



Human Rights Council
Working Group on the Universal Periodic Review
Thirty-ninth session
1–12 November 2021

Summary of Stakeholders' submissions on Ireland*

Report of the Office of the United Nations High Commissioner for Human Rights

I. Background

1. The present report was prepared pursuant to Human Rights Council resolutions 5/1 and 16/21, taking into consideration the periodicity of the universal periodic review. It is a summary of 35 stakeholders' submissions¹ to the universal periodic review, presented in a summarized manner owing to word-limit constraints. A separate section is provided for the contribution by the national human rights institution that is accredited in full compliance with the Paris Principles.

II. Information provided by the national human rights institution accredited in full compliance with the Paris Principles

2. IHREC, the national human rights institution, reported that legislation regulating civil society space, including the wide definition of 'political purposes' in the Electoral Act 1997, restricted civil society engagement.² It recommended that Ireland review the Act to prevent restriction of civil society.³

3. IHREC noted the absence of effective hate crime or hate speech legislation, and that Travellers and Black people experienced high rates of labour market discrimination.⁴ IHREC recommended that Ireland develop legislative measures to combat online incitement to hatred and hate speech, take measures to address workplace discrimination, and introduce a national action plan against racism informed by human rights standards.⁵

4. Despite a commitment to policing reform, IHREC noted unclear implementation timeframes. Prisoners on remand and people detained for immigration-related reasons continued to share cells with sentenced prisoners, and some prisoners were required to 'slop out'.⁶ IHREC recommended that Ireland produce details on the implementation of policing reform, and a time-bound plan to address detention conditions.⁷

5. IHREC reported on under-resourcing of the criminal legal aid system and financial contribution requirements as barriers to access to justice, notably for those on low incomes,

* The present document is being issued without formal editing.



women, victims of trafficking and labour exploitation, international protection applicants, Travellers, Roma, people with disabilities and minority ethnic communities. The Legal Aid Board could not represent individuals before quasi-judicial tribunals addressing social welfare, housing, employment and equality cases. IHREC recommended that Ireland progress reform of the legal aid schemes.⁸

6. On human trafficking, IHREC noted an inadequate administrative scheme, and the failure to provide specialised services.⁹ It recommended that Ireland place the identification process, non-punishment principle, and right to specialised assistance on a statutory footing.¹⁰

7. IHREC reported that the gender pay gap was approximately 14%.¹¹ It recommended addressing the gap, including through legislation.¹²

8. Progress on the housing crisis remained slow, with particular groups disproportionately impacted, including children, Travellers, Roma, refugees, victims of domestic violence, and persons with disabilities.¹³ IHREC recommended that Ireland recognise socio-economic rights, including the right to housing, in the Irish Constitution, and ensure affordable housing at necessary scale.¹⁴

9. IHREC contended that the State had failed to ensure independent and effective investigations into alleged human rights abuses in Magdalene Laundries, Mother and Baby Homes, reformatory and industrial schools, foster care settings, and regarding symphysiotomy. The January 2021 Mother and Baby Homes Commission of Investigation's Final Report illustrated the need for systemic change to ensure accountability.¹⁵ IHREC recommended that Ireland overhaul the approach to investigating historical human rights abuses to ensure effective victim-centred investigations.¹⁶

10. Article 41.2.2 of the Constitution perpetuated stereotypical attitudes on the role of women, and an *Amendment of the Constitution (Role of Women) Bill* was pending.¹⁷ IHREC recommended amending Article 41.2.2 to ensure it is gender neutral and recognises care work.¹⁸

11. On gender-based violence, IHREC noted limited support services available, notably in rural locations. This was particularly concerning during the COVID-19 pandemic, when domestic violence had increased.¹⁹ IHREC recommended that Ireland ensure that services to victims are sufficient and not limited by geography or disability access.²⁰

12. Regarding persons with disabilities: reform was required for the legislative and policy framework to meet UNCPRD standards; Ireland continued to have amongst the lowest employment rates in the European Union (EU); progress on deinstitutionalising residential disability services was slow; involuntary admissions and treatment in mental health establishments persisted; and COVID-19 had exacerbated concerns.²¹

13. IHREC recommended that Ireland: develop legislative reform to comply with the CRPD; adopt a human rights-based transition from COVID-19 inclusive of persons with disabilities; and undertake positive action measures to increase employment.²²

