



EUROPEAN UNION
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Rialtas na hÉireann
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ESF PEIL OP

Irish Human Rights and Equality Commission – input on Equal Opportunities and Non-Discrimination Horizontal Principle, Monitoring Committee

Overarching Points

The Activities are largely strong on the Horizontal theme of promoting Equal Opportunities and Non-Discrimination. It is clear that efforts have been made in the reports to accommodate a diversity of needs within project implementation.

Equality and Non-discrimination - planning, design, implementation

For several Activities there remains a need for support to develop further understanding of the application of the equality grounds throughout the projects and what it means to take steps to eliminate discrimination and promote equal opportunities in the design, implementation and monitoring of specific programmes and actions.

The horizontal principles could usefully be considered and applied more systematically to the design, implementation, and monitoring of actions, which would facilitate reporting and compliance. Information and data on monitoring mechanisms, consultation and collecting feedback, and methods of reporting on equality of opportunity and non-discrimination actions and the data these have provided, are important evidence for reporting and for planning future actions.

Equality and Non-discrimination - monitoring and reporting, data collection

Furthermore, for several Activities there appears to be a need for support in relation to monitoring, reporting and data collection. Previous IHREC reports suggested examples of how the reporting might be enhanced which could include:

- providing a breakdown of **data** on participants across equality grounds where that data exists, or
- Providing information on **steps taken** by the activity manager to ensure individual projects, service providers, firms, etc., are aware of or **comply with equality legislation**.

Several Activities have developed reporting on the horizontal principle, including around providing **data breakdowns of participants under the equality grounds**, where the data exists. When incorporated, this data greatly strengthened reports and provided essential information to inform the application of the horizontal principles. However, some did not provide the breakdown or looked only at a small proportion of the equality grounds. Grounds such as gender and disability are often referenced however grounds such as ethnicity, age, sexual orientation and civil and family status are often not.

The lack of relevant equality and human rights data is an impediment to evidence based action on equality and human rights. Organisations do, within the bounds of data protection legislation, collect data on staff and service users. This data, if desegregated across the equality grounds, can be a key resource in monitoring rates of access, participation and outcomes for participants on equality and human rights.

Several reports would have been strengthened by **addressing intersectionality** (how participants or potential participants may be affected by more than one equality ground), demonstrating a need to strengthen understanding, data collection, analysis, action design and reporting in this area.

Several reports referenced briefly steps taken to ensure that individual projects service providers, staff, firms etc. are aware of equality legislation, however information was not provided on steps taken to ensure compliance with those conditions and whether and how this is monitored. While improvements have been reported in regard to reminding service providers etc. of their obligations under the law in some instances, there is still a need for more information on how they account for this, e.g. how their compliance is monitored and reported on.

Positive Action, Reasonable Accommodation

Most reports indicated that projects are open to all eligible applicants, without discrimination on the equality grounds but did not provide information as to how persons across the grounds are facilitated to apply and participate. Equality does not mean treating everyone the same and certain people or groups of people may be more at risk than others of experiencing discrimination. Ensuring equality of opportunity may mean catering for the specific needs of people or groups of people who experience disadvantages in society. Detail on specific steps taken to promote equal opportunities and non-discrimination, are valuably referenced in several reports but not in others. Generally further information on reasonable accommodation and/or positive actions measures would greatly strengthen reports, for example on

- Positive actions that have been taken to encourage involvement from underrepresented and disadvantaged groups
- Positive actions that have been taken to facilitate the participation of disadvantaged groups throughout the programmes, and the evidence informing these actions (e.g. consultation with disadvantaged groups).
- Monitoring rates of participation and outcomes for participants on equality and human rights, adjusting programmes where needed.

As mentioned in last year's report Activities are encouraged to take steps to proactively encourage participation of people who may fall under the equality grounds and support statements of non-discrimination by quoting policies in place. Commendably several Activities did outline specific policies in place, and more information on positive actions resulting from them would be welcomed in future reports. Examples include: providing evidence based support to facilitate access of persons under the equality grounds; evaluating the accessibility of the project and making reasonable accommodation for people with disabilities; collecting data on applicants and participants and analysing that data, for example whether it is representative of the overall potential target group and, if not, analysing why there are any significant differences and identifying what barriers may be causing these, including through consultation, and then putting in place supports and policies to overcome those barriers. Implementing the Public Sector Equality and Human Rights Duty (section 42 of the Irish Human Rights and Equality Act) may support the generation of such information.

