

NGO Alliance Against Racism

**Submission to the 12th Session of the Working Group
on the Universal Periodic Review of Ireland.**

March 2011

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A. Background

1. This joint submission has been prepared on behalf of the NGO Alliance Against Racism (NAAR), a network of over fifty non-governmental organisations (NGOs) working on a broad range of community and human rights issues with a focus on anti-racism and non-discrimination.¹ This report has been informed by recent submissions by NAAR to the UN Committee on the Elimination of Racial Discrimination and by related consultations with member organisations.² The participating organisations are each concerned with some but not all of the issues covered in this report, and the views expressed do not necessarily reflect the policies and positions of each of the contributing organisations. Rather, the report reflects a collective vision of human rights and anti-racism in Ireland.

2. Since 2008, Ireland has faced stark economic challenges. These challenges persist today and will persist into the future. However, they cannot be used to justify retrograde steps and a failure to address racism and discrimination faced by people in the State.

B. Constitutional and legislative framework

3. Ireland has ratified six international human rights treaties. For the most part, they have not been incorporated into domestic law,³ denying the full protections of the treaties to the people in Ireland. **NAAR recommends that the State ratify and incorporate into national law the international human rights treaties and protocols to which it is not yet a party including the UN Migrant Workers Convention on the Protection of the Rights of All Migrant Workers and Members of their Families 1990 and the International Labour Organisation Migration for Employment Convention (Revised) 1949. The State should fully incorporate those to which it is already a party. All reservations to these treaties should be withdrawn.**

C. Protection and promotion of human rights

Funding of national anti-racism and human rights bodies

4. In response to the economic crisis faced by Ireland over the past three years, the State has introduced austerity measures which have disproportionately and severely infringed upon the capacity of human rights and anti-racism bodies to fully execute their functions. Bodies particularly affected include the Irish Human Rights Commission which suffered a budget cut of

¹ See Annex 1 for a full list of endorsing organisations.

² See Annex 2 for recent submissions by NAAR to the Committee on the Elimination of Racial Discrimination.

³ Ireland is a party to the UN Convention on the Rights of the Child, the UN Convention on the Elimination of All Forms of Racial Discrimination, the UN Convention on the Elimination of Discrimination Against Women, the UN International Covenant on Civil and Political Rights, the UN International Covenant on Economic, Social and Cultural Rights and the UN Convention Against Torture and other Cruel or Inhuman Treatment or Punishment. It has only incorporated aspects of the latter.

32% and the Equality Authority which sustained a 43% reduction in funding.⁴ The National Consultative Committee on Racism and Interculturalism (NCCRI)⁵ lost its funding entirely and was closed down. While it was to be subsumed into a government department there is no evidence of this.

5. As a result of these cuts, the State is without a countrywide independent monitoring body of racist incidents or a provider of anti-racism training at a national level. Moreover, with the loss of these bodies and their expertise, Ireland has lost key political leadership in the anti-discrimination field and a vacuum remains in the high level representation of these issues at a national level. The CERD Committee has recently recommended that budget cuts should not negatively impact the ability of these bodies to carry out their work in particular relating to racial discrimination and that the agencies that were closed be fully subsumed into other bodies.⁶ **NAAR echoes this recommendation.**

Paucity of national strategies to promote anti-discrimination

6. There is no integrated, strategic mechanism or stated goals for government action to address racism in Ireland. The National Action Plan Against Racism (NAPR) ceased operation in 2008 and has not been replaced. **NAAR recommends that a national policy, strategy and plan of action to address racism, discrimination and the promotion of tolerance be implemented.**

Lack of effective remedies to address racism

7. **NAAR recommends that the scope of equality legislation be expanded to include all government functions, activities and controlling duties** as it is currently restricted to the provision of goods and services by the State.

