

STRATEGIC PLAN 2009 – 2011

Equality for All in a Time of Change

First Published March 2009

By

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ISBN-13: 978-1-905628-81-0



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CHAIRPERSON'S INTRODUCTION

Equality for All in a Time of Change

The last ten years have been a period of extraordinary change in Ireland. Unparalleled economic growth and opportunity triggered the emergence of an Ireland that is more diverse and more multicultural. In many ways we are more tolerant, albeit in some ways less caring and more individualistic. During this time our equality infrastructure was created, with the establishment in 1999 of the Equality Authority and the Equality Tribunal. Other significant state agencies with complementary objectives also emerged to strengthen the overall equality and rights framework now firmly in place. As this new framework developed, it gained recognition for Ireland in Europe as a leader in building equality infrastructure and on anti-discrimination issues. This national endeavour continues. It involves all of us: government, state agencies, voluntary and community organisations, employers, trade unions, the media and the vast number of people who seek dignity for all.

Today we have a radically changed fiscal environment, as the country faces a most severe economic crisis. This rapid slowdown means we must now plan more strategically and use our limited resources more carefully, to ensure that we continue to embed the values of equality in our society. The challenge for us as a nation, while rebuilding our economy, will be to hold true to the vision of a society which fosters equal opportunities for all. This Strategic Plan reinforces the Equality Authority's commitment to achieving this aim.

The Equality Authority's vision for an equal society is clear and strong, and we will pursue this with leadership, passion and vigour. We know that real equality in our society is reliant on the comprehension, commitment and active support of everyone. The doors of the Equality Authority are wide open and we welcome all those who have an interest in working with us.

We are fortunate that our national parliament has put in place a strong framework of legislation which promotes equality and prohibits discrimination under nine grounds. This national legislative framework is underpinned by European non-discrimination law. The Authority's remit extends beyond promoting best practice and making recommendations on changes to legislation. It also informs, advises, promotes access to legal redress and legally challenges issues of strategic importance.

Like most public agencies, the Equality Authority will have to work towards its goal with more modest resources during the period of this Strategic Plan. This may limit what we spend, but not what we may achieve. These difficult financial times offer us an opportunity to examine what we do and how we do it.

The equality agenda and the work of the Authority is owned by every man, woman and child in Ireland. This Strategic Plan reaffirms our ambition to include all voices in our policy and work programmes. We will listen, consult and strive to facilitate equality and non-discrimination across all the nine grounds protected by legislation – Age; Disability; Family Status; Gender; Marital Status; Race; Religion; Sexual Orientation; and membership of the Traveller Community. We will work harder to ensure that our responses are relevant and promote a more respectful society.

Over the past six months in preparing the Strategic Plan the Equality Authority listened. We are grateful for the many excellent contributions and submissions that we received. The Plan identifies six strategic goals – rights awareness; access to redress; promotion and compliance; evidence gathering; practical responses for priority groups experiencing inequality, and an effective and efficient Equality Authority.

We will pursue these strategic activities of the Equality Authority with energy and commitment. In doing so we look forward to working more closely with other statutory and non-statutory organisations, groups and individuals on joint initiatives, sharing ideals, achieving practical ends, developing new ideas and ways of communicating our messages and forging new partnerships and alliances.

The Equality Authority has always been to the fore in encouraging developments in equality law and practice at European level. We intend to maintain and to deepen our engagement with the European institutions, notably the European Commission and also with our fellow equality bodies in other EU member states.

We warmly thank all those who contributed to this Strategic Plan and to the work of the Authority over the past decade. I also acknowledge those many people in this country who strive to promote equality and anti- discrimination measures. My hope is that more people will participate in the work of the Equality Authority, thereby broadening its reach, reinforcing its worth, and contributing to its success in the delivery of these important strategic goals. We also welcome the formal endorsement of the Minister for Justice, Equality and Law Reform, Mr Dermot Ahern T.D. and his Department officials for this Strategic Plan and look forward to their support in its implementation.

The Board of the Equality Authority also recognises its responsibility to ensure an independent, efficient and effective Authority that represents value for money and quality service provision. This responsibility has been fully embedded in the Strategic Plan. I would like to take this opportunity to acknowledge the great commitment and enthusiasm that the Board and the staff of the Authority have shown in the preparation of this Strategic Plan. We are confident that through effective use of resources and a "can do" attitude we can fully deliver on the ambitions set out in this plan – *Equality for All in a Time of Change*.

