



Submission from Mental Health Reform (MHR) on new National Plan on Business and Human Rights

8th September 2023

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List of Abbreviations

AVFC	A Vision for Change
CSR	Corporate Social Responsibility
DPCN	Disability Participation and Consultation Network
IHREC	Irish Human Rights and Equality Commission
MHR	Mental Health Reform
SDG	Sustainable Development Goal
StV	Sharing the Vision
UN	United Nations
UNCRPD	United Nations Convention on the Rights of Persons with Disabilities
WRC	Workplace Relations Commission

Who We Are

Mental Health Reform (MHR) is Ireland’s leading national coalition on mental health. Our vision is of an Ireland with accessible, effective and inclusive mental health services and supports. We drive the progressive reform of mental health services and supports, through coordination and policy development, research and innovation, accountability and collective advocacy. Together with our 81 member organisations and thousands of individual supporters, MHR provides a unified voice to the Government, its agencies, the Oireachtas and the general public on mental health issues. MHR is delighted to submit to this public consultation on behalf of our 81 members. MHR would like to thank our members for their continued insight, input and work.¹

MHR is a funded member of the [Disability Participation and Consultation Network](#) (DPCN). The role of DPCN members is to “*provide the views and opinions of people with disabilities living in Ireland on law, policy and other important issues. Working on specific issues, this could mean, for example, attending workshops and meetings (online, or in person, having discussions with other members, or completing questionnaires).*”²

Further information on our members can be found on the MHR website, www.mentalhealthreform.ie.

¹ <https://www.mentalhealthreform.ie/membership/>

² <https://www.gov.ie/en/consultation/a3ef2-launch-of-disability-participation-and-consultation-network/>



Key Recommendations

MHR calls for the State to commit to the ratification of the following in the new National Plan on Business and Human Rights:

- [Protocol 12](#) to the European Convention on Human Rights and Fundamental Freedoms
- Optional Protocol to the UN International Covenant on Economic, Social and Cultural Rights
- Optional Protocol to the UN Convention on the Rights of Persons with Disabilities

MHR calls for Equality to be a central focus of the new National Plan on Business and Human Rights, with a focus on improving employment for people with mental health difficulties through some of the following initiatives:

- **Reasonable Accommodation Awareness:** Make information about low cost reasonable accommodations available to employers
- **Supported Employment:** Incentivise engagement with supported employment programmes
- **Awareness Raising:** Increase awareness raising campaigns about the supports available to employers (e.g. Reasonable Accommodation Fund, Disability Awareness Support Scheme and Wage Subsidy Scheme). Ensure that any awareness raising campaigns make it clear that mental health is included in these supports
- **Signposting to Services:** Provide a directory of services that employers could access should an employee experience a mental health difficulty
- **Universal Design:** Workplaces should implement a universal design approach and should be designed to be inclusive and supportive of mental health difficulties from the outset
- **Disclosure Considerations:** Workplaces should allow employees to control the amount of information they want to share about their mental health
- **Access to Remedy:** An action item of the new plan should be to ensure that the Civil Legal Aid Scheme is expanded to be made available for cases of discrimination that are taken to the Workplace Relations Commission

A Note on Language

While our national mental health policy, [Sharing the Vision](#), uses the terminology 'mental health difficulties', the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), which Ireland ratified in 2018, refers to 'psychosocial disabilities' when referring to people with mental health difficulties or people who self-identify with this term. The UNCRPD clearly states that the protections and rights set out extend to those with psychosocial disabilities. Mental Health Reform (MHR) advocates for the choice of the individual in how they prefer to describe their experience and acknowledge that *"it is an individual choice to self-identify with certain expressions or concepts, but human rights still apply to everyone, everywhere"*.³

³ [Mentalhealthreform.ie](#), A Human Rights Analysis of the Draft Heads of a Bill to Amend the Mental Health Act, 2001, p. 9



Introduction

Mental Health Reform welcomes this opportunity to make a submission on Ireland's new National Plan on Business and Human Rights. We would like to commend the Government for continuing to show commitment to the advancement of human rights across all sectors of society including in the area of responsible business and in this instance in the practical adoption of the United Nations (UN) Guiding Principles on Business and Human Rights.⁴