8. **NAAR recommends that racist behaviour be explicitly and specifically criminalised under Irish law** as it currently lacks definition in criminal provisions except in relation to

⁴ Irish Times, *Human rights groups criticise savage cuts*, 12 December 2008

⁵ The National Consultative Committee on Racism and Interculturalism (NCCRI) was established in 1998 as an independent expert body on racism and interculturalism, with an annual budget from the State of €500,000. It was established as a partnership body, bringing together government and non-government organisations to combat racism, contribute to policy development on racism and interculturalism, to provide advice and technical assistance to government and to provide support for community organisations and training. The NCCRI played an important role in carrying out research and monitoring. A Monitoring Racist Incidents Unit was established in 2001 for the confidential reporting of racist incidents. The dearth of an instrument to monitor racist incidents in the State has led a number of NGOs to establish such services, some with limited public funds to do so, For example, Immigrant Council of Ireland's Racist Incidents Support and Referral Service and Show Racism the Red Card's service.

⁶ Concluding Observations of the UN Committee on the Elimination of Racial Discrimination, 10 March 2011, para. 11, UN Doc: CERD/C/IRL/CO/3-4

incitement to hatred.⁷ **Racist motivation or aim in the commission of an offence should be considered an aggravating factor in sentencing.**⁸

9. The number of racist and xenophobic incidents in the State is increasing⁹ with Sub-Saharan Africans¹⁰ and Travellers¹¹ particularly vulnerable. There is a lack of disaggregated, statistical data relating to racist and hate-related offences. There is evidence of the under-reporting of such incidents,¹² due to a fear of jeopardising immigration status for example. **NAAR recommends the establishment of a national independent entity to which racist incidents can be reported, as well as recorded and monitored.**

10. Regularly updated official data and statistics are difficult to obtain relating to various aspects of the lives of Black and minority ethnic groups including Travellers. The State fails to recognise the nexus between race and other types of discrimination such as gender discrimination. These failures have implications for service delivery as well as legislation and policy relating to these groups. **NAAR recommends that the State publish gender and racially disaggregated data in areas such as employment, health, accommodation, education and women's issues. Moreover, an analysis of the effectiveness of information that has been collated should be undertaken.**

11. The legislation establishing the Garda Síochána (national police force) Ombudsman Commission (GSOC) allows some alleged complaints of discrimination against the Gardaí to be

⁷ Examples of legislation used to prosecute such acts are Section 6 Criminal Justice (Public Order) Act 1994 on offensive speech; Section 2 (assault), Section. 3 (assault causing harm) and Section 10 (harassment) Non-Fatal Offences against the Person Act 1997.

⁸ The European Commission against Racism and Intolerance recommended that the Irish authorities include in the criminal legislation provisions which allow for the racist motivation of a crime to be considered as an aggravating circumstance at sentencing and that they envisage providing that racist offences be defined as specific offences, European Commission Against Racism and Intolerance, Third Report on Ireland, 15 December 2006, para, 26; Schweppe J., Walsh D., *Combating Racism and Xenophobia through the Criminal Law*, Centre for Criminal Justice Research, University of Limerick, December 2008, page 179

⁹ NGO Alliance Against Racism, *Shadow Report in response to the Third and Fourth Periodic Reports of Ireland under the UN International Convention on the Elimination of All Forms of Racial Discrimination*, 2011, p. 16

¹⁰ European Union Agency for Fundamental Rights, *European Union Minorities and Discrimination survey 2009*, p. 9, 10

¹¹ The All Ireland Traveller Health Study was the first study of Traveller health status and health needs that involved all Travellers living on the island of Ireland, north and south. Over 9,000 families participated in the comprehensive study which had a phenomenal response rate at 80%. School of Public Health, Physiotherapy and Population Science, University College Dublin, *All Ireland Traveller Health Study*, September 2010, Technical Report 1, p. 86

¹² For example, European Union Agency for Fundamental Rights, *European Union Minorities and Discrimination survey 2009*, p. 82; Browne, C., Garda Research Unit, *Garda Public Attitude Survey 2008*, Research Report No. 1/08, p. 32

referred back to the Gardaí for investigation.¹³ While such investigations are under the supervision of the GSOC, **NAAR recommends that this practice should cease. Disaggregated data on the nature and types of complaints against Gardaí relating to discrimination should also be made available.**

12. **NAAR recommends that the State introduce preventative measures such as systematic equality proofing to address underlying inequalities, for example multiple discrimination faced by groups such as minority women.**

