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Block 1, Miesian Plaza
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Sent by email only to: Carol.Baxter@equality.gov.ie

RE: General Scheme of the Equality (Miscellaneous Provisions) Bill 2024

Dear Carol,

I refer to the above General Scheme of the Equality (Miscellaneous Provisions) Bill 2024 ('the General Scheme') which the Department of Children, Equality, Disability, Integration and Youth ('the Department') shared with the Commission on 3 December 2024, and which has now been published.

In accordance with the Irish Human Rights and Equality Commission Act 2014, the Commission is mandated to keep under review the adequacy and effectiveness of law and practice in the State relating to the protection of human rights and equality, and to examine any legislative proposal and report its views on any implications for human rights or equality.¹ In this regard, the Commission provided advice to the Department in our submissions on the Review of the Equality Acts of December 2021 ('2021 Submission')² and July 2023 ('2023 Submission').³ We welcome that legislation on foot of the Review of the Equality Acts, which was announced by Minister O'Gorman in June 2021, has been progressed.

In particular, we welcome those provisions of the General Scheme where it appears that the recommendations of the Commission have been implemented, including in relation to repeal of section 19 of the Intoxicating Liquor Act 2003, which we have previously highlighted may be incompatible with the requirements of EU law including the Race Equality Directive,⁴ the removal of differential rates of pay for disabled people, the requirement for objective

¹ Section 10(2)(b)&(c), Irish Human Rights and Equality Commission Act 2014.

² <https://www.ihrec.ie/documents/recommendations-on-the-review-of-the-equality-acts/>

³ <https://www.ihrec.ie/documents/submission-on-the-review-of-the-equality-acts/>

⁴ IHREC, Report of a review of section 19 of the Intoxicating Liquor Act 2003 carried out pursuant to section 30 of the Irish Human Rights and Equality Commission Act 2014 (February 2022), p.48-51:
<https://www.ihrec.ie/documents/report-of-a-review-of-section-19-of-the-intoxicating-liquor-act-2005-carried-out-pursuant-to-section-30-of-the-irish-human-rights-and-equality-commission-act-2014/>



justification in respect of qualifications under section 36(4) of the Employment Equality Acts ('the EEA'), and the amendments to the provisions relating to victimisation under the Equal Status Acts ('the ESA') and vocational training under the EEA.

However, we also note those provisions where it seems that there has been only partial implementation or no implementation of the Commission's recommendations, including in relation to amendments to provisions regarding redress, time limits, compensation limits, reasonable accommodation and intersectional discrimination.

With regard to the relevant heads of the General Scheme, the appendix below sets out the Commission's advice in relation to these matters, and which was previously provided to the Department in our 2021 Submission and 2023 Submission.

We acknowledge that the General Scheme, if amended in line with the Commission's advice as detailed in the Appendix, represents some progress in respect of the review of equality legislation.⁵ We also understand that this represents the first phase of reform and modernisation of the State's equality legislation. However, we are disappointed that a considerable amount of the Commission's advice and recommendations, as set out in our 2021 submission and developed in our 2023 submission, have not been addressed. Whilst the Commission reiterates its advice and recommendations in respect of all matters considered in these submissions, we note the following significant omissions from this General Scheme:

- Amendments to provisions relating to indirect discrimination (p.24-25, 2023 Submission)
- Amendment of the ESA to include public functions in the definition of services (p.43, 2023 Submission)
- Repeal of section 14(1)(a) of the ESA (p.46, 2023 Submission)
- Amendment of the gender ground to refer to, and define, gender identity, gender expression, and sex characteristic (p.60-62, 2023 Submission)
- Introduction of a ground prohibiting discrimination on socio-economic status (p.50-57, 2023 Submission)
- Provisions to strengthen and expand the Public Sector Equality and Human Rights Duty , (p.74-76, 2023 Submission)
- Provisions relating to the collection and publication of disaggregated equality data (p.90-92, 2023 Submission)

⁵ We note that the Maternity Protection, Employment Equality and Preservation of Certain Records Act 2024 implements certain provisions relating to non-disclosure agreements. Please see the Commission's letter to Minister O'Gorman in relation to this legislation of 26 August 2024.



