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EUROPEAN SOCIAL CHARTER

15th National Report on the implementation of the
European Social Charter

submitted by

THE GOVERNMENT OF IRELAND

- Follow-up to Collective Complaints Nos. 83/2012, 92/2013 and 100/2013
- Complementary information on Articles 1§2, 15§3

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CYCLE 2017

REVISED EUROPEAN SOCIAL CHARTER

2017 National Report on the implementation of the Revised European Social Charter

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THE GOVERNMENT OF IRELAND

PART A: Update on Collective Complaints 83/2012, 92/2013 and 100/2013

Collective Complaint 83/2012: European Confederation of Police (EuroCOP) v. Ireland

The public service pay negotiations which led to the Haddington Road Agreement¹ (2013) also provided for a wide-ranging review of An Garda Síochána. The elements of this review dealing with industrial relations and pay-related issues were conducted on an independent basis by the former Chair of the Labour Court, John Horgan. This included an examination of the appropriate structures and mechanisms for the future resolution of issues relating to pay, industrial relations and attendant matters. The outcome of this process, the Horgan Review², was published on 12 December 2016.

Separately, the Minister for Jobs, Enterprise and Innovation requested that the services of the Workplace Relations Commission (WRC) and the Labour Court be utilised, on an ad-hoc basis, to assist in the resolution of a dispute involving the Garda Representative Association (GRA) and Association of Garda Sergeants and Inspectors (AGSI) in An Garda Síochána in 2016. This intervention mirrored how the WRC and Labour Court would operate in relation to a dispute involving trade unions with full negotiation rights.

The Labour Court issued recommendations³ on 3 November 2016 in resolution of the dispute. The Government fully respected the Labour Court Recommendations and accepted them in full. As part of this process the Government agreed to progress the drafting of legislation⁴ to provide the Garda Associations with full access to the WRC and the Labour Court. The Garda Associations also accepted the Labour Court Recommendations and thereby came within the framework of the Lansdowne Road Agreement and the national collective bargaining process.

¹ <http://www.per.gov.ie/wp-content/uploads/Haddington-Road-Agreement.pdf>

² [Horgan Report 2016](#)

³ <http://gra.ie/archive/documents/LabourCourtRecommendations.pdf>

⁴ <http://justice.ie/en/JELR/Pages/PR16000400>

The Government gave a further commitment that the Garda Associations would have full access to future national public service pay negotiations. In accordance with this commitment the Garda Associations, facilitated by the Workplace Relations Commission and the Department of Justice and Equality, were fully included in June/July 2017 in the collective bargaining process relating to the continuation of the Lansdowne Road Agreement, and took part in these negotiations on an equal basis with other public service representative bodies.

The analysis and recommendations which were contained in the Horgan Review were taken into account by a cross-Departmental Working Group set up in early 2017 with a remit to examine industrial relations structures for An Garda Síochána; to consider all the issues arising from providing access to the WRC and the Labour Court; and to identify the industrial relations mechanisms to be established in An Garda Síochána to support this change.

The first report of the working group was presented to Government⁵ in September 2017. The recommendations of the report, which were accepted by Government, included draft legislation to give permanent access to the WRC and Labour Court. A second and final report from the Working Group will deal with the internal industrial relations mechanisms, including structures that need to be put on place to support access to the WRC and Labour Court.

Collective Complaint 92/2013: Association for the Protection of all Children (APPROACH) Ltd v. Ireland

In 2015, the Oireachtas passed the Children First Act, 2015. Section 28 of this Act specifically relates to corporal punishment and removes the common law defence of reasonable chastisement. This termination of the common law defence seeks to ensure that children have the necessary and full protection of the law in regard to corporal punishment in all settings, including the home. Section 28 was commenced by the Minister for Children and Youth Affairs on 11 December 2015.

With regard to children in foster care, residential care and children who are placed in the care of relatives under the 1991 Child Care Act, the removal of the defence of reasonable chastisement under Section 28 of the Children First Act 2015 has been further strengthened by secondary legislation which came into effect on 21 December 2015. This secondary

⁵ [First Report of the Working Group on Industrial Relations Structures for An Garda Síochána](#)

legislation⁶ provides a legislative basis for previous guidelines and practice and now copperfastens the existing prohibition on certain forms of discipline, including corporal punishment and treatment that is cruel, inhuman or degrading, in foster care, residential care settings or where children are in the care of relatives.

