



Coimisiún na hÉireann um Chearta
an Duine agus Comhionannas
Irish Human Rights and Equality Commission

Consultation on the Irish Human Rights and Equality Commission Strategy Statement 2025-2027

Invitation for Submissions



Introduction

The Irish Human Rights and Equality Commission (the Commission) would like to invite you to make a contribution to our consultation process for our new Strategy Statement 2025-2027. This will be our fourth Strategy Statement.

Consultation with Individuals and Stakeholders

We are inviting submissions from people (rights-holders), civil society groups, public bodies and other stakeholders working to eliminate discrimination, and promote and protect human rights and equality. Your contributions will spotlight issues that you believe we should take into account when we are developing our strategic priorities for the next three years.

Irish Human Rights and Equality Commission Act 2014

The Irish Human Rights and Equality Commission Act 2014 sets out our role to promote and protect human rights, equality and respect for intercultural understanding in Ireland. Our vision is of an inclusive Ireland where human rights and equality are respected.

Under the Irish Human Rights and Equality Commission Act 2014 (the Act), the overall functions of the Commission are to:

- (a) protect and promote human rights and equality;
- (b) encourage the development of a culture of respect for human rights, equality and intercultural understanding in the State;
- (c) promote understanding and awareness of the importance of human rights and equality in the State;
- (d) encourage good practice in intercultural relations, to promote tolerance and acceptance of diversity in the State and respect for the freedom and dignity of each person; and
- (e) work towards the elimination of human rights abuses, discrimination and prohibited conduct.

Section 42 of the Act sets out the Public Sector Equality and Human Rights Duty. The Duty places a statutory obligation on public bodies to eliminate discrimination, promote equality of opportunity



and protect the human rights of those to whom they provide services and staff when carrying out their daily work. The Commission gives guidance to them to develop policies and good practice based on human rights and equality standards.

The Act provides the framework for the Commission's next Strategy Statement 2025 - 2027.

How can I make a submission?

You can use this form to make a written submission. You can [send your views to us by email](#) or post using this form.

There are four sections to complete in this form:

1. [Group or Organisation Background](#)(only for representatives of groups or organisations)
2. [Context for the Commission's work over the next three years](#)
3. [Performance of the Irish Human Rights and Equality Commission](#)
4. [Achieving change](#)

If you would like to make a video submission, please visit our website for information on how to submit a video.

The closing date for submissions is **Wednesday 27 March 2024**.



How we will use your information

Your submissions will only be shared internally and with our appointed consultants to inform the development of the next Strategy Statement. Your submissions will not be circulated outside of the Commission. The information provided will not be used for any other purpose. It will be securely stored and only kept for 12 months. We appreciate your time and valuable input to this consultation process.

Consent for use of information

I agree that the information I provide may be used for the purposes outlined above and in accordance with our [Data Protection Information Notice](#).

I do not agree that the information I provide may be used for the purposes outlined above and in accordance with our [Data Protection Information Notice](#).

Please note, if you do not agree, we cannot use your information and you should not complete and submit this form.



Section 1: Group or Organisation Background

Please only fill out this section if you are representing a group or organisation

What is the name of your group or organisation?

St Patrick's Mental Health Services

Which category or categories does your group or organisation's human rights and equality work relate to?

Please select one or more of the following options:

- Age
- Disability
- Civil status
- Family status (including lone parents and carers)
- Gender (including a transgender person or a person who is transitioning to another gender)
- Race
- Religion
- Sexual orientation
- Traveller community
- Housing Assistance
- People experiencing or at risk poverty and social exclusion
- People with a history of contact with the criminal justice system
- Other (please specify below)

Click or tap here to enter text.



Section 2: Context for the Commission's work over the next three years

We would like to understand your experience, or the experience of those you represent, so that it informs the human rights and equality context in which the Commission will work over the next three years.

What is going well for you (and/or your community / constituency you represent)?

Max 200 words

SPMHS is Ireland's largest independent not-for-profit mental health service provider. Our vision is to see a society where all citizens are empowered and given the opportunity to live mentally healthy lives. This submission is made in this context. Input to this submission was also kindly provided by the organisation's Service User and Supporters Council, with the following shared for this question: "The last few years have seen a dramatic shift in public awareness and stigmatisation of mental health challenges in Ireland and I think this has had an extremely positive impact for those who experience mental health challenges. Ireland has historically had a uniquely shameful way of managing the difficulties that we all face in life and the new culture of openness and acceptance has allowed those who face challenges to come forward and share their experiences."

SPMHS would also note recent progress with advancing application of the UNCRPD, including the enactment of the Assisted Decision-Making (Capacity) Act, as significant. We would also highlight a recent pledge by national mental healthcare providers to participate in the WHO QualityRights programme which aims to promote rights-based approaches to mental health as a positive advancement for people with mental health difficulties.