Public Sector Equality and Human Rights Duty

Section 42 of the Irish Human Rights and Equality Commission Act 2014 places a statutory obligation on public bodies, in the performance of their functions, to have regard to the need to eliminate discrimination, promote equality of opportunity and protect human rights of staff and service users. It requires public bodies to assess, address and report on progress in relation to equality and human rights. A statutory obligation since 2014, the Duty is an ongoing requirement of public bodies as part of their strategic planning and their accountability and reporting process. Implementing the Duty has an important role to play in supporting public bodies to respond positively to growing diversity in Irish society, improving quality of service delivery and the experience of staff in the workplace.

Section 42(2) (a) of the Irish Human Rights and Equality Commission Act 2014 requires a public body to set out in its strategic plan “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.” In order to meet this requirement it is recommended that public bodies integrate their assessment of their ongoing obligations under the Duty and any implementation planning arising from that assessment into their strategic planning process.

The public bodies reporting on the horizontal principles have not as yet complied with their statutory obligation under Section 42 of the IHREC Act 2014. Through undertaking an assessment of equality and human rights issues pertaining to its purpose and functions and devising an action plan to address those issues, this will greatly assist Activities in complying with horizontal principles requirement in a systematic way. In a number of reports Activities were requesting service providers they fund to comply with Public Sector Duty which is very welcome. Yet it is equally important that all public bodies implement the Duty as a matter of priority, noting that implementation of the Duty greatly complements and supports work on applying the horizontal principles.

The Duty is a priority area of work for IHREC, where there is a focus on increased awareness and enhanced implementation of the Public Sector Duty and also on effective compliance with the Duty through enforcement. The focus of the work on the Duty is moving from

awareness raising towards effective compliance under the Commission's new Strategy Statement 2019-2021.

IHREC has produced a guidance on Implementing the Public Sector Equality and Human Rights Duty which was published in March 2019 and is available to download via the webpage <https://www.ihrec.ie/our-work/download-our-guide/>

Reporting on equality and non-discrimination training and capacity

Many of the reports could have been strengthened by providing information on the capacity and training of their staff and that of beneficiary organisations to address issues relating to promotion of equality and non-discrimination. General equality and non-discrimination training could be highlighted for further exploration, to support all programmes.

Consultation

Many of the reports could have been strengthened by providing information on consultation that may have taken place with a diversity of participants / target groups as part of reviewing and evaluating equality outcomes of programmes. More information on consultation with a diversity of participants to ascertain effectiveness of programme or a review of equality outcomes would be welcomed.

Data Collection Guidance

IHREC notes that some of the activity leaders, having noted a difficulty with gathering particular areas of equality data and ensuring compliance with GDPR, reporting issues with data and personal sensitivity and difficulties in gathering data on some grounds, highlighted the need for practical guidance in that regard. The Managing Authority undertook some work to identify what barriers exist and how activities can respond to these challenges, via the Horizontal Principles Working Group meetings, reported on at the 4th Programme Monitoring Committee on 24 May 2018. Further action may be needed to provide specific guidance on equality data and other matters pertaining to application of the equal opportunities and non-discrimination horizontal principle.

Review

IHREC would recommend a review of the application of the horizontal principles to the ESF Operational Programme for Employability, Inclusion and Learning 2014-2020 in order to capture learning and inform enhanced reporting on the principles in future rounds of funding.

