The National Equality Data Strategy

2026-2031

Table of Contents

Table of Contents

Foreword

I am delighted to publish Ireland's first ever National Equality Data Strategy. I am proud that Ireland is an emerging European leader in the equality data area and with the publication of this Strategy we show our commitment to ensuring that we continue to improve the state of equality in our country.

Equality data is a fundamental tool for assessing and addressing equality issues within our society. With high-quality equality data, we can better establish where needs are most acute in society. It will allow us to develop policies and service delivery, informed by this data, to directly effect change. Equality data also assists us in analysing the impacts of interventions and to identify any gaps.

This Strategy sets out a clear vision, along with an action plan, to improve the collection, disaggregation and use of equality data in Ireland. The Strategy highlights the importance of gathering a wide range of data in order to be able to analyse the lived experiences of people in our society. It recognises that in order to make Ireland more equitable, we must look to improve the systems that inform our policies and service delivery.

This Strategy will pave the way for better policy and service delivery in Ireland by not only improving the way we collect equality data, but how we use, reuse, and link data that we already collect.

It is my hope that this Strategy will provide a strong foundation that future equality-focused strategies will build on and complement, so that we can continue to work towards our shared goal of an equitable society for all in Ireland.

Norma Foley
Minister for Children, Disability and Equality
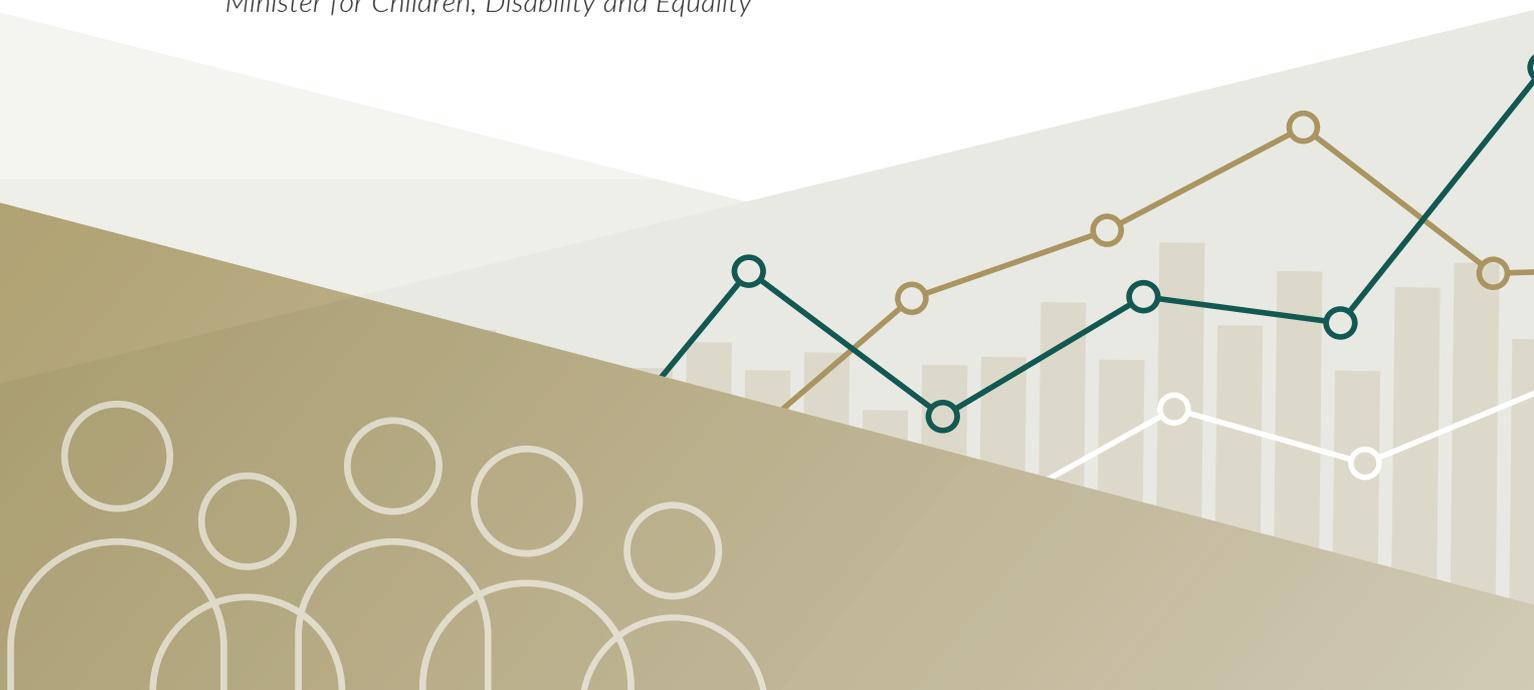
Executive Summary

Equality data refers to *"any piece of information that is useful for the purposes of describing and analysing the state of equality"*.[1]

Comprehensive, accurate and comparable evidence is vital for:

- the design and delivery of inclusive policies and services,
- enabling policy-makers and the public to assess the scale and nature of discrimination suffered by vulnerable and marginalised groups, and
- analysing where needs are most acute and what impact interventions are having.

It has been decided to develop a National Equality Data Strategy as the framework to support the collection and use by Government Departments of equality data and to develop the necessary standardisation, guidance and capacity building to support this process.

The overall goal of this Strategy for the period of 2026-2031 is to *"improve the collection, disaggregation and use of equality data in the Civil and Public Service in Ireland"*.

It is proposed to advance this goal through four strands:

The Four Strands

1. Collection of Equality Data

- The purpose of collecting equality data is to have data available to support the development of:

  » policy grounded in an understanding of the equality needs of the population; and

  » services which take account of the equality factors which can influence use, access and outcomes of services.

- Equality data gaps should be identified and addressed.
- Data should be reused wherever possible through the principle of 'collect once, use often'.

2. Standards and Classifications for Equality Data

- Every statistical system requires standard concepts, definitions, and classifications to enable it to collect, process, and make sense of data.
- The harmonisation of standards enables more accurate use and comparison of data across services.

---

1   European Handbook on Equality Data, European Commission, 2016

3. Use of Equality Data

- Equality data will be used to support evidence-informed policymaking and analysis of the uptake of access to services.
- It will play an important role in assisting public bodies to fulfil their obligations under the Public Sector Duty.[2]
- An Equality Data Hub is to be established. This will be a key component in the dissemination of equality data that is linked and shared in a meaningful way for a broad range of users.

4. Monitoring and Oversight of the Strategy

- The Central Statistics Office (CSO) and the Department of Children, Disability and Equality (DCDE) will co-chair a Steering group to monitor the progress of the Strategy.

The Actions proposed within the Strategy are intended to provide the building blocks for the development of a whole of Government system to collect and use equality data.

| Chapter	Action	Time Line	Responsible Body
1: Introduction	**Action 1.1** All Government Departments will make a commitment to collect, use or disseminate equality data and to develop the organisational capacity to fulfil this commitment.	**2026**	**All Government Departments**
	Action 1.2 All Government Departments will support public bodies under their aegis in the collection or use of equality data.	**2026-2031**	**All Government Departments**
2: Collection of Equality Data	**Action 2.1** An Equality Data Audit will be completed and annually updated by Civil and Public Service bodies to identify data gaps and monitor improvements in systems.	**2026-2031**	**All Civil and Public Service Bodies**
	Action 2.2 Guidance will be developed with regard to the inclusion of stakeholders in collection of equality data.	**2026-2031**	**CSO and Civil Society**
	Action 2.3 Public service organisations will draw on IHREC resources when developing guidance for the ethical collection and sharing of equality data.	**2026-2031**	**All Civil and Public Service Bodies**

2   See Appendix III

Chapter	Action	Time Line	Responsible Body
2: Collection of Equality Data	**Action 2.4** Capacity building will be delivered to Civil and Public Service bodies on collecting equality data, including stakeholder engagement to identify potential gaps, legislative or other, to achieve comprehensive and future focused equality data collection.	**2026-2031**	**DCDE, CSO and Civil Society**
	Action 2.5 An ethnic identifier will be introduced into the collection, use and dissemination of equality data beginning with the Department of Education and Youth and DCDE.	**2026-2031**	**Department of Education and Youth and DCDE**
	Action 2.6 Guidance will be developed to support and to advise Civil and Public Service bodies in relation to the categorisation and use of an ethnic identifier, with a specific focus on data relating to Travellers & Roma.	**2026-2031**	**CSO, DCDE and Civil Society**
	Action 2.7 Equality data will be used to inform performance indicators for national strategies starting with the new Equality Strategies and equality budgeting reporting.	**2026-2031**	**DCDE**
3: Standards and Classifications for Equality Data:	**Action 3.1** CSO will act as lead in the development, maintenance, and promotion of harmonised standards around classifications, providing guidance, follow-up training and support and technical advice for harmonisation.	**2026-2031**	**CSO**
	Action 3.2 As custodian of standards for national statistical classifications, CSO will develop a platform for the communication and promotion of harmonised standards around classifications used in the collection and presentation of equality data.	**2026**	**CSO**
	Action 3.3 Civil and Public Service bodies acting as producers or users of equality data will develop plans to implement the use of harmonised standards as these become available.	**2026-2031**	**All Civil and Public Service Bodies**

