care services for older people; and
 - unequal sharing of care responsibilities between women and men.
- Lack of targeting and positive action to directly address the disadvantage of the identified groups.

Participation

Participation is about being heard and having a say, and about engagement and collaboration. It involves being open, informing, listening to, and involving the diversity of people, and their representative organisations, in consultation and decision-making processes and in partnership endeavours.

The equality and human rights issues to be addressed in implementing the Duty, related to this value and relevant to the functions of Galway County Council, are:

- Lack of opportunities to have a say and participate in consultations and in decision-making processes, including:

- lack of structures and systems in place to enable people to have a say;
- inappropriate design of structures and systems for people to have a say;
- hostility to diversity and excluding culture within structures and systems for people to have a say; and
- limited range of policy fields that are open for consultation and participation.
- Lack of influence and meaningful participation through consultation processes and in decision-making processes, lack of impact through these processes, and lack of feedback after consultation and participation.
- Limited presence of people from the identified groups in decision-making positions.
- Lack of representation for people from the identified groups in public and political life, including:
 - under-representation of women in elected positions; and
 - lack of presence of Travellers and non-Irish citizens in elected positions and as candidates for election.
- Lack of, limited development of and/or limited resources for organisation within some identified groups.
- Lack of skills, knowledge, and awareness within the identified groups for an effective participation.
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4. Enabling Implementation

Leadership

The elected members give leadership for implementation of the Duty. The elected members and Council structures, including such as SPCs:

- engage equality and human rights values in their deliberations and ensure compliance with the Duty in their decision-making; and
- are familiarised with the Duty and its requirements and with the Galway County Council implementation plan for the Duty.

Senior management give a leadership for implementation of the Duty, by:

- organising familiarisation sessions to ensure they have an understanding of the Duty and its requirements;
- reviewing and approving the implementation plan for the Duty, and subsequent annual plans, and establishing an organisational priority for the Duty; and
- giving consideration to the Duty and ensuring alignment with the equality and human rights values in the decisions and actions taken by senior management.

Management responsibility for implementation of the Duty rests with Corporate Services.

A Working Group on the Duty, drawn from across the organisation, is convened on a quarterly basis to:

- prepare annual plans for implementing the Duty – covering both enabling initiatives and implementation actions;
- providing support for those sections implementing the address step of the Duty;
- prepare a report and organise and support internal review and reflection on the progress made, and the further steps that might be taken to strengthen this;

- maintain a centralised data bank of records on implementation of the Duty within Galway County Council and the progress and achievements made on foot of this; and
- maintain its expertise in relation to the Duty and its implementation and ensure new members are enabled to achieve this level of expertise.

Organisation Culture

Senior management give leadership for an organisational culture concerned with equality and human rights, by consistently engaging the equality and human rights values of Galway County Council in their communications, decisions, and actions.

Internal and external communications include an ongoing and creative focus on the Duty and its implementation in Galway County Council, and on the equality and human rights values that underpin this, through: social media, website, posters; all-staff emails; staff intranet; and email signature blocks.

Workshops, events and initiatives are organised to:

- familiarise staff with the Duty and Galway County Council's ambitions for equality and human rights, the Duty and the benefits in its implementation; and
- engage staff with our equality and human rights values of dignity, diversity, participation and inclusion, exploring how we might best continue to give effect to these values in our work as an organisation and as staff.

The Duty, and a focus on the equality and human rights values underpinning this, are a feature in the terms-of-reference developed for various groupings and structures within the Council.

Capacity Building

Specific training on the Duty and the approach developed by Galway County Council to its implementation is provided to staff responsible for key moments in its implementation.

Training for elected members, for senior management and for members of Council structures, on the Duty, the approach being taken to its implementation and the ambition that informs this.

Staff training, including induction training, includes reference to the Duty and engages the equality and human rights values that underpin our approach.

A focus on the Duty and the equality and human rights values that underpin its implementation, and on staff practice based on these values, is included in our PMDS process.

Consultation

Steps are taken to enable a consultative approach to implementing the Duty, engaging civil society organisations that are representative of the identified groups, as appropriate, in:

- any updating our assessment of equality and human rights issues in advance of the next Corporate Plan;
- undertaking reviews and developing plans, policies, programmes, and strategies;
- implementing the equality and human rights impact assessment; and
- identifying and developing plans, policies and actions to directly address equality and human rights issues.

