

## Submission to Oireachtas Justice Committee August 2021

# Irish Network Against Racism



**(INAR)**

## Comments on the General Scheme of the Criminal Justice (Hate Crime) Bill, 2021

The Irish Network Against Racism ([INAR](http://www.inar.ie)) coordinates a network of over 160 civil society organisations in Ireland to share practices and develop common positions on questions relating to all forms of racism in Ireland. INAR has pioneered the [iReport.ie](http://iReport.ie) racist incident reporting system since 2013, logging [thousands of hate crimes and racist incidents](#) and producing from their data cutting edge reports and policy submissions to national and international reporting bodies, government and media. INAR is an active member of the European Network Against Racism (ENAR), itself a civil society network across 30 European states. INAR makes submissions on racism and discrimination in Ireland to the Government, National Authorities, and the European Union, the OSCE, the Council of Europe and UN bodies. INAR prepared and presented the Irish Civil Society collective [Shadow Report](#) to the UN Committee for the Elimination of Racial Discrimination (UN CERD) hearing on Ireland in November 2019. INAR has also contributed to the Future of Policing in Ireland report, and numerous other policy submissions.

INAR is a founder member and former coordinating organisation of the Coalition Against Hate Crime Ireland (CAHC) (2017-21), an inter-NGO alliance (anti-racism, LGBTQIA+, disability rights org) lobbying for Hate Crime Legislation and related policy in Ireland. INAR

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Chairs the Garda National Diversity Forum, overseeing the implementation of the An Garda Síochána Diversity Strategy (2018-21).

In 2020 INAR's Director was appointed by the Minister of Justice to advisory Government Anti-Racism Committee (ARC) (2020-21) - now under the aegis of the Minister for Equality, developing the National Action Plan Against Racism (NAPAR).

INAR is a participant in several projects in the area of hate crime and minority relations with the criminal justice system, including the 'Facts Against Hate' programme (commended by the EU Fundamental Rights Agency) with OSCE/ODIHR, the Finnish Ministries of Justice and Equality and Finnish Police Training College, and Finnish and Croatian human rights groups monitoring hate crime. Similarly, INAR is a key partner in EU-wide "[Facing Facts](#)" project led by CEJI (Jewish Contribution to an Inclusive Europe); researching and developing online training courses for NGOs, Prosecutors and Police forces (Italy, Hungary, Spain, Belgium, Ireland) in responding to, hate speech, hate crimes and monitoring hate crimes. INAR is the co-author of "[Connecting on Hate Crime in Europe, Country Report for Ireland](#)", and has subsequently co-developed the 'Facing Facts' online training module for Gardaí with Garda Síochána College and the Garda National Diversity and Inclusion Unit (GNDIU) (2021).

INAR is established as a 'trusted reporter' for hate content with Facebook, Twitter, Google/YouTube, and as the European Commission's Irish civil society partner for the EC annual hate content 'Monitoring Exercise' on Social Media platforms' adherence to EC Voluntary Code of Conduct.

Our submission to the Justice Committee here on the Heads of Bill, and other issues relating to minority access to justice, brings together findings and learnings from our collaborations, previous consultations and research, including from iReport.ie data, and from consultations with our member organisations, civil society partners and other key stakeholders.

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**This submission is divided into 2 parts:**

1) *General Scheme of the Criminal Justice (Hate Crime) Bill, 2021*

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# *1) General Scheme of the Criminal Justice (Hate Crime) Bill, 2021*

## **Introduction**

The Hate Crime Bill is a historic opportunity for Ireland to create a comprehensive framework that ensures sufficient access to remedies by victims of hate crime. At times the determination of the law by a court may be subject to some challenges, mainly in cases where the content of the applicable law is hard to ascertain. In such cases the law risks failing to protect victims; hence our emphasis on the need for clarity in the regulatory framework.

### **Head 1 - Title.**

The title of the Act should reflect the fact that its contents include provisions, both for prohibiting incitement to hatred, and for prohibiting hate crime.

### **Head 2: Interpretation**

#### **Definitions**

- The Interpretation section is welcome because it is an opportunity to provide clear definitions of terms.
- Definitions are important as they encapsulate the substance of the definition, or inclusion or exclusion from it, within the text of the definition.

#### **Hatred and hostility**

- The addition of wording around Hatred and Hostility is welcome, provided clear definitions are given to ensure the consistency of form and language. INAR also welcomes the range in which the hate element is recognised as manifesting as this is very progressive.