14. Travellers experienced systemic discrimination in employment, education, health, and housing, and were more likely to contract COVID-19. The High Court had found that State recognition of Travellers as an ethnic minority in 2017 had no legal effect, and the National Traveller and Roma Integration Strategy 2017–2021 lacked clear parameters. Despite increased drawdown of housing funds, inconsistencies between local authorities remained.²³

15. IHREC recommended that Ireland ensure a well-resourced, measurable and time-bound successor Strategy, prioritize measures to combat discrimination, and subject local authorities who fail to provide Traveller-specific accommodation to sanctions.²⁴

16. Regarding migration, IHREC noted planned replacement of Direct Provision. Long delays remained in determining international protection claims, while the International Protection Act 2015 restricted family reunification, and there was no pathway to residency for undocumented people.²⁵

17. IHREC recommended that Ireland prioritise establishing the new international protection support service, address delays in determining claims, amend the Act 2015 to define ‘family member’ in line with international human rights law, and develop a regularisation scheme for undocumented people.²⁶

III. Information provided by other stakeholders

A. Scope of international obligations²⁷ and cooperation with international human rights mechanisms and bodies²⁸

18. Various stakeholders recommended that Ireland ratify the OP-CAT,²⁹ the OP-CRC-SC,³⁰ the OP-ICESCR,³¹ the OP-ICRPD,³² and the ICPPED.³³

B. National human rights framework³⁴

N/A

C. Implementation of international human rights obligations, taking into account applicable international humanitarian law

1. Cross-cutting issues

Equality and non-discrimination³⁵

19. Three stakeholders recommended that Ireland introduce legislation prohibiting ethnic profiling by the police.³⁶ JS9 recommended training law enforcement officials on anti-Traveller and Roma discrimination.³⁷

20. OSCE-ODIHR reported that discrimination was directed towards refugees, migrants, and people of Asian descent during the COVID-19 pandemic.³⁸ JS9 expressed concern about persistent anti-Traveller and Roma racism, with increased reports during the pandemic.³⁹

21. OSCE-ODIHR recommended that Ireland condemn discrimination and hate crime, and ensure that emergency measures imposed are created and applied in a non-discriminatory manner.⁴⁰

22. AMRI was concerned that the Mother and Baby Homes Commission of Investigation made no recommendations regarding mixed race children. The Commission had reported that mixed race children suffered from racial discrimination and had been targeted for illegal vaccine trials.⁴¹

23. AMRI recommended that Ireland: provide a State Apology for human rights violations suffered by mixed race children while in institutions or unsuitable families; provide remedies/redress to mixed race children; and introduce anti-racism policies for all state child care bodies.⁴²

24. Doras was concerned about increased racist incidents and incitement to hatred by far-right hate groups.⁴³ CoE-ECRI and JS9 reported that Ireland had not renewed its National Action Plan against Racism since 2008, and there were no provisions in criminal law defining racist or homo/transphobic offences as specific offences.⁴⁴

25. Three stakeholders recommended that Ireland develop a new National Action Plan against Racism with clear indicators, timeframes and resources.⁴⁵ Stakeholders recommended that the Action Plan: complies with the Durban Declaration and Programme of Action; addresses anti-Traveller and Roma discrimination; strengthens labour market access; and includes migrants and international protection applicants.⁴⁶ CoE-ECRI recommended that Ireland develop a new strategy against racism focussed on the most vulnerable communities.⁴⁷

26. CoE-ECRI and Nasc observed the absence of statutory provisions for racist or other hate motivation to be considered as aggravating circumstances for criminal offences, and that the Prohibition of Incitement to Hatred Act 1989 was ineffectual.⁴⁸ Three stakeholders recommended that Ireland enact new hate speech and hate crime legislation.⁴⁹

27. JS5 recommended that Ireland regularly review laws and policies to prevent discrimination against LGBTI individuals.⁵⁰ CoE-ECRI and JS5 recommended amending the Employment Equality Acts and Equal Status Acts to include the ground of gender identity and transgender protection.⁵¹

*Development, the environment, and business and human rights*⁵²

28. Oxfam reported that human rights violations were widespread in the global value chains of companies conducting business in Ireland. There was no legally binding business and human rights regulation to stop related abuse, and Ireland supported human rights due diligence only on a voluntary basis.⁵³

29. Oxfam noted that other countries' ability to raise revenue was undermined by tax avoidance, and Ireland's role in international tax avoidance was well-documented.⁵⁴