Furthermore, *Children First Guidance for the welfare and protection of children* (2017)⁷, which replaces previous editions, states:

“The Children First Act 2015 includes a provision that abolishes the common law defence of reasonable chastisement in court proceedings. This defence could previously be invoked by a parent or other person in authority who physically disciplined a child. The change in the legislation now means that in prosecutions relating to assault or physical cruelty, a person who administers such punishment to a child cannot rely on the defence of reasonable chastisement in the legal proceedings. The result of this is that the protections in law relating to assault now apply to a child in the same way as they do to an adult.”

This applies to children in all settings.

Collective Complaint 100/2013: European Roma Rights Centre (ERRC) v. Ireland

The Irish Government has embarked on a number of initiatives since the Council of Europe European Committee on Social Rights decision in 2015.

The Programme for a Partnership Government (May 2016) outlined the new Government’s intentions with regards to Traveller accommodation;

“We will establish a special working group to audit the current delivery and implementation of local authorities’ Traveller Accommodation plans and consult with stakeholders on key areas of concern. The group should report a plan for the delivery of safe, culturally appropriate accommodation.”

⁶ <http://www.irishstatutebook.ie/eli/2015/si/605/made/en/print>;
<http://www.irishstatutebook.ie/eli/2015/si/606/made/en/print>
<http://www.irishstatutebook.ie/eli/2015/si/607/made/en/print>

⁷ [Children First Guidance for the welfare and protection of children](#)

The new National Traveller and Roma Inclusion Strategy 2017-2021⁸ commits the Irish Government to a number of actions aimed at enhancing accommodation for the Traveller community. The key objectives here are;

- *There should be adequate provision of accessible, suitable and culturally-appropriate accommodation available for Travellers.*
- *Delivery of Traveller accommodation should be underpinned by a robust monitoring and evaluation framework, ensuring full expenditure of funds allocated for Traveller-specific accommodation.*

These objectives are to be achieved through six specific actions.

1. The National Traveller Accommodation Consultative Committee (NTACC), which includes all key stakeholders, on publication of a review of funding, allocations, spending and outputs in relation to Traveller accommodation from the Housing Agency in July 2017, has agreed a sub-group to examine and analyse the findings of the review⁹, with a view to preparing a report and recommendations for the Minister for Housing and Urban Renewal as soon as possible after its receipt. This will include a review of the Housing (Traveller Accommodation) Act 1998. The review was included as a specific action in the Action Plan for Housing and Homelessness¹⁰ (July 2016) aimed at tackling the broader challenges in housing in Ireland.
2. The Department of Housing, Planning, Community and Local Government will ring-fence its Capital budget for Traveller accommodation and put robust mechanisms in place to monitor expenditure and delivery, including periodic reviews to assess progress in meeting needs and to identify new and emerging needs.
3. The National Traveller Accommodation Consultative Committee will examine how best to develop the capacity and operation of Local Traveller Accommodation Consultative Committees to maximise their contribution to local accommodation programmes and policies.

⁸ [National Traveller and Roma Inclusion Strategy 2017-2021](#)

⁹ [Review of Funding for Traveller-Specific Accommodation and the Implementation of Traveller Accommodation Programmes](#)

¹⁰ <http://rebuildingireland.ie/Rebuilding%20Ireland%20Action%20Plan.pdf>

4. The Department of Housing, Planning, Community and Local Government will ensure that any guidelines developed by the National Traveller Accommodation Consultative Committee in relation to the operation of the Local Traveller Accommodation Consultative Committees are promulgated across all Local Authorities.
5. The Department of Housing, Planning, Community and Local Government will assess if there are any barriers to Travellers accessing social housing waiting lists.
6. The National Traveller Accommodation Consultative Committee and the Local Traveller Accommodation Consultative Committees will examine how best they can further develop the involvement of Traveller-specific accommodation tenants in issues relating to their scheme or site.

In June 2017, the Government announced a substantial increase in capital funding for Traveller specific accommodation, allocating €9 million in 2017, up from 5.5 million in 2016, with another €4.22 million for non-capital costs associated with traveller accommodation.