Summary Remarks on the Activities

ESF 1.1 ETB Training for the Unemployed (SOLAS)

- The Activity is strong on the Horizontal theme of promoting Equal Opportunities and Non-Discrimination.
- The establishment of an Active Inclusion Unit and the FET strategy are very positive steps, in order to provide a focus on equality and non-discrimination work across a range of programmes and projects and provide oversight of progress.
- Welcome the working reference document on inclusion strategies as an important step towards an equality and non-discrimination proofing tool and equality impact assessment.
- Very welcome to see a strong focus on Continuous Professional Development for staff within ETBs and the focus on equality and non-discrimination within staff capacity building.
- It is positive that the activity references the application of equality and non-discrimination in its funding to service providers, in particular the reference to the Public Sector Equality and Human Rights Duty, but does not detail how that is monitored and reported on to ensure compliance.
- Lack of information and data on overall numbers of participants, breakdown across the equality grounds, uptake or equality impacts of the programme. The reporting template does not provide information on the numbers of participants who are Travellers, who are from other minority ethnic backgrounds, who have a disability, etc.
- The reporting template provides information on the real effort made to ensure that reasonable accommodation is in practice provided. The report provides information on positive action measures undertaken to encourage applications and participation from under-represented and disadvantaged groups within the target group. There is evidence of an active and committed approach to the horizontal principles in the Activity.
- Good evidence of consultation through National Learners Forum. However it would be useful to outline how this Forum is conducted to ensure that a diversity of learners can contribute and give constructive feedback on the programme.
- It would be useful to have information on consistency of approach across all ETBs in relation to equality and non-discrimination work. There appears to be evidence of very good practice but would welcome information on how that best practice is mainstreamed across the network of service providers. For example a number of ETBs

reported providing intercultural awareness training to staff and it would be useful if that was provided by all ETBs as a matter of course.

- It is very positive that reviews and evaluations have been carried out. It would be useful to outline if the reviews or evaluations had an equality focus and if so, to report on key findings and recommendations for change.

ESF 1.2 Springboard+ (Higher Education Authority)

- The Activity makes important reference to the Horizontal theme of promoting Equal Opportunities and Non-Discrimination
- The report only provides information on total number of participants. There is a lack of data on participants across the equality grounds, uptake or equality impacts of the programme. The reporting template does not provide information on the numbers of participants who are Travellers, who are from other minority ethnic backgrounds, who have a disability, etc.
- The reporting template does not provide information on steps taken to ensure that reasonable accommodation is in practice provided, or on the numbers of applicants who requested or required reasonable accommodation or on the steps taken or investment in providing those accommodations to meet their needs.
- The reporting template does not provide information on positive action measures undertaken to encourage applications and participation from under-represented and disadvantaged groups within the target group. Examples of proactive measures to attract persons from a diversity of backgrounds would be welcomed in future reports.
- It is positive that the Activity references the application of equality and non-discrimination in its funding to service providers but does not detail how that is monitored and reported on to ensure compliance.
- More information on consultation with a diversity of participants to ascertain effectiveness of programme or a review of equality outcomes would be welcomed. There is no information provided on the equality impact assessment / proofing with respect to the Springboard initiative.

ESF 1.3 ICT Skills Conversion (Higher Education Authority)

- The Activity makes important reference to the Horizontal theme of promoting Equal Opportunities and Non-Discrimination
- The report only provides information on total number of participants. There is a lack of data on participants across the equality grounds, uptake or equality impacts of the programme. The reporting template does not provide information on the numbers of participants who are Travellers, who are from other minority ethnic backgrounds, who have a disability, etc.

- The reporting template does not provide information on steps taken to ensure that reasonable accommodation is in practice provided, or on the numbers of applicants who requested or required reasonable accommodation or on the steps taken or investment in providing those accommodations to meet their needs.
- The reporting template does not provide information on positive action measures undertaken to encourage applications and participation from under-represented and disadvantaged groups within the target group. Examples of proactive measures to attract persons from a diversity of backgrounds would be welcomed in future reports.
- It is positive that the Activity references the application of equality and non-discrimination in its funding to service providers but does not detail how that is monitored and reported on to ensure compliance.
- More information on consultation with a diversity of participants to ascertain effectiveness of programme or a review of equality outcomes would be welcomed. There is no information provided on the equality impact assessment / proofing of the initiative.