Angela Kerins

Chairperson

Onjeh Viens

MISSION

The Equality Authority works to promote equality of opportunity and to eliminate discrimination.

MANDATE

The Equality Authority was established in 1999 under the Employment Equality Act 1998. Its functions and powers were amended under the Equal Status Act 2000, the Equality Act 2004 and the Civil Law (Miscellaneous Provisions) Act 2008. It is also accorded a number of functions under the Intoxicating Liquor Act 2003.

This legislation establishes the general functions of the Equality Authority. These include:

- To work towards the elimination of discrimination in relation to the areas covered by the Employment Equality Acts 1998 to 2008 and the Equal Status Acts 2000 to 2008.
- To promote equality of opportunity in relation to employment and vocational training and in relation to the provision of goods and services, accommodation and education.
- To provide information to the public on the working of the Employment Equality Acts 1998 to 2008, the Equal Status Acts 2000 to 2008, the Maternity Protection Acts 1994 and 2004 and Adoptive Leave Acts 1995 to 2005. The Parental Leave Acts 1998 to 2006 also accords the Equality Authority an information role on the provisions of the legislation
- To keep under review the workings of the Employment Equality Acts 1998 to 2008, the Equal Status Acts 2000 to 2008, the Maternity Protection Acts 1994 and 2004 and the Adoptive Leave Acts 1995 to 2005 and to make recommendations for necessary change to the Minister for Justice, Equality and Law Reform.

The Employment Equality Acts 1998 to 2008 prohibit discrimination in the workplace, self employment and in vocational training. The Equal Status Acts 2000 to 2008 prohibit discrimination in the provision of goods and services, facilities, accommodation and education. The legislation covers the nine grounds of gender, marital status, family status, age, disability, sexual orientation, race, religion and membership of the Traveller community.

Separate provision is made in relation to registered clubs. Claims in relation to licensed premises are governed by the provisions of the Intoxicating Liquor Act 2003.

The equality legislation provides the Equality Authority with a range of explicit powers to implement these functions. These include:

- to provide assistance at its discretion to those who consider that they have been discriminated against if there is an important point of principle involved or if it is unreasonable to expect the person to represent themselves;
- to prepare Codes of Practice for submission to the Minister for Justice, Equality and Law Reform which, if approved, can be relied on in relevant court proceedings;
- to undertake or sponsor research;
- to conduct an inquiry for any purpose connected with its functions and to recommend actions on foot of this inquiry;
- to undertake or sponsor activities related to the dissemination of information;
- to invite a business to carry out an equality review and prepare and implement an equality action plan or, where appropriate and where the business does not have less than fifty employees, to carry out such a review and prepare such an action plan on its own initiative;
- to take cases on its own initiative in certain defined circumstances.

STRATEGIC GOALS

After ten years of investment in the equality infrastructure, significant progress can be reported on the achievement of the responsibilities of the Equality Authority as set down by equality legislation. The meeting of those legislative responsibilities are the focus of the Strategic Goals outlined below.

- 1. The majority of people in Ireland are aware that they have rights and responsibilities under equality legislation and that they have statutory leave entitlements.
- 2. Enhanced access to redress under Irish equality legislation and EU Equal Treatment Directives for people experiencing discrimination.
- 3. A proactive approach by employers and service providers in key sectors to promote equality and achieve compliance with equality legislation.
- 4. Continuous enhancement of evidence for and understanding of equality issues.
- 5. Practical responses made to critical priority issues for groups experiencing inequality.
- 6. An effective and efficient Equality Authority.

Rights & Responsibilities

Strategic Goal 1:

The majority of people in Ireland are aware that they have rights and responsibilities under equality legislation and that they have statutory leave entitlements.

Research by the ESRI on "The Experience of Discrimination in Ireland" identified that 28% of respondents had a lot of knowledge of their rights under equality legislation, 52% had some knowledge and 20% of respondents had little or no knowledge of their rights. Many of the groups found to have a higher risk of discrimination are also those least likely to know their rights. The national and regional consultation exercise for this plan repeatedly emphasised the need and demand to further evolve initiatives to provide information on the equality legislation. The Equality Authority will continue its work in this area of improving awareness of rights and responsibilities in relation to the equality legislation, with a particular focus on groups at higher risk of discrimination.