13. In spite of recent amendments to equality legislation,¹⁴ the opportunity was not used to address provisions which allow religious institutions to give preference to those who share the institutions' religious ethos in their hiring practices and in pupil admittance to schools. This is notably problematic due to the high proportion of denominational schools of the same religion (Roman Catholicism) in the State. **NAAR recommends that new strategies be put in place to ensure that segregated schooling does not become a reality in Ireland due to a lack of non-denominational or multid denominational schools.**

Minorities and Travellers

14. Irish Travellers are an indigenous nomadic minority people who have been part of Irish life for centuries. The CERD, the CERD Follow-Up Coordinator, the Human Rights Committee and the Council of Europe High Commissioner for Human Rights have all recommended that the State progress the recognition of Travellers as an ethnic group.¹⁵ The State continues to refuse to provide such recognition in spite of the danger that without it policy and law makers can continue to marginalise Traveller culture and exclude them from anti-racism initiatives and safeguards. **NAAR recommends that the Travelling Community be recognised as an ethnic group.**

15. Despite legislation which provides a legal obligation on local authorities to ensure Traveller-appropriate accommodation,¹⁶ many Travellers still live without basic facilities.¹⁷ The Housing (Miscellaneous Provisions) Act 2002 criminalises the entering of private or public land without consent. This raises specific concerns for Travellers who may be charged with trespass for parking their caravans at a location without specific permission. Moreover, the Act increases

¹³ Section 94, Garda Síochána Act 2005

¹⁴ The Equal Status Acts 2000-2008

¹⁵ Concluding Observations of the UN Committee on the Elimination of Racial Discrimination, 10 March 2011, para. 12, UN Doc: CERD/C/IRL/CO/3-4; Report, Visit of Co-ordinator on Follow-Up to Ireland (21-23 June 2006), UN Doc: CERD/C/69//Misc.9 para. 16; Concluding Observations by the UN Human Rights Committee on Ireland, 30 July 2008, para. 23 UN Doc: CCPR/C/IRL/CO/3; Report by the Council of Europe, High Commissioner for Human Rights Mr. Thomas Hammarberg on his visit to Ireland, 26-30 November 2007, para. 97

¹⁶ Housing (Traveller Accommodation) Act 1998

¹⁷ School of Public Health, Physiotherapy and Population Science, University College Dublin, *All Ireland Traveller Health Study*, September 2010, Technical Report 1, p. 76-82.

the powers of Gardaí who are permitted to impound the caravans thereby removing the homes of Travellers from land or evicting the families involved. There are no available statistics relating to the number of arrests or prosecutions under this legislation. **NAAR recommends that this Act be reviewed to ensure that its provisions do not disproportionately and negatively affect Travellers.**

16. Travellers continue to face discrimination in a range of aspects of their lives including health,¹⁸ employment¹⁹ and education,²⁰ in particular Traveller women who face discrimination on multiple levels.²¹ The mortality rate for Traveller men is almost four times that of the general male population and stands at three times the national figure for Traveller women.²² Travellers remain well behind the general population in employment figures and education with early school leaving representing a particular problem.²³ State strategies to date have failed to progress the situation of Travellers compared to the general settled population. **NAAR recommends that Traveller-specific alternative accommodation be provided to Travellers who are living without adequate basic facilities. Sufficient resources should be provided for the implementation of the National Traveller Education Strategy. Travellers should be fully consulted and engaged in any process with affects them.**

17. **NAAR recommends that measures be introduced to improve the representation of Travellers in political life and public affairs in the State.²⁴ Such measures should also extend to Black and other minority groups and with an emphasis on women from such backgrounds.**

Policing

18. **NAAR recommends that racial profiling be explicitly prohibited in Irish law.** Under immigration legislation, Gardaí and immigration officers are empowered to stop and demand the

¹⁸ School of Public Health, Physiotherapy and Population Science, University College Dublin, *All Ireland Traveller Health Study*, September 2010

¹⁹ *Ibid*

²⁰ *Ibid*

²¹ Pavee Point Fact Sheet on Traveller Women, <http://www.paveepoint.ie/publications-gender.html>

²² School of Public Health, Physiotherapy and Population Science, University College Dublin, *All Ireland Traveller Health Study*, September 2010, Summary of Findings, p. 85