#### **The use of the word 'Magnitude'**

- INAR proposes that either: a) the word "magnitude" be defined to avoid ambiguity in

interpretation by attributing a specific meaning to the word Or b) that the word should be taken out altogether to avoid any ambiguity which interpretation of the word might lead to.

### **Addition of the word Prejudice under Head 2**

- INAR suggests that for precision the phrase “prejudice” should also be clearly defined under Head 2.

### **Protected Characteristics**

- The “protected characteristics” should be expanded to fully reflect the diversity of Irish society i.e. add family status and age

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- ‘Race ‘ and ‘Colour’, as with all relevant protected categories, should be defined in accordance with the Equal Status Acts, 2000 and the Employment Equality Act, 1998.
- The wording must encompass both actual and perceived association with and membership of a protected group.

### **Compliance with international law**

- It is important that definitions and all parts of the legislation should ensure compliance with international human rights standards, principles and best practices.
- To ensure the strongest protections for victims of hate crime, INAR is of the view that this legislative framework would benefit from an express provision stating that domestic laws should be interpreted in line with international human rights law while paying special attention to the specific needs of the diversity in Irish society

### **Head 3: Incitement to Hatred**

INAR welcomes the expansion of the definition of ‘Incitement to Hatred’ to include, ‘reckless’. This effectively recognises the wider array of manifestations of hate crime that victims experience ensuring a better protection to them.

### **Head 4: Hate Crime**

The creation of aggravated ‘offences’ is a welcome development, there is a need for clarity of terms and definitions.

Head 4 (1) Assault:

#### **- “Aggravated by Prejudice”**

This is welcome as it adds to the range of behaviours that needs to be captured by the legislation. The term ‘prejudice’ must be clearly defined and we suggest that it should be defined explicitly and unequivocally under Head 2.

Head 4 (2) Assault causing harm:

- **“Motivated by Prejudice”**

This is welcome but should be amended to add “and/or involving the demonstration of prejudice, ill will, hostility on the part of the perpetrator against a protected characteristic.” This will remove ambiguity in the recording of possible hate crimes.

Head 4 (3) Causing serious harm:

- **“Aggravated by Prejudice”**

We recommend that this should also be amended by adding “and/or involving the demonstration of prejudice, ill will, hostility on the part of the perpetrator against a

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protected characteristic.” this will remove ambiguity in the recording of possible hate crimes and provide a clear way of establishing the hate element

Head 4 (4) Threats to Kill or cause serious harm:

- **“Aggravated by Prejudice”**

This is welcomed but should be amended to add “and/or involving the demonstration of prejudice, ill will, hostility on the part of the perpetrator against a protected characteristic. “This will remove ambiguity in the recording of possible hate crimes and provide a clear way of establishing the hate element.

Head 4 (5) Coercion:

- **“Aggravated by Prejudice”**

This is especially welcomed as it captures behaviours that affect victims who have hitherto been unrecognised, however, it must be amended to add “and/or involving the demonstration of prejudice, ill will, hostility on the part of the perpetrator against a protected characteristic. “This will remove ambiguity in the recording of possible hate crimes and provide a clear way of establishing the hate element.

Head 4 (6) Harassment:

- **“Aggravated by Prejudice”**

This is a welcomed development but should be amended to include “and/or involving the demonstration of prejudice, ill will, hostility on the part of the perpetrator against a protected characteristic. “This will remove ambiguity in the recording of possible hate crimes and provide a clear way of establishing the hate element.

Head 4 (7) Endangerment:

- **“Aggravated by Prejudice”**

This is welcome however prejudice must be clearly defined for the avoidance of doubt as to what it constitutes and should be amended to add “and/or involving the demonstration of prejudice, ill will, hostility on the part of the perpetrator against a

protected characteristic.” This will remove ambiguity in the recording of possible hate crimes and provide a clear way of establishing the hate element.

## Head 5: Amendments to the Criminal Damage Act 1991

Head 5 (1) Damage to Property:

- **“Aggravated by Prejudice”**

The inclusion of damage to property aggravated by prejudice is welcome, however, the term “prejudice” must be defined clearly and unambiguously to ensure the consistent application of the law. It should also be amended and add “and/or involving the demonstration of prejudice, ill will, and hostility on the part of the perpetrator against a protected characteristic.” This will remove ambiguity in the

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recording of possible hate crimes and provide a clear way of establishing the hate element.