PART B: Additional information in respect of:-

- Article 1 para. 2 [Right to work- freely undertaken work (non-discrimination, prohibition of forced labour, other aspects)] and
- Article 15 para. 3 [Right of persons with disabilities to independence, social integration and participation in the life of the community]

1. Information on any concrete positive measures/actions taken or envisaged to promote equality in employment and to combat all forms of discrimination in employment (Article 1 , para. 2)

Ireland already has a strong legislative framework in place to prevent discrimination in the workplace. The Irish Government's initiatives to promote equality in the workplace have been included in several distinct new strategies that focus on specific groups.

a) Migrant Integration Strategy 2017-20

Launched in February 2017, the Migrant Integration Strategy¹¹ includes measures aimed at encouraging greater migrant participation in public sector employment, including in the civil service, on State boards and in politics. Its 70 actions overseen by the Office for the Promotion of Migrant Integration include 10 relating directly to employment such as promoting workplace diversity and targets for migrant recruitment to the civil service. Twelve further actions on education will also facilitate access to employment.

An annual Monitoring Report on Integration¹² commissioned by the Government from the Economic and Social Research Institute (ESRI) provides timely evidence for policy making in relation to migrants across policy areas, including employment.

In a separate development, in July 2017, the Department of Justice established an Interdepartmental Taskforce to address the implications of a recent Supreme Court

¹¹ [Migration Integration Strategy 2017 - 2020](#)

¹² <https://www.esri.ie/publications/monitoring-report-on-integration-2016/>

judgement that ruled that an absolute prohibition on the right to work for asylum applicants is contrary to rights under Article 40.1 of the Constitution of Ireland.

b) The National Strategy for Women and Girls 2017-2020: Creating a Better Society for All

Launched in May 2017, this Strategy¹³ encompasses a broad approach to issues facing women and girls in society. Specific actions aimed at reducing inequality include measure to measure the gender pay gap. A public consultation on the gender pay gap was launched in August 2017. Other Actions in the Strategy focus on relevant issues such as reconciling family and work obligations, promoting female entrepreneurship and encouraging girls to study STEM (Science, Technology, Engineering and Maths) subjects. An exhaustive list of Actions can be found in the Strategy.

c) Comprehensive Employment Strategy for Disabilities

The Comprehensive Employment Strategy for Disabilities 2015-2024¹⁴ aims to ensure a coordinated approach to support persons with disabilities to progress into employment. It is a cross-government approach bringing together actions by different Departments and state agencies in a concerted effort to address the barriers and challenges that impact on employment of people with disabilities.

It includes six strategic objectives;

- Building skills, capacity and independence
- Providing bridges and supports into work
- Making work pay
- Promoting job retention and re-entry to work
- Providing co-ordinated and seamless support
- Engaging employers

¹³ [National Strategy for Women and Girls 2017 -2020](#)

¹⁴ [Comprehensive Employment Strategy for People with Disabilities 2015-2024](#)

The Strategy includes almost 70 actions to implement those objectives. The First Report of the Chair of the Implementation Group, published in March 2017¹⁵, highlights the progress made to date and the work still outstanding.

d) National Traveller and Roma Inclusion Strategy 2017-21

Launched in June 2017, this Strategy includes a specific section on Employment and the Traveller Economy. Its objectives focus on enhancing access and opportunities for the Traveller and Roma communities. Its specific actions include;

- The Department of Social Protection will promote the availability of existing employment and training services (e.g. those provided by the Education and Training Boards) to the Roma and Traveller communities and continue to ensure promotional and information materials are available and accessible on any of its schemes and services including via the Department's website. The Department of Social Protection will provide tailored supports for the long-term unemployed and for young people to build their confidence and prepare them for the workplace.
- The Department of Social Protection will develop targeted initiatives to increase Traveller and Roma engagement with employment and training services.

Anti-racism and cultural awareness training for staff will be developed under the new shared Civil Service learning and development curriculum and will be made available for Departments in 2017.

- The Department of Social Protection and the Department of Housing, Planning, Community and Local Government will put in place liaison arrangements between INTREO and the Social Inclusion and Community Activation Programme (SICAP) to enable Travellers and Roma to access relevant supports, training and opportunities.
- Objective - *Targeted positive public service recruitment to train and employ Traveller and Roma staff in public services should be introduced :*
 - We will develop proposals for internships for Traveller and Roma in Government Departments, Local Authorities and other public bodies and will support provision of Transition Year, Leaving Certificate Applied and Youthreach work experience placements for Travellers and Roma in public services and statutory agencies as a route to meaningful employment.