²³ The 2006 census shows that 63.2% of Traveller children under the age of 15 had left formal education. The same figure for the general population stands at 13.3%. Only 8 in 1,000 Travellers went on to higher education compared with 302 in 1,000 nationally; Statistics Office, Volume 5, *Ethnic or Cultural Background (including Irish Travellers)*, Table 24, p. 45

²⁴ In March 2011, CERD recommended that affirmative action programmes and other special measures be put in place in order to improve the representation of Travellers in political institutions and other areas of public life. Concluding Observations of the UN Committee on the Elimination of Racial Discrimination, 10 March 2011, para. 14, UN Doc: CERD/C/IRL/CO/3-4

production of certain identity documents of any “non national” “at any time.”²⁵ There is evidence that such powers used by Gardaí have resulted in the arbitrary detention of Irish citizens who were without requested documentation on their person when stopped by Gardaí.²⁶

19. At the State’s ports of entry, there is no automatic review of an immigration officer’s decision regarding leave to land. Neither is there any supervision of such decisions by an independent body.²⁷ **NAAR recommends that a legal remedy should be available in the case of an individual who has been arbitrarily detained as a result of a refusal of leave to land.**²⁸

Immigration, asylum and foreign workers

20. Irish immigration legislation remains piecemeal and market-driven. The State’s third attempt²⁹ at consolidating immigration legislation recently lapsed with the dissolution of the Dáil (lower house of parliament). Concern has been expressed regarding the “fairly short time limit” that exists in respect of the judicial review of administrative immigration decisions.³⁰ **NAAR recommends that reasonable time limits are allowed within which judicial review of an administrative decision may be instigated.**

21. There is no efficient independent appeals procedure for immigration-related decisions. The right of administrative review is not provided against all decisions and is based on ministerial discretion. **NAAR recommends that any consolidated immigration legislation should include an independent appeals procedure for immigration-related decisions.**

22. No clear remedy is available in immigration law or administrative procedures for migrant woman who experience domestic violence and are resident in the State as the dependent spouse of a citizen or of a legally resident foreign national. It is not possible to apply for a residence permit to remain in the State following a separation from a spouse as a result of domestic violence and permission to remain is entirely discretionary. Further difficulties arise regarding access to social welfare for women in such circumstances.³¹ There is an overrepresentation of

²⁵ Section 12(1), (2), (3), Immigration Act 2004

²⁶ Immigrant Council of Ireland News Bulletin Issue 32, *ICI calls for investigation of unlawful detention of Irish citizen*, 20 November 2008

²⁷ Irish Human Rights Commission, *Report on an Enquiry into the Treatment of a Visitor Refused Leave to Land in the State*, January 2009, para. 9.11-9.17

²⁸ *Ibid*, para. 8.21

²⁹ The State has produced three lengthy and complex Immigration, Residence and Protection Bills in 2008, 2009 and 2010. Bill No. 37 of 2007, Bill No. 2 of 2008, Bill No. 38 of 2010.

³⁰ Concluding Observations of the UN Committee on the Elimination of Racial Discrimination, 10 March 2011, para. 15, UN Doc: CERD/C/IRL/CO/3-4

³¹ Due to the Habitual Residence Condition (see paragraph 26) migrant women on a dependent residency pass may not be entitled to social welfare. Access to social welfare payments to migrant workers who may require

minority women in statistics of those who access the services of Women’s Aid which emphasises the additional barriers faced by migrant women in reaching safety.³² **NAAR recommends that adequate protection is provided in law for all migrant women who experience domestic abuse.**

23. Between 2000 and 2010, 512 children went missing from care in Ireland. Only 72 children were later accounted for, leaving 440 children still missing from the care of the Health Service Executive.³³ From 2004 to the end of June 2009, 611 separated children³⁴ applied for asylum in Ireland. 250 were granted refugee status.³⁵ From 2000 to 2010, 5,952 separated children were referred to the Health Service Executive, and 2,865 of these were placed in care.³⁶ Although a commitment has been made to appoint a social worker to all separated children, there are still separated children without an allocated social worker.³⁷ While the role of a social worker is not to be underestimated, it does not replace the role of a *guardian ad litem*.³⁸ **NAAR recommends that the State should provide each separated child with a *guardian ad litem* as soon as they are identified as such.**