## Defences

(5) In a prosecution for an offence under paragraph (3), it shall be a defence to prove that -

(a) The material concerned consisted solely of a “**reasonable and genuine**” contribution to literary, artistic, political, scientific, or academic discourse,

- What is meant by “**reasonable**” and “**genuine**”? Is there a need to clarify these terms for the avoidance of doubt?
- The use of wide defences has the potential to render the regulatory framework ineffective, therefore there is a need to tighten defences to ensure that the law is operable.
- INAR is of the view that this law should have both a horizontal and vertical application to ensure that the private sector is targeted as well. This is against the backdrop that in the past corporations have been shielded from human rights responsibilities and have not been held accountable for violating fundamental rights. This Bill would benefit from an express proviso on the duty of private actors to prohibit hate crime.

## Head 6: Amendment of the Criminal Justice (Public Order) Act

1994 Head 6 (1) Threatening, abusive or insulting behaviour in a public

place:

- **“Aggravated by Prejudice”**

This new development is welcome however we suggest that the term ‘prejudice’ must be defined and amended to include “and/or the demonstration of prejudice, ill

will, hostility on the part of the perpetrator against a protected characteristic.” This will remove ambiguity in the recording of possible hate crimes and provide a clear way of establishing the hate element.

Head 6 (2) Distribution or display in a public place .....

- **“Aggravated by Prejudice”**

The inclusion of distribution or display in a public place of materials threatening ..... is welcome but should be amended to add “and/or the demonstration of prejudice, ill will, hostility on the part of the perpetrator against a protected characteristic.” This will remove ambiguity in the recording of possible hate crimes and provide a clear way of establishing the hate element.

Head 6 (3) Entering the building, etc. with intent to commit an

offence: 6

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- **“Aggravated by Prejudice”**

This new development is welcome but we recommend that this be amended to add “and/or the demonstration of prejudice, ill will, hostility on the part of the perpetrator against a protected characteristic.” This will remove ambiguity in the recording of possible hate crimes and provide a clear way of establishing the hate element.

Head 6 (4) Assault with intent to cause bodily harm.....:

- **“Aggravated by Prejudice”**

The word ‘prejudice’ must be defined clearly for the purposes of this Act and we suggest an amendment to this subsection to add “and/or the demonstration of prejudice, ill will, hostility on the part of the perpetrator against a protected characteristic.” This will remove ambiguity in the recording of possible hate crimes and provide a clear way of establishing the hate element.

### **Head 7: General Provision where a scheduled offence is aggravated by prejudice**

This is welcomed because it captures the wide range of abusive behaviours faced by affected communities. It allows any other offence to be brought to the attention of the court even though it has not been listed under Head 6.

- **“Aggravated by Prejudice”**

While we acknowledge the importance of this clause, lack of clarity on what is meant by ‘prejudice’ is tricky and is detrimental to the victims’ ability to secure effective remedies. The word ‘prejudice’ should be defined in unequivocal terms and the clause should be amended to add “and/or the demonstration of prejudice, ill will, hostility on the part of the perpetrator against a protected characteristic.” This will remove ambiguity in the recording of possible hate crimes and provide a clear way of

establishing the hate element.

## Head 8: determining whether an offence was motivated by prejudice

### Bias Indicators

- This provision lists 8 grounds that may be considered when determining whether an offence was motivated by prejudice. The Irish Network Against Racism, which has [extensive experience in developing lists of Bias Indicators \(BIs\)](#) as investigative tools, finds this unusual, taking bias indicators and putting them in the face of the law. This should be changed and replaced with a 'legal test of proof of hate crime.'
- The ODIHR list of BIs should come as recommendations for good practice in the investigation and recommended to be taken into account by judges and juries. Work should be conducted with Irish civil society groups to develop pertinent lists of context-specific BI's for each protected category, in the Irish context.

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- Bias indicators (BI's) are very helpful for focusing police investigative practice in areas where a crime may have a hate motivation, but those indicators are impractical in legislation. The exclusion of disability indicators from the list of factors is an additional cause for concern, the list should be comprehensive enough to include all factors.
- We suggest that the drafters remove the line "bias indicators are objective facts" and replace it with a demonstration test per our suggested amendments above. Bias indicators are not definite and are not proof in themselves.