Tracking

Data and information systems are strengthened, as required, to support tracking of our progress and achievements under the Duty in addressing the equality and human rights issues as assessed.

Maintain adequate and appropriate records across the organisation, of steps taken on implementing the Duty and their impact, making these available to the Working Group to hold centrally in order to demonstrate compliance with the Duty.

5. Implementation

5.1 Planning Implementation

The Galway County Council Corporate Plan is the cornerstone for implementing the Duty. The Corporate Plan includes a link to: the assessment of equality and human rights issues and evidence book; and the implementation plan for the Duty for the period of the Corporate Plan.

Ongoing implementation of the Duty is integrated within the planning cycle of Galway County Council. The Annual Service Delivery Plan:

- tags plans, policies, programmes and strategies to be reviewed or developed which will be subject to an equality and human rights impact assessment, as part of the ongoing Duty under Section 42(1);
- identifies plans, policies and actions that directly address equality and human rights issues, as part of the strategic Duty under section 42(2); and
- identifies the steps that will be taken to enable implementation of the Duty, based on this implementation plan.

This information is then gathered in the form of an annual plan for implementation of the Duty, which will be the focus for the working group on the Duty during the year.

5.2 Ongoing Duty

Each year, key moments for implementing the Address Step are identified in terms of development and review processes in regard to policies, plans, services and programmes, to be developed or reviewed, which will be subject to an equality and human rights impact assessment include;

- County Development Plan.
- Operational strategies and service delivery plans, such as the Local Economic and Community Plan, the homeless plan, the Traveller Accommodation Programme, the age friendly programme, the anti-social behaviour strategy, the libraries development plan, communication plans, and the digital strategy.
- Operational policies and procedures in service provision and programme delivery, such as the housing allocation scheme and customer charter and customer service action plan.
- Human resources policies and procedures, such as recruitment policy.

- Corporate strategies, policies and procedures, such as the corporate risk register and the ethic register.
- Design process for public realm initiatives, for buildings and infrastructure, and for programmes and services.
- Procurement and funding/grant aid procedures will reviewed and revised with a view to building in a process where the Duty is passed on to the contracting or recipient organisation, in a manner suited to the nature and scale of the organisation.

These might already be programmed for review or development or they might be chosen by the Department to undergo review by way of an equality and human rights impact assessment in order to improve their performance in this regard.

5.3 Equality and Human Rights Impact Assessment

The equality and human rights impact assessment is undertaken to give effect to the ongoing Duty, under Section 42(1), on the organisation. It is implemented as an integral part of the development and review of plans, policies, programmes and strategies.

The equality and human rights impact assessment is the responsibility of the Department that is developing or reviewing the plan, policy, programme or strategy. Galway County Council has developed a template to assist the Departments in undertaking the equality and human rights impact assessment and to ensure a coherent approach across the organisation.

At the commencement of the development/review process, the Department:

- Reviews the assessment of equality and human rights issues to establish those issues that are relevant to the particular plan, policy, strategy, or programme.
- Gathers the data and information available in relation to the equality and human rights issues identified as relevant, the evidence book for the assessment may assist in this regard.
- Reviews the equality and human rights values statement to extract the statements of outcome or statements of process that are relevant.

In implementing the development/review process, the Department:

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

At final draft stage of the development/review process, the Department:

- Convenes 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 priority and process in the equality and human rights values statement, using and completing the Galway County Council template developed for this purpose.

- Conduct a participative exercise, as appropriate 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 addressing the equality and human rights issues – the Report step of the Duty.
- Use this report to reflect on this progress and to strengthen the plan, policy, or programme as found to be necessary.

5.4 Strategic Duty

Each year, specific actions, plans and programmes are that are in place or that are proposed to directly address priority issues from the assessment of equality and human rights issues. These currently include, as per the Corporate Plan:

- Age Friendly Strategy
- Strategy Plan for Housing People with a Disability
- Disability Strategy
- Traveller Accommodation Programme
- Migrant Integration Strategy
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6. Report

The Galway County Council Annual Report will include a report on the developments and achievements in implementing the Duty, based on a report prepared by the working group.

This report will identify:

- new outcomes for the identified groups for the Duty;
- developments and improvements in the delivery of the functions of Galway County Council; and
- improvements in Departmental processes to embed a focus on equality and human rights

The working group will organise or support a reflection process on this report with a view celebrating success and to strengthening plans, policies, and actions to address the equality and human rights issues as found to be necessary.