24. Ireland adopts a policy of direct provision and dispersal with regard to those who seek asylum and other forms of protection in the State. This means that these groups are provided accommodation by the State on a full board basis thereby notionally having their needs met directly. Due to the high demand on accommodation in the capital, Dublin, the policy of dispersal was introduced to spread the housing of these groups nationwide. This policy has

emergency or supplementary payments in order to access refuge accommodation is at the discretion of a Community Welfare Officer.

³² Safe Ireland, *Safety and Change – A national study of support needs and outcomes for women accessing refuge provision in Ireland*, 2009; National Women’s Health Council, *Translating Pain into Action: A Study of Gender-based Violence and Minority Ethnic Women in Ireland*, February 2009, p. 5

³³ Irish Times, *Number of missing children falls as new policies adopted*, by Jamie Smyth, 11 January 2011. The Health Service Executive runs the public health services in Ireland and is charged with the care of separated children in the State.

³⁴ Separated children are defined as ‘children under 18 years of age who are outside their country of origin and separated from both parents, or previous/legal customary primary care giver.’ Save the Children and The Separated Children in Europe Programme, *Position paper on: Returns and Separated Children*, September 2004

³⁵ Ombudsman for Children, *Separated children living in Ireland: A Report by the Ombudsman for Children’s Office*, 2009, section 3.4. This figure does not account for individuals who applied for asylum initially as minors but were subsequently deemed to be adults.

³⁶ Irish Refugee Council, *Closing a protection gap*, 2010, p. 12

³⁷ *Ibid*, section 5

³⁸ There is no national official legal definition of a *guardian ad litem* nor is there a nationally agreed standard. Her role is broadly understood as to ‘independently establish the wishes, feelings and interests of the child and present them to the court with recommendations’ – Children’s Acts Advisory Board, *Giving a voice to children’s wishes, feelings and interests*, Guidance on the Role, Criteria for Appointment, Qualification and Training of *Guardians ad Litem* Appointed for Children in Proceedings under the Child Care Act 1991, May 2009, p. 3

resulted in the segregation and isolation of asylum seekers, preventing their full interaction with the local community and from others sharing their own nationality or interests. Denied access to the labour market and with significant numbers having to wait years for a decision as to their asylum applications,³⁹ asylum seekers in Ireland face discrimination,⁴⁰ poverty,⁴¹ exclusion⁴² and both physical and mental health issues.⁴³ **NAAR recommends that the processing of asylum applications should take no longer than six months. In cases where the processing time exceeds six months, the asylum applicant should have the right to access employment. Given the fall in the number of asylum applicants, the direct provision system, designed to cater for much larger numbers of applicants, should now undergo a radical review in light of the serious concerns as to its negative impact on residents.**⁴⁴

25. **NAAR recommends that an independent, transparent and anonymous complaints mechanism is established for those living under direct provision.**⁴⁵ All complaints which are not dealt with informally by the direct provision centre manager are forwarded to the Reception and Integration Agency (RIA) for a decision. There is concern among residents that making a complaint could impact on their asylum application because the Department of Justice and Law Reform is not only responsible for their provision but also the adjudication of their cases, albeit

³⁹ Reception and Integration Agency Report, September 2010, p. 20. In April 2010, there were 6,360 people living in direct provision accommodation; more than half of these had been living there for more than two years and more than a third for more than three years. In 2002, 11,634 people applied for asylum in Ireland. This number had fallen by 83% to 1,939 in 2010; Office of the refugee Applications Commissioner, *Monthly Statistical Report*, December 2010, p. 1

⁴⁰ Free Legal Advice Centres, *One Size Doesn't Fit All*, 2010, Section 3.2

⁴¹ *Ibid*, Chapter 2

⁴² *Ibid*, Section 3.2

⁴³ Health Service Executive, *National Intercultural Strategy in Health, 2008-2010*, p. 42; *Report of consultations for the National Intercultural Strategy in Health, 2008*, section 2.4