The focus of our submission will be on the area of mental health and employment, Ireland's equality legislation and the ratification of international protocols and conventions. [Ireland's National Plan on Corporate Social Responsibility](#) (CSR) highlights the importance of businesses aligning their CSR models to the Sustainable Development Goals (SDGs), with one of the four core dimensions of CSR under this plan being '*The Workplace - Supporting and engaging with your employees*' (p. 19). As identified in Ireland's [first National Action Plan on Business and Human Rights](#), there are three Sustainable Development Goals (SDGs) from the 2030 Agenda for Sustainable Development most relevant to this National Plan, namely SDG 1 'End poverty in all its forms everywhere', SDG 5 'Achieve gender equality and empower all women and girls' and SDG 8 'Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all'. Mental health is relevant to all these areas, as will be outlined in this submission.

According to the HSE (2022)⁵, one in two people in Ireland have experienced mental health difficulties and a global study on *The Mental State of the World in 2022*⁶ reported that Ireland had one of the highest rates of people experiencing distress. This study also showed that there was little to no recovery in mental wellbeing since the lifting of Covid-19 restrictions. Hence, mental health needs to be a vital area of focus for Ireland's new National Plan on Business and Human Rights.

Significant work has been undertaken by Mental Health Reform in 2021 on the Draft State Report on the United Nations Convention on the Rights of Persons with Disabilities (UNCPRD). MHR undertook two public consultations and an information webinar as part of this process in 2021. Mental Health Reform also made a submission as part of the consultation on the Review of the Equality Acts⁷ (Equal Status Acts 2000-2018 and the Employment Equality Acts 1998-2015) which can be found [here](#). These previous processes inform this submission.

In July 2021, Minister O'Gorman launched a review of the Equal Status Acts.⁸ This review and public consultation was a very welcome step in advancing and reforming Irish Equality Legislation. However, it is vitally important that Irish businesses are aware of the provisions of the equality legislation and their responsibilities as an employer, as well as being prepared for the changes to this legislation coming down the line.

In [Ireland's First National Action Plan on Business and Human Rights](#), 'Equality' was identified as a key focus with the plan stating that "*the government is committed to promoting equality in all aspects of Irish society.*" (p. 14) However, very little of the action items in the plan related to improving equality in the Irish context. Ireland has made many international and national commitments to improving employment outcomes for people with mental health difficulties. It is crucial that the new National Action Plan on Business and Human Rights entails key action items on equality in Irish employment.

⁴ https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinessshr_en.pdf

⁵ HSE (2022) [Campaign](#)

⁶ [The Mental State of the World in 2022; A publication of the Mental Health Million Project](#)

⁷ <https://www.gov.ie/en/press-release/24864-minister-ogorman-announces-review-of-the-equality-acts/>

⁸ <https://www.gov.ie/en/consultation/066b6-review-of-the-equality-acts/>



SDG 1 ‘End poverty in all its forms everywhere’

People with psychosocial disabilities face high levels of stigma and discrimination⁹, have higher costs of living and are at risk of living in consistent poverty. The Cost of Disability in Ireland report¹⁰, now over a year published, clearly outlines the additional costs faced by people with disabilities, with those with mental health difficulties (‘to a great extent’) reporting the highest level of deprivation. The average additional cost of having a mental health difficulty was reported to be €13,251 per year.¹¹ This means that people with mental health difficulties are at risk of being more adversely affected by the current cost of living crisis.

Poverty and unemployment are inextricably linked. While we are now experiencing a record low unemployment rate in Ireland (4.1% as of July 2023¹²), Ireland has one of the biggest employment gaps between people with and without disabilities in the EU.¹³ This is discussed further under ‘SDG 8’ below.

SDG 5 ‘Achieve gender equality and empower all women and girls’

A briefing on Women’s Mental Health in Ireland¹⁴ states that “*Many of the risk factors for experiencing mental health difficulties - poverty, violence, low social status, responsibility for care of others – fall disproportionately on women.*” (p. 2) This paper also reports that certain mental health experiences, including depression, eating disorders, perinatal mental health, self-harm and posttraumatic stress disorder, are more common among women. More evidence on these higher rates of mental health difficulties among women can be found in [Ireland’s Statistical Spotlight #10](#). Therefore, prioritising mental health and equality in the new plan is an important aspect of helping to achieve gender equality and empowering women and girls.