30. Oxfam informed that Ireland had not supported the mechanisms proposed by WHO and WTO to increase COVID-19 vaccine supplies.⁵⁵

31. C2030 called for Ireland to pursue a transformative recovery from COVID-9 that integrated human rights protections and prioritised Sustainable Development Goal targets.⁵⁶

32. C2030 recommended that Ireland provide additional resources to assist developing countries to respond to the health crisis following COVID-19.⁵⁷

33. FoE reported that Ireland had failed to meet EU 2020 climate targets, and commitments were not aligned with the ambition of the Paris Agreement.⁵⁸ FoE recommended that Ireland implement the 2019 Climate Action Plan, and advance on the Climate Change Adaptation Framework, particularly how marginalised groups will be protected.⁵⁹

34. FoE recommended that Ireland take forward international cooperation policy commitments, including revising Ireland's trade and investment strategy to include the promotion of human rights and environmental protection.⁶⁰

Human rights and counter-terrorism

35. JS5 informed that Ireland's counter-terrorism legislation underpinned the Special Criminal Court. Use of the Special Criminal Court outside of a proclaimed emergency period raised human rights concerns, including regarding the right to a fair trial.⁶¹ JS5 recommended that Ireland abolish the Special Criminal Court, and if not, ensure fair trial rights are protected.⁶²

2. Civil and political rights

*Right to life, liberty and security of person*⁶³

36. ADF and HI argued that the 2020 Dying with Dignity Bill, introduced to enable the ending of one's life with medical assistance in case of an incurable illness, fell short of Ireland's obligations to protect the rights to life, non-discrimination and health of older persons and persons with disabilities, and freedom of conscience of healthcare professionals.⁶⁴

37. ADF recommended that Ireland resist pressures to legalize euthanasia and assisted suicide, acknowledge that such practices violate the above rights, and commit to support palliative care for terminal illness.⁶⁵

38. On ill-treatment of detainees, CoE-CPT recommended that Ireland place the right of access to a lawyer on a statutory basis, and establish an independent system of monitoring police stations.⁶⁶ JS5 recommended expediting section 9 of the Criminal Justice Act 2011, ensuring that persons detained by the police have the right of access to a lawyer.⁶⁷

*Administration of justice, including impunity, and the rule of law*⁶⁸

39. CoE-GRECO reiterated its appeal to Ireland to reform the recruitment and promotion processes for judges.⁶⁹

40. FLAC and ITM reported that: for legal representation and advice under Ireland's State-funded civil aid scheme, applicants must pay a financial contribution, except in domestic violence cases; waiting times were long; legal aid did not cover land or evictions; and the Legal Aid Board was precluded by law from providing representation before many quasi-judicial tribunals. The Department of Justice had committed to a 2021 review of the scheme.⁷⁰

41. FLAC recommended that Ireland commit to a comprehensive, independent review of the civil legal aid system, and ensure equal treatment before tribunals.⁷¹

42. OCO noted that the age of criminal responsibility had been set at 12 for most offences and 10 for certain serious offences under the Children Act 2001.⁷² OCO recommended that Ireland review the Children Act 2001, to raise the minimum age in line with recommendations from the Committee on the Rights of the Child.⁷³

43. EU-FRA identified as a promising practice the Bail Support Scheme for children suspected of committing a criminal offence, allowing suspects to remain in the community.⁷⁴

44. IPRT and JS5 recommended that Ireland use the measures successfully introduced to reduce the prison population during the COVID-19 pandemic, to end overcrowding.⁷⁵

45. IPRT and JS5 recommended that Ireland establish an effective independent National Preventive Mechanism to inspect all places of detention, and an independent prisoner complaint mechanism.⁷⁶

46. IPRT recommended ensuring remand and sentenced prisoners are held separately.⁷⁷

*Fundamental freedoms and the right to participate in public and political life*⁷⁸

47. JS2 and HAI reported that there were superficial plans to reduce religious discrimination in schools, with students enrolled in religion classes by default and no publicly funded non-denominational schools, while obligatory religious oaths for high office remained.⁷⁹ HAI highlighted continued discrimination in school enrolment, teacher training and employment, and the statement of Christian belief in the preamble to the Constitution.⁸⁰

48. HAI recommended that Ireland remove the Integrated Curriculum, repeal section 37 of the Employment Equality Act 1998 so that discrimination on religious grounds is prohibited, remove/replace the pre-ambular statement in the Constitution, and remove the requirement for religious oaths.⁸¹ JS2 recommended providing access to non-denominational schools and secular education, and holding a referendum to remove obligatory religious oaths.⁸²