Chapter	Action	Time Line	Responsible Body
4: Use of Equality Data	**Action 4.1** CSO will create an Equality Data Hub. This should include a compendium of best practice and a repository of case studies or reports that are examples of best practice as well as disaggregated data and the equality data audits.	**2026**	**CSO**
	Action 4.2 Public Bodies will demonstrate in their Statements of Strategy, or Annual Reports as appropriate, how they use and plan to use equality data.	**2026-2031**	**All Civil and Public Service Bodies**
	Action 4.3 Guidelines or best practice will be developed on how to make equality data accessible for users.	**2026**	**CSO**
	Action 4.4 Civil and Public Service bodies will be given capacity building training on using equality data.	**2026-2031**	**All Civil and Public Service Bodies**
5: Monitoring and Oversight of the Strategy	**Action 5.1** The CSO and DCDE will co-chair a Steering group to monitor the progress of the Strategy. The Steering Group will develop an annual Action Plan for the Strategy which will identify priorities and set out timelines for progress.	**2026-2031**	**CSO/ DCDE**
	Action 5.2 The Steering Group will liaise with relevant officials to ensure alignment between this Strategy and the forthcoming Public Service Data Strategy. The annual Action Plan will be adjusted, as necessary to account for that Strategy, when published.	**Annual**	**Steering Group**
	Action 5.3 The Minister for Children, Disability and Equality will bring a Memorandum for Government each year to report on progress on the annual Action Plan and on the Strategy.	**Annual**	**DCDE**

Chapter	Action	Time Line	Responsible Body
5: Monitoring and Oversight of the Strategy	**Action 5.4** The Steering Group and CSO will monitor the annual equality data audit returns and compile in a central repository. Feedback will be provided to each return in relation to harmonisation and guidance on collections.	**Annual**	**CSO/ Steering Group**
	Action 5.5 An Equality Data Conference will be held to launch the Equality Data Hub and to share progress on the implementation of the Strategy.	**on completion of Equality Data Hub**	**CSO/ DCDE**
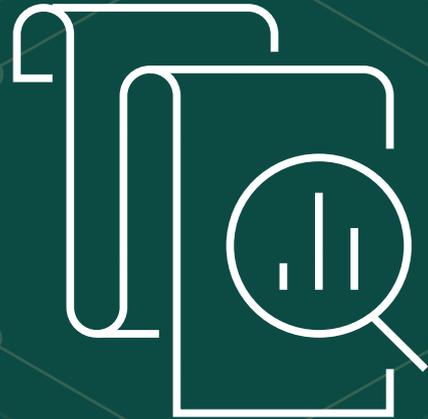
Introduction

1. Introduction

Vision

"To improve the collection, disaggregation and use of equality data".

This Strategy aims to improve Ireland's collection of equality data in order to enable policymakers to develop sound and inclusive evidence-informed policies to improve service delivery and outcomes across Ireland. It is a 5-year strategy, aimed primarily at the Civil and Public Service in Ireland, but it is envisioned that any data made available will be useful for both the public and private sectors to understand and analyse potential equality impacts of their actions.

As the first National Equality Data Strategy, this Strategy will be the starting point for improving the collection, disaggregation and use of equality data by the Civil and Public Service in Ireland. It is a cross-government strategy developed by the Central Statistics Office (CSO) with policy input from the Department of Children, Disabilty and Equality (DCDE). It is intended to link existing and future strategies and initiatives in this area.

This Strategy reflects a commitment across Government to the collection and disaggregation of equality data, and to using the data collected to develop equality-proofed policies and to report meaningfully on progress on equality in Ireland. It sets out the agreed approach across Government for those looking to fill gaps that have been identified, and to improve disaggregation and use of equality data.

The Public Sector Equality and Human Rights Duty in Section 42 of the Irish Human Rights and Equality Commission Act 2014 commits public bodies to have regard to the need to eliminate discrimination, promote equality and protect the human rights of staff and people availing of their services, and those affected by their policies and plans (See Appendix III). Enhanced collection and use of equality data will assist and encourage public bodies in carrying out this duty.

This Strategy will outline a general approach for identifying where data gaps currently lie and guidance on how best to fill those gaps over the lifetime of the Strategy.

What is Equality Data?

Equality data refers to *"any piece of information that is useful for the purposes of describing and analysing the state of equality".*[3] Such data can be collected from a number of data sources such as official data (census, administrative databases), household and individual surveys, victimisation surveys, diversity monitoring, and qualitative research. It may also include data that is not collected for the purpose of measuring equality or discrimination, such as administrative databases.

The protected characteristics outlined in the Equality Acts (see Appendix I) act as a foundation for identifying the areas where equality data should be collected, but equality data is not limited to these characteristics.

---

3   European Handbook on Equality Data, European Commission, 2016

> ### ⓘ Info Box 1.1 - Equality Data
>
> The European Guidelines on improving the collection and use of equality data define equality data as *"any piece of information that is useful for the purposes of describing and analysing the state of equality"*.[4] Equality data may be qualitative or quantitative in nature and could include data that is collected for other purposes.

Disaggregated Data

In order to ensure a more inclusive and fair society, policymakers need access to data related to equality. Robust and comprehensive evidence allows Government to design and evaluate policies and services more effectively. Disaggregated data, or data broken down by characteristics such as age, race or disability, allows policymakers to compare the outcomes for population groups. This allows Government to identify potential disadvantage or barriers to access to services, to assess and monitor the equality impacts of existing policies and to adapt policies accordingly.

Disaggregated data helps Government bodies to develop policy and services that are more correctly adapted to the diversity of the population and to the target service users as it provides a clearer picture of service use and policy outcomes for specific groups. Otherwise, the policies and services developed can benefit some groups more than others and can fail to meet the needs of marginalised groups or individuals.

> ### ⓘ Info Box 1.2 - Disaggregated Data
>
> Disaggregated data is data that is separated by characteristics such as sex, gender, race, or ethnicity and allows data users to compare population groups and understand the situations of specific groups. (e.g. when collecting data on the use of a service, aggregate data would show that 100 people used this service vs. data disaggregated by civil status might show that 3 single people, 75 married people, and 22 divorced people used this service.)

The Importance of Equality Data

In order to assess the equality impacts and monitor any adverse impacts of policies, public bodies need information to ensure that decisions and equality assessments are evidence-informed and appropriate. This information allows us to measure how effective our current policies and legislation are in terms of delivering services and to direct resources and supports where inequalities are most acute.

The collection of equality data also helps to highlight inequalities that may remain hidden in larger data collection exercises. Data that is disaggregated by equality grounds such as age, race or disability can highlight where a particular service user may not be able to adequately access the services we are providing. It also aids us in measuring compliance with our obligations to promote equality and protect human rights in Ireland.

---

4   European Handbook on Equality Data, European Commission, 2016

The Irish Context

EU level

Acknowledging the importance of equality data, in February 2018, the EU High Level Group on Non-discrimination, Equality and Diversity set up the Subgroup on Equality Data to help Member States improve the collection and use of equality data. The European Commission asked the Fundamental Rights Agency to facilitate the work of this Subgroup. It provides an important forum for relevant national authorities and EU institutions to discuss challenges and opportunities in improving the collection and use of equality data. In addition, the European Guidelines on improving the collection and use of Equality Data[5] provide practical guidance to Member States on how to best collect and use equality data to support policy implementation.

A Compendium of Practices on Equality Data[6] has also been published, with the aim of providing inspiration to EU Member States when implementing the Guidelines. It collates practices of Member States on equality data, providing information on the background and rationale underlying the practice, the way it was implemented, the main output, technical information, as well as a contact address for further information. The compendium is linked to the Guidelines and provides practical examples on how to implement them.

Current data collection in Ireland

Progress has been made in collecting relevant equality data in Ireland. In 2020, a CSO equality data audit found that, in Ireland, age and sex are routinely captured in data collection. It identified a number of collection gaps, such as gender identity, as well as quality gaps in the data that is collected, such as a lack of standard definition for disability, and the grouping together of the 65+ age group, which does not allow for further disaggregation. Chapter 2 discusses this audit and a number of other recent data audits that outline the data currently being collected and which highlight gaps needing to be addressed.

Relevant strategies

The importance of data collection and management has been noted in a range of Government strategies. The Public Service Data Strategy 2019-2023, for instance, states:

"Data lies at the heart of Government, informs and drives public policy, is collected and consumed by Public Service bodies and is central to the delivery of public services. [...] While there are many examples of good data management practice throughout the Public Service, data is frequently collected and managed in an independent manner."[7]

A number of government strategies in recent years have called for improvements in the management of data and included actions in this area, with a particular emphasis on achieving a consistent and uniform approach across Government.