You will be aware that the Commission, as the National Equality Body, has invested significant resources into its engagement with the review of the Equality Acts including two substantial submissions, the establishment of the Future of Equality Legislation Advisory Committee, a policy statement on socio-economic status as a discriminatory ground, and engagement with your Departmental officials. The Commission's two submissions continue to represent our view on how to reform the Equality Acts in order to create the next generation of equality legislation. There remains a significant opportunity to reform and modernise Ireland's equality legislation, which will have a meaningful impact on the lives of individuals, and on the realisation of a more equal society. We strongly recommend that this project continues to be prioritised.

We note the suggestion that provisions to transpose the EU Directives on Standards for Equality Bodies could be included in the Equality (Miscellaneous Provisions) Bill. However, we expect full and ambitious transposition of the Directives, which will necessarily take some time to allow for proper consideration of the issues arising in respect of same. This should not lead to further delay of the Equality (Miscellaneous Provisions) Bill which has already been delayed from the previous government. As such, we do not consider that this legislation should be used for the purpose of transposing the Directives.

We note that there is a commitment in the recently published Programme for Government to examine the compensation limit for claims made under the Equal Status Act 2000, however, there is no commitment in respect of the Equality (Miscellaneous Provisions) Bill nor to progressing the Review of the Equality Acts. We expect that the Equality (Miscellaneous Provisions) Bill will be prioritised in the Government's first legislative programme. In accordance with our mandate, we will continue to analyse this legislation as it progresses through the legislative process. My team and I remain available for further communication with you on the matters raised in our submissions.

In line with our publications policy, this letter will be published on our website. This policy only pertains to IHREC-issued communications, and not to correspondence received by us.

Yours sincerely

Deirdre Malone

Director



APPENDIX

EU Pay Transparency Directive (Heads 4 & 5)

Although the Commission did not make a recommendation in respect of Article 5 of the Pay Transparency Directive in our submissions to the Equality Act Reviews, we did make recommendations in relation to the Directive. Namely, that all reporting data under the Gender Pay Gap Information Act 2021 should be kept within a central location to allow public access to all employer reports; that a requirement to undertake detailed joint pay assessment where reporting has shown a pay gap of at least 5% should be introduced into Irish legislation in line with the EU Pay Transparency Directive; and that legislation be introduced to extend pay gap reporting to all grounds in the EEA.⁶

Vocational Training Courses (Head 6)

With regard to vocational training, the Commission noted that section 12 of the EEA contains a limited definition relating only to courses that are ‘exclusively concerned with training’ for an occupational activity. Training courses not covered by section 12 of the EEA are covered by section 7 of the ESA. The limited definition of vocational training under the EEA may indicate an inadequate transposition of EU law on the basis that the duty to provide reasonable accommodation under the ESA is less extensive than that required under Article 5 of the Framework Employment Directive.⁷ The Commission recommends that the definition of vocational training in the Employment Equality Acts be amended to ensure compliance with the Framework Employment Directive.⁸

Positive Action in the Employment Equality Acts (Head 7)

The Commission recommends that Directive 2022/2381/EU on improving the gender balance among directors of listed companies should be transposed into Irish law in the context of the Equality Acts review. We also recommend that consideration be given to extending the provisions of Directive 2022/2381/EU on improving the gender balance among directors of listed companies permitting employers to take positive action measures across all grounds

⁶ IHREC, [Submission on the Review of the Equality Acts](#) (2023), pp.79-80.

⁷ [Framework Employment Directive 78/2000](#).

⁸ IHREC, [Submission on the Review of the Equality Acts](#) (2021), pp. 59-60.



under the Employment Equality Act, and to broaden its scope to positions outside of director roles.⁹

Removal of differential pay for Disabled People (Head 8)

In both our submissions to the review of the Equality Acts, the Commission has recommended that section 35(1) on different rates of remuneration for disabled people be removed from the EEA.¹⁰ The Commission noted that it may have been intended that section 35(1) of the EEA, allowing employers to provide different rates of remuneration for disabled persons, was to provide an element of support for sheltered or supported employment. However, the Commission is of the view that this is a major qualification on the principle of equal pay for disabled persons and, in fact, perpetuates inequality.¹¹ Such an exemption is not provided for in the Framework Employment Directive and a strong argument can be made that this provision is not in compliance with the positive action provision under article 7 or the reasonable accommodation measures provided for under article 5. The provision also appears to run contrary to the UNCRPD.¹²

Requirement of Educational Attainment (Head 9)

Under section 36(4) of the EEA, it is not unlawful for an employer to require that an employee holds:

- (a) specified educational, technical or professional qualification which is a generally accepted qualification in the State in respect of the particular position; or
- (b) the production and evaluation of information about any qualification other than such a specified qualification.