### Public Consultations

- The Hate Crime Bill was drafted in the context of the review of the Prohibition of Incitement to Hatred Act (1989), conducted with limited public consultation on the specific Hate Crime dimension, which is often confused in the public mind with hate speech and incitement to hatred. Considering the challenges that have been faced by victims of hate crime in accessing justice, it is paramount that the drafters develop a comprehensive framework within which victims can vindicate their rights. The public, including victims of hate crime, should be at the heart of policy development. The Hate Crime Legislation must provide better-established rights for affected individuals and communities that are at high risk of experiencing hate crime, this is best achieved by carrying out extensive public consultations.

### The contradiction of the wording under Head 8

- The first line states that "In addition to any other relevant evidence, '**any or all**' of the following factors may be considered in seeking to determine whether an offence was motivated by prejudice for the purposes of this Act. This suggests that the presence



of one or more is sufficient to determine whether an offence was motivated by prejudice.

- It then goes on to say that, '**None of the above shall**' be taken to be proof of motivation in and of itself, however, the presence of '**several**' of the indicators listed may be given weight in determining the likelihood that the incident was motivated by prejudice on the part of the perpetrator, which must be demonstrated beyond a reasonable doubt. This creates legal obstacles for victims. The language must be airtight to guarantee the utilization of the policy imperatives and the protection of victims.
- The word '**several**' is offered no legal definition, meaning that courts would come to rely on the Oxford Dictionary definition which states that it means 'more than 2 or 3 but not many; this means that in the event of having just one of the indicators present, the hate element risks not being considered; the requirement that several BIs be present creates a very high legal threshold which may be impossible to reach. This presents additional challenges to victims of hate crime who already face obstacles in accessing justice. It is against this backdrop that we're recommending

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an amendment to this provision to allow for factors to be considered through the presence of 'demonstrated hostility.'

- The adoption of 'demonstrated hostility' to establish a legal test removes any apparent contradictions, ambiguities or lack of clarity in the legislation. Making the application of the law more straightforward.

## **Head 9: denial or gross trivialisation of crimes of genocide**

This is welcome as a valuable and pertinent addition to the policy framework, however, there is a need for a comprehensive definition of genocide that goes beyond Article II of the Genocide Convention. Ireland has a unique opportunity to create a hybrid definition of genocide that does not inherit the weakness and limitations under the Genocide Convention.

### **Reference to the Genocide Convention**

- Article II of the [United Nations Convention on the Prevention and Punishment of the Crime of Genocide \(the Genocide Convention\), 1948](#) contains a very restrictive definition of the crime of genocide, which includes two main elements:
  1. The mental element: the "intent to destroy, in whole or in part, a national, ethnical, racial or religious group, such as", and
  2. The physical element, which excludes political groups.
- INAR suggests that the definition of genocide for the purposes of this Act must be inclusive and recognize other genocides, for example, the genocides in Rwanda, Armenia, Cambodia, East Timor, Circassia, Bambuti, Guatemala, and Srebrenica etc.

- Head 9 should also incorporate crimes against humanity and war crimes in line with the EU framework and ECRI's most recent recommendations for Ireland.
- The drafters should also ensure clarity of terms, for example, what is meant by "gross trivialisation" and what it entails.
- While INAR acknowledges the compelling significance of Head 9 on genocide, without legal clarity, references to genocide risk missing out on the comprehensiveness and effectiveness of the bill as a whole. A policy framework of this magnitude and importance would benefit from an express provision clearly defining the crime of genocide.

### **Head 10: Repeal**

No Comments

### **Head 11: Consequential Amendments to other Acts**

No Comments

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## *2) Other areas relating to equal access for minorities with the criminal justice system*

### **Introduction**

As INAR we work with people and groups from all backgrounds who experience racism, racial discrimination and hate crime - all *racialised groups* - as a result, we are unable to single out one group to focus on in our submission. In the context of Ireland, Travellers, Roma, Jews, Muslims, Black people, asylum seekers, refugees, people from an immigrant background, second, third generation, and undocumented people, etc. share experiences of racism, which suggests a common approach to tackling the root structural and institutional underpinnings is necessary. An overall principle of the criminal justice system is to provide justice for everyone in society therefore INAR suggest the following key areas of work with recommendations:

#### **1. Policy Reform**

Ethnic minorities and migrants are still experiencing challenges in accessing their rights and justice. One of the key areas to ensuring equal access to the criminal justice system is policy reform. Our findings tell us that the criminal justice system can fail minorities, especially in those places where racism and racial discrimination is normalised and embedded in the structures.