The Open Data Strategy 2023-2027 aims to create easy access to high quality government data. This Strategy builds on the principle, outlined in the Open Data Strategy, that making

---

5   Guidelines on Improving the Collection and Use of Equality Data, European Commission, 2021
6   Compendium of Practices on Equality Data, European Union Agency for Fundamental Rights
7   Public Service Data Strategy 2019-2023, Department of Public Expenditure, Infrastructure, Public Service Reform and Digitalisation, 2019

data available for reuse for economic and social purposes can facilitate genuine improvements for society, and can help inform better decision making.

Data is named as one of the building blocks of reform in the Better Public Services - Public Service Transformation 2030 Strategy. Under that Strategy, Public Service Bodies are asked to identify and prioritise actions that share data safely across the Public Service to improve the evidence base for policy and service development.

Other relevant strategies include, Harnessing Digital: The Digital Ireland Framework, Our Public Service 2020, and The National Statistics Board Strategic Priorities for Official Statistics 2021-2026. This Strategy aims to build on the work of these strategies and the steering group will oversee the alignment of this Strategy with the forthcoming successor Public Service Data Strategy 2026-2031.

Ireland's National AI Strategy[8] notes that biases built into AI-based systems "have the potential to exacerbate existing structural inequities and marginalisation of vulnerable groups". Improved collection, disaggregation and use of equality data will build on this Strategy's actions to promote trustworthy AI. Taking steps to implement this Equality Data Strategy will assist Public Service Bodies in ensuring their data is high quality and representative. As a result, they will be in a better position to evaluate their data accurately, identify any bias and decide on the appropriate use of this data in the development of AI systems in line with recently published Guidelines for the Responsible Use of Artificial Intelligence in the Public Service.[9]

Recent Equality strategies such as the National LGBTIQ+ Inclusion Strategy II[10] and the National Traveller and Roma Strategy II[11] include actions related to improved data collection and reference that this work will be informed by the National Equality Data Strategy. The National Human Rights Strategy for Disabled People also commits to a more strategic and coordinated approach to disability research and data, working in line with this Strategy.[12] The National Strategy for Women and Girls 2025-2030 references this Strategy's complementary role in its strategic objective on gender mainstreaming.[13]

The National Action Plan against Racism (NAPAR), which aims to eliminate racism in all its forms in Ireland, outlines actions for improved equality data.[14] In Objective Four, Being Counted – Measuring the impacts of racism, the NAPAR outlines priority actions aimed at addressing issues of racism by improving ethnic equality monitoring, data collection and its use. Specifically, the NAPAR includes an action concerning the introduction of a standardised ethnic classification across all routine administrative systems, state agencies and surveys.

---

8   Ireland's National AI Strategy
9   Guidelines_for_the_Responsible_Use_of_AI_in_the_Public_Service.pdf
10   National LGBTIQ+ Inclusion Strategy II 2024-2028
11   National Traveller and Roma Inclusion Strategy II 2024-2028 (NTRIS II)
12   National Human Rights Strategy for Disabled People
13   National Strategy for Women and Girls 2025-2030
14   National Action Plan against Racism

First steps

In order to collect high-quality equality data, Government Departments, their agencies, and other public bodies at both a national and local level require a range of sources. Identifying where data related to equality is not currently being collected and prioritising the collection of that data is an important step.

Government Departments and public bodies need to review their current data and data collection methods, and with the help of this Strategy, improve standardisation across all data collected, by including and prioritising the collection, disaggregation and dissemination of equality data. The first step is for all Government Departments to make a commitment and to develop the organisational capacity to collect, use or disseminate disaggregated equality data, across all the protected grounds in their areas of responsibility. This may involve the reuse of data collected by other public bodies, such as in the examples provided in Case Studies 2.4 and 4.2 below.

The implications of data collection, use or dissemination will differ greatly for different Departments depending on their remit and on the extent and type of data collected or processed. In each case, it will be necessary for the public body to identify an appropriate legal basis for processing and planned guidance on implementing the Strategy will assist public bodies in doing so.

> **Action 1.1:** All Government Departments will make a commitment to collect, use or disseminate equality data and to develop the organisational capacity to fulfil this commitment.

> **Action 1.2:** All Government Departments will support public bodies under their aegis in the collection or use of equality data.

Collection of Equality Data

2. Collection of Equality Data

The purpose of collecting equality data is to have relevant, useful data available to help policymakers and others to analyse and assess the state of equality. This, in turn, will aid the development of well-informed and effective policies to protect against discrimination and exclusion in our society.

All data has the potential to be equality data, if it includes a variable related to one of the protected characteristics (See Appendix I) or other areas of equality. A considerable amount of data exists across the Irish public sector that can be used to explore the experiences and outcomes of different groups of people with different characteristics. There is significant crossover between the protected characteristics under the Equality Acts, and special categories of personal data under the GDPR, where the data relates to identifiable natural persons (Civil Status, Sexual Orientation, Religion, Disability, Age, and Membership of the Traveller Community). Where such data is held by a public body in respect of identifiable persons, it should be noted that processing for equality purposes must be in compliance with Article 9 GDPR.

Before we can begin to improve the collection of equality data, it is important to assess the breadth and scale of information that is currently collected, and to identify gaps in this collection. This includes examining existing public service data to ascertain which data can be reused for equality purposes, and determine any gaps where new collection or better disaggregation of data is needed.

An Equality Data Audit provides a means of identifying the data already being collected, in order to avoid data having to be collected unnecessarily. An annual audit will also enable public bodies to identify and review potential data gaps.

ⓘ Info Box 2.1 - Equality Data Gap

When data on characteristics such as race or ethnicity, age, disability or gender are not available, this should be identified as an equality data gap.

Action 2.1: An Equality Data Audit will be completed and annually updated by Civil and Public Service bodies to identify data gaps and monitor improvements in systems.

Case studies

The CSO carried out an equality data audit, which it published together with an accompanying report in 2020.[15] This involved reaching out to public sector bodies and requesting them to fill out an audit template. The returned audits were then collated and reviewed. Some analysis was then completed, highlighting areas where there is a lack of data collected, such as Race and Sexual Orientation, and also areas where there is a large variety of data sets available, such as Age. It is intended that The Equality Data Audit will be periodically updated. Further details can be found in Case Study 2.1.

---

15   The Equality Data Audit, CSO, 2020

Tusla, the Child and Family Agency also conducted an equality data audit of their agency, which was supported by the Department of Children, Equality, Disability, Integration and Youth, the Department of Public Expenditure and Reform and the CSO. Further information regarding this single-agency equality data audit can be found in Case Study 2.2.

The National Social Inclusion Office of the Health Service Executive developed a survey to assess the existing levels of understanding, barriers, and use of ethnic equality monitoring across health and social care. Further information regarding this survey and how the findings were implemented to update training in this area can be found in Case Study 2.3.

Case Study 2.1 – The CSO Equality Data Audit

The CSO equality data audit 2020[16] found that in the Irish system data on sex is well collected, as is age for working age persons, but significant gaps were identified in the following areas:

Quality Gaps

- Age data on the older population is often limited to the grouping '65+' which does not allow disaggregation of older groups.

- Nationality is frequently collected; however, ethnicity and race are rarely collected. These three markers should be clearly distinguished as they each are a very different part of a person's identity and are not interchangeable.

- Irish Travellers have been formally recognised as a distinct ethnic group since March 2017; however ethnic data inclusive of Travellers is not collected or used consistently across the system.

- Data on disability is collected often but a standard definition is not used.

Collection Gaps

- Gender identity is not collected in a manner which reflects the broad complexity of gender identity.

- Sexual Orientation is not directly collected. However it can sometimes be implied from questions on civil partnership or marriage if there is a same sex option when collected.

- Religion is rarely collected.