Objective 1: To Raise Awareness of Rights Under Equality Legislation By:

- a. Developing and implementing innovative information initiatives that
 - target specific groups covered by the equality legislation;
 - engage with other statutory organisations providing information on rights; and
 - support local information provision strategies.
- b. Responding to queries from the general public through a public information centre that is accessible, timely and expert.

Objective 2: To Raise Awareness Of Statutory Leave Entitlements Under The Maternity Protection Acts, Parental Leave Acts And Adoptive Leave Acts By:

- a. Implementing innovative, cost-effective initiatives to develop new channels through which information on statutory leave entitlements is disseminated.
- b. Responding to queries on the Maternity Protection Acts, the Parental Leave Acts and Adoptive Leave Act through an accessible and expert Public Information Centre.

Objective 3: To Raise Awareness Of Responsibilities Under Equality Legislation By:

a. Providing briefing to employers, service providers, and trade unions on caselaw under equality legislation and on good equality and diversity practice.

Key Performance Indicators

- 1.1 Number of queries under the equality legislation responded to by the Public Information Centre (PIC) of the Equality Authority each year: Target 2009-2011: 4,000 per annum.
- 1.2 Number of queries in relation to statutory leave entitlements responded to by the PIC each year:

 Target 2009-2011: 4,000 per annum.
- 1.3 Number of promotional events held: Target 2009-2011: minimum 2 per annum.
- 1.4 Number of hits recorded on Equality Authority summary web-pages providing information on equality legislation:

 Target 2009-2011: 100,000 per annum.

Access To Rights

Strategic Goal 2:

Enhanced access to redress under Irish equality legislation and EU Equal Treatment Directives for people experiencing discrimination.

Research by the ESRI on "The Experience of Discrimination in Ireland" found that 12.5% (over 380,000 people) aged 18 and over reported that they had been discriminated against in the preceding two years on the nine grounds and on other grounds. More than 75% of respondents reported that the discrimination they had reported had some, serious or very serious affect on their lives. However 60% of those who reported discrimination took no further action. Only 6% of those who reported discrimination made a formal response by making an official complaint or taking legal action, rising to 15% among those who judged the impact on them to be serious. The national and regional consultation exercise for this plan emphasised the importance of pursuing a critical mass of casework to further develop a culture of compliance with equality legislation.

Objective 1: Pursue Strategic Casework Within the Resources Available To Further The Elimination Of Discrimination By:

- a. Providing legal advice and representation to claimants under the equality legislation on the basis of criteria established and kept under review by the Equality Authority.
- b. Publishing casework reviews to communicate the learning from this casework.
- c. Engaging in a partnership with trade unions and non-governmental organisations that supports these organisations to give assistance to people experiencing discrimination.

Objective 2: Use Existing Powers Of Equality Authority To Best Strategic Effect Within Resources Available By:

- a. Taking cases under the equality legislation in the name of the Equality Authority as appropriate.
- b. Seeking to act as 'amicus curiae' as appropriate in legal cases where the equality legislation has a relevance.

- c. Preparing Codes of Practice as allowed under the equality legislation as appropriate.
- d. Deploying the law review functions of the Equality Authority and making recommendations for change to the Minister for Justice, Equality and Law Reform as appropriate.

Key Performance Indicators

- 2.1 Number of casefiles progressed per annum under the Employment Equality Acts, Equal Status Acts and Intoxicating Liquor Act: Target 2009-2011: 200 per annum.
- Frequency of use of powers (e.g. cases taken in our own name, *amicus* sought/granted, and/or Codes of Practice):
 Target 2009-2011: 1 per annum.
- 2.3 Publication of casework reviews: Target 2009-2011: minimum 1 per annum.

Partnership For Equality in Employment & Service Provision

Strategic Goal 3:

A proactive approach by employers and service providers in key sectors to promote equality and achieve compliance with equality legislation.

Towards 2016 commits the Government and social partners to 'continue to encourage companies and organisations to meet proactively the challenges of diversity and equality.'

The Equality Authority has engaged in successful partnerships over the previous Strategic Plan to promote awareness of good practice in equality and in this way to improve compliance with the equality legislation by service providers in the public and private sectors. The Equality Authority will continue to develop partnerships and networks with employers and service providers, having found this to be a resource-effective way to promote compliance with the equality legislation. The national and regional consultation exercise for this plan emphasised the need for Equality Authority intervention to support good practice in employment, vocational training, education provision, health services and accommodation provision.