What are the challenges and barriers that you (and/or your community / constituency) face?

Max 300 words



Input shared by members of the St Patrick's Service User and Supporters Council regarding challenges and barriers faced by people with mental health difficulties was as follows: "The primary barriers in Ireland are access to services. Despite being one of the most economically prosperous countries in Europe and the world, Ireland's mental health structure is that of a developing nation. A cultural shift toward a more holistic approach to mental health has made access even more difficult as individuals now want an approach not primarily guided by pharmacotherapies, but also from psychological therapies which are far more time intensive."

SPMHS would further highlight the following as challenges and barriers in the context of people with mental health difficulties:

- Delays in progressing the reform of the Mental Health Act, necessary to strengthen human rights protections. While hopefully the updated legislation will have been enacted before 2025, Mental Health Reform have highlighted a risk of it lapsing following the dissolution of the Dáil if it is not signed into law this year.
- Ongoing and serious shortfalls in the provision of timely care to children and young people with mental health difficulties, including a lack of upstream early-intervention services.
- Insufficient budgeting for mental health services below that recommended within Sláintecare – 10% of the overall health budget, with the proportion allocated in recent years remaining between 5 and 6 %, and which continues to impede timely access to services as highlighted above.
- Ireland has not signed up to the Optional Protocol under the UNCRPD, though the recent announcement of an Interdepartmental Group related to same is an indicator of some progress in this regard.

What do you (and your community/ constituency) need to thrive – to have your human rights and equality protected?

Max 200 words

Input shared by members of the Service User and Supporters Council: "Personally, I find purpose and advocacy help to sustain me. Having a reason to get up every day and to work towards a goal that I am passionate about keeps me going. In regard to my human rights and equality, I do think



I'm lucky as I have access to resources which allow me access to services. Others however, are not as fortunate."

SPMHS advocate the following as necessary for people with mental health difficulties to have their human rights and equality protected: People experiencing mental health difficulties should be treated with respect and dignity, protected against discrimination, and have full inclusion and equality. Independence, autonomy and the opportunity to make decisions about their care and treatment are essential. This necessitates continued efforts to eliminate mental health stigma and discrimination, particularly within communities and workplaces, and to implement rights-based approaches to mental health within services. Increased access to timely mental health services for all who need them is necessary, including an urgent need for investment in community-based early intervention approaches for children and young people. It is also essential that children stop being admitted to adult mental health units.



Section 3: Performance of the Irish Human Rights and Equality Commission

We would like to understand how you perceive the Commission's performance over the past three years. Set out below are our current strategic priorities. We also encourage you to look at the full [2022-24 Strategy Statement](#) and our [Annual Report 2022](#).

Our Strategic Statement 2022-24 – Strategic Priorities:

1. Economic Equality

We will seek greater economic equality in housing, employment, income and for carers

2. Justice

We will defend access to justice and the rule of law in the international protection system, in the courts and in the use of public powers

3. Respect and Recognition

We will promote the eradication of racism, ableism, ageism and sexism through public understanding and State action

4. Future Proofing

We will respond to crises that threaten rights and equality, including the COVID-19 and climate change

5. Public Sector Equality and Human Rights Duty

We will encourage, report on and enforce the compliance of public bodies, including engaging in consultation with rights holders directly and through civil society organisations towards the promotion of the Duty

What do you think our impact has been over the past three years?

What do you think were the successes? Were there gaps?

Where possible, please refer to a specific aspect of our work – i.e. our legal work; research; legislative and policy submissions; international reporting (e.g. to the UN); anti-human trafficking;



civil society engagement; grants programme; public awareness campaigns; public communication; and promotion of the Public Sector Equality and Human Rights Duty etc.

Max. 400 words

SPMHS commends the breadth of human rights and equality work which IHREC achieves, and notes the prominent campaign on disability rights as a particular success during the period of the last strategy to raise public awareness and promote underpinning principles of the UNCRPD at a broad level. The role of the Your Rights service, and the provision of a range of information in accessible formats for the public on their rights, is a vital element of IHREC's work.

The essential role of independent reporting on national progress under UN Conventions remains impactful in highlighting shortfalls within human rights progress within and beyond the monitoring process, and the work of the Disability Advisory Committee is especially significant in the context of meaningfully progressing the implementation of the UNCRPD in Ireland. The highlighting within IHREC reports of serious shortfalls in State obligations under the right to health are welcomed by SPMHS. In particular, in the most recent report to the Committee on Economic, Social and Cultural Rights, the emphasis on the need for mental health to be prioritised and a focus on impacts on children and young people, and vulnerable and marginalised groups within society, was especially important. Additionally the highlighting of the intersection between climate action and human rights, and health impacts, within this report were also a welcome focus and one that has become increasingly urgent in its necessity. The significance of State actions on climate and biodiversity issues to children and young people's human rights, including the right to health, are also very important to see highlighted in reports such as these.