⁴⁴ CERD recently made recommendations relating to these issues, Concluding Observations of the UN Committee on the Elimination of Racial Discrimination, 10 March 2011, para. 20, UN Doc: CERD/C/IRL/CO/3-4

⁴⁵ The current complaints systems is set out in a document entitled *Direct Provision Reception and Accommodation Centres: House Rules & Procedures*. There are two elements to the complaints procedure: one to be invoked where a resident has a complaint against the centre and the other to be invoked in relation to a breach of house rules by a resident.

through two different sections.⁴⁶ Residents have no right of appeal to an independent body and there are no statistics collated with regard to such complaints.⁴⁷

26. The Habitual Residence Condition (HRC) was introduced in May 2004 as an additional qualifying condition for certain social welfare payments.⁴⁸ Before the introduction of the HRC, direct provision residents were entitled to a small number of social welfare payments⁴⁹ including universal Child Benefit⁵⁰ if they met the other qualifying criteria attached to the payment. However, the introduction of the condition effectively led to a blanket ban on granting any direct provision resident a social welfare payment which was subject to the condition.⁵¹ As direct provision residents are wholly reliant on social welfare payments, the HRC has had a negative impact on this group in spite of its original aim. Social welfare payments they receive amount to €19.10 per adult per week and €9.60 per child, figures which have not, at any time, been raised in line with inflation. The introduction of the HRC has created a difference in treatment between children of protection applicants and other children living in Ireland. **NAAR recommends that provisions which deny any direct provision resident the right to be recognised as habitually resident in Ireland be repealed.**⁵²

27. In spite of legislation which provides that an employment permit facilitates the employment of a foreign national in the State in a particular economic sector for the duration of the permit's validity,⁵³ State policy has been to continue to issue an employment permit for a specific position with a particular employer for all types of employment permits.⁵⁴ Legislation

⁴⁶ The Reception and Integration Agency (RIA) is an administrative unit which is responsible for the accommodation and care of protection applicants and asylum seekers. The Office of the Refugee Applications Commissioner, an independent statutory body, is responsible for the processing of asylum applications. Both are under the aegis of the Department of Justice and Law Reform. Decisions concerning applications for protection such as leave to remain and subsidiary protection are decided by the Irish Naturalisation and Immigration Service and granted at the discretion of the Minister for Justice and Law Reform. Most of those currently living in direct provision are at this later stage of their asylum application.

⁴⁷ Response by Minister for Justice and Law Reform to Dáil question no 357 by Deputy Caoimhghín Ó'Caoláin, 8 July 2010.

⁴⁸ The rationale for the introduction of the Habitual Residence Condition was to prevent "welfare tourism" following the enlargement of the EU. For further information, see Free Legal Advice Centres, *One Size Doesn't Fit All*, 2010, s. 2.1.1

⁴⁹ For a full list of these payments see FLAC, *Direct Discrimination? An Analysis of the Scheme of Direct Provision in Ireland*, 2003

⁵⁰ Child benefit is a state payment to a parent on a monthly basis.

⁵¹ It is worth noting that those in receipt of a payment continued to receive it as did parents already in receipt of Child Benefit payments for one or more child before the introduction of the HRC.

⁵² The provision at issue is section 15 of the Social Welfare and Pensions [No.2] Act 2009

⁵³ Section 8, Employment Permits Act 2006

⁵⁴ Department of Enterprise, Trade and Innovation, *Employment Permit Arrangements, Guide to Work Permits, May 2010*, p. 3; *Guide to Green Card Permits, August 2010*, p. 4

provides for a Ministerial power⁵⁵ which permits the refusal of the issuance of a new permit in the first twelve months of a permit being issued. No statutory exception is provided for in the cases of exploitation and in such circumstances, a solution for the permit-holder is dependent on the existence of an alternative offer of employment and an employer willing to apply for a permit. Allowing for mobility within an economic sector, as actually provided for in the relevant legislation, would alleviate this problem. **NAAR recommends that work permit holders should be given the freedom to change employers to any job on the eligible category list within a reasonable time frame.**