The Commission notes that this provision gives rise to potential indirect discrimination on a number of grounds, particularly in light of the approach by the Labour Court to viewing the provision as a complete defence.¹³ In the absence of any obligation for the qualification requirement to be objectively justified, it is difficult to see how the measure is justifiable, legitimate and proportionate to its intention. The Commission therefore recommends that

⁹ IHREC, [Submission on the Review of the Equality Acts](#) (2023), pp. 78-79.

¹⁰ IHREC, [Submission on the Review of the Equality Acts](#) (2023), p. 43; IHREC, [Submission on the Review of the Equality Acts](#) (2021), pp. 36-37.

¹¹ Equality Authority, Overview of the Employment Equality Act 1998 and the Equal Status Act 2000 (2003), pp. 38-39.

¹² IHREC, [Submission on the Review of the Equality Acts](#) (2021), pp. 36-37.

¹³ *Health Services Directive v Fitzgerald* EDA1915.



section 36(4) of the Employment Equality Acts is amended in order to include a test of objective justification in respect to the specified qualification.¹⁴

Six-month Time Limit (Head 10)

The Commission recommends section 77(5)(a) of the EEA and section 21(6)(a) of the ESA are amended to provide that the time limits for discrimination complaints run from the date of knowledge of the discrimination, or from the date a grievance procedure or internal procedure in relation to the discrimination ended.¹⁵ The Commission has previously highlighted that the six-month time limit poses particular problems under the EEA, including in circumstances when an employee is pregnant or on maternity leave. Further, the six-month time limit makes no allowances for attempts to resolve issues through internal procedures or invoking grievance procedures. The Labour Court has repeatedly found that the same strict time limit applies even where an employee is delayed in making their complaint because they are using an internal grievance procedure.¹⁶

Amendments to Redress (Head 11)

The Commission has repeatedly recommended the removal of the limits on the amount of compensation that can be awarded under the EEA and ESA. The Commission has highlighted that there is symbolic value to the limit at which compensation is set, which demonstrates the seriousness with which discrimination is taken by the legislature. We also highlighted that there is an obvious link between the maximum amount of compensation that can be awarded and the dissuasive and deterrent effect of the law.

In this regard, the Commission recommends section 82 of the EEA and section 27 of the ESA be replaced with provisions that explicitly provide that orders for redress must be effective, proportionate and dissuasive; remove the limits on compensation which may be ordered; provide for the payment of interest; provide that orders for compensation may be made in favour of IHREC; and provide that, where an order has been made against a licenced premises

¹⁴ IHREC, [Submission on the Review of the Equality Acts](#) (2021), p. 39.

¹⁵ IHREC, [Submission on the Review of the Equality Acts](#) (2023), p. 28.

¹⁶ *Ibid*: For example, in two 2019 cases, the Labour Court underlined that the pursuit of an internal grievance does not stop the time limit running: [Pfizer Pharmaceuticals Ireland Ltd. v Whelan](#), EDA1924, 12 July 2019; [Beaumont Hospital v Kaunda](#), EDA1930, 3 September 2019.



under the Employment Equality Act or Equal Status Act, any person may make an objection, related to the prohibited conduct concerned, to the renewal of the licence.¹⁷

Victimisation (Head 12)

The Commission notes the inconsistency in the framing of victimisation under the Equality Acts.¹⁸ Under the ESA, victimisation is constructed as an additional ground of discrimination requiring a comparator, whereas no such comparator is necessary under the EEA. Article 9 of the Racial Equality Directive sets out that Member States shall take all necessary measures to protect victims of discrimination from adverse treatment in response to their seeking of enforcement of the principle of equal treatment.¹⁹

The construction of victimisation under the ESA requires a complainant to show that compared to another person in a similar situation they were treated less favourably. Such a requirement is not prescribed by the Racial Equality Directive, or the Gender Goods and Services Directive,²⁰ and this has been argued to potentially raise issues regarding the ESA's compliance with EU law. The Commission therefore recommends the ESA be amended to include a standalone provision for victimisation, which requires only the establishment that a detriment has been suffered and does not have any comparator requirement.²¹

Intersectional Discrimination (Head 13)

The Commission has repeatedly called for the Equality Acts to be amended to provide for intersectional discrimination.²² In addition, the Commission has recommended that sections

¹⁷ IHREC, [Submission to the Equality Acts Review](#) (2021), pp. 42-43; IHREC, [Submission to the Equality Acts Review](#) (2023), pp. 31-32.