---

16   The Equality Data Audit, CSO, 2020

Case Study 2.2 – The Tusla Equality Audit

The Tusla Equality Audit[17] was a focused equality data audit of a single agency, supported by the then Department of Children, Equality, Disability and Equality, the Department of Public Expenditure and Reform (DPER) and the CSO. This is a good example of a first time audit, which could then be reviewed in subsequent years.
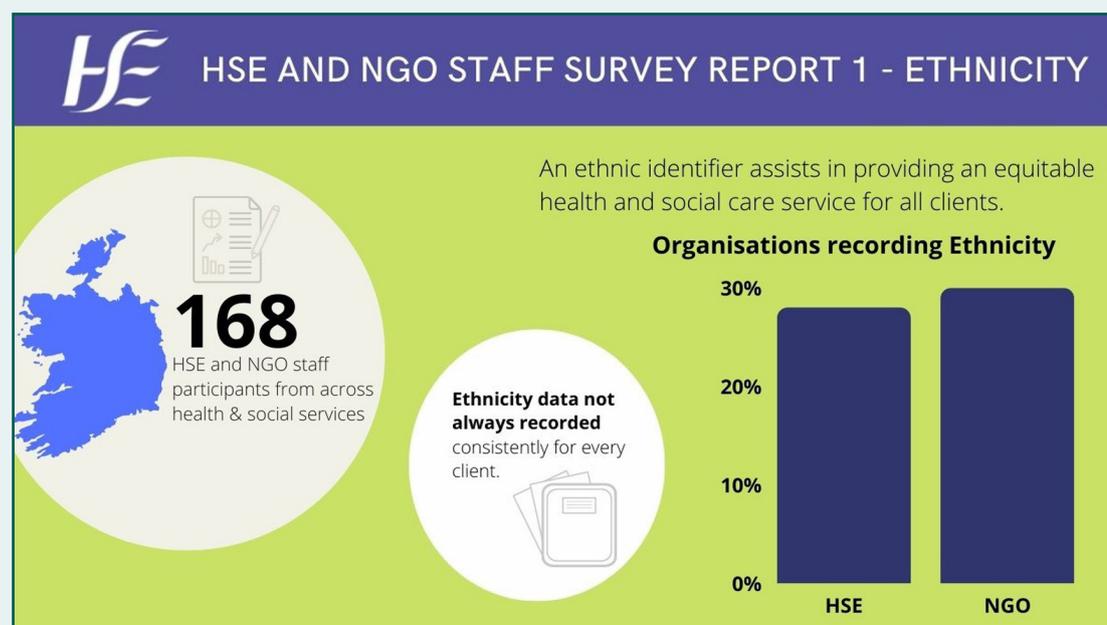
Of the nine grounds covered by the Employment Equality Acts 1998-2015 and the Equal Status Acts 2000-2018, age (95%) and gender (82%) are well represented across the audited data sets. Race (including ethnicity and nationality) is captured in 59% of data sets. Each of the remaining six grounds has coverage below 35%.

There is inconsistency in the classifications used for the collection of both disability and race data. Within Tusla, work is underway to improve the collection and coverage of data for both race (in the form of ethnicity) and disability.

Case Study 2.3 – The Ethnic Equality Monitoring Survey

The Ethnic Equality Monitoring (EEM) Survey[18] was developed to provide information for the EEM Subgroup in the National Social Inclusion Office (NSIO) on the existing levels of understanding, barriers and use of EEM across health and social care. The aim was to identify if and how this information is being used to adapt/improve services in the HSE to ensure fairness for everyone.

HSE AND NGO STAFF SURVEY REPORT 1 - ETHNICITY

An ethnic identifier assists in providing an equitable health and social care service for all clients.

168 HSE and NGO staff participants from across health & social services

Ethnicity data not always recorded consistently for every client.

Organisations recording Ethnicity

---

17 Equality Budgeting: Equality Audit of Tusla Data, Tusla, 2021
18 Ethnic Equality Monitoring Survey, HSE, 2019

🔍 Case Study 2.3 – continued

The outcomes from the survey exercise informed the updating of the EEM module on the Irish Health Service's national online learning and development portal (HSeLanD). The EEM training module: Introduction to ethnic equality monitoring looks at Cultural Sensitivity, the use and importance of EEM, communication, GDPR and managing personal data.
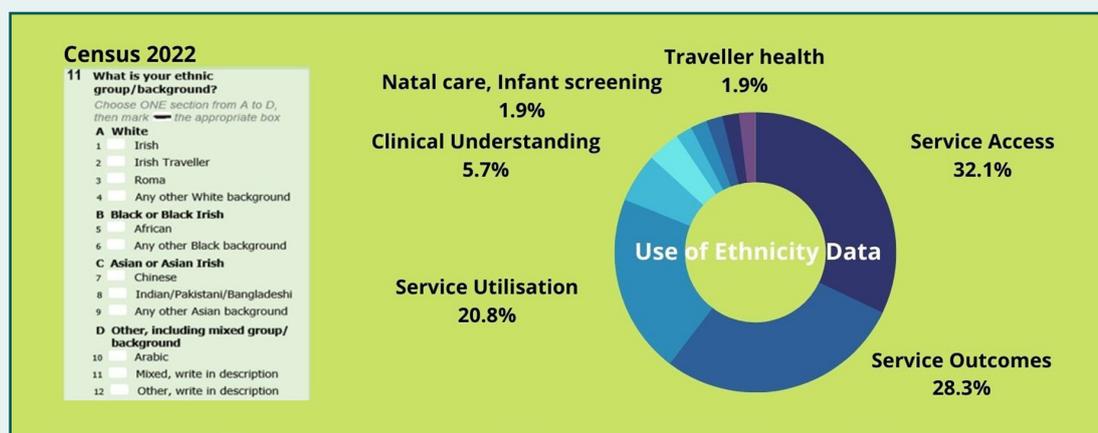
Reuse of data

It is important that, over the course of this Strategy, the Civil and Public Service should look to address gaps where they are identified. Equally, in line with the Public Service Data Strategy[19], and the Better Public Services - Public Service Transformation 2030 Strategy, data should be reused and shared where possible and the National Data Infrastructure (NDI)[20] of trusted unique identifiers (PPSN, Eircode, UBI), which enables the linking of data across public sector data holdings, should be used. When sharing anonymised data, public bodies should be aware of the risk of reidentification of individuals through the recombination of identifiable data from other datasets and the processing of identifiers that uniquely identify natural persons, such as PPSN and Eircode, must comply with data protection law.

ⓘ Info Box 2.2 - Data Linkage

Data linkage is a key concept addressed in this Strategy, and guidance on how equality data can be shared and accessed through the principle of 'collect once use often' will be proposed by CSO. Further, the Strategy will direct those collecting equality data to standard practices in classification, as well as policies and strategies already in place, in order to help identify and fill in gaps in equality data.

---

19 Public Service Data Strategy 2019-2023, Department of Public Expenditure, Infrastructure, Public Service Reform and Digitalisation, 2019

20 The National Data Infrastructure (NDI) plays an integral part in facilitating the CSO to develop new and improved statistical products for the benefit of citizens and policymakers. The core concept of the NDI involves the collection, maintenance, and storage of all public-sector data holdings, of three identifiers: the PPSN for interactions between the individual and the public sector; the Eircode; and unique business identifier (UBI), to enable improvements in service delivery, and policy formulation and analysis for businesses when interacting with the public sector.

This reuse of data allows for gaps to be filled, not by collecting variables for all grounds for disaggregation in all data collections, but by using unique identifiers. This allows an equality flag in one area be used to disaggregate and gain insight in other areas.
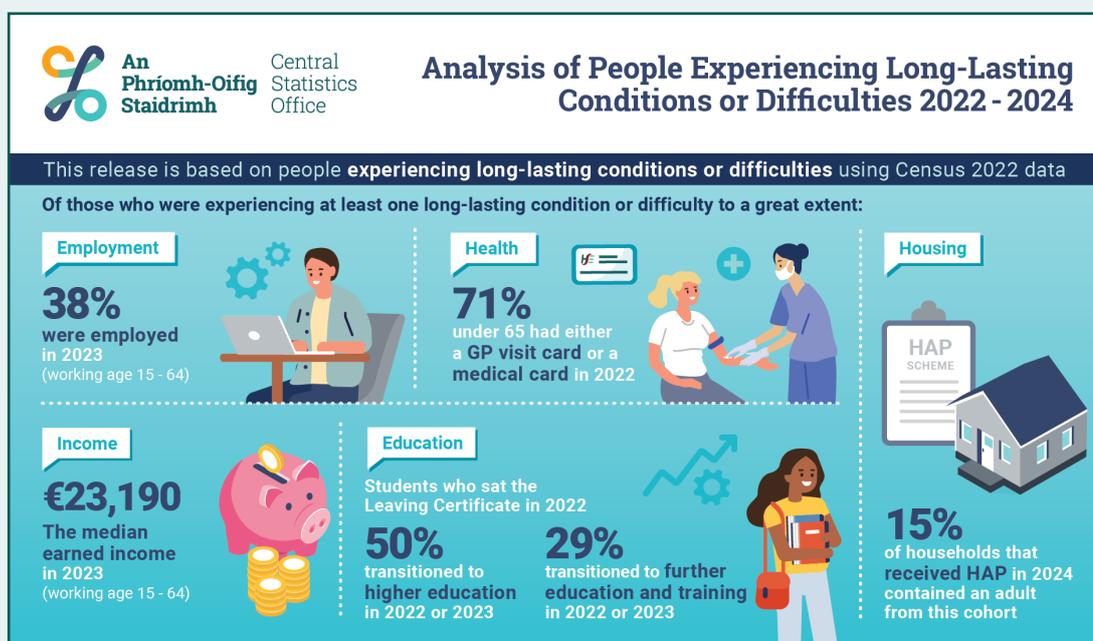
Case Study 2.4 - 'Analysis of People Experiencing Long-Lasting Conditions or Difficulties 2022 – 2024'

In 2025 the CSO published the frontier report:

'Analysis of People Experiencing Long-Lasting Conditions or Difficulties 2022 – 2024'.[21]

This report looked at individuals who reported a long-lasting condition or difficulty on Census night 2022 and linked them to pseudonymised administrative data sources, including employment data from the Revenue Commissioners, welfare data from the Department of Social Protection, education data from the Department of Education and the Higher Education Authority, social housing data from the Department of Housing and health support data from the Health Service Executive (HSE) to provide new insights into the employment, income, education, health and housing outcomes for people with a long-lasting condition or difficulty.