A review on the European Year of Equal Opportunities for All in Ireland by Hibernian Consulting proposed an action plan from the European Year. The Equality Authority has now secured funding from the European Commission's PROGRESS fund to manage a European Year Legacy Action Plan which will enable the Equality Authority to undertake networking initiatives with public and private sector organisations.

Objective 1: To Encourage and Support Initiatives To Promote Equality, Value Diversity And Combat Discrimination In Service Provision In Four Sectors by:

a. Promoting and assisting practices that contribute to equality and non-discrimination in schools, health institutions, housing authorities and private sector accommodation providers.

Objective 2: To Implement Initiatives To Promote Equality, Value Diversity And Combat Discrimination In Employment And Vocational Training By:

- a. Developing and implementing support packages for providers of vocational training and employment services and implement a programme of work through the Equal Opportunities Framework Committee under the Equality Mainstreaming Unit. This action will be part-funded through the European Union.
- b. Supporting the Work Life Balance Framework Committee in its work to promote work-life balance, including through a support scheme for small and medium enterprises.

Objective 3: To Implement An Action Plan That Supports A Legacy From The European Year Of Equal Opportunities For All By:

- a. Supporting a networking of organisations within the private, public, university, local authority, trade union and community and voluntary sectors to support good practice in:
 - promoting equality,
 - accommodating diversity, and
 - eliminating discrimination.
- b. Supporting projects to develop an equality competence in public and private sector organisations.

Objective 4: To Develop Partnership With Organisations That Support Good Equality Practice In New Sectors By:

- a. Engaging with regulatory bodies, funding bodies and bodies responsible for quality marks to include a commitment to equality, diversity and non-discrimination as an explicit part of their roles.
- b. Engaging with organisations including the arts, sports, legal, enterprise support and economic development sectors to promote and support initiatives to promote equality.
- c. Participating actively in initiatives to promote policy for economic development and competitiveness through enhanced diversity and equality.

Objective 5: To act as a resource to Government to develop and apply equality tools in policy making and resource deployment.

- a. Developing equality impact assessment tools to be used by Government departments.
- b. Participating actively in the work of the Equality Proofing Working Group convened by the Department of Justice, Equality and Law Reform.

Key Performance Indicators

- 3.1 Number of Equality Mainstreaming Unit (EMU) support packages developed: Target 2009-2011: 2 per annum
- 3.2 Percentage of labour market programme providers supported by the Equality Mainstreaming Unit, undertaking equality actions:
 Target 2009-2011: 100%
- 3.3 Number of Small and Medium Enterprises (SMEs) assisted/granted through Equal Opportunities Framework Committee scheme: Target 2009-2011: 40 per annum.
- 3.4 Percentage of enterprises supported by Equal Opportunities Framework Committee undertaking additional equality actions:

 Target 2009-2011: Ten percentage points increase over baseline per annum
- 3.5 Number of follow-on initiatives on equality undertaken by organisations funded as part of the European Year Legacy Action Plan:
 Target 2009-2011: 11 actions
- 3.6 Number of equality impact assessments supported: Target 2009-2011: 1 per annum

Evidence For & Understanding of Equality

Strategic Goal 4:

Continuous enhancement of evidence for and understanding of equality issues.

'Towards 2016' states that 'The achievement of a fairer society and equality for all citizens is a key principle of the partnership approach. Policies and programmes at each stage of the lifecycle will be implemented having due regard to the need to promote equality of opportunity'. In this context, the key priorities to be pursued include: 'Collecting data to support policies for the promotion of equality of opportunity across the nine grounds covered by equality legislation.'

The national and regional consultation exercise for this plan identified the need to develop the evidence base on equality and discrimination and to further develop the business case for equality. It also confirmed the need for communication strategies that build support for equality issues.

Objective 1: To Build the Evidence Base on Diversity, Current Inequality and Discrimination and of Effective Responses to These Issues by:

- a. Promoting data collection on equality, diversity and discrimination and in particular with the cooperation of the Central Statistics Office.
- b. Developing research and survey projects to build evidence and understanding of current inequalities and discrimination.
- c. Benchmarking institutional responses and public attitudes to equality.
- d. Further researching the business case and the economic development case for equality and diversity.
- e. Communicating this research in a manner that enables it to contribute to the elimination of discrimination and the promotion of equality.