SDG 8 ‘Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all’

People living with mental health difficulties experience lower levels of workforce participation compared with the overall population. Those who do report workforce participation are more likely to experience either discrimination or harmful effects from discrimination in occupational settings.¹⁵ In a [See Change](#) public attitudes survey, 70% of respondents felt that a diagnosis of mental health difficulties would have a negative effect on their job and career prospects and 60% said that they were not aware that mental health difficulties were covered under the nine grounds of discrimination.¹⁶ The See Change findings relating to stigma are consistent with research conducted

⁹ Millward Brown Lansdowne, Public Attitudes towards Mental Illness: A Benchmark Study for See Change (unpublished).

¹⁰ [Indecon \(2021\) The Cost of Disability in Ireland - Research Report](#)

¹¹ *ibid*, pg. xii

¹² <https://www.cso.ie/en/releasesandpublications/ep/p-mue/monthlyunemploymentjuly2023/>

¹³ <https://www.esri.ie/publications/identification-of-skills-gaps-among-persons-with-disabilities-and-their-employment>

¹⁴ National Women’s Council of Ireland and the Health Service Executive (2020). A briefing on Women’s Mental Health in Ireland

¹⁵ Banks, J., Grotti, R., Fahey, E. and Watson, D., (2018). Disability and Discrimination in Ireland, p. 5

¹⁶ <https://seechange.ie/wp-content/uploads/2018/02/Mental-Health-Matters-web.pdf>



by the National Disability Authority into the disclosure of disabilities in workplace settings¹⁷, which found that the experience of those with ‘invisible disabilities’ was complex regarding whether to disclose a disability or not. The review of the Ability Programme 2018-2021, which aimed to support people with disabilities across Ireland with employment, also echoed this finding, stating that those with mental health difficulties were hesitant to identify with having a disability due to fears of stigma or discrimination.¹⁸

The consequences of this reluctance can be harmful in a range of ways, including that such persons cannot avail of supports and reasonable accommodations that may be due to them under Irish employment and equality law¹⁹.

Given the fears around disclosure of mental health difficulties in the workplace, consideration should be given as to how much information is required to be disclosed by the employee for reasonable accommodations to be provided in a workplace. MHR would advocate that the individual is allowed to control the amount of information they share about their mental health difficulties. For example, an individual can disclose that certain supports are needed without outlining the details of any specific difficulties or diagnosis.

The Covid-19 pandemic has led to a significant worsening of population mental health.²⁰ Thus, mental health and employment should be an even higher priority in this context, especially given the benefits of employment for someone’s mental health, as outlined below.

In 2016, the Central Statistics Office (CSO) reported that 13.5% of the population had a disability (a total of 643,131 people). The 2022 Census data shows that the population of people living with a disability or disabling condition in Ireland is growing, with a total of 1,109,557 people (22% of the population) reporting experiencing at least one-long lasting condition or difficulty to any extent. A recent European Disability Forum report showed that Ireland ranks 24th of the EU 27 for disability poverty, and lowest in the EU for disability employment rates and the disability employment gap.

In 2017, an Economic and Social Research Institute (ESRI) report found that around 35,600 people with a disability would join the active workforce if Government policy facilitated their access to employment. In the Cost of Disability report produced by the Department of Social Protection in 2021, participants with experience of mental health difficulties stated that there were insufficient employment supports and that if these were improved they would likely be able to work.

The Irish Health Survey (2019) reported that 21% of participants who were unemployed experienced some form of depression, compared to 9% of those in employment. This shows the possible impact that unemployment can have on an individual’s mental wellbeing. Employment can also be an important part of someone’s recovery when they are experiencing mental health difficulties. In fact, supporting people to gain or retain employment has a significant impact on more life domains than nearly any other type of medical or social intervention.²¹ Thus, prioritising the employment of people with mental health difficulties and tackling discrimination and equality issues in Ireland’s new National Plan on Business and Human Rights is vital.

¹⁷ Millward Brown Lansdowne, Public Attitudes towards Mental Illness: A Benchmark Study for See Change (unpublished).

¹⁸ Quality Matters (2021) Ability Programme Evaluation 2018-2021, available at <https://www.gov.ie/pdf/?file=https://assets.gov.ie/221963/bf76dc5f-e11e-4585-983d-6883c0fa5364.pdf#page=null> [accessed 4th May 2022].