¹⁵ [First Report of the Chair of the Implementation Group](#)

- Objective - *Entrepreneurship and self-employment opportunities for Traveller and Roma should be supported:*
 - The Department of Housing, Planning, Community and Local Government, in conjunction with Local Authorities, will arrange for the inclusion in Local Economic and Community Plans of provisions for Traveller and Roma economy supports including general policies and programmes as well as group-specific (targeted) initiatives to support Travellers and Roma in enterprise, mainstream labour market and the Traveller economy.

The various actions, objectives and strategies described above are substantive Government initiatives that, with the appropriate measuring and follow-up built in to these policies, will promote equality in employment and help combat all forms of discrimination in employment.

2. Information on regulation of Prisoners' working conditions, particularly if they are working, directly or indirectly, for employers other than the prison service (Article 1 , para. 2)

Regulation of prisons is governed primarily by the Prison Act 2007 and the Prison Rules 2017.

Rule 28 (1) of the Prison Rules 2007 states that, "*Subject to this Rule, a convicted prisoner shall do work consisting of the performance of tasks necessary for the maintenance and operation of the prison.*" The emphasis in Irish prisons is for prisoners' work to be focussed on the maintenance and running of the prison rather than on any commercially-based labour

Section 37 of the Prisons Act 2007 excludes prison work from Minimum Wages legislation. In addition to a daily allowance, prisoners may also receive additional payments under the Approved Working Gratuity Scheme, which rewards work in areas such as kitchens, laundry, grounds maintenance, painting and cleaning.

In general, the emphasis in Irish prisons is on education and training. Prisoners engaging in work that contributes to the running and maintenance of the prison are not regarded as employees in the normal sense.

Nonetheless, the Prison Service has a substantive duty of care to prisoners, their well-being and their health and safety. The Irish Prisons Service Occupational Health and

Safety Policy Document ¹⁶ (July 2015) states that the policy is “applicable to all those to whom the Irish Prison Service owes a duty of care”, including prisoners. The Policy includes a commitment to the “Provision of adequate resources to ensure the safety of all those to whom it owes a duty of care, including staff, prisoners, contractors, visitors etc.”

In addition, the Inspector of Prisons, under Section 32(2) of the Prisons Act 2007, will report on “the conditions and general health and welfare of prisoners”.

3. Information on the existence of forced labour in the domestic environment and in family businesses, particularly information on the laws enacted to combat this type of forced labour and on the steps taken to apply such provisions and monitor their application (Article 1 , para. 2)

The Criminal Law (Human Trafficking) Act 2008 criminalises forced labour in Ireland. This was enhanced by the Criminal Law (Human Trafficking) (Amendment) Act 2013 which defines what constitutes “forced labour”.

In 2014, Ireland ratified the ILO Convention on Decent Work for Domestic Workers. No implementing national legislation was required as the existing suite of employment rights legislation already met the threshold of the Convention.

The Workplace Relations Commission has produced a guide entitled *Employment Rights for Domestic Workers in Ireland*.¹⁷ In addition the Government has published a *Code of Practice for Protecting Persons Employed in other People’s Homes*¹⁸ which sets out the current employment rights and protections for persons employed in other people’s homes.

Currently the Oireachtas is examining the Diplomatic Relations (Miscellaneous Provisions) Bill 2017. This Bill aims to enhance the efficiency, efficacy and clarity of various arrangements with respect to the staff of diplomatic missions and international organisations. Among other things, it aims to enhance safeguards for domestic workers in diplomatic missions and diplomatic households.

Domestic workers are, of course, covered by the body of employments rights and minimum wage legislation that applies to the general workforce.

¹⁶ http://www.irishprisons.ie/images/policy/occupational_health_safety_policy.pdf

¹⁷ https://www.workplacerelations.ie/en/Publications_Forms/Domestic-Workers-in-Ireland.pdf

¹⁸ https://www.workplacerelations.ie/en/Good_Workplace_Relations/codes_practice/COP10/

4. Information on measures taken by the state to ensure that employers give due consideration to workers' private lives in the organisation of work and that all interferences are prohibited and where necessary sanctioned (Article 1 , para. 2)

The Data Protection Commissioner provides a Guidance Note on the monitoring of Staff¹⁹ on what is acceptable at work. This is based on the output of the EU Data Protection Working Party, an independent European advisory body on data protection and privacy.