Objective 2: To Enhance Public Understanding of Equality, Diversity and Discrimination by:

- a. Promoting and supporting public debate on key and emerging equality issues.
- b. Engaging proactively with groups across the nine grounds.
- c. Implementing public education initiatives to build awareness and understanding of equality issues and a commitment to addressing these issues.
- d. Developing and implementing communication strategies targeting key stakeholders at national, regional and local level.
- e. Implementing a strategy to build awareness of stereotyping across the nine grounds covered by the equality legislation.
- f. Developing Equality Authority capacity to provide training to support effective action to promote equality within organisations in the public and private sectors. Establish an advisory committee on equality and diversity training.

Objective 3: To Engage With The European Union And Other International Institutions And With Equality Bodies Across The European Union By:

- a. Participating actively on the European Commission Advisory Committee for Equality of Opportunity between Women and Men.
- b. Sustaining a formal and direct dialogue with the institutions of the European Union, of the Council of Europe, and of the United Nations, as appropriate.
- c. Participating in the development and work of EQUINET, the European network of specialised equality bodies.
- d. Maintaining a partnership with the Equality Commission for Northern Ireland. An annual joint meeting of the Boards of both organisations will be convened to define joint initiatives.

Key Performance Indicators

- Number of presentations delivered to external events (i.e. events not organised by the Equality Authority):
 Target 2009-2011: 40 per annum.
- 4.2 Number of events (conferences, seminars, launches etc.) organised by the Equality Authority:
 Target 2009-2011: 5 per annum.
- 4.3 Number of activities on stereotyping undertaken: Target 2009-2011: 3 over the 2009-2011 period.
- 4.4 Number of research reports published: Target 2009-2011: 3 per annum

Equality Issues

Strategic Goal 5:

Practical responses made to critical priority issues for groups experiencing inequality.

The *Towards 2016* Review and Transitional Agreement 2008-2009 sets out a vision of Ireland of the future based on 'a strong commitment to social justice and equality'. The national and regional consultation exercise for this plan identified a range of critical priority issues for groups experiencing inequality in order to advance this vision. *Towards 2016* specifically prioritises action to respond to the needs of people with disabilities and older people. It also includes a commitment to explore the causes of the gender pay gap with a view to reducing it further. Equally the European Pact on Gender Equality commits EU Governments to take measures to promote equal pay for equal work and to mainstream a gender perspective into all public activities.

The Equality Authority's high levels of case-files involving allegations of pregnancy related discrimination, failure to make reasonable accommodation for customers and employees with disabilities, discrimination experienced by migrant workers and discrimination against older people on the age ground also highlight the continuing need for action on ground-specific equality issues. In addition, research work by the Equality Authority has emphasised the importance of action to address the gender pay gap, the sharing of care responsibilities between men and women, homophobic bullying in schools and the need for positive action in employment for Travellers. Similarly, the work undertaken by equality Non-Governmental Organisations (NGOs) on equality issues through the European Year of Equal Opportunities for All's Burning Issues funding programme pointed to the continuing need for initiatives to highlight or to combat persistent inequalities experienced by specific equality grounds.

The European Year Legacy Action Plan will provide an opportunity to support initiatives on particular equality issues as will the Equality Mainstreaming Unit, which is part-funded by the European Social Fund.

Particular opportunities have emerged to progress priority issues with the National Women's Strategy, the Office of the Minister for Integration, the National Disability Strategy, the proposed National Strategy for Carers, the initiatives taken by the HSE in relation to transsexual people and the report of the Working Group on Domestic Partnerships.

Objective 1: To Support Initiatives Responding to Priority Issues for Specific Equality Grounds through the European Year Legacy Action Plan by:

- a. Promoting the status of men as carers, in particular the equal sharing of caring rights and responsibilities between women and men and continuing dialogue with men's organisations on issues of equality for men.
- b. Promoting access to a health treatment path for transsexual people. Supporting recognition for transsexual people in the gender with which they identify.
- c. Supporting service providers and employers in meeting their responsibilities under Equal Status legislation.
- d. Promoting family diversity day. Supporting a response to accommodation issues for lone parents.
- e. Supporting the recommendation of the Working Group on Domestic Partnerships on partnership rights for lesbian and gay people.
- f. Supporting action to achieve access for people with disabilities.
- g. Promoting access for Travellers to mainstream services and an acknowledgement of Traveller ethnic identity.