Our research has shown that most victims from minority groups do not report crimes. Minorities report to us that one of the reasons is that victims are deterred by what they regard as a hostile court system. For ethnic minorities, the apprehensiveness can start from the

conduct and the treatment they receive from the police. The state should put in place policies and safeguards that empower right-holders to access their rights and justice, starting with their first contact with An Garda Síochána. The government needs to address issues of racial and ethnic equality in the justice system and ensure a proportionate representation of migrants and ethnic minorities in the criminal justice system.

Policy changes must be put in place to dismantle every barrier victims encounter in the criminal justice system. There is a need to make the system more humane and compassionate for the most vulnerable people and groups it serves. Policies must be deliberate enough to address the weaknesses and limitations of the current regulatory framework and reduce racial disparities in the criminal justice system. Laws are important in the criminal justice system because they impact individuals' lives in terms of delineating what society will and will not accept and dictates how police officers are going to conduct business.

### **Recommendations:**

- i. Develop a National Action Plan Against Racism (NAPAR) across government departments and state functions, integrating with key initiatives including the

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Roadmap on Social Inclusion, the Women's Strategy and the upcoming Children's Guarantee.

- ii. Restore an independent body with functions of NCCRI as a home for anti-racism work by the State, and to oversee the implementation of a NAPAR.
- iii. Minimum examinable mandatory training standards on anti-racism and human rights for all state servants and professionals, e.g., social workers, Gardaí, Legal professionals, frontline public servants Government targets e.g., appointments in public services. (see section on Public Sector Duty below)
- iv. Publication of disaggregated data relevant to antidiscrimination and anti-racism from public bodies
- v. Provide for regular monitoring of infringements of anti-discrimination laws.
- vi. Raise awareness of anti-discrimination legislation in public and key groups including asylum seekers
- vii. Implement the Online Safety and Media Regulation Bill to be in line with international human rights standards.
- viii. In addition to Hate Crime legislation, put in place measures to tackle hateful behaviours, organising and other uses of online platforms by the far-right ix. Implement new hate Crime and incitement to hatred legislation, paying due regard to the test of the hate element ( see above).
- x. Ensure that hate crime is properly recorded.
- xi. Ensure that cases of racism, discrimination and hate crime are thoroughly investigated and prosecuted.
- xii. Effectively investigate and, as appropriate, prosecute and punish acts of speech that incite hatred
- xiii. Support the Electoral Commission, once established, to address the prohibition of racist hate speech in line with EU protocol

- xiv. Inform and sensitize the public about racist hate speech.
- xv. Provide best practice hate crime and anti-discrimination training for the police, prosecutors, and judges.
- xvi. Monitor racist incidents and the implementation of anti-racism measures including training within the criminal justice system.
- xvii. Consider gender and other identities in consultation platforms.
- xviii. Take measures to identify and protect victims of trafficking
- xix. Adopt ethnic identifiers across government and public bodies,
- xx. Provide information and legal advice on immigration to children and those supporting them.
- xxi. Integrate restorative justice into operational practices.

## 2. Reform of the Criminal Justice System

The effects of racism can be devastating on individuals/ groups and have lasting consequences. Reforming the criminal justice system is key to empowering individuals and groups to seek legal redress when experiencing discrimination. The state must undertake reform of policing as the entry point to the criminal justice system to strengthen its capacity to respond to the needs of minorities.

### Recommendations:

- i. Outlaw, monitor and publish regular reports on racial profiling, and other interactions between Gardaí and minorities
- ii. The government must introduce the concept of “firewall protection”, providing a clear separation between the provision of public services and immigration enforcement to ensure that migrants are guaranteed equal access to justice and basic rights should they fall victim or witness a crime.
- iii. Develop expertise appropriate for policing a highly diverse and integrated society.
- iv. Ensure effective usage by AGS of all hate crimes and incitement to hatred provisions in the law.
- v. Develop anti-discrimination plans for the police.
- vi. Strengthen human rights and equality training.
- vii. Resource and implement human rights and anti-racist work within the force.
- viii. Promote [a culture of Human Rights, Diversity, Equality and Interculturalism](#).
- ix. Provide training for all personnel across the criminal justice system to be equipped to deal with the intersectional nature of hate crime, as well as the intersectional nature of domestic violence and sexual and gender-based violence.
- x. Provide clear, simple, well communicated and accessible reporting procedures.
- xi. Establish partnerships with civil society organisations working in human rights protection to ensure the development of high quality, well-informed policies and to monitor progress on relations between police and minorities.
- xii. Ensure full implementation of Garda Diversity and Integration Strategies.
- xiii. Promote diversity and inclusion by recruiting ethnic minorities in the force
- xiv. Establish minimal professional standards for interpreting services in Ireland.
- xv. Ensure the effective implementation and monitoring of a dedicated helpline and