The General Data Protection Regulation (GDPR) (EU 2016/679) will replace current data protection laws in Ireland and throughout the European Union from 25 May 2018. The GDPR is aimed at enhancing individual rights, while ensuring businesses retain no more information than is absolutely necessary. In addition, it will enhance the powers of the Data Protection Commissioner to impose substantial sanctions when appropriate. The GDPR does not require transposition into Irish law as its measure will have direct effect in Ireland under EU law. The new Regulation has a greater emphasis on the need to secure consent from employees for processing data and stresses the entitlement of employees to withdraw that consent at any point.

Resources, in terms of both manpower and funding, have been increased substantially for the Office of the Data Protection Commissioner in recent years, with a 55% annual increase announced in Budget 2018 alone, reflecting the challenges for safeguarding protections and privacies for employees and the public alike.

5. Information on access to technical aids for people with disabilities (Article 15 , para. 3)

Assist Ireland²⁰ has been developed by the Citizens Information Board in association with disability organisations, service providers and support agencies both in Ireland and abroad.

There are numerous assists available to those seeking technical aids. A Medical Card, the Housing Adaption Grant, the Mobility Aids Grant Scheme as well as VAT refunds and

¹⁹ <https://www.dataprotection.ie/docs/Guidance-Notes-Monitoring-of-Staff/208.htm>

²⁰ <http://www.assistireland.ie/eng/>

tax credits are all means of Government assistance for technical aids. A comprehensive list is available online²¹.

In addition, the new National Disability Inclusion Strategy includes a commitment to develop proposals to address access to, or affordability of necessary aids, appliances or assistive technologies required for everyday living, for those people with disabilities whose entry, retention or return to work could be jeopardised due to being unable to afford these items.

6. Information on the Implementation of the National Disability Inclusion Strategy (Article 15 , para. 3)

The National Disability Inclusion Strategy 2017-21²², launched in July 2017 was undertaken as part of a commitment for in the Programme for a Partnership Government (May 2016). Monitoring and implementation of this Strategy will be key to its success.

The National Disability Inclusion Strategy Steering Group (NDISSG) will monitor the implementation of the Strategy based on annual work plans and will meet four times a year or as directed by the Minister. The NDISSG will publish an annual report on progress made in each year and a revised iteration of the Strategy will be prepared following the mid-term review at the end of 2018.

The first version of this living document included 114 specific actions assigned to responsible bodies with relevant timelines.

7. Information on the recognition of sign language (Article 15 , para. 3)

The Recognition of Irish Sign Language for the Deaf Community Bill 2016 was introduced into the Seanad (Upper House) in 2016 and completed Report Stage on 17 October 2017. Though a Private Members Bill as distinct from a Government Bill, the Government has signalled that it will not oppose it. The Bill provides for recognition of Irish sign language and contains provisions relating to the obligations of public bodies in relation to Irish Sign Language. The Bill is expected to become law within months.

²¹ http://www.assistireland.ie/eng/Information/Information_Sheets/Relevant_Grants_and_Supports.html

²² [National Disability Inclusion Strategy 2017- 2021](#)

In addition, the National Disability Inclusion Strategy (July 2017) includes several goals relating to sign language including;

- Extension of Irish Sign Language remote interpretation service to evenings and weekends;
- Resourcing of the Sign Language Interpretation Service to increase the number of trained Sign Language and Deaf Interpreters, the establishment of a quality-assurance and registration scheme for interpreters, and on-going professional training and development;
- Legislation that will ensure that all public bodies provide Irish Sign Language users with free interpretation when accessing or availing of their statutory services.

8. Information on the accessibility of public transport for people with disabilities, in particular outside major metropolitan areas (Article 15 , para. 3)

The Department of Transport Statement of Strategy 2016-19 includes a commitment to invest to make public transport services more accessible for people with disabilities. Examples of such investment include increased wheelchair access to bus and train stations, bus fleet enhancement and audio announcements on train and bus services, to aid the visually impaired.

More recently, the National Disability Inclusion Strategy 2017-21 includes a review of transport supports to determine the type of cross departmental transportation options that will best help people with a range of disabilities to get to work, and implementation of the most viable proposals.

The Strategy includes a section on Transport & Accessibility that includes several specific actions aimed at enhancing transport for those with disabilities, including enhancing the accessibility of public transport in rural areas.