Efforts to mainstream human rights and equality within policy and practice via the implementation of the Public Sector Human Rights and Equality Duty, civil society engagement and capacity-building, and expert recommendations to policy-makers, as highlighted within the 2022 Annual Report, are essential to the meaningful realisation of human rights and equality within daily life.



Section 4: Achieving Change

We would like to understand how we could work effectively to fulfil our mandate and achieve change that will lead to the realisation of an inclusive Ireland where human rights and equality are respected.

What issues should we continue to address as a priority and build upon in our new Strategy Statement 2025-2027 and programme of work?

Max. 300 words

It is notable within the 2022 annual report for IHREC that the most frequently cited basis for discrimination within the public contacts to the Your Rights service on equality issues relates to disability. On this basis, we would suggest that a continued focus on addressing disability-based discrimination should remain a priority, and further that it may be of benefit to consider a more targeted approach to tackle any specific recurrent discriminatory themes emerging within this annual trend. Regarding the rights of people with mental health difficulties, the continued implementation of the UNCRPD should remain a priority, including advancement of relevant legislation, addressing mental health service shortfalls and gaps, and developing rights-based approaches within services. On a broader level, it must be recognised and understood that the levers for health lie beyond the health sector, and often intersect with human rights and equality issues, and as such should be treated as a cross-cutting issue in national policies and plans. A focus on making clear the impacts of climate and biodiversity action or inaction on human rights within and beyond IHREC's monitoring duties, and especially advocating for the rights of children and young people in this regard, including their right to health, should remain a key priority and be built upon within the new Strategy Statement.

What emerging or other issues should we begin to address in our new Strategy Statement 2025-2027 and programme of work as a priority?

Max. 300 words

SPMHS would highlight the need to address tackling worrying anti-immigrant and anti-asylum seeker sentiment emergent within a minority of Irish society and within some aspects of media



and social media, and would highlight the negative impacts this can have on mental health and wellbeing within a cohort that already experiences disproportionately high levels of mental health difficulties. As noted above there is an increasingly urgent need to address the intergenerational inequality of climate change, and advocate for a focus on children's rights, including the right to physical and mental health, within and beyond IHREC's monitoring duties. Also in relation to the rights of children and young people, recent data highlighting various negative impacts of smartphone and social media use on children including exposure to violence and harm, and inadequate safeguarding measures to protect children's rights in this regard, merit further attention in the context of children's rights, especially the right to mental health.

How can we work with and support the further development of civil society as key actors in addressing discrimination and human rights infringements?

SPMHS commends and welcomes the capacity-building efforts within the work of IHREC while acknowledging its status as a necessarily independent body, and values any opportunity to meaningfully develop our role in addressing discrimination and human rights infringements, and to strengthen our organisational skills and capacity to support rights-based approaches to services. As regards information provision for service users of SPMHS, the availability of accessible information on rights under the UNCRPD, mental health as it relates to the Equality Acts, and the availability of the YourRights Service are especially valued. As regards work concerning progressing realisation of the UNCRPD, SPMHS would highlight a continued need for the voices of those with mental health difficulties, and the participation of other stakeholders such as service providers, to be heard and included within this work.

What impact would you like to have seen from us by 2027?

In relation to the human rights and equality of people with mental health difficulties, SPMHS would like to have seen IHREC having effectively supported the implementation of necessary legislation and human rights protections, including the enactment of the reformed Mental Health Act and the adoption of the Optional Protocol to the UNCRPD. SPMHS would like to have seen a reduction in the experience of disability discrimination within Irish society, within communities



and workplaces especially, and further realisation of human rights under the UNCRPD. We would like to see increased prioritisation and mainstreaming of children's rights within national policy and law, especially any related to health and disability services. We would like to have seen a substantive impact from IHREC's monitoring efforts in improving access to mental health services for all who need them, establishment of upstream early intervention mental health services for children, and for the admission of children and young people to adult services to have fully stopped. Additionally, the prioritising of children's rights within climate and biodiversity action nationally, including their right to physical and mental health, would have been achieved.

Click or tap here to enter text.

Thank you!



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How do you submit this form?

Please send your submission by 27 March 2024.

You can email this form to:

consultation@ihrec.ie

Please use the subject line: “Submission to IHREC 2025-2027 Strategy Statement Consultation”.

You can also post this form to us at:

Strategy Statement Consultation

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