- website accessible by all to report incidents and find support.
- xvi. Identify ways in which to address trial delays and improve efficiency within the criminal justice system. Delay, waiting times,
  - xvii. Fully implement the recommendations of [the Future of Policing in Ireland](#).

### **3. Public Sector Duty (Equality and Human Rights)**

The Public Sector Equality and Human Rights Duty ('the Duty') places a statutory obligation on public bodies to eliminate discrimination, promote equality of opportunity and protect the human rights of those to whom they provide services and staff when carrying out their daily work. The Irish Government must ensure the full implementation of the Public Sector Equality and Human Rights Duty.

#### **Recommendations:**

- i. Public sector bodies to develop and publish strategic plans which demonstrate how they will meet their Public Sector Human Rights and Equality Duty obligations

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- ii. Enhance IHREC's enforcement role vis-a-vis implementing the Public Sector Duty.
- iii. Integrating human rights and equality objectives in the implementation processes.
- iv. Build partnership with and ensure participation of organisations working in the human rights field particularly organisations representing ethnic minorities in the development and implementation of the plan.
- v. Raise awareness on the public sector duty and explore effective ways of implementing it.
- vi. The state must ensure its full and effective implementation.

### **4. Reform of the Workplace Relations Commission**

The Workplace Relations Commission is important in the resolution of employment disputes particularly for minority groups who face significant challenges in the access of justice, therefore it is vital to ensure that the system is robust and that both parties regardless of the outcome should feel that they have received a fair hearing. To ensure that justice prevails the adjudication process must not just be efficient but must also be transparent. The WRC must be a platform for workers to have their rights vindicated, and must be done in a manner that promotes fairness, justice and equality. The Government must take the necessary steps to address the challenges associated with the WRC system and ensure that it works effectively and fairly to guarantee access to justice for all.

#### **Recommendations:**

- i. Review the effectiveness of Equal Status and Equality in Employment Acts and access to justice using them, moving rapidly to reform the Workplace Relations Commission to create a body equivalent to the former Equality Tribunal with support to ensure equitable access to ensure effective uptake. This must ensure equitable outcomes of

the Equality Acts on 'Race' and related grounds, and of complaints about licensed premises and other related breaches of the Equal Status Act.

- ii. Support and resource independent advocacy services such as Citizens Information Centers and Law Centers to recognise cases which come under the 'Race' and related grounds, and effectively use Equality legislation to remedy them.
- iii. Extend access to Legal Aid for cases under Equality legislation
- iv. The process of appointment of the adjudication officers must ensure independence and impartiality as these are fundamental components of the capacity to administer justice.
- v. Need for adjudicating officers to have formal legal training to ensure legal correctness of rulings.
- vi. Need to align rules of procedure with the Constitution
- vii. Need for an appeal mechanism to the Courts to resolve disputes heard by the WRC.

### **5. Support NGOs working in anti-racism to support victims of hate crime.**

Civil society plays a key role in the progressive realisation of human rights and democratic norms. These organisations are best placed to be aware of the challenges faced and

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suggest viable solutions. The state should ensure adequate resourcing to allow organisations to make a meaningful contribution including grassroots communities.

#### **Recommendations:**

- i. The government should ensure that NGOs and grassroots organisations working in anti-racism are fully resourced and staffed to ensure an efficient discharge of their duties.
- ii. In partnership with civil society, the government must develop community initiatives that bring communities together in support of the recognition of minorities, integration, diversity and inclusion.
- iii. Promote synergies and linkages which enables departments, agencies and NGOs to tackle structural racism and other issues.
- iv. Create platforms for respectful dialogue among all groups and pathways towards equality and justice for all people.

Thank you for the invitation to make this submission; we are at your disposal for any further questions. We look forward to having the opportunity to discuss these proposals in person.

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