ESF 1.5 Intra-EU Mobility (Department of Employment Affairs and Social Protection)

- The Activity makes important reference to the Horizontal theme of promoting Equal Opportunities and Non-Discrimination
- The reporting template does not provide data on participants or break these down across the equality grounds etc. or report on equality outcomes of the programme.
- The reporting template does not provide information on steps taken to ensure that reasonable accommodation is in practice provided, or on the numbers of applicants who requested or required reasonable accommodation or on the steps taken or investment in providing those accommodations to meet their needs. Eg. In regard to jobfair and DIALOG events information on accessibility and reasonable accommodation
- Further reporting on positive action undertaken to encourage participation from under-represented and disadvantaged groups across the grounds within the target group would strengthen the report.
- Further information on the consultation and identification of need would be useful.
- Equality and non-discrimination impact assessment of current targeting encouraged.

ESF 2.1 SICAP (Department of Rural and Community Development)

- The Activity is strong on the Horizontal theme of promoting Equal Opportunities and Non-Discrimination. The horizontal principles are taken into account in the design and implementation of programmes. The reporting template records concrete steps and innovative measures that seek to ensure that the aims of the horizontal theme are achieved in practice.
- The report is strong on data collection in relation to several of the grounds. Further information on how analysis of the data informs programming would further strengthen the reporting, including in regard to outcomes for participants.
- Makes an important point that further guidance is needed on collecting equality data

- Several reports would have been strengthened by **addressing intersectionality** (how participants or potential participants may be affected by more than one equality ground), demonstrating a need to strengthen understanding, data collection, analysis, action design and reporting in this area.
- The report notes that SICAP is a positive action towards new communities and does not discriminate on the basis of any of the equality grounds but information on proactive positive measures to facilitate the participation of people across the grounds or under intersecting grounds, would be welcome.
- Further information on the consultation and identification of need would be useful across all projects participating the programme.
- It is welcome that equality applies to and is reflected in internal practices but would welcome more information and practical examples to illustrate how that is achieved in practice within different projects.
- Welcome the equality and human rights proofing tool developed by one project in Longford – is this something that could be utilised / adapted by all projects across SICAP.
- Welcome feedback provided in question 5 of the reporting template in relation to seeking support to capture experiences of discrimination.
- Welcome development of specific measurement tools to record participant soft outcomes The Distance Travelled Tool.

ESF 2.3 Adult Literacy (SOLAS)

- The Activity is strong on the Horizontal theme of promoting Equal Opportunities and Non-Discrimination.
- The establishment of an Active Inclusion Unit and the FET strategy are very positive steps, in order to provide a focus on equality and non-discrimination work across a range of programmes and projects and provide oversight of progress.
- Welcome the working reference document on inclusion strategies as an important step towards an equality and non-discrimination proofing tool and equality impact assessment.
- Very welcome to see a strong focus on Continuous Professional Development for staff and the focus on equality and non-discrimination within staff capacity building.
- It is positive that the Activity references the application of equality and non-discrimination in its funding to service providers, in particular the reference to the Public Sector Equality and Human Rights Duty, but does not detail how that is monitored and reported on to ensure compliance.
- Lack of information and data on overall numbers of participants, breakdown across the equality grounds, uptake or equality impacts of the programme. The reporting template does not provide information on the numbers of participants who are Travellers, who are from other minority ethnic backgrounds, who have a disability, etc.
- The reporting template provides information on the real effort made to ensure that reasonable accommodation is in practice provided.
- The report provides much information on positive action measures undertaken to encourage applications and participation from under-represented and disadvantaged

groups. There is ample evidence of an active and committed approach to the horizontal principles. Most notable is the proactive measures taken as part of the refugee resettlement programme and for learners from the Traveller and Roma Communities.

- It would be useful to have information on consistency of approach across all ETBs in relation to equality and non-discrimination work. There appears to be evidence of very good practice but would welcome information on how that best practice is mainstreamed across the network of service providers. For example a number of ETBs reported providing intercultural awareness training to staff and it would be useful if that was provided by all ETBs as a matter of course.
- Good evidence of consultation through National Learners Forum. However it would be useful to outline how this Forum is conducted to ensure that a diversity of learners can contribute and give constructive feedback on the programme.