Objective 2: To Take Initiatives That Further Equality For Groups And Individuals Experiencing Inequality by:

- a. Responding to gender equality issues for women, in particular the gender pay gap and supporting the implementation of the National Women's Strategy.
- b. Promoting positive action in the employment of Travellers.
- c. Highlighting and supporting practical responses to ageism experienced by older people.
- d. Supporting employers to develop integrated workplaces in a context of a culturally diverse workforce. This initiative will be developed in partnership with the Office of the Minister for Integration and the social partners.
- e. Responding to gender equality issues for men including their impact on health and wellbeing.

- f. Contributing to an understanding of and appropriate responses to religious diversity in Ireland.
- g. Supporting a safe learning environment for lesbian, gay and bisexual people in schools.
- h. Developing an understanding of, and responses to, the experience of multiple discrimination.

Key Performance Indicators

- Number of equality projects developed drawing on EU and national opportunities (to support good practice, to contribute to policy formation and to develop profile for and knowledge about these issues).

 Target 2009-2011: 3 per annum.
- 5.2 Number of equality actions taken to promote equality for groups experiencing inequality.

Target 2009-2001: 2 per annum

Capacity Building

Strategic Goal 6:

An Effective and Efficient Equality Authority.

The environmental context for the Equality Authority is subject to significant change:-

- The Equality Authority is part of the Government decentralisation programme.
- The reform agenda emerging from the recent OECD report/Task Force on the Public Service will be relevant to the Equality Authority.
- The Equality Authority is subject to the financial constraints affecting the public sector.

It is the goal of the Equality Authority to be as efficient and effective as possible within this changing environment.

Objective 1: To Achieve A Stabilised Environment For The Equality Authority By:

- a. Implementing and reviewing good governance policies and practices.
- b. Implementing Government decentralisation policy and ensure the efficient operation of the Equality Authority out of two locations.
- c. Seeking the human and financial resources required for the effective implementation of this Strategic Plan and to respond effectively to the scale and nature of discrimination experienced across the nine grounds.
- d. Responding to public sector reform in a manner that sustains and enhances the capacity of the Equality Authority to carry out its functions.
- e. Developing the equality expertise and capacity of new Equality Authority staff members in a context of significant organisational change.

Objective 2: To Enhance The Capacity Of The Equality Authority Taking Due Regard To Resources And Environment By:

a. Further developing knowledge and skills within the Board and the staff of the Equality Authority to ensure the effective implementation of this Strategic Plan.

- b. Developing and implementing a new customer service action plan and customer charter.
- c. Sustaining and expanding the contact management systems of the Equality Authority.
- d. Continuing to evaluate the work programme of the Equality Authority
- e. Putting in place a recognised internal quality assurance system.

Key Performance Indicators

- 6.1 Staff training and development plan in place and reviewed annually.
- 6.2 Staff participation in and completion of integrated PMDS cycle.
- 6.3 Annual review of governance systems and compliance
- 6.4 Customer Service Action Plan published and implemented.
- 6.5 Internal Quality Assurance System in place.

Contextual Indicators

A number of relevant and broad contextual indicators will become available during the life of this Strategic Plan. The Equality Authority will track and report on these as they relate to its strategic goals in their implementation over the coming three-year period.

Rights & Responsibilities

[Strategic Goal 1]

Percentage of adult population who have a good understanding of their rights under equality law.

Access to Redress

[Strategic Goal 2]

Percentage of persons experiencing discrimination who take action.

Partnership for Equality in Employment & Service Provision

[Strategic Goal 3]

Percentage of firms/organisations implementing equality and diversity actions.

Evidence For & Understanding of Equality

[Strategic Goal 4]

Percentage of population supporting further action on equality.

It is not possible to claim a direct correlation between the actions of the Equality Authority alone under this plan and these indicators. Whether or not the indicator goes up or down may be related to many factors as well as actions of the Equality Authority, but also to actions by other economic or social actors. However the contextual indicators identified can usefully guide the activity of the Equality Authority in a number of ways. In particular should any of these indicators perform negatively, they would act as a warning signal to prioritise reviewing and possibly refocusing activity related to that area.

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