This report provides an example of the data linkage that is possible using existing data collection, and how it can be used to gain a better insight into equality issues.

An Phríomh-Oifig Staidrimh / Central Statistics Office

Analysis of People Experiencing Long-Lasting Conditions or Difficulties 2022 - 2024

This release is based on people **experiencing long-lasting conditions or difficulties** using Census 2022 data

Of those who were experiencing at least one long-lasting condition or difficulty to a great extent:

Employment
38% were employed in 2023 (working age 15 - 64)

Health
71% under 65 had either a GP visit card or a medical card in 2022

Housing
15% of households that received HAP in 2024 contained an adult from this cohort

Income
€23,190 The median earned income in 2023 (working age 15 - 64)

Education
Students who sat the Leaving Certificate in 2022
50% transitioned to higher education in 2022 or 2023
29% transitioned to further education and training in 2022 or 2023

---

21   Analysis of People Experiencing Long-Lasting Conditions or Difficulties 2022 – 2024

New data collections through existing surveys

Where existing data sources are not sufficient, and data needs to be collected, the use of existing regular CSO surveys to collect these variables may be considered as the first solution. For example, the EU Statistics on Income and Living Conditions (EU-SILC) survey, which focuses in particular on income and living conditions, that the Central Statistics Office (CSO) has undertaken every year since 2004, is the official source of data on household and equivalised disposable income in Ireland. It also provides a number of key national poverty indicators, including the 'at risk of poverty' rate, the 'consistent poverty rate' and 'rates of enforced deprivation'.[22] CSO surveys are continually revised and updated to reflect societal demands, and so adapting this, or other surveys, to fill an identified data gap, should in many cases be a straightforward and effective solution.

If this does not meet the data requirement, the CSO may consider the inclusion of a specific module in an existing instrument or a dedicated thematic campaign, for example, the Labour Force Survey, (previously known as the Quarterly National Household Survey), included an Equality and Discrimination module in 2014, 2010 and 2004. Further information regarding this survey can be found in Case Study 2.5.

If either of these options are unavailable and a questionnaire is instead designed for these purposes by a public service body, the CSO should be consulted to ensure the proper use of standards and classification for quality purposes.

> **Action 2.2:** Guidance will be developed with regard to the inclusion of stakeholders in the collection of equality data.

Case Study 2.5 – The Equality and Discrimination Survey

The Equality and Discrimination Survey was carried out in 2014, 2010 and 2004 as a module of the Quarterly National Household Survey (QNHS), however, since then the Labour Force Survey (LFS) has replaced the QNHS. The purpose of the QNHS/LFS is the production of quarterly labour force estimates and occasional reports on special social topics, one of which was the Equality and Discrimination Survey. In 2024, the Equality and Discrimination Survey became a standalone survey.[23] The Equality and Discrimination Survey is a good example of transitioning from a module in an existing survey instrument to a standalone survey.

GDPR and Data Protection

The General Data Protection Regulation (GDPR) gives effect to peoples' right to data protection. The GDPR creates a framework allowing for the free flow of personal data within the European Union, in a manner that protects the fundamental rights and freedoms of natural persons, and requires a high level of security for this data. The obligations set out in the GDPR apply to those working with equality data, supporting its safe collection and use. The collection, use or

---

22   Survey on Income and Living Conditions, CSO, 2025
23   Equality and Discrimination Survey, CSO, 2024

transmission of equality data is permissible under the GDPR provided that there is a basis for its collection and use. This must be communicated to people whose data will be affected.

The GDPR enhances the rights of data subjects and provides clear conditions for collecting, storing, processing and transferring personal data by institutions. It only applies to personal data, or data that is not anonymised. Equality data is considered personal data when it relates to an identified or identifiable person. However, in general, the equality data to be collected is intended to be anonymised. Anonymised data is not personal data, and does not come under GDPR obligations. However, special care must be taken that individuals cannot be identified with reference to any other information collected. Collectors of data should consider whether, and under what circumstances, they need to gather personal data as part of the process of gathering equality data. For personal data collection, the GDPR has specific implications for the information that must be provided to individuals at the time of data collection, which includes but is not limited to, transparency regarding the collection process, the purpose of collecting this data, where it will be stored, and their rights.

For the purposes of data protection law, each public sector body is a data controller with regard to the personal data that they collect and process, including for the purposes outlined in this Strategy. As such, each body is responsible for both ensuring and demonstrating compliance with GDPR when processing personal data for equality purposes. It will be the responsibility of each public sector body, as a data controller to clearly identify an applicable legal basis for the processing of personal data for the purposes outlined in this Strategy. For further information on the processing of special categories of personal data under GDPR see Appendix II.

The Statistics Act, 1993 established the Central Statistics Office (CSO) on a statutory basis, and provides a legislative basis for the compilation and dissemination of official statistics. The sharing of equality data with the CSO under this Strategy will be done in line with the provisions of this Act.

One of the key actions under this section will be to produce guidance for the ethical collection and sharing of equality data. This will help to ensure that any potential data linkage or collection project can take all data protection requirements into consideration from the initial stages. See Info Box 2.4 for information on the Human Rights Based Approach to Data and Appendix IV for more information on ethical collection of data.

The Public Sector Equality and Human Rights Duty in Section 42 of the Irish Human Rights and Equality Commission Act 2014 commits public bodies to have regard to the need to eliminate discrimination, promote equality and protect the human rights of staff and people availing of their services, and those affected by their policies and plans (See Appendix III). Enhanced equality data will assist and encourage public bodies in carrying out this duty.

The Irish Human Rights and Equality Commission (IHREC) is an independent public body whose purpose is to promote and protect human rights and equality in Ireland and build a culture of respect for human rights, equality and intercultural understanding in the State. It has specific functions to assist public bodies in accordance with Section 42 of the Act. The wider public service will draw on the expertise of IHREC in the development and implementation of guidance for the ethical collection and sharing of equality data.

> **Action 2.3:** Public service organisations will draw on IHREC resources when developing guidance for the ethical collection and sharing of equality data.

(i) Info Box 2.4 - Human Rights Based Approach to Data

The UN published a guidance note which provides general advice and guidance on elements of a common understanding of a Human Rights-Based Approach to Data. The guidance note specifically focuses on the issues of data collection and disaggregation. A preliminary set of main principles, recommendations and good practices are set out under the following headings:

- Participation
- Data disaggregation
- Self-identification
- Transparency
- Privacy
- Accountability

The Guidance note can be accessed here: https://www.ohchr.org/sites/default/files/Documents/Issues/HRIndicators/GuidanceNoteonApproachtoData.pdf

Ethnicity Data

The collection of ethnicity data is important for monitoring the access, participation and outcomes for ethnic minorities, particularly Travellers, as non-disaggregated data may mask poorer outcomes for such groups in accessing and progressing in key public services such as health, education, employment and access to accommodation. Introducing an ethnic identifier is therefore a key component in analysing and tackling social inequality in education and training, employment and social protection, housing and healthcare. Significant work has been undertaken by the CSO, in the context of the Census process, to develop an appropriate ethnic identifier. This builds on the work undertaken by civil society and others within the framework of the National Traveller and Roma Inclusion Strategy to develop such an identifier. Its importance has also been underlined in the National Action Plan Against Racism.

One challenge is the quality of the collection itself. This requires both training for the data collector and awareness raising for the data subject. Firstly, an agreed standardised ethnic identifier needs to be used by all data collectors. In addition to this, data collectors require training in relation to cultural sensitivity so that they can explain why this data is being collected to data subjects upon the point of collection. On the other hand, data subjects equally need to be aware that ethnicity data is required to help improve the services they use, and the policies aimed at addressing their specific concerns. This should allow them to feel confident in sharing

their ethnicity with the data collector. Public bodies should be aware that ethnicity data that relates to an identifiable natural person is a special category of data for data protection purposes (see Appendix II). Each public body will be responsible for ensuring that equality data, which is also special category data, is processed in a manner that is compliant with GDPR.

ℹ Info Box 2.5 – Disability Service planning and the use of ethnic identifiers

Data collection standards in the disability sector are not always sufficient to meet requirements. While there are many existing resources which provide data on disability in Ireland, many of these are focussed on groups with specific disabilities or users of specialised support services, making them unsuitable for understanding the wider population of persons with disabilities. For example, the Health Research Board (HRB), the National Council for Special Education (NCSE), the Irish Longitudinal Study on Ageing (TILDA) and the Intellectual Disability Supplement (IDS-TILDA) all collected data on specific subgroups, and as such cannot be viewed as nationally representative samples of the broader population of persons with disabilities. In addition, many of these resources are administrative data sets collected for a particular purpose, which can make it difficult to analyse for planning purposes.