¹⁹ National Disability Authority of Ireland (2009). Disclosing Disability in the Workplace a Review of Literature and Practice in the Irish Public Sector. Dublin

²⁰ <https://www.esri.ie/news/the-covid-19-pandemic-has-led-to-poorer-mental-health-among-young-adults>

²¹ OECD (2011) Sick on the job? Myths and realities about Mental Health and Work



There are a number of national policies and strategies which commit to improving employment outcomes for people with mental health difficulties, including Sharing the Vision²², [the Pathways to Work Strategy 2021-2025](#), the [Comprehensive Employment Strategy for People with Disabilities \(CES\)](#), the [National Disability Inclusion Strategy 2017 - 2021](#) and the [Roadmap for Social Inclusion 2020 - 2025](#). These are underpinned by international commitments under the UNCRPD, the UN International Covenant on Economic, Social and Cultural Rights, the World Health Organisation's Report on Disability²³, the [European Union \(EU\) Disability Strategy](#) and the European Convention on Human Rights and Fundamental Freedoms.

Employment and Mental Health - Ireland's International Commitments

“States Parties recognize the right of persons with disabilities to work, on an equal basis with others; this includes the right to the opportunity to gain a living by work freely chosen or accepted in a labour market and work environment that is open, inclusive and accessible to persons with disabilities” - [Article 27 of the UNCRPD](#)

In their [submission](#) in 2015, ahead of the development of [Ireland's First National Action Plan on Business and Human Rights](#), the Irish Human Rights and Equality Commission (IHREC) highlighted that *“Ireland's existing equality legislation should be a cornerstone of the National Action Plan on business and human rights...Ireland must also uphold its various binding commitments under international and European law concerning equality and non-discrimination in this context; ratification of Protocol 12 to the European Convention on Human Rights and Fundamental Freedoms would strengthen the existing protections against discrimination.”*²⁴ However, Ireland has still not ratified [Protocol 12](#) to the European Convention on Human Rights and Fundamental Freedoms.²⁵ According to IHREC *“Ireland has ratified every protocol to the Convention to date, except for Protocol 12, which gives an added level of protection against discrimination.”*²⁶

IHREC also highlighted that *“The State should give serious consideration to the ratification of the Optional Protocol to the UN International Covenant on Economic, Social and Cultural Rights, the UN International Convention on the Protection of the Rights of Migrant Workers and Members of their Families, the UN Convention on the Rights of Persons with Disabilities and the 2014 Protocol to the Forced Labour Convention.”* (p. 20). This year marks the fifth anniversary of Ireland's ratification of the UNCRPD. However, Ireland has still not ratified the Optional Protocol.

The [UN Guiding Principles on Business and Human Rights](#) outline that *“States should ensure that they can effectively oversee the enterprises' activities, including through the provision of adequate independent monitoring and accountability mechanisms.”* (p. 8). Ratification of the optional protocols to the UN conventions on the Rights of Persons with Disabilities and the International Covenant on Economic, Social and Cultural Rights would provide an additional layer of protection and international accountability on Ireland's compliance with these conventions.

It is also important to note that Ireland is due to be reviewed by the UN Committee on Economic, Social and Cultural Rights in early 2024. The UN Committee has explicitly identified the importance of non-discrimination and the progress on the review of Ireland's Equality Legislation in their [List of Issues](#), published March 2022. The State has also been asked to report on the realisation of the right to work for people with disabilities.

²² Department of Health (2020) Sharing the Vision; A Mental Health Policy for Everyone. Dublin: Government of Ireland

²³ <https://www.who.int/teams/noncommunicable-diseases/sensory-functions-disability-and-rehabilitation/world-report-on-disability>

²⁴ IHREC [submission](#) 2015, p. 10

²⁵ [Chart of signatures and ratifications of Treaty 177](#)

²⁶ https://www.ihrec.ie/download/pdf/echr_guide.pdf, p. 24



Recommendations:

In order to strengthen protections against discrimination in the workplace for people with mental health difficulties, MHR calls for the State to commit to the ratification of the following in the new National Plan on Business and Human Rights:

- [Protocol 12](#) to the European Convention on Human Rights and Fundamental Freedoms
- Optional Protocol to the UN International Covenant on Economic, Social and Cultural Rights
- Optional Protocol to the UN Convention on the Rights of Persons with Disabilities