ESF 2.3 Garda Youth Diversion Project (Department of Justice and Equality)

- The Activity is strong on the Horizontal theme of promoting Equal Opportunities and Non-Discrimination.
- The report is strong on data collection in relation to several of the equality grounds. Further information on how analysis of the data informs programming would further strengthen the reporting, including in regard to outcomes for participants.
- It is also positive to see that the Garda Youth Diversion Projects Operational Requirements is reported as referencing an equality ground, and reporting of a number of 'new actions' programmes targeting groups across the 9 grounds
- As highlighted last year, the report does not provide information on the reasonable accommodation steps taken to facilitate the participation of the 323 participants with disabilities.
- Further information on active positive measures to facilitate participation by groups across the equality grounds would be welcome in future reports.

ESF 2.4 Young Person Probation (Department of Justice and Equality)

- The Activity is strong on the Horizontal theme of promoting Equal Opportunities and Non-Discrimination.
- Participant data is provided in relation to several of the grounds, including, commendably, the ground of family status
- It is useful that the report highlights policies to promote non-discrimination – e.g. the Dochas Don Oige Equality policy, and Zero Tolerance to Racism policy– these are very welcome developments. Further information on how these and other equality and non-discrimination are implemented through reported actions would be welcomed in future reports.
- The report references further positive action taken- with the concrete example given of language supports. Further detail and more information would be useful on this. Information on other positive actions undertaken to encourage participation from under-represented and disadvantaged groups across the grounds within the target group would strengthen the report.

- The report refers to positive reported results and further data and evidence around the review and evaluation of programmes in regard to equality impact would be welcomed in future reports.

ESF 2.6 Ability (Department of Employment Affairs and Social Protection)

- The Activity is strong on the Horizontal theme of promoting Equal Opportunities and Non-Discrimination.
- Detailed data and analysis is provided and the report is strong on consultation and participation
- The case studies provided are illustrative and highly beneficial to the report
- The report outlines targeting of participants facing intersectional inequalities in regard to communities experiencing social isolation and/or socio-economic disadvantage. As this Activity has as its primary focus a group covered by one of the equality grounds, it will be important that the application of the horizontal principle specifically addresses the issue of intersectional inequalities across the equality grounds.
- The report demonstrates that the programme is being monitored and challenges identified through an important issue raised related to transport for young people with disabilities. This is important learning to flag to inform future programmes planning and equality budgeting

ESF 2.7 Integration and Employment of Migrants (Department of Justice and Equality)

- The Activity is strong on the Horizontal theme of promoting Equal Opportunities and Non-Discrimination.
- The report is strong on data collection and breakdown in relation to several of the grounds. Further information on how analysis of the data informs programming would further strengthen the reporting, including in regard to impact evaluation.
- Makes an important point that further guidance is needed on collecting equality data and GDPR compliance
- Barriers for migrants accessing employment are outlined
- The programme is targeted at both EEA and 'third country nationals'. Further breakdown of data and analysis in regard to these groupings may provide further insights around need and targeting
- The report notes that the programme is seen as a positive action towards migrants and 'does not discriminate on the basis of any of the nine equality grounds' but information on proactive positive measures to facilitate the participation of people across the grounds or under intersecting grounds, would be welcome.
- Reporting on positive action undertaken to encourage participation from under-represented and disadvantaged groups across the grounds within the target group would strengthen the report.
- As this Activity has as its primary focus a group covered by one of the equality grounds, it will be important that the application of the horizontal principle specifically addresses

the issue of intersectional inequalities, and includes a clear focus on ensuring that the Activity meets the needs of women migrants, of migrants with a disability, of older migrants, of LGBT migrants, migrants with caring responsibilities, etc.

- Welcome recognition that asylum seekers can now apply (if they have not received a decision on their status within 9 months)
- It is noted that it is planned to provide a horizontal principles report from the projects annually.