Accurate and up-to-date equality data can be particularly important in terms of service planning and delivery for disabled people in communities less likely to seek out, or likely to have more difficulties in accessing, services. In Ireland, there is evidence that there are higher rates of some disabilities in the Traveller and Roma communities.[24] Research with disabled people from the Gypsy Roma Traveller (GRT) communities in the UK found that persons with disabilities from these communities are often averse to accessing health and social care services as a result of previous negative experiences and discrimination in society.[25] The research identified delays in accessing aids and adaptations as well as disability and health services, delays which can lead to adverse outcomes. The research also identified stigma surrounding disability among Gypsy Traveller and Roma communities as well as reluctance among service providers to visit GRT sites as being key barriers to the delivery of necessary disability services by statutory or voluntary organisations. This often places burdens on families who have to plug the gaps. Having an ethnic identifier in health and disability datasets is crucial for planning services and resource allocation for disabled people in the Traveller and Roma communities in Ireland.

> **Action 2.4:** Capacity building will be delivered to Civil and Public Service bodies on collecting equality data, including stakeholder engagement to identify potential gaps, legislative or other, to achieve comprehensive and future focused equality data collection.

---

24   Watson D, Kenny O, McGinnity F, Russell H. A social portrait of Travellers in Ireland [Internet]. ESRI; 2017 Jan [cited 2023 Nov 24]. Available from: https://www.esri.ie/publications/a-social-portrait-of-travellers-in-ireland
25   Disabled Gypsy Roma and Traveller people [Internet]. Shaping Our Lives. [cited 2023 Nov 24]. Available from: https://shapingourlives.org.uk/report/disabled-people-in-gypsy-roma-and-traveller-communities/

Health

The significance of equality monitoring for minority groups in healthcare access, participation and outcomes was recognised in particular in the National Traveller Health Action Plan 2022-2027. The Action Plan sets out how the use of an ethnic identifier would benefit the development and measurement of approaches to address the inequalities experienced by minority groups, thus ensuring greater equality and inclusion in services that are designed to meet their specific health needs. In order to help address health inequalities, the Department of Health is looking at ways to progress the standardised collection of ethnicity data across the health services in Ireland. Public bodies should again here be aware that health data that relates to an identifiable natural person is also a special category of data for data protection purposes (see Appendix II). Each public sector body will be responsible for ensuring that equality data that is also special category data is processed in a manner that is compliant with GDPR.

ⓘ Info Box 2.6 - Health inequalities

Health inequalities mean that some communities have poorer health outcomes when compared with the general population. These differences (inequalities) are unfair and unjust (inequities) and can be prevented. They can be measured by comparing indicators. These indicators include:

- life expectancy;
- infant mortality rates;
- adult mortality rates and causes;
- morbidity: the rate and extent of single and multiple, long-term diseases;
- mental health and suicide rates;
- quality of life indicators that can measure wellbeing.

From the National Traveller Health Action Plan 2022-2027.

Education

To monitor the impact of Delivering Equality of Opportunity In Schools (DEIS) on student participation and retention, ethnicity data of students is collected (on an opt-in / voluntary basis) on both the Primary Online Database (POD) and Post-Primary Online Database (PPOD) systems which captures student data on enrolment and progression through primary and post-primary education respectively. This data is used to produce statistical reports on participation and retention for specific cohorts (for example, see report on Pupils from the Traveller Community[26]), and annually for the entire student population. The provision of an opt-in or "prefer not to say" option in the primary collection of Equality Data (i.e. where the data is not strictly necessary for the performance of the tasks or functions of a public body) can be an effective way to incorporate the will and preference of the data subject in the processing of data that may be closely linked to their own sense of identity, and aligns with the principle underpinning the Right to Object to processing under Article 21 GDPR, which is based upon the particular situation of the Data Subject.

---

26 Pupils from the Traveller Community 2016-2020, Department of Education, 2022

> **Action 2.5:** An ethnic identifier will be introduced into the collection, use and dissemination of equality data beginning with the Department of Education and Youth and the Department of Children, Disability and Equality.

Public Awareness

Training and awareness raising is a necessary step that must be taken in order to create an environment of trust between the data subjects and data collectors. This applies not only to ethnicity data, but data across all the protected grounds or other areas of equality

Guidance

It is recognised that guidance will be needed for public service organisations which do not have expertise in collecting, using or disseminating data that integrates an ethnic identifier. Equally, it is important that standard classifications be used so that outcomes can be compared for ethnic minorities, including Travellers, across different policies and services. To this end, guidance to support and advise front line data collectors, and the corresponding civil and public service bodies, in relation to the use of an ethnic identifier will be developed.

> **Action 2.6:** Guidance will be developed to support and advise Civil and Public Service bodies in relation to the categorisation and use of an ethnic identifier, with a specific focus on data relating to Travellers & Roma.

Equality Budgeting

Equality budgeting is an initiative led by the Department of Public Expenditure, NDP Delivery and Reform (DPENDR) which has been implemented since 2018. This process assists the Irish Government to make informed decisions and to assess data on how best to allocate resources. The aim of equality budgeting is to ensure that as far as possible that there are no adverse impacts on marginalised groups from spending decisions.

An equality budgeting scan was conducted by the Organisation for Economic Co-Operation and Development (OECD) in 2019 in order to assess the actions that the Government had taken to mainstream equality considerations as part of the budget process. The OECD scan suggested that to improve equality budgeting and to ensure accurate and informed data, there is a need to improve the collection of equality data in Ireland.[27] Equality data is relevant to all public policy makers, beyond those explicitly dealing with equality and human rights issues.

Implementation of the National Equality Data Strategy will support the implementation of equality budgeting as disaggregated equality data is necessary to identify expenditure with equality impacts and to provide evidence as to the equality outcomes of programmes funded by the Exchequer.

---

27   OECD Scan of Equality Budgeting in Ireland, OECD, 2021

ⓘ Info Box 2.7 - Equality Budgeting

Equality Budgeting is an initiative led by the Department of Public Expenditure, NDP Delivery and Reform, which involves providing greater information on the likely impact of budgetary measures across a range of areas such as income, health and education, and how outcomes differ across gender, age, ethnicity and so on. Equality budgeting helps policy makers to better anticipate potential impacts in the budgetary process, therefore enhancing the Government's decision-making framework.[28]

National Strategies

A focus is being placed on developing effective performance indicators for a series of national strategies, starting with the successor to the National Traveller and Roma Inclusion Strategy. The collection and use of equality data will be important to enable the progress of such indicators to be adequately measured. Accordingly, equality data will be used to inform the performance indicators included in national strategies and to measure the progress of specific objectives and actions.

> **Action 2.7:** Equality data will be used to inform performance indicators for national strategies, starting with the new Equality Strategies and equality budgeting reporting.

---

28   Equality Budgeting, Department of Public Expenditure, Infrastructure, Public Service Reform and Digitalisation, 2021

Standards and Classifications for Equality Data
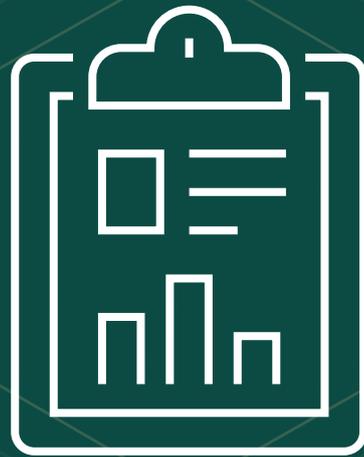
3. Standards and Classifications for Equality Data

Developing classifications supports

"Statistical classifications group and organise information meaningfully and systematically, in exhaustive and structured sets of categories that are defined according to an agreed set of criteria for similarity".[29]

Every statistical system requires standard concepts, definitions, and classifications to enable it to collect, process, and make sense of data. Where standard concepts and classifications have not been established, the ability to achieve coherence and comparability in analysis is inescapably weakened.

Utilising shared standards is particularly relevant in providing insight for equality data which is disaggregated by certain personal characteristics to describe inequalities or their causes or effects in societies.

The first step in standardising classifications is to ensure clarity and appropriateness around concepts being measured across data being collected. All data producers should review the conceptual foundations of their measures for relevant populations and groups, ensuring the measures that are used accurately reflect the appropriate standards and legislation.

> **Action 3.1:** CSO will act as lead in the development, maintenance, and promotion of harmonised standards around classifications, providing guidance, follow-up training and support and technical advice for harmonisation.

Data producers planning data collection should engage with the CSO Classifications Unit as early as possible to address key questions such as:

- How will you classify responses in data collection?
- How do you plan on classifying the data in the processing and analysis stages?
- Are you aware of existing classifications available on the topic?
- Has the CSO or any other Departments/Agency worked on this before?
- Are you clear on your use of classifications?
- Do the classifications you use meet user needs?

Early engagement with the CSO by key stakeholders across the Irish Statistical System will be needed, particularly around standardisation of equality data and identification of priority concepts and variables. This will assist in moving towards consistent definitions in data collection, will improve understanding of how data can be combined, and will facilitate the presentation of data and statistics in a comparable and coherent manner that better meets user needs.