Employment and Mental Health - Ireland's National Commitments

A Vision for Change (AVFC), the previous national mental health policy states that “access to employment.....for individuals with mental health problems should be on the same basis as every other citizen”²⁷. The Expert Group on AVFC recognised that in order to achieve a recovery-orientated mental health system, whereby individuals can live a full life in their community, “supportive communities [are necessary] where actions are taken to address basic needs such as employment”²⁸. This is further endorsed in a detailed report on mental health and social inclusion, in which the National Economic and Social Forum in Ireland concluded that work is the best route to recovery and employment is the best protection against social exclusion.²⁹ *A Vision for Change* specifically recommended that “evidence-based approaches to training and employment for people with mental health problems should be adopted...”³⁰

Sharing the Vision (STV) 2020³¹, the successor to AVFC, carries forward this recommendation around employment and mental health. Specifically, Outcome 3(c) relates to improved outcomes in employment and the policy outlines the importance of securing or returning to employment as a pivotal factor in recovery.

The fourth strand of the Department of Social Protection *Pathways to Work Strategy 2021-2025* is entitled ‘Working for All - Leaving No One Behind’. It focuses on extending employment supports to those facing extra challenges, including those with disabilities. The aim is to increase employment rates among people with disabilities from 22% to 33% by 2026.³²

The Department of Justice and Equality’s (2015) *Comprehensive Employment Strategy for People with Disabilities (2015-2024)* notes the particularly low employment rates for people with mental health difficulties. It advocates for early intervention, prior to any work absences where possible, and that support should be given to facilitate reducing the length of an absence if it does occur. This is because the longer the absence, the less likely someone is to return to employment.³³

²⁷ Department of Health (2006) *A Vision for Change*, p. 35.

²⁸ *Ibid*, p.41.

²⁹ National Economic and Social Forum (2007) *Mental Health and Social Inclusion*, Dublin: National Economic and Social Forum.

³⁰ Department of Health (2006), p.39.

³¹ Department of Health (2020) *Sharing the Vision; A Mental Health Policy for Everyone*. Dublin: Government of Ireland

³² Department of Social Protection (2021) *Pathways to Work Strategy 2021-2025*, Dublin: Government of Ireland

³³ Department of Justice and Equality (2015) *Comprehensive Employment Strategy for People with Disabilities (2015-2024)*. Dublin: Government of Ireland



The *Healthy Ireland at Work 2021–2025* policy also acknowledges the importance of addressing mental health difficulties in the workplace. Objective 5 relates to providing supports, including fiscal incentives to support employers to adapt work environments.³⁴

There are many equality action items that could be included in the new National Plan on Business and Human Rights to improve employment opportunities for people with mental health difficulties. In May 2022, Mental Health Reform highlighted the absence of provisions for mental health in the State’s reasonable accommodation fund (RAF). Please see our full submission [here](#).

Some of the key recommendations that are relevant to the new National Plan on Business and Human Rights included the following;

Recommendations:

- **Reasonable Accommodation Awareness:** Make information about low cost reasonable accommodations available to employers
- **Supported Employment:** Incentivise engagement with supported employment programmes
- **Awareness Raising:** Increase awareness raising campaigns about the supports available to employers (e.g. Reasonable Accommodation Fund, Disability Awareness Support Scheme and Wage Subsidy Scheme). Ensure that any awareness raising campaigns make it clear that mental health is included in these supports
- **Signposting to Services:** Provide a directory of services that employers could access should an employee experience a mental health difficulty
- **Universal Design:** Workplaces should implement a universal design approach and should be designed to be inclusive and supportive of mental health difficulties from the outset
- **Disclosure Considerations:** Workplaces should allow employees to control the amount of information they want to share about their mental health

Access to Remedy

“Voluntary corporate social responsibility initiatives may make a positive contribution to human rights, they are no substitute for the meaningful legal protection of human rights” - IHREC [submission](#) 2015, p. 7

A key aspect of the [UN Guiding Principles on Business and Human Rights](#) is ‘Access to Remedy’ where human rights violations do occur. It states that *“Unless States take appropriate steps to investigate, punish and redress business-related human rights abuses when they do occur, the State duty to protect can be rendered weak or even meaningless.”* (p. 27)