28. Given the often private and isolated nature of their work, domestic workers are vulnerable to exploitation in Ireland. Because an employee's work permit and thereby her immigration status is linked to her employer,⁵⁶ a worker who asserts her right to leave because of a denial of her employment rights, for example, risks losing her immigration status. Domestic workers employed by foreign diplomats are particularly at risk. There is no domestic legal remedy for exploited workers employed by embassies if diplomatic immunity is invoked⁵⁷ and if the domestic worker is not employed under Irish law.⁵⁸ **NAAR recommends that adequate legal remedies be introduced to ensure that workers employed at embassies can assert their rights and have their grievances heard.**

⁵⁵ Section 12(1)(e)(i) Employment Permit Act 2006

⁵⁶ Section 4, Employment Permits Act 2006

⁵⁷ It is not always the case that immunity is invoked, and in these cases workers may access legal remedies through the Labour Relations Commission. Immunity relates to that provided under Article 41 of the Vienna Convention on Diplomatic Relations given effect in Irish law through the Diplomatic Relations and Immunities Act 1967

⁵⁸ For more information, please see response by Minister of State with special responsibility for Public Service Transformation and Labour Affairs, Department of Enterprise, Trade and Employment; Minister of State, Department of An Taoiseach; Minister of State, Department of Finance, Mr. Dara Calleary, T.D., to Parliamentary Questions 36394/10 and 36395/10, 13 October 2010

Annex 1: List of endorsing organisations⁵⁹

Africa Centre
AkiDwA
Anti Racism Network (ARN)
Cairde
Catholic Bishops' Refugee and Migrant Project
Churches' Asylum Network (CAN)
Clare Intercultural Network
Comhlámh
Crosscare
Dominican Justice Office
Doras Luimni
Educate Together
Equality & Rights Alliance
European Network Against Racism (ENAR) Ireland
Free Legal Advice Centres (FLAC)
Galway Refugee Support Group
Immigrant Council of Ireland (ICI)
Insaka-Ireland
Integration Centre
Integration Office of the Irish Inter-Church Committee
Irish National Organisation of the Unemployed (INOUE)
Irish Penal Reform Trust (IPRT)
Irish Refugee Council (IRC)
Irish Traveller Movement (ITM)
LIR Anti Racism Training and Education Programme
Mercy Justice Office
Mercy Refugee Network
Migrant Rights Centre Ireland (MRCI)
Nasc, The Irish Immigrant Support Centre
National Traveller MABS
National Women's Council of Ireland (NWCI)
National Traveller Women's Forum
National Youth Council of Ireland (NYCI)
New Communities Partnership (NCP)
Pavee Point Travellers' Centre
Presentation Justice Network
Show Racism the Red Card
Sport Against Racism Ireland (SARI)
Vincentian Refugee Centre

⁵⁹ As this document is based on the NAAR *Shadow Report in response to the Third and Fourth Periodic Reports of Ireland under the UN International Convention on the Elimination of All Forms of Racial Discrimination*, January 2011, the organisations listed above are those that endorsed the Shadow Report.

Annex 2: Recent NAAR submissions to CERD and NAAR contact details

Recent NAAR submissions

NGO Alliance Against Racism, *Shadow Report in response to the Third and Fourth Periodic Reports of Ireland under the UN International Convention on the Elimination of All Forms of Racial Discrimination*, 2011

http://www.newcommunities.ie/download/pdf/naar_shadow_report_to_cerd_2011.pdf

NGO Alliance Against Racism (NAAR), *Submission to the UN Committee on the Elimination of Racial Discrimination, List of Issues, with regard to the examination of Ireland's joint third and fourth periodic reports under Article 9 of the UN Convention on the Elimination of All Forms of Racial Discrimination*, 10 December 2010

http://www2.ohchr.org/english/bodies/cerd/docs/ngos/NAAR_Ireland78.pdf

NAAR contact details

The NGO Alliance Against Racism is coordinated by the Dominican Justice Office.

NAAR can be contacted at:

NGO Alliance Against Racism,
C/o Dominican Justice Office,
All Hallows College,
Gracepark Road,
Drumcondra,
Dublin 9, Ireland

T: +353 1 857 4654

F: +353 1 857 4652

E: justiceop@eircom.net