In their work on standardising classifications, the CSO will look to international and European best practice guidance and will consult with relevant stakeholders, including the groups from whom the data is sought, to inform the classifications.

---

29   Best Practice Guidelines for Developing International Statistical Classifications, United Nations Statistics Division, 2013

> ### (i) Info Box 3.1 - Classifications
>
> A classification is an ordered set of related categories used to group data according to its similarities. It consists of codes and descriptors and allows survey responses to be put into meaningful categories in order to produce useful data. A classification is a useful tool for anyone developing statistical surveys. It is a framework which both simplifies the topic being studied and makes it easy to categorise all data or responses received.
>
> CSO classifications:
> https://www.cso.ie/en/methods/classifications/csodatastandardsandclassifications/

Harmonisation and Standardisation

It may not always be possible to have completely standardised data and statistics for all equality grounds. This is because of differences in data collection, legislative requirements for particular bodies, and varied user needs. However, by working together at an early stage of design, these differences can be better understood, and even where full standardisation is not achievable, it may be possible to harmonise classifications to get more usable information from the data. This will help create more meaningful statistics that allow users to better understand a topic.

> **Action 3.2:** As custodian of standards for national statistical classifications, CSO will develop a platform for the communication and promotion of harmonised standards for classifications used in the collection and presentation of equality data

Harmonisation is about making statistics and data more comparable, consistent, and coherent.

Harmonisation can include:

- using the same text in questionnaires and in administrative data collection;
- producing statistical outputs that use the same categories;
- indicating the limitations around successfully comparing data and statistics from different sources, including communicating what sources can and cannot be compared and the reasons for this.

Transparency around classifications and other standards being applied to data is vital in mitigating the risk that users might arrive at incorrect conclusions which can affect decisions and policy making. Therefore, building a system to make this information accessible is a key aim.

Support for harmonised standards should include the provision of a library of definitions, sample survey questions, code books and transparency of information for both data producers and data users. Producers of statistics can then use these harmonised standards to align with other data producers, which will increase the usefulness of their statistics.
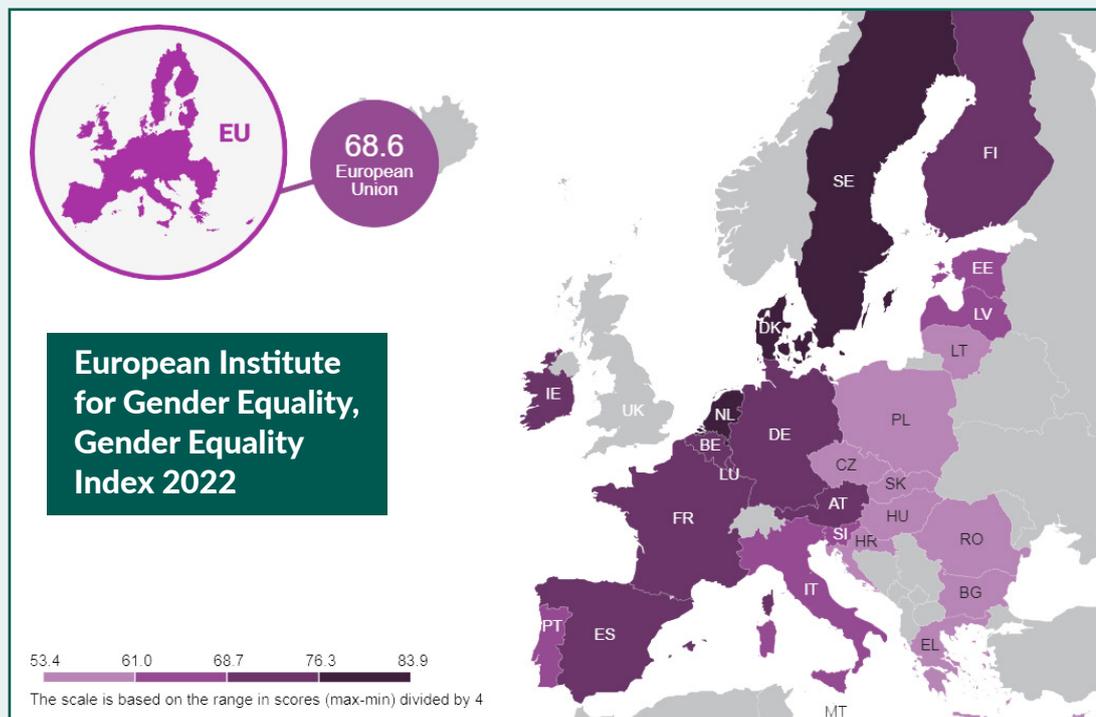
Statistics do not always have to be fully standardised to be harmonised, but development and use of harmonised standards allows data producers to develop outputs that align reasonably with information from other data producers thereby increasing the usefulness of their statistics for research, analysis, decisions, and policymaking.

In view of the importance of ensuring that data is harmonised, an action is included in the Strategy that Civil and Public Service bodies should develop plans relating to the use of harmonised standards.

Case Study 3.1 – The Gender Equality Index

The Gender Equality Index is a tool to measure the progress of gender equality in the EU, developed by the European Institute for Gender Equality (EIGE). It gives more visibility to areas that need improvement and ultimately supports policy makers to design more effective gender equality measures. EIGE's Gender Equality Index is an example of how good practices of standardisation allows for national data to be comparable with data from other countries:

European Institute for Gender Equality, Gender Equality Index 2022

68.6 European Union

53.4   61.0   68.7   76.3   83.9
The scale is based on the range in scores (max-min) divided by 4

https://eige.europa.eu/gender-equality-index/2022/country/IE

Action 3.3: Civil and Public Service bodies acting as producers or users of equality data will develop plans to consider impact of implementation and use of harmonised standards as these become available.

Use of Equality Data

4. Use of Equality Data

Equality data will be used to support evidence-informed policymaking and analysis of the uptake and access to services. By disaggregating data, we can see how different people interact with public services across all the protected characteristics as set out in the Equality Acts. Being aware of good practice in the use of equality data will help public bodies, equality bodies, research institutes and NGOs to utilise the data available to them to inform their work effectively.

Equality Data Hub

One of the key Actions of this Strategy is the establishment of an Equality Data Hub. This will be a key component in the dissemination of equality data that is linked and shared in a meaningful way for a broad range of users. It is envisaged that the Equality Data Hub will initially aggregate existing equality data sources and research but will be an ongoing project that will be monitored and improved through future strategies.

The CSO will lead on the creation of an Equality Data Hub, which will be the centralised site for all equality related data and research in Ireland. This will be an important tool for policy makers to be able to access the data they need to inform public policy, but equally will be a place for members of the public to access information on new developments in the collection, availability and use of equality data.

Case Study 4.1 - Equality Monitoring Data review (2022)

The Public Appointments Service, the centralised recruiter for the civil and public sector, acknowledge that our civil service needs to better reflect wider Irish society. Collecting data on who is applying and who is getting jobs is essential to ensure they can do just that. Gathering equality monitoring data will help them to target underrepresented groups better and to develop data-driven policies and programmes that encourage people to look for careers in the public sector. In 2022 they commissioned the Economic and Social Research Council (ESRI) to 'health check' their data and do a 'deep dive' analysis of application and assignment data between 2019 and 2021, across three categories: disability, gender and ethnicity.

As a result of this review, they are now confident that their data is both robust and representative and they now also have a useful baseline from which to measure the growing diversity of the public sector workforce. National Data Infrastructure (NDI) will provide an alternative approach to measurement in an environment where public service bodies are being asked to record the ethnicity and protected characteristics of people they interact with.

https://www.publicjobs.ie/en/

> **Action 4.1:** CSO will create an Equality Data Hub. This should include a compendium of best practice and a repository of case studies or reports that are examples of best practice as well as disaggregated data and the equality data audits.

Public Bodies' Statements of Strategy

The Public Sector Duty places a statutory obligation on public bodies to eliminate discrimination, promote equality of opportunity and protect human rights. The Duty is an ongoing obligation on public bodies and must be incorporated as part of the organisations overall strategic planning cycle. (See Appendix III).

A Statement of Strategy is a strategic plan which sets out the current context facing Departments or public bodies, and their stakeholders, and details the commitments that Departments and public bodies are making in terms of delivering on their strategic goals. Public bodies will be required to demonstrate how they are using equality data to inform their policymaking in their Statement of Strategy. This will assist in ensuring that equality data is being incorporated into their implementation of the Public Sector Duty.

Once made available through the Equality Data Hub, equality data will play an important role in assisting public bodies to fulfil their obligations.

> **Action 4.2:** Public bodies will demonstrate in their Statements of Strategy, or Annual Reports as appropriate, how they use and plan to use equality data.