The Workplace Relations Commission (WRC) publishes statistics regularly on its decisions in relation to equality complaints. This information is disaggregated by discriminatory ground. The [2022 report](#) outlines that there were 1,851 complaints made to the Workplace Relations Commission relating to Discrimination/Equality/Equal Status (14% of all complaints that year). This represents an increase of 16% compared to [2021](#). It is important to note that disability is consistently in the top

³⁴ Department of Health (2021) *Healthy Ireland at Work; A National Framework for Healthy Workplaces in Ireland 2021–2025*

three grounds of discrimination cited since the establishment of the Workplace Relations Commission.³⁵

In Mental Health Reform's [consultation](#) ahead of Ireland's review under the UNCRPD, participants reported that they felt compelled to endure alleged breaches of employment law, in exchange for remaining in employment. These included:

1. Being paid below minimum wage.
2. Having their role diminished in a form of de facto demotion.
3. Failure on the part of the employer to make reasonable accommodation for the needs of employees living with psychosocial disabilities.
4. Being forced out of their position through encouragement to take extended leave, with little effort being made to encourage or facilitate a return to working.

Mental Health Reform also received feedback that those who investigated their legal options to address breaches of employment law or equality legislation, found the process prohibitive. This related to a range of factors, including:

1. The prospect of being liable for costs in the event a claim was not upheld.
2. The length of time a claim would take to reach a tribunal or court setting.
3. The anxiety caused by engagement with such an adversarial process.
4. A feeling that statutes of limitations were too restrictive for those struggling to manage a psychosocial disability. There is a requirement that complaints be lodged within 6 months of an alleged breach being committed. An extension of this was cited as necessary to accommodate the needs of some.³⁶

Discrimination cases can be very complex, involving complicated areas of both national and European law. As is noted in Mental Health Reform's [submission](#) on the review of the Equality Acts, under the current regimes there are exhaustive, emotional and psychological burdens experienced by anyone with disabilities who takes a case under the Equality Acts. Issues around the burden of proof, accessing the relevant information and forms all create barriers for people with disabilities. Without representation the person making the complaint must deal with navigating these complex issues alone, while sitting across from the Employer/Service Provider that they have taken their case against. Often employers and businesses may have the financial means to pay for private legal representation for WRC cases when the person making the complaint may not, creating stark inequality in many of these cases.³⁷

The review of the Civil Legal Aid scheme³⁸ is a welcome development in this regard. The Legal Aid Board is currently prohibited by law (in the absence of a Ministerial Order)³⁹ from providing representation for many quasi-judicial tribunals, including the Workplace Relations Commission (WRC). This means that legal aid is generally unavailable for discrimination cases under the Equality Acts, regardless of the severity of the discrimination.

MHR made a submission to this review advising that the current exclusion of proceedings before quasi-judicial settings should not continue to apply. The Civil Legal Aid Scheme should be expanded to be made available for cases of discrimination that are taken to the Workplace Relations

³⁵ Workplacerelements.ie

³⁶ Mentalhealthreform.ie

³⁷ FLAC, (2021). [FLAC Guide: The Review of the Equality Acts, Making a Submission to the Review & the Key Issues Under Review.](#)

³⁸ <https://www.gov.ie/en/consultation/79e1d-public-consultation-on-the-review-of-the-civil-legal-aid-scheme/>

³⁹ [Civil Legal Aid Act 1995](#)



Commission. Focusing on enabling access to remedy in cases of discrimination is an important action item for the new National Plan for Business and Human Rights.

Recommendations:

- **Access to Remedy:** An action item of the new plan should be to ensure that the Civil Legal Aid Scheme is expanded to be made available for cases of discrimination that are taken to the Workplace Relations Commission.

Conclusion

As Ireland develops its next National Action Plan on Business and Human Rights, equality needs to be a central focus, with clear action items to be delivered. It is important that Ireland's business community develops in a way that is equitable for all citizens and that enables access to remedy in any cases where there are human rights breaches. With the mental health impacts of the pandemic being felt both globally and within Ireland, the wellbeing of Ireland's employees needs to remain at the forefront of thinking when it comes to responsible business. Thank you for your consideration of our submission and recommendations.

For more information on any of the above content please contact Suzanna Weedle, Policy and Advocacy Coordinator at sweedle@mentalhealthreform.ie or at 0860245409

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