¹⁸ See section 74(2) EEA and section 4 ESA.

¹⁹ [Racial Equality Directive](#).

²⁰ [Gender Goods and Services Directive](#).

²¹ IHREC, [Submission to the Equality Acts Review \(2021\)](#), p. 56.

²² IHREC, [Submission to the Equality Acts Review](#) (2021), pp. 26-29; IHREC, [Submission on the Review of the Equality Acts](#) (2023), pp. 27-28. See also: IHREC, [Submission to the Equality Acts Review](#) (2021), p. 56; IHREC, [Submission to the United Nations Committee on the Elimination of Racial Discrimination on Ireland's Combined 5th to 9th Report](#), (2019) pp. 17-18; IHREC, [Submission to UN Committee on the Elimination of Discrimination](#)



25(1A) of the Equal Status Act and 79 (1A) of the Employment Equality Act be amended to provide for intersectional discrimination by removing reference to a decision being made on each claim, and including the clause ‘or on a combination of the grounds’ in subsection (a).²³

Reasonable Accommodation under the Equal Status Acts (Head 14)

IHREC, Submission on the Review of the Equality Acts (2021)

Article 5(3) of the UNCPRD requires States Parties to take all appropriate steps to ensure that reasonable accommodation is provided to disabled people.²⁴ While Ireland ratified the UNCPRD in 2018, the Commission is concerned that the requirement of reasonable accommodation under article 5 of the UNCPRD is not incorporated into Irish law to the fullest extent possible.²⁵ Limiting accessibility to goods and services by imposing the lesser burden of ‘nominal cost’ on providers of goods and services²⁶ has the potential to significantly impact the day-to-day lives of disabled persons.²⁷

In light of this, the Commission has made the following recommendations:²⁸

- The Commission has therefore recommended that the need and desirability of coherence in reasonable accommodation standards across all fields of equality legislation merit a reassessment of the balance being struck between the right to private property and the principles of social justice, in light of evolving international and EU law developments.

[Against Women](#), (2017) pp. 34-35; and IHREC, [Submission to the Citizens’ Assembly on Gender Equality](#), (2020) p. 28.

²³ [Submission on the Review of the Equality Acts](#) (2023), p. 73.

²⁴ Article 5(3), [UN Convention on the Rights of Persons with Disabilities](#).

²⁵ See also L. Buckley and S. Quinlivan, ‘Reasonable accommodation in Irish equality law: An incomplete transformation’ (2021) 41(1) *Legal Studies* 37: ‘[...] Irish legislation could still be considerably improved by remodelling current legislation to comply as far as constitutionally possible with the CRPD duty.’

²⁶ The higher standard of ‘disproportionate burden’ is applied to employers under section 16(3) (b) EEA. See also IHREC, [Observations on the General Scheme of the Equality / Disability \(Miscellaneous Provisions\) Bill](#) (2016).

²⁷ Disability Legislation Consultation Group, [Equal Citizens: Proposals for Core Elements of Disability Legislation](#) (2003): “A key issue for the DLCCG is that ‘reasonable accommodation’ should not be limited by the concept of ‘nominal cost’ when applied to public bodies.”

²⁸ IHREC, [Submission to the Equality Acts Review](#) (2021), pp. 51-53.



- The Commission also recommends that the State consider how reasonable accommodation obligations might be extended to further secure the rights of disabled people, for example through the provision of grants to small businesses and training on reasonable accommodation in various service sectors where barriers are identified.
- The Commission recommends that the Equal Status Acts be amended to incorporate a relatively increased burden for larger providers of goods and services, which might, for example, be based on a turnover threshold.
- The Commission recommends that the current legislative provision on the right to reasonable accommodation is made fully compliant with the UNCRPD.
- The Commission recommends that the Equal Status Acts be amended to remove the ‘impossible or unduly difficult’ test in respect of the provision of reasonable accommodation.