ESF 2.8 Tus Nua (Department of Justice and Equality)

- The Activity is strong on the Horizontal theme of promoting Equal Opportunities and Non-Discrimination.
- Welcome reference to relevant national strategies
- Report indicates equal opportunities and non-discrimination but positive measures to facilitate participation of women across the grounds, facing intersectional inequalities, and reasonable accommodation to facilitate potential participants with disabilities could be usefully detailed. The reporting template does not provide information on positive action undertaken to encourage applications/access from under-represented and disadvantaged groups within the target group.
- The report notes that the programme ‘strives to work with women taking account of their particular circumstances and situation’ – more detail on this would be welcomed. As this Activity has as its primary focus a group covered by one of the equality grounds, it will be important that the application of the horizontal principle specifically addresses the issue of intersectional inequalities, and includes a clear focus on ensuring that the Activity is accessible and meets the needs of migrant women, of women with a disability, of older women, of Traveller women, women with caring responsibilities, of lesbian, bisexual and trans women etc.
- The reporting template does not provide information on steps taken to ensure that reasonable accommodation is in practice provided, or on the numbers of applicants who requested or required reasonable accommodation or on the steps taken or investment in providing those accommodations to meet their needs.
- It is not detailed in the report whether there is a mechanism to capture feedback and/or consult with participants and potential participants to the programme.

ESF 2.9 Gender Equality (Department of Justice and Equality)

- The Activity is strong on the Horizontal theme of promoting Equal Opportunities and Non-Discrimination.
- Welcome data and analysis is provided, and reference to relevant national strategies and policies

- Useful observation is made that there is a need for further guidance on what equality data is needed and for what purpose, and GDPR compliance
- Very positive examples of targeting people faced by intersectional inequalities are referenced eg women from remote rural communities, disadvantaged areas, previous carers, migrant domestic workers, lone parents. More detailed information on these and positive actions across the equality grounds would strengthen reporting further
- Information on reasons why women who are registered as unemployed are not eligible is not provided.

ESF 3.1 Third Level Access (Higher Education Authority)

- The Activity is strong on the Horizontal theme of promoting Equal Opportunities and Non-Discrimination.
- The National Action Plan for Equity of Access to Higher Education 2015-2019 is very positive and we note the progress review of the Plan highlighted important achievements including the increase in participation rates across a number of target groups. More information and data on this aspect would be beneficial.
- The report provides information on total number of participants in the Student Assistance Fund with a gender breakdown. It would be useful to have data on recipients of this Fund across the equality grounds, uptake or equality impacts of the programme. The reporting template does not provide information on the numbers of participants who are Travellers, who are from other minority ethnic backgrounds, age etc.
- The reporting template provides data on reasonable accommodation through the number of persons that are recipients of the FSD as that is the nature of the Fund but in terms of intersectionality it would be welcome to see a breakdown of those figures across other equality grounds.
- The reporting template does not provide concrete examples on positive action measures undertaken to encourage applications and participation from under-represented and disadvantaged groups within the target group except for the recent application of the Funds to part-time study. More examples like this would be welcome.
- It is very positive to see reports of reviews that have been carried out into both Funds with recommendations for change. It would have been useful if the report outlined the key findings and recommendations relating to equality and non-discrimination and any steps taken to progress changes. There is no information given on consultation with service users or staff in the review of the Funds from an equality perspective and no information of equality impact assessment / proofing exercise done with respect to the design and operation of the Funds in practice. Information on this would be most welcome in future reports.

ESF 3.2 BTEI- (Back to Education Initiative) SOLAS

- The Activity is strong on the Horizontal theme of promoting Equal Opportunities and Non-Discrimination.
- The establishment of an Active Inclusion Unit and the FET strategy are very positive step, in order to provide a focus on equality and non-discrimination work across a range of programmes and projects and provide oversight of progress.
- Welcome the working reference document on inclusion strategies as an important step towards an equality and non-discrimination proofing tool and equality impact assessment.
- Very welcome to see a strong focus on Continuous Professional Development for staff within ETBs and the focus on equality and non-discrimination within staff capacity building.
- It is positive that the Activity references the application of equality and non-discrimination in its funding to service providers, in particular the reference to the Public Sector Equality and Human Rights Duty, but does not detail how that is monitored and reported on to ensure compliance.
- Lack of information and data on overall numbers of participants, breakdown across the 9 equality grounds, uptake or equality impacts of the programme. The reporting template does not provide information on the numbers of participants who are Travellers, who are from other minority ethnic backgrounds, who have a disability, etc.
- The reporting template provides information on the real effort made to ensure that reasonable accommodation is in practice provided The report provides information on positive action measures undertaken to encourage applications and participation from under-represented and disadvantaged groups within the target group. There is evidence of an active and committed approach to the horizontal principles in the Activity.
- Good evidence of consultation through National Learners Forum. However it would be useful to outline how this Forum is conducted to ensure that a diversity of learners can contribute and give constructive feedback on the programme.
- It would be useful to have information on consistency of approach across all ETBs in relation to equality and non-discrimination work. There appears to be evidence of very good practice but would welcome information on how that best practice is mainstreamed across the network of service providers. For example a number of ETBs reported providing intercultural awareness training to staff and it would be useful if that was provided by all ETBs as a matter of course.
- It is very positive that reviews and evaluations have been carried out. It would be useful to outline if the reviews or evaluations had an equality focus and if so, to report on key findings and recommendations for change.