Case Study 4.2 - Diversity in An Garda Síochána 2023

The Diversity in An Garda Síochána 2023 is a pilot project, initiated by An Garda Síochána (AGS), to produce a statistical analysis of diversity of AGS personnel. Instead of AGS explicitly collecting and recording the demographic characteristics of employees, it measures diversity by matching public service workforce data to CSO datasets. The success of this project provides a template for anonymously measuring diversity in the public service, while adhering to the principle of "once only" data collection. It highlights the further potential of the National Data Infrastructure (NDI) to provide an alternative approach to measurement in an environment where public service bodies are being asked to record the ethnicity and protected characteristics of people they interact with.

https://www.cso.ie/en/releasesandpublications/fp/fp-ags/diversityinangardasiochana2023/

Accessibility

Data should be easily accessible to users. The needs of different types of users, including those with disabilities, poor literacy or those for whom English is not their first language, should be considered.

Guidelines on making data accessible will be developed and made available to ensure that public bodies understand how to address these different needs appropriately.

> **Action 4.3:** Guidelines or best practice will be developed on how to make equality data accessible for users.

Capacity Building

Capacity building on how best to use equality data effectively in our work to develop policies and improve our services will be delivered to the Civil and Public Service. As seen through Case Study 3.3, the HSE effectively implemented capacity building training through their online learning platform which was informed by their equality monitoring survey. The Public Service could similarly utilise the One Learning Platform to build capacity on reading equality data sets from the Hub, how to analyse this data for specific work streams, and how to incorporate the learnings from equality data into our work to better deliver our services.

> **Action 4.4:** Civil and Public Service bodies will be given capacity building training on using equality data.

Monitoring & Oversight of the Strategy

5. Monitoring and Oversight of the Strategy

The first phase of the National Equality Data Strategy will involve establishing the Equality Data Hub and the collection and dissemination of equality data through this Hub. It is planned that the current National Equality Data Strategy Working Group will function as a steering group to monitor the Strategy during its term. Relevant stakeholders may be invited, or a consultation of relevant groups may take place, as the work moves on, to ensure that there is input from all appropriate groups at each stage of the Strategy.

DCDE, with input from the Steering Group, will coordinate a Memorandum for Government each year which will report on the achievements under the annual Action Plan and progress towards achievement of the aims of the Strategy

> **Action 5.1:** The CSO and DCDE will co-chair a Steering group to monitor the progress of the Strategy. The Steering Group will develop an annual Action Plan for the Strategy which will identify priorities and set out timelines for progress.

> **Action 5.2:** The Steering Group will liaise with relevant officials to ensure alignment between this Strategy and the forthcoming Public Service Data Strategy. The annual Action Plan will be adjusted, as necessary to account for that Strategy, when published.

> **Action 5.3:** The Minister for Children, Disability and Equality will bring a Memorandum for Government each year to report on progress on the annual Action Plan and on the Strategy.

The current working group comprises stakeholders from across Government, as well as civil society and research bodies. It will act as a steering group to monitor the progress of the Strategy. The steering group will first decide on the sequence of actions and assess the priority of the actions laid out in this Strategy. The steering group will also assign actions to relevant bodies and follow up for progress reports.

The steering group will work with the CSO to monitor and update the equality data audit returns. The steering group and the CSO will provide feedback and direct respondents to guidance and frameworks in relation to any gaps or harmonisation that are found in the results.

> **Action 5.4:** The Steering Group and CSO will monitor the annual equality data audit returns and compile in a central repository. Feedback will be provided to each return in relation to harmonization and guidance on collections.

The steering group will organise an Equality Data Conference to launch the Equality Data hub and share the progress of the Strategy. The aim of the conference will be to bring together a wide range of actors and to share best practices in terms of collecting, sharing and use of equality data. This will also be an opportunity for evaluating the Hub and assessing where improvements or changes might need to be made. This will be both a sharing opportunity for

what is working well and an opportunity to evaluate where we still need to improve in any aspect of the Strategy.

> **Action 5.5:** An Equality Data Conference will be organised to launch the Equality Data Hub and to share progress on the implementation of the Strategy.

Appendix

I - Protected Characteristics in the Equality Acts

In Ireland, the major pieces of legislation that promote equality and offer protections from discrimination are the Equal Status Act 2000-2018 and the Employment Equality Act 1998-2021 (The Equality Acts).[30] These pieces of legislation prohibit both direct and indirect discrimination in the areas of employment and access to goods and services, including housing, healthcare and education. The Equality Acts also outlaw harassment, sexual harassment, and victimisation.

The nine protected characteristics of the Equality Acts are:

- Gender

- Civil status

- Family status

- Sexual orientation

- Religion

- Age

- Disability

- Race

- Membership of the Traveller community

In addition to these nine grounds, the Equal Status Acts also prohibit discrimination in the provision of accommodation services against people who are in receipt of rent supplement, housing assistance, or social welfare payments, known as the 'Housing Assistance Ground'.

II - Processing of special categories of personal data under the General Data Protection Regulation

Public Bodies, as data controllers, will be responsible for ensuring that the processing of special categories of personal data is compliant with GDPR.

In the case of secondary processing note the provisions of Article 5(1)(b) GDPR on purpose limitation:

"Personal data shall be collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interests, scientific or historical research purposes or statistical purposes shall, in accordance with Article 89(1), not be considered to be incompatible with the initial purposes."

---

30   The Equal Status Act 2000-2018
      The Employment Equality Acts 1998-2021

Further to the above, Article 89(1) GDPR states that:

"Processing for archiving purposes in the public interests, scientific or historical research purposes or statistical purposes, shall be subject to appropriate safeguards, in accordance with this Regulation, for the rights and freedoms of the data subject. Those safeguards shall ensure that technical and organisational measures are in place in particular in order to ensure respect for the principle of data minimisation. Those measures may include pseudonymisation provided that those purposes can be fulfilled in that manner. Where those purposes can be fulfilled by further processing which does not permit or no longer permits the identification of data subjects, those purposes shall be fulfilled in that manner".

The following is an extract from the European Commission Guidelines on improving the collection and use of equality data, p.12

https://op.europa.eu/en/publication-detail/-/publication/a3d2cd88-0eba-11ec-b771-01aa75ed71a1

"Article 9 of the General Data Protection Regulation (EU) 2016/679 (GDPR) prohibits the processing of personal data revealing characteristics such as racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health, or data concerning a natural person's sex life or sexual orientation. However, the GDPR clarifies that this prohibition does not apply, among others, when:

- the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition may not be lifted by the data subject (Article 9.2 (a));

- processing is necessary for reasons of substantial public interest, statistical purposes, scientific or historical research purposes, or for archiving purposes in the public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject (Article 9.2 (g) and (j)).

Recital 26 of the GDPR further states the principles of data protection should not apply to anonymous information, that is, information which does not relate to an identified or identifiable natural person, or which relates to personal data rendered anonymous in such a manner that the data subject is not or no longer identifiable. Recital 26 further states that the GDPR does not concern the processing of such anonymous information, including for statistical or research purposes.

Finally, the way personal data are processed has to comply with the GDPR and in particular with the general principles of data protection as set out in Article 5: lawfulness, fairness, transparency, purpose limitation, data minimisation, accuracy, storage limitation, integrity, confidentiality and accountability."

III - Public Sector Duty

One of the main obligations of the GDPR is a requirement to have a legal basis to collect and process special category data. This is provided for in various ways in relation to the public sector, mainly through section 42 of the Irish Human Rights and Equality Commission Act 2014.[31]

Section 42 requires that all public bodies promote equality, prevent discrimination and protect the human rights of their employees, customers and service users.[32] This is known as the Public Sector Duty, and includes three core steps:

- Identify human rights and equality issues
- Identify policies and practices to address these issues
- Report on developments and achievements in human rights and equality issues.

This should be published in their strategic plan and annual reports in a manner that is accessible to the public.

The Public Sector Duty will play a key role in holding public bodies accountable for their use of equality data and engagement with this Strategy as they report how they are using equality data to inform their work.

Other specific legislative provisions related to GDPR can also be found, for example a legal basis for the collection of ethnicity data in the higher education sector has been provided in section 49 of the Higher Education Authority Act 2022.[33]

IV – Ethical Data Collection

As the demand for equality data grows, the requirement for an ethical review of data collection developments is recognised as best practice. Advice on governance and ethical considerations is required for public bodies embarking on equality data collections. This advice should be created in collaboration with stakeholders in collection and monitoring of equality data to ensure that it is fit for purpose and not burdensome.

Advice on ethical data collection should be centred on trust and communication. It is vital to build trust, particularly with minority groups, in order to ensure that people understand why their data, which may include sensitive personal information, is being collected, how it will be used and, where possible, to include people in the collection process so that it is collaborative. Equally, communication is key in public understanding of how any information that the public provides is shared, stored and used.

---

31   Irish Human Rights and Equality Commission Act 2014
32   Irish Human Rights and Equality Commission Act 2014
33   The Higher Education Authority Act 2022

V – Points of Contact

Support on Data Standards and classifications - classifications@cso.ie

Equality Data Audit - sscu@cso.ie

Equality Data Hub - sscu@cso.ie

DCDE - equalitypolicy@dcde.gov.ie