IHREC, Submission on the Review of the Equality Acts (2023)

The FELAC has raised some concerns with [the] definition [of reasonable accommodation under section 4 of the ESA], finding that it is not compliant with the UNCRPD in a number of ways, including:

- the reference to ‘*special* treatment or facilities’;
- the ‘impossible or unduly difficult’ participation threshold;²⁹
- the ‘nominal cost’ ceiling;³⁰

²⁹ See for example *Harrington v Cavan Crystal Hotel*, DEC-S2008-117

³⁰ The ‘nominal cost’ standard was introduced by the Oireachtas in response to the case of *Re Article 26 and the Employment Equality Bill 1996* [1997] 2 IR 321 where the Supreme Court found that the EEA reasonable accommodation provision was unconstitutional and imposed constraints on reasonable accommodation. The EU Framework Directive on Employment Equality, transposed in 2004, extended the threshold in the employment context only from ‘nominal cost’ to the standard that employers should not incur a disproportionate burden.’ The respondent should seek out available supports: *Two Complainants v A Primary School*, DEC-S2006-028; *Parents (on behalf of their son) v Board of Management of a Gaelscoil*, DEC-S2016-053. However, case law on this is inconsistent, and ‘nominal cost’ is often not interrogated.



- the term ‘reasonable’ being used to assess extent of measures required on a case-by-case basis³¹ (the threshold should be assessed instead solely with reference to disproportionate burden);
- the scant guidance for service providers; and
- the duty to avail of government supports is not explicit.

The government has previously proposed amendments to reasonable accommodation in the Disability (Miscellaneous Provisions) Bill 2016 and the General Scheme of the Assisted Decision-Making (Capacity) (Amendment) Bill 2021. These proposals intended to leave the current definition intact, but add a subsection raising the applicable threshold to ‘disproportionate burden’ for public bodies, credit unions, financial institutions, telecommunications and public transport providers.³² The FELAC has advised that such proposals are inadequate to bring reasonable accommodation into alignment with the UNCRPD.³³

It is also important to note that although the UNCRPD is useful as a baseline, it is still reactive and individualised in nature, rather than striving for universal access for all. To remedy this, it may be useful to have regard to draft reasonable accommodation provisions in a proposed EU Directive,³⁴ which include an anticipatory element to the duty.³⁵ The inclusion of an anticipatory element to the reasonable accommodation duty would be an effective method of bridging the divide between an individualised conceptualisation of reasonable accommodation, and universal access measures.

³¹ See for example, *Cahill v Minister for Education* [2017] IESC 29.

³² The proposals also provide some guidance on ‘disproportionate burden’: that account shall be taken, in particular, of (i) the financial and other costs entailed, (ii) the scale and financial resources of the service provider, and (iii) the possibility of obtaining public funding or other assistance.

³³ See also the Law Society, [Submission on the Review of the Equality Acts](#), (2021: 3.37-38) which states that reliance on the 1997 Supreme Court judgment is ‘flawed’. Further, the rationale for selection of particular private service providers (those regulated for quality of service provision) may be constitutionally suspect.

³⁴ [Proposal for a Council Directive on implementing the principle of equal treatment between persons irrespective of religion or belief, disability, age or sexual orientation, COM2008/426](#).

³⁵ COM2008/426, Article 4(1)(a) – measures necessary... “shall be provided by anticipation”; an anticipatory element of the reasonable accommodation duty is provided for in the UK and Norway, see Lawson & Orchard 2021; Liisberg 2015.



An effective definition of reasonable accommodation, based on the UNCRPD, the EU framework employment directive, and the draft EU provision, could be the following:

- (1) In order to guarantee compliance with the principle of equal treatment and ensure equality of access, inclusion and participation in relation to disabled people, reasonable accommodation shall be provided.
- (2) For the purposes of this Act, discrimination includes a refusal or failure to provide reasonable accommodation to a person with a disability.
- (3) Reasonable accommodation means appropriate modifications and adjustments, where needed in a particular case to ensure effective non-discriminatory access to services, unless this would impose a disproportionate burden.
- (4) A service provider shall consult with the person concerned in determining the modifications and adjustments required.
- (5) In determining whether the provision of appropriate modifications and adjustments would impose a disproportionate burden, account shall be taken, in particular, of
 - (i) the financial and other costs entailed,
 - (ii) the scale and financial resources of the service provider,
 - (iii) the possibility of obtaining public funding or other assistance, and
 - (iv) any third party benefits
- (6) In the case of a 'public body' within the meaning of section 2(1) of the Irish Human Rights and Equality Commission Act 2014, the measures necessary to enable persons with disabilities to have effective non-discriminatory access to services shall be provided by anticipation, including through appropriate modifications or adjustments. Such measures should not impose a disproportionate burden.³⁶

The Commission recommends the definition of reasonable accommodation in the Equal Status Act should be amended to bring it into compliance with the UN Convention on the Rights of Persons with Disabilities.