ESF 4.1 Back to Work Enterprise Allowance (Department of Employment Affairs and Social Protection)

- The Activity makes important reference to the Horizontal theme of promoting Equal Opportunities and Non-Discrimination
- Lack of information and data on overall numbers of participants, breakdown across the equality grounds, uptake or equality impacts of the programme.

- The reporting template does not provide information on the numbers of participants who are Travellers, who are from other minority ethnic backgrounds, who have a disability, etc.
- The reporting template does not provide information on steps taken to ensure that reasonable accommodation is in practice provided, or on the numbers of applicants who requested or required reasonable accommodation or on the steps taken or investment in providing those accommodations to meet their needs.
- The reporting template does not provide information on positive action undertaken to encourage applications and participation from under-represented and disadvantaged groups within the target group.

ESF 4.2 Jobsplus Department of Employment Affairs and Social Protection

- The Activity makes important reference to the Horizontal theme of promoting Equal Opportunities and Non-Discrimination
- Welcome that employers are reported to be made aware of their obligations under equality legislation and supports for employees with disabilities. However, the reporting template does not provide information on what measures are in place to ensure employers do not discriminate against participants and comply with these obligations.
- Lack of information and data on participants, breakdown across the equality grounds, uptake or equality impacts of the programme.
- The reporting template does not provide information on the numbers of participants who are Travellers, who are from other minority ethnic backgrounds, who have a disability, etc.
- The reporting template does not provide information on steps taken to ensure that reasonable accommodation is in practice provided, or on the numbers of applicants who requested or required reasonable accommodation or on the steps taken or investment in providing those accommodations to meet their needs.
- Positive policy to facilitate participation on the age ground is welcomed- further such examples would be useful to strengthen reporting
- The removal of the qualifying period requirement for 'former one parent family payment customers' meeting certain requirements and persons with refugee status meeting certain requirements is positive. Further reporting on positive action undertaken to encourage participation from under-represented and disadvantaged groups across the grounds within the target group would strengthen the report.

ESF 4.5 Youthreach (SOLAS)

- The Activity is strong on the Horizontal theme of promoting Equal Opportunities and Non-Discrimination.
- The establishment of an Active Inclusion Unit and the FET strategy are very positive step, in order to provide a focus on equality and non-discrimination work across a range of programmes and projects and provide oversight of progress.

- Welcome the working reference document on inclusion strategies as an important step towards an equality and non-discrimination proofing tool and equality impact assessment.
- Very welcome to see a strong focus on Continuous Professional Development for staff within ETBs and the focus on equality and non-discrimination within staff capacity building.
- It is positive that the AIP references the application of equality and non-discrimination in its funding to service providers, in particular the reference to the Public Sector Equality and Human Rights Duty, but does not detail how that is monitored and reported on to ensure compliance.
- Lack of information and data on overall numbers of participants, breakdown across the 9 equality grounds, uptake or equality impacts of the programme. The reporting template does not provide information on the numbers of participants who are Travellers, who are from other minority ethnic backgrounds, who have a disability, etc.
- The reporting template provides information on the real effort made to ensure that reasonable accommodation is in practice provided The report provides information on positive action measures undertaken to encourage applications and participation from under-represented and disadvantaged groups within the target group. There is evidence of an active and committed approach to the horizontal principles in the Activity.
- Good evidence of consultation through National Learners Forum. However it would be useful to outline how this Forum is conducted to ensure that a diversity of learners can contribute and give constructive feedback on the programme.
- It would be useful to have information on consistency of approach across all ETBs in relation to equality and non-discrimination work. There appears to be evidence of very good practice but would welcome information on how that best practice is mainstreamed across the network of service providers.
- It is very positive that reviews and evaluations have been carried out. It would be useful to outline if the reviews or evaluations had an equality focus and if so, to report on key findings and recommendations for change.

