

IPRT submission to the Department of Children, Disability and Equality on its *Statement of Strategy 2025-2027*

23 May 2025

Introduction

1. IPRT welcomes the opportunity to contribute to the Department of Children, Disability and Equality (DCDE) consultation on its next *Statement of Strategy 2025-2027*.
2. While some progress has been made in advancing the rights of minoritised persons over the lifetime of the previous strategy, there are gaps concerning the rights of those in the criminal justice system. People in the criminal justice system often face complex disadvantages relating to poverty, homelessness, and mental health and addiction challenges. IPRT believes that DCDE's updated Statement of Strategy should recognise these issues as they relate to some of the most stigmatised and marginalised communities in the State.
3. This submission focuses on areas of concern that while they may relate to criminal justice thematically, fall within the remit of the DCDE.

Youth justice

4. A core aspect of IPRT's work is the promotion of a more effective youth justice system, with an emphasis on non-custodial alternatives, diversion, early intervention and prevention strategies and programmes. We would therefore encourage DCDE to closely consider how this Strategy may complement and promote the relevant actions outlined in the Department of Justice's *Youth Justice Strategy 2021-2027* to contribute to better outcomes for young people in contact with the youth justice system, including those detained in Oberstown Children's Detention Campus for which DCDE has responsibility. It should also consider the role of the Young Ireland Advisory Council in overseeing the implementation of the *Youth Justice Strategy*, given how it intersects with so many other policy areas, including children with care experience, Traveller children and young people, and those experiencing poverty, deprivation and homelessness.
5. We believe that the Strategy should include a key strategic action for DCDE to collaborate with other relevant state agencies to develop and implement evidenced-based policies and interventions that will support diversion for young people from the youth justice system and ensure that there are effective alternatives to prison and that youth detention is only ever used as a truly last resort. The Strategy should also include an action to explore the establishment of a youth justice agency, particularly given that the Irish Youth Justice Service is no longer co-located between the Department of Justice and DCDE. IPRT believes this would provide a more cohesive, comprehensive and holistic approach to youth justice policy and practice which could facilitate and drive greater cross-agency and interdepartmental working.

6. Young Travellers are significantly over-represented in Oberstown.¹ As such, IPRT considers that the Statement of Strategy should include commitments that adequate resources are afforded to Traveller-specific training to prison staff and supports for young Travellers in contact with the youth justice system. Further, the Strategy should set targets to increase funding for youth and family supports for young Travellers in Oberstown, as well as increased access to training programmes such as peer mediation training in the detention centre.

Children with one or more parents in prison

7. IPRT welcomes the positive outcome from the previous Statement of Strategy of the inclusion of children of prisoners in the *Young Ireland: The National Policy Framework for Children and Young People 2023-2028*.
8. The imprisonment of a household member is often cited as one of ten adverse childhood experiences which have a significant negative impact on children's long-term health and well-being, school attainment, and later life experiences. Supporting these children and their families is critical to promoting social inclusion and ensuring they are provided with the necessary supports to maintain a relationship with their imprisoned parent while at the same time having their own needs met and rights respected. It is a low-cost, high-impact measure that ensures children do not bear the unintended consequences of parental imprisonment. In this context, the Strategy should include a commitment to lead on developing an interdepartmental strategy to support children impacted by parental imprisonment, including educational supports and improved visiting conditions for all children, including those from ethnic minorities, with disabilities, or who are neurodivergent.
9. There is currently no national support service specifically for children and the families of people in prison. IPRT recommends that DCDE, in collaboration with other relevant agencies, should commit to developing a national support service that can specifically provide information and support to children and families with a family member in prison.
10. IPRT encourages DCDE to internally focus, throughout its work and at all levels, on the rights, needs and experiences of children who have a family member in prison and how this might relate to different policy areas. This includes supporting the introduction of a child impact assessment toolkit to identify the needs of children with a parent or family member in the criminal justice system and adopting trauma-informed practices.²

¹ According to data provided to IPRT by Oberstown Detention Campus on 28 February 2025, of the 40 young people in detention, one in four identified as an Irish Traveller.

² For examples of child impact assessments, see Prison Reform Trust, [A Child Impact Assessment Toolkit](#). This toolkit was co-created with 28 children and young people with experience of a mother in the criminal justice system and is underpinned by the United Nations Convention on the Rights of the Child.

11. Further, IPRT maintains that full incorporation of the United Nations Convention on the Rights of the Child (UNCRC) into domestic law is a matter of priority. This has been recommended by several human rights bodies, including the Office of the Ombudsman for Children.³

Persons with disabilities in prison

12. We encourage DCDE to consider how the Statement of Strategy may reflect and promote the rights and needs of persons with disabilities in Irish prisons and upon their transition from prison to the community. Research demonstrates that people in prison with disabilities are often discriminated against and face significant difficulties navigating the prison environment and prison services, as well as there being a lack of support.⁴ We therefore see an opportunity for the Strategy to help address this by committing to collaboratively developing specific policies and interventions to support persons with disabilities in the criminal justice system.