9. Information on the implementation of measures under the National Housing Strategy 2011-2016 for People with a Disability (Article 15 , para. 3)

The National Housing Strategy for People with a Disability, 2011-2016 was published in October 2011. The associated National Implementation Framework for the National Housing Strategy for People with a Disability, 2011-2016 was published in July 2012. Since then, three progress reports have been published by the Implementation Monitoring Group (IMG) :

- The First Report on Implementation: September 2012-December 2013²³
- The Second Progress Report on the Implementation of the National Housing Strategy for People with a Disability: January 2014 – December 2015²⁴
- Third Progress Report on the Implementation of the National Housing Strategy for People with a Disability: January - December 2016²⁵

The National Housing Strategy for People with a Disability, 2011-2016 has been reaffirmed under the Rebuilding Ireland Action Plan for Housing and Homelessness and extended until 2020.

The current Strategy will be extended beyond its original timeframe of 2016 to continue to deliver on its aims. As part of the overall implementation of the Strategy, local Strategic Plans for local areas to help identify and address the housing needs of people with a disability over the next 5 years are currently being collated by the Housing Agency into a draft National Strategic Plan. These plans will inform the specific supply response for people with disabilities at a local level, including, for example, accessibility requirements in new social housing stock.

²³ [First Report National Housing Strategy for People with a Disability](#)

²⁴ [Second Report National Housing Strategy for People with a Disability](#)

²⁵ [Third Report National Housing Strategy for People with Disabilities](#)

10. Information concerning access to sports activities for people with disabilities (Article 15 , para. 3)

Sport Ireland is the national body for planning, leading and co-ordinating the sustainable development of competitive and recreational sport in Ireland. Its policy for enhancing access to sports for those with disabilities includes the funding for 15 Sports Inclusion Disability Officers across the country. These officers provide a range of services including:

- Providing training programmes to volunteers, coaches, care staff etc. to improve access to sport for people with disabilities;
- Delivery of a wide range of inclusive events and sessions annually;
- Provision of information and links on activities for people with disabilities.

In addition, The CARA Centre in Tralee, county Kerry, is a national organisation which coordinates, facilitates and advocates for the inclusion of people with disabilities in sports, physical activities and physical education. It works at a strategic level to influence and support policies and programmes of agencies involved in the provision of sport, physical activity and physical education for people with disabilities.

Action 76 of the National Disability Inclusion Strategy 2017-21 includes a commitment to “foster disability awareness and competence in voluntary, sporting, cultural and other organisations” and “ensure that disability inclusion is fully integrated into funding programmes, monitored and linked to further funding.”

11. Information concerning information and communications technologies (Article 15 , para. 3)

People with disabilities are among the targets of a Digital Skills for Citizens Scheme²⁶ devised by the Department of Communications, Climate Action and Environment. The Scheme awarded €2.2 million to 15 groups including the National Council for the Blind, in December 2016. It will provide training, free of charge, to some 26,000 people in 2017 who have never used the internet.

The Centre for Excellence in Universal Design, established by the National Disability Authority in 2007, has published a Universal Design Guidance for Online Public

²⁶ [Digital Skills for Citizens Scheme](#)

Services²⁷ to demonstrate how Universal Design processes and techniques can be progressively used to enable more people to use online public services with ease and satisfaction

Ireland, as an EU Member State, is also committed to implementing EU Directive 2016/2102 on the accessibility of the websites and mobile applications of public sector bodies. This will ensure access for persons with disabilities, on an equal basis with others, to information and communication technologies and systems. It will provide a framework to develop, promulgate and monitor the implementation of minimum standards and guidelines for the accessibility of facilities and services open or provided to the public, and to promote access for persons with disabilities to new information and communications technologies and systems.

On an ongoing basis, the National Disability Authority (NDA) advises the Department of Communications, Climate Action and the Environment and its agencies on the implementation of commitments under the National Disability Strategy. It undertakes research, engages in consultation, brings people together in forums, and holds seminars and workshops to underpin advice and guidelines. The NDA aims to make sure that, as far as possible, that as audiences for the broadcast media, as users of communication technology and as customers of public utilities, people with disabilities have the same level of access as other customers and receive the same level of customer service.

²⁷ <http://universaldesign.ie/Technology-ICT/Guidance-for-Online-Public-Services>