ESF 4.8 Community Training Centres (SOLAS)

- The Activity is strong on the Horizontal theme of promoting Equal Opportunities and Non-Discrimination.
- The establishment of an Active Inclusion Unit and the FET strategy are very positive steps, in order to provide a focus on equality and non-discrimination work across a range of programmes and projects and provide oversight of progress.
- Welcome the working reference document on inclusion strategies as an important step towards an equality and non-discrimination proofing tool and equality impact assessment.
- Very welcome to see a strong focus on Continuous Professional Development for staff within ETBs and the focus on equality and non-discrimination within staff capacity building.
- It is positive that the Activity references the application of equality and non-discrimination in its funding to service providers, in particular the reference to the Public

Sector Equality and Human Rights Duty, but does not detail how that is monitored and reported on to ensure compliance.

- Lack of information and data on overall numbers of participants, breakdown across the equality grounds, uptake or equality impacts of the programme. The reporting template does not provide information on the numbers of participants who are Travellers, who are from other minority ethnic backgrounds, who have a disability, etc.
- The reporting template provides information on the real effort made to ensure that reasonable accommodation is in practice provided. The report provides information on positive action measures undertaken to encourage applications and participation from under-represented and disadvantaged groups within the target group. There is evidence of an active and committed approach to the horizontal principles in the Activity.
- Good evidence of consultation through National Learners Forum. However it would be useful to outline how this Forum is conducted to ensure that a diversity of learners can contribute and give constructive feedback on the programme.
- It would be useful to have information on consistency of approach across all ETBs in relation to equality and non-discrimination work. There appears to be evidence of very good practice but would welcome information on how that best practice is mainstreamed across the network of service providers.
- It is very positive that reviews and evaluations have been carried out. It would be useful to outline if the reviews or evaluations had an equality focus and if so, to report on key findings and recommendations for change.

ESF 4.9 Defence Forces Employment Support Scheme

- The Activity makes important reference to the Horizontal theme of promoting Equal Opportunities and Non-Discrimination
- Lack of information and data on overall numbers of participants, breakdown across the equality grounds, uptake or equality impacts of the programme.
- The reporting template does not provide information on positive action measures undertaken to encourage applications and participation from under-represented and disadvantaged groups within the target group across the equality grounds.
- There is no information on targeted initiatives to ensure scheme is advertised to a diversity of women and men. It is positive that the Defence Forces have a focus on gender equality but more work is required on looking at ways to ensure that a diversity of women and men are included, considering ethnicity, religion, age and sexual orientation.
- More information on consultation with a diversity of participants to ascertain effectiveness of programme or a review of equality outcomes would be welcomed. There is no information provided on the equality impact assessment / proofing of the Scheme.

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- The Activity makes important reference to the Horizontal theme of promoting Equal Opportunities and Non-Discrimination
- Overall number of participants accepting places and gender data breakdown provided but lack of information and data on participant breakdown across the equality grounds.
- Welcome that Placement Hosts and Case Officers are reported to be made aware of their obligations under equality legislation. However, the reporting template provides no information on what measures are in place to ensure they do not discriminate against participants and comply with these obligations. This information would be welcome in future reports.
- The reporting template does not provide information on concrete steps for positive action undertaken to encourage applications and participation from under-represented and disadvantaged groups within the target group.
- The reporting template does not provide information on steps taken to ensure that reasonable accommodation is in practice provided, or on the numbers of applicants who requested or required reasonable accommodation or on the steps taken or investment in providing those accommodations to meet their needs.

Jacqueline Healy & Hannah Collins

Public Sector Duty Team

Irish Human Rights and Equality Commission