Criminal convictions and socio-economic status as grounds for discrimination

13. IPRT welcomes the review of the Equality Acts and the publication of the report on submissions to the review. IPRT believes that to promote a progressive, respectful and equal society, the State must take steps to ensure no-one faces discrimination as a result of a criminal conviction. Persons with convictions often face a range of barriers to their inclusion in society, including, for example, in accessing employment, education and training, housing, insurance, and volunteering opportunities.⁵ To this end, IPRT has called for the Equality Acts to be amended to include a broad prohibition on discrimination on the ground of criminal conviction, as has the Irish Human Rights and Equality Commission (IHREC).⁶ Both IPRT and IHREC have also advocated for the introduction of a new ground of discrimination on the basis of socio-economic status. We believe that this is particularly important, given the intersectionality of economic deprivation, social exclusion, and people who come into contact with the criminal justice system.
14. IPRT considers the addition of these two grounds for discrimination to the Equality Acts to be an important step to promote a more inclusive Irish society. Given the ongoing review of the Equality Acts, we encourage DCDE to consider how this may be reflected in the updated Statement of Strategy.

³ For more information, see Irish Penal Reform Trust, [Piecing it Together: Supporting Children and Families with a Family Member in Prison](#) (2021) and Ombudsman for Children's Office, [Report of the Ombudsman for Children's Office to the UN Committee on the Rights of the Child on the combined fifth and sixth reports](#) (2022).

⁴ See Irish Penal Reform Trust, [Making Rights Real for People with Disabilities in Prison](#) (2020).

⁵ For more information, see Irish Penal Reform Trust, [The Secondary Punishment: A Scoping Study on Employer Attitudes to Hiring People with Criminal Convictions](#) (2024).

⁶ Irish Human Rights and Equality Commission, [Submission on the Review of the Equality Acts](#) (2023).

Travellers in the criminal justice system

15. As the lead agency for implementing the *National Traveller and Roma Inclusion Strategy II 2024-2028 (NTRIS)*, DCDE should include a commitment in the Statement of Strategy to progress its implementation. This includes ensuring peer mediation programmes in the prison system are adequately resourced across the prison estate through an interdepartmental approach. The Strategy should also include aims to increase access to health and wellbeing services for Travellers in the criminal justice system as a priority action.
16. The over-representation of Travellers in the criminal justice system is contributed to by systemic and structural barriers, including difficulty accessing employment. DCDE should take a lead in introducing positive measures to ensure employment in the public sector, including DCDE and agencies that it funds, in line with the *NTRIS* strategic objective to “increase the number of Travellers and Roma in employment in the public sector”.⁷
17. Traveller women are over-represented in the prison system.⁸ IPRT asks that the expansion of the ‘Traveller Mothers’ programme in the Dóchas centre be included in the Statement of Strategy, and that it be extended to Limerick women’s prison.⁹ We believe that this model of support could also apply to Traveller men, also hugely over-represented across the prison estate.

Data collection

18. Progress on tackling inequality cannot be measured unless there is reliable data on participation and outcomes for groups experiencing inequality.¹⁰ Very little information exists on the needs and lived experiences of minority ethnic and foreign national people in prisons and on probation. A 2022 IPRT report outlined significant gaps in data, with almost a quarter of cases in the Irish Prison Service dataset on all committals over a 12-month period having no ethnicity recorded.¹¹
19. In relation to the criminal justice sector, there must be published data disaggregated by ethnicity, which would report not only on the extent of the over-representation of Travellers in the criminal justice system, but also their participation and outcomes, including in education and training, general prison services, the extent to which they are on restricted regimes, and the

⁷ Department of Children, Disability and Equality, [National Traveller and Roma Inclusion Strategy II 2024-2028](#) (2024), p. 18.

⁸ Irish Penal Reform Trust, [Opening Statement to the Joint Committee on Key Issues affecting the Traveller Community: Travellers in Prison](#), 26 September 2024.

⁹ This service was established to provide intensive family support to Traveller Mother’s and their families at all stages of the Criminal Justice System, following a feasibility study carried out by the National Traveller Women’s Forum in 2020.

¹⁰ For more information, see Irish Penal Reform Trust, [Sometimes I’m Missing the Words: The rights, needs and experiences of foreign national and minority ethnic groups in the Irish penal system](#) (2022).

¹¹ Irish Penal Reform Trust, [Progress in the Penal System](#) (2022).

extent to which they benefit from early release schemes. This would be consistent with strategic objective 6 of *NTRIS* which seeks to “review systems of data collection and available research across all state-funded organisations, processes and systems relevant to the Traveller and Roma communities”.¹²

20. IPRT believes that action 52 of the *Young Ireland* policy framework, which outlines the need to develop a method of collecting comprehensive data on children with a family member in prison, should be referenced in the Statement of Strategy.¹³ Understanding the impact of imprisonment on these vulnerable children is crucial to developing effective support systems and policies that address their unique needs.

Conclusion

21. Thank you for the opportunity to provide input to DCDE on its *Statement of Strategy 2025-2027*. This submission has outlined several issues for inclusion in the updated Strategy that IPRT believes would contribute to a fairer and more inclusive Irish society, with better outcomes for some of the most stigmatised and marginalised communities in the State. Should you require any further information on any of the points raised above, please do not hesitate to contact IPRT at nmccormack@irpt.ie or tlord@prt.ie.

¹² See Department of Children, Disability and Equality, [National Traveller and Roma Inclusion Strategy II 2024-2028](#) (2024), p. 18.

¹³ Department of Children, Disability and Equality, [Young Ireland: The National Policy Framework for Children and Young People 2023 – 2028](#) (2023), p. 98.