49. FoE was concerned about limited consultation, with certain NGOs, on the universal periodic review (UPR).⁸³ FoE recommended that Ireland address civil society engagement in the UPR.⁸⁴

50. AI and HAI contended that the widening of the 1997 Electoral Act from prohibiting funding any organisation for political purposes to funding for any change in Government policy was stifling the work of advocacy organisations.⁸⁵

51. Three stakeholders recommended to amend the Electoral Act to remove the limits on funding organisations legitimately advocating for change in Government policy.⁸⁶

52. JS5 reported that, in the context of the COVID-19 pandemic, the Minister for Health had signed regulations restricting a range of rights. JS5 noted concerns about lack of pre-legislative scrutiny or human rights impact assessment, and disproportionate impacts on certain groups.⁸⁷

53. JS5 recommended that Ireland subject all emergency law to parliamentary pre-legislative scrutiny or immediate post-legislative review, undertake human rights impact assessments, and ensure disproportionate impacts are mitigated through supports.⁸⁸

*Prohibition of all forms of slavery*⁸⁹

54. Doras and JS4 reported that victims of trafficking were not being systematically identified.⁹⁰ JS4 informed that only the police had authority to identify victims.⁹¹ JS4 recommended that Ireland train all police units in consistent use of the National Referral Mechanism, and allow victim identification and referral by entities other than police.⁹²

55. JS4 noted that human trafficking for sexual exploitation was the most prolific form. JS4 recommended that Ireland improve the identification of, and assistance to, child victims by ensuring all social workers receive training.⁹³

56. Doras informed that protections for victims applied only to a limited number of cases involving undocumented migrants from non-European Economic Area (EEA) countries.⁹⁴ Doras noted that those identified lived in Direct Provision centres, which had the potential for re-trafficking.⁹⁵

57. Doras and CoE_GRETA recommended that Ireland recognise all trafficking victims regardless of their nationality or immigration status, give victims from EEA and non-EEA countries the same supports, discontinue accommodating trafficking victims in Direct Provision, and ensure systematic early vulnerability assessments and supports for identified victims.⁹⁶

58. GRETA recommended that Ireland enact statutory rights to assistance for trafficking victims, regardless of nationality or immigration status, and adopt a legal provision on the non-punishment of victims for involvement in unlawful activities.⁹⁷

59. JS4 asserted that failure to secure any convictions for human trafficking represented a failure in the administration of justice.⁹⁸ Three stakeholders recommended that Ireland bring perpetrators to justice.⁹⁹

60. JS4 asserted that the State had failed to effectively resource and coordinate anti-trafficking efforts.¹⁰⁰ JS4 recommended that Ireland develop a Third National Action Plan to Prevent and Combat Trafficking including a budget, responsibilities and time frame, and reinstate a dedicated anti-trafficking unit.¹⁰¹

61. Global Unions reported that Ireland's 2016 Atypical Working employment Scheme had made the situation for non-EEA fishers worse. Permits were only granted to those directly employed by the fishing licence holder via a written contract for 12 months. Fishers found themselves in situations akin to bonded labour, as employers were able to threaten imminent deportation.¹⁰² Global Unions had provided details of potential human trafficking victims to the Irish Government, but there had been little investigation into allegations.¹⁰³

62. Global Unions recommended that Ireland investigate and take action on allegations of human trafficking and labour abuses in the fishing industry.¹⁰⁴

*Right to privacy and family life*¹⁰⁵

63. JS1 reported that in 2019, the Data Protection Commission had found that individual privacy rights had been violated by extension of the Public Services Card (PSC) beyond core social welfare benefits. Although the Commission had found that the Government must cease requiring a PSC as a precondition for accessing wider public services, the Government continued to process personal data, hold personal data "indefinitely", illegally withhold services from citizens without PSCs, and illegally share data.¹⁰⁶

64. JS1 recommended that Ireland refrain from requiring individuals to provide their personal data to the PSC to access social welfare services; develop legal procedures for the collection of biometric data; comply with the findings of the Commission, and stop withholding services from citizens without PSCs, sharing data, and holding personal data indefinitely.¹⁰⁷

3. Economic, social and cultural rights

*Right to work and to just and favourable conditions of work*¹⁰⁸

65. CoE-ECSR reported that national legislation did not protect all workers against dismissal on grounds of membership or involvement in a trade union.¹⁰⁹

66. EUROMIL informed that associations of the Defence Forces had not been permitted to join the Irish Congress of Trade Unions, the body dominating national pay negotiations. Under the Defence Forces Regulation, it was an offence to participate in industrial action.¹¹⁰

67. JS5 reported that women were under-represented in political and public life, payment levels for maternity leave were low, and maternity leave lacking for elected officials. A gender pay gap persisted, and the status of a 2019 Gender Pay Gap Information Bill to increase transparency was unclear.¹¹¹

68. JS5 recommended that Ireland take measures to increase women's representation in political and public life, and to reduce the gap, including through pay transparency.¹¹²

*Right to social security*¹¹³

69. CoE-ECSR stated that the minimum amount of sickness, work injury and occupational diseases benefits, unemployment assistance for persons below age 25, and social assistance for single persons, were not adequate.¹¹⁴

70. FLAC reported that people under age 25 eligible for social security payments received less than those aged 25 and over.¹¹⁵ MRCI noted that non-EU/EEA migrants were disqualified from social welfare payments that were subject to the Habitual Residence Condition (HRC).¹¹⁶ JS9 was concerned at the discriminatory impact that the HRC had on Roma access to social protection, including Child Benefits.¹¹⁷

71. FLAC recommended that Ireland end lower rates of social welfare payments to people under age 25, and review the HRC to eliminate discriminatory impact.¹¹⁸ JS9 recommended making Child Benefits a universal payment.¹¹⁹

*Right to an adequate standard of living*¹²⁰

72. CoE-ECSR stated the reduced minimum wage for adults on first employment was not sufficient for a decent standard of living.¹²¹

73. OCO was concerned that over 92,000 children were living in consistent poverty, with children in one-parent families, Traveller, Roma and migrant children, and children in Direct Provision, disproportionately affected.¹²² OCO recommended that Ireland work towards eliminating child poverty, particularly for children most affected, including through an action plan.¹²³

74. AI noted that, despite supported second cycle UPR recommendations to improve housing availability, more people were experiencing homelessness or inadequate housing. This had become critical in the COVID-19 pandemic context, disproportionately impacting Travellers and Roma, migrants, and older persons.¹²⁴

75. Two stakeholders recommended that Ireland schedule a referendum on a constitutional right to housing.¹²⁵

*Right to health*¹²⁶

76. AI and JS3 informed that the 2018 Health (Regulation of Termination of Pregnancy) Act (the Act) provided for abortion on request up to 12 weeks, subject to a mandatory three-day waiting period, and permitted abortion under limited circumstances after 12 weeks, namely emergencies, when pregnancy poses a "risk to the life, or of serious harm to the health" of the pregnant person, or when a "condition [is] likely to lead to death of foetus" before or within 28 days of birth. JS3 and AI contended that the law was framed in terms of criminal offences, rather than access to healthcare, and that the three-day waiting period prohibited some women from accessing care in Ireland.¹²⁷ JS3 indicated that, since the Act used the word "woman", it excluded transgender, intersex and non-binary people.¹²⁸

77. JS3 noted that patients in Ireland had to navigate a complex system of healthcare characterized by poor geographic distribution of services. Telemedicine or “remote” provision of medications for early abortion, in response to the COVID-19 pandemic, however, had improved the accessibility of abortion care. JS3 argued that the Act provision allowing doctors to refuse care by claiming conscientious objection hampered abortion access within the 12-week limit.¹²⁹ Ireland was due to review the Act in 2021.¹³⁰

78. JS3, JS5 and IFPA recommended to decriminalise abortion in all circumstances.¹³¹ JS3 recommended to: improve the geographic distribution of care providers; increase access by authorising nurses, midwives, and other medics to provide abortion care; maintain telemedicine as a permanent feature of abortion care; repeal the 12-week limit, the three-day waiting period, ambiguous wording regarding abortions for health risks and ‘fatal’ foetal diagnoses, and refusal of care; make explicit the right of transgender people to access abortions; and provide free contraception to all.¹³²

79. JS3 and IFPA recommended that Ireland hold an open review of the Act.¹³³ AI recommended ensuring the review provides a human rights-compliant framework.¹³⁴

80. JS5 noted that anti-abortion activity outside healthcare providers aimed to deter individuals from accessing health care.¹³⁵ JS3 and JS5 recommended that Ireland enact legislation providing safe zones around abortion providers.¹³⁶

81. ADF and ECLJ also made comments and recommendations on abortion-related issues.¹³⁷

82. JS5 registered concerns about the protection of the rights of older people during the COVID-19 pandemic, notably the lack of clinical oversight of care in private nursing homes.¹³⁸ JS5 recommended that Ireland conduct an inquiry into the impact of COVID-19 measures on the rights of older persons, and provide clinical oversight of care in private nursing homes.¹³⁹

83. JS7 reported that the COVID-19 pandemic had greatly impacted two main groups of people: older persons, for whom “cocooning” social distancing measures had been introduced; and people from disadvantaged backgrounds.¹⁴⁰

84. JS7 recommended that Ireland analyze the long-term effects of “cocooning” on older persons, and provide services for physical and mental wellbeing, and address the disparities faced by disadvantaged groups.¹⁴¹

*Right to education*¹⁴²

85. OCO and JS7 were concerned about educational disadvantage, particularly among children who were homeless, with disabilities, Travellers, seeking asylum, in care, and in one-parent families.¹⁴³ JS7 noted disadvantage among children in low income families, since some schools asked for “voluntary contributions”.¹⁴⁴ OCO highlighted the disproportionate adverse effects of COVID-19-related school closures on children with disabilities and from disadvantaged backgrounds.¹⁴⁵

86. OCO recommended that Ireland address root causes of educational disadvantage and support access, attendance, and attainment.¹⁴⁶ JS7 recommended ensuring low income families have financial support to cover school-related fees, and Direct Provision facilities are adequate for children.¹⁴⁷

87. JS6 noted good practices to support students from specific groups, including sensory pods for autistic children, and services for people in the asylum system.¹⁴⁸

88. JS6 also noted good practices regarding digital inclusion, through expanding public internet access in libraries and offering digital skills learning.¹⁴⁹

4. Rights of specific persons or groups

*Women*¹⁵⁰

89. JS4 noted that funding to tackle gender-based violence remained inadequate. It recommended that Ireland finance the Third National Strategy on Domestic, Sexual and Gender-based violence.¹⁵¹

90. JS4 noted the continued shortfall in providing supports for victims of domestic violence.¹⁵² JS4 recommended that Ireland increase refuge places for victims, and ensure training for the police, lawyers and judges.¹⁵³

91. JS5 noted the rise in women and children seeking support during the COVID-19 pandemic.¹⁵⁴ JS5 recommended that Ireland augment funding to non-governmental organisations delivering services to victims of gender-based violence.¹⁵⁵

92. Plan International was concerned that women and girls were disproportionately affected by online abuse and harassment, and were thus not free to participate in online public and political life. When schools moved online during the COVID-19 pandemic, girls were at higher risk of harassment and abuse on educational and social media platforms.¹⁵⁶

93. Plan International recommended that Ireland: enact the Online Safety Media Regulation Bill 2019; appoint the Digital Safety Commissioner proposed by the 2018 Action Plan for Online Safety; ensure that children are educated about the dangers of online spaces; and domesticate international legal frameworks on online sexual abuse of children.¹⁵⁷

94. Oxfam expressed concern about lack of attention to gender equality in economic decision-making since the COVID-19 pandemic, and that the pandemic had exacerbated pre-existing gender inequities in sharing care responsibilities.¹⁵⁸

95. Oxfam recommended that Ireland: increase investments in public services, especially the care economy; ensure care workers are properly compensated; hold a referendum on Art. 41.2 of the Constitution to amend the language so it is gender neutral and recognises the value of carework; ensure policy changes that support carers and encourage male participation in care; and adopt gender budgeting.¹⁵⁹

96. SMPHS noted the various gendered impacts of the pandemic, with consequences for women's mental health.¹⁶⁰

*Children*¹⁶¹

97. AI and JS5 noted that the Mother and Baby Homes Commission of Investigation Final Report did not examine the system of unregulated adoptions.¹⁶² AI stated that the separation of children from parents, conditions within the 'homes', and experimental use of vaccinations could constitute human rights violations. It was the Government's responsibility to ensure truth, justice and reparation for survivors, with a state investigation and prosecution of perpetrators.¹⁶³

98. JS5 recommended that Ireland: conduct independent effective investigations into allegations of ill-treatment of women and children in all institutional contexts; conduct an independent effective investigation into the system of unregulated adoption in Ireland in the 20th Century; and implement a redress scheme.¹⁶⁴

99. OCO highlighted the adverse effects of COVID-19 measures on children, which exacerbated challenges for certain groups of children.¹⁶⁵ OCO recommended that Ireland ensure children's rights are protected in its COVID-19 response, and that regressive measures adopted are necessary, non-discriminatory and temporary.¹⁶⁶

100. SPMHS stated that the continued placement of children in adult mental health units remained a children's rights violation and required urgent remedy.¹⁶⁷

*Persons with disabilities*¹⁶⁸

101. OCO had concerns about barriers faced by children with disabilities, including delays in assessing their needs and receiving services.¹⁶⁹ OCO recommended that Ireland

improve coordination and resource allocation to address the rights of children with disabilities.¹⁷⁰

*Minorities*¹⁷¹

102. Several stakeholders noted that national strategies on Travellers and Roma lacked concrete implementation plans and a monitoring and evaluation mechanism.¹⁷²

103. Stakeholders recommended that Ireland adopt an implementation plan with clear targets, indicators, timeframes and resources for all socio-economic measures in the National Traveller and Roma Inclusion Strategy 2017–2021.¹⁷³ OCO recommended that Ireland progress the Strategy implementation and evaluation.¹⁷⁴

104. JS10 noted that, despite formal Traveller ethnicity recognition in 2017, this was “symbolic”, not legal, recognition.¹⁷⁵ JS10 recommended that Ireland give legal effect to Traveller ethnicity recognition.¹⁷⁶

105. ITM and JS9 reported that: Travellers were over-represented among the homeless and in prisons, and there was little improvement in educational completion rates. Travellers had lower life expectancy, higher morbidity and mortality, and were vulnerable to COVID-19 infection.¹⁷⁷

106. JS10 noted the underspending of funding for Traveller accommodation by local authorities, and lack of transparency.¹⁷⁸ CoE-ECRI reported that most local authorities failed to provide adequate and culturally-appropriate accommodation.¹⁷⁹

107. JS9 recommended that Ireland ensure implementation of recommendations from the Independent Expert Group on Traveller accommodation.¹⁸⁰ JS10 recommended that Ireland establish a National Traveller Accommodation Agency to identify needs and ensure delivery by local authorities.¹⁸¹

108. CoE-ECRI recommended developing a national housing strategy to generate affordable housing and combat racial discrimination, with particular attention paid to the needs of vulnerable communities, including Travellers, Roma, migrants and refugees.¹⁸²

109. ITM reported that, during COVID-19, the Government provided supports for Traveller families.¹⁸³ CoE-CDADI noted measures taken at local level to create space for Traveller communities to maintain social distancing.¹⁸⁴

110. CoE-CDADI recommended that local and municipal authorities maintain the adoption of needed measures once the crisis is over.¹⁸⁵ JS10 recommended retaining all temporary accommodation facilities provided under COVID-19, until permanent facilities are established.¹⁸⁶

111. OSCE-ODIHR reported that circumstances had placed Roma and Sinti communities in a vulnerable situation regarding COVID-19, including in Ireland. OSCE-ODIHR recommended that Ireland assist Roma and Sinti children in accessing remote learning, and ensure Roma and Sinti participation in developing recovery plans.¹⁸⁷

*Migrants, refugees, and asylum seekers*¹⁸⁸

112. Various stakeholders were concerned that people in Direct Provision continued to be at risk of the negative impacts of lengthy stays, including on mental health.¹⁸⁹ AI and Nasc noted the Government commitment to ending this system by 2024.¹⁹⁰

113. Three stakeholders recommended that Ireland ensure timely processing and that the backlog of cases in the international protection system are addressed, while Doras and JS4 recommended providing adequate resources to the International Protection Office.¹⁹¹ CoE-ECRI recommended investing resources in ensuring that asylum applications are processed efficiently.¹⁹² Nasc recommended placing deadlines for processing immigration applications on a statutory footing.¹⁹³

114. Several stakeholders reported that Ireland had restricted the right to family reunification for people in the international protection process through enactment of the International Protection Act 2015, which removed the right to family reunification for dependent family members who were previously eligible.¹⁹⁴

115. Doras and Oxfam recommended that Ireland amend the International Protection Act 2015 to extend the definition of family members to include all dependent family members.¹⁹⁵ JS4 and Nasc recommended that Ireland enact the International Protection (Family Reunification Amendment) Bill 2017.¹⁹⁶

116. Nasc was concerned that Ireland did not have permanent residence status for non-European Economic Area migrants.¹⁹⁷ It recommended that Ireland introduce such permanent residence status.¹⁹⁸

117. JS4 reported that migrant women were disproportionately represented among women presenting to domestic violence services.¹⁹⁹ Doras and MRCI remained concerned that migrant victims faced barriers leaving abusive relationships, including dependent immigration status.²⁰⁰ Nasc noted the absence of a statutory right for migrant victims of domestic, sexual or gender-based violence to retain immigration status.²⁰¹

118. JS4 recommended that Ireland develop gender-sensitive procedures in Direct Provisions.²⁰² Doras and Nasc recommended placing the right for victims to apply for independent residence on a statutory footing.²⁰³

119. Doras noted that, although the right to work for people in the international protection process was introduced in July 2018, the condition of no first-instance decision within 9 months meant most people remained prohibited.²⁰⁴

120. Doras recommended that Ireland remove the legislative barriers restricting international protection applicant access to work.²⁰⁵ CoE-ECRI recommended assisting asylum seekers to access the labour market.²⁰⁶

121. MRCI reported that the lack of legal status of undocumented migrants prevented them from accessing their rights to housing, health, education and employment. MRCI recommended that Ireland introduce a regularisation scheme, and noted the Government's commitment to introduce regularisation by mid-2021.²⁰⁷

122. CoE-CPT and Nasc noted that immigration detainees continued to be held together with remand and convicted prisoners.²⁰⁸

123. CoE-CPT called upon authorities to establish a specific centre for immigration detainees.²⁰⁹ Three stakeholders recommended that people detained for immigration purposes not be held in prisons.²¹⁰

Stateless persons

124. JS8 informed that although Ireland was State party to both main UN Statelessness Conventions,²¹¹ neither had been fully incorporated into domestic law, and national law did not contain a definition of a stateless person. While there were some safeguards to ensure children's rights to a nationality, there were gaps in law for children born stateless.²¹² Doras noted that, although a small number of people had acquired legal statelessness status, this had been on an ad-hoc basis.²¹³

125. Three stakeholders recommended that Ireland establish a statelessness determination procedure.²¹⁴ JS8 recommended that Ireland fully incorporate into national law the Statelessness Conventions, and amend the safeguard to ensure all otherwise stateless children born in Ireland acquire Irish nationality.²¹⁵

Notes

¹ The stakeholders listed below have contributed information for this summary; the full texts of all original submissions are available at: www.ohchr.org. (One asterisk denotes a national human rights institution with "A" status).

Civil society

Individual submissions:

ADF International	ADF International, Geneva (Switzerland);
AI	Amnesty International, London (United Kingdom);
AMRI	Association of Mixed Race Irish, Dublin (Ireland);

C2030	Coalition 2030 Ireland, Dublin (Ireland);
Doras	Doras, Limerick (Ireland);
ECLJ	The European Centre for Law and Justice, Strasbourg (France);
EUROMIL	European Organisation of Military Associations and Trade Unions, Brussels (Belgium);
FLAC	Free Legal Advice Centres, Dublin (Ireland);
FoE	Friends of the Earth Ireland, Dublin (Ireland);
Global Unions	International Transport Workers Federation, London (United Kingdom of Great Britain and Northern Ireland);
HAI	Humanist Association of Ireland, Dun Laoghaire (Ireland);
HI	Hope Ireland, Dublin (Ireland);
IFPA	Irish Family Planning Association, Dublin (Ireland);
IPRT	Irish Penal Reform Trust, Dublin (Ireland);
ITM	Irish Traveller Movement, Dublin (Ireland);
MRCI	Migrant Rights Centre Ireland, Dublin (Ireland);
Nasc	Nasc, Migrant and Refugee Rights, Cork (Ireland);
OCO	Ombudsman for Children's Office, Dublin (Ireland);
Oxfam	Oxfam Ireland, Dublin (Ireland);
Plan International	Plan International, Geneva (Switzerland);
SPMHS	St. Patrick's Mental Health Services, Dublin (Ireland).
<i>Joint submissions:</i>	
JS1	Joint submission 1 submitted by: Access Now, New York (United States of America), and Digital Rights Ireland;
JS2	Joint submission 2 submitted by: Atheist Ireland, Dublin (Ireland), Evangelical Alliance of Ireland, Ahmadiyya Muslim