Victimisation (Head 15 new section)

See above under Head 12

Extension of Time Limits to apply for Redress (Head 16)

³⁶ It should be noted that public bodies should already be undertaking these measures in order to comply with the public sector duty under s.42 of the IHREC Act 2014.



The Commission recommends that written notification of a complaint within a two month period should be optional.³⁷

The Commission also recommends that section 77(5)(a) of the Employment Equality Act and section 21(6)(a) of the Equal Status Act are amended to provide that the time limits for discrimination complaints run from the date of knowledge of the discrimination, or from the date a grievance procedure or internal procedure in relation to the discrimination ended.³⁸

Compensation Limits (Head 17)

The Commission has repeatedly recommended³⁹ the removal of the limits on the amount of compensation that can be awarded under the EEA and the ESA and further recommends that they are replaced with a coherent, accessible compensation system that calculates awards relative to the size of the enterprise involved and ensures compliance with the requirements of the EU Directives.⁴⁰

In this regard, the Commission recommends section 82 of the EEA and section 27 of the ESA be replaced with provisions that explicitly provide that orders for redress must be effective, proportionate and dissuasive; remove the limits on compensation which may be ordered; provide for the payment of interest; provide that orders for compensation may be made in favour of IHREC; and provide that, where an order has been made against a licenced premises under the Employment Equality Act or Equal Status Act, any person may make an objection, related to the prohibited conduct concerned, to the renewal of the licence.⁴¹

Jurisdictional Issues - Intoxicating Liquor Act 2003 (Head 18)

³⁷ IHREC, [Submission to the Equality Acts Review](#) (2021), pp. 48-49.

³⁸ IHREC, [Submission on the Review of the Equality Acts](#) (2023), pp. 27-28.

³⁹ Equality Authority, *Overview of the Employment Equality Act 1998 and the Equal Status Act 2000* (2003) 20; Equality Authority, [Embedding Equality in Immigration Policy: Submission on the discussion document of the Department of Justice, Equality and Law Reform on the Immigration and Residence Bill](#) (2006) 12; IHRC, [Observations on the Equality Bill](#) (2004) 3-4; IHREC, [Submission to UN Committee on the Elimination of Discrimination Against Women](#) (2017) 35-36; IHREC, [Comments on Ireland's 16th National Report on the European Social Charter](#) (2019) 46; and IHREC, [Submission to the Citizens' Assembly on Gender Equality](#) (2020) 28-29.

⁴⁰ IHREC, [Submission to the Equality Acts Review](#) (2021), pp. 40-41.

⁴¹ IHREC, [Submission to the Equality Acts Review](#) (2021), pp. 42-43; IHREC, [Submission to the Equality Acts Review](#) (2023), pp. 32-33.



The Commission has repeatedly highlighted that the transfer of jurisdiction to the District Court in relation to complaints of discrimination that occur on or at the point of entry to licensed premises, imposes a fundamentally more onerous process for people wishing to bring complaints. The Commission notes the deterrent effect and inequality of arms, particularly as it is the complainant who is more likely to have no access to legal representation. We further note that criticisms have been raised that the District Court is less efficient and takes place in an adversarial and public context, as opposed to the more complainant-centric approach of the WRC. Incidents that take place in a part of the premises not covered by the licence also remain under the jurisdiction of the WRC, which can create confusion in the case of mixed-use premises such as hotels or restaurants.⁴²

In both our submissions to the review of the Equality Acts, the Commission has recommended the State return complaints of discrimination in licensed premises to the purview of the Equal Status Acts and the jurisdiction of the Workplace Relations Commission by repealing section 19 of the Intoxicating Liquor Act 2003.⁴³

⁴² [Submission to the Equality Acts Review](#) (2023), pp. 35-36.

⁴³ IHREC, [Submission to the Equality Acts Review](#) (2021), pp. 63-66; [Submission to the Equality Acts Review](#) (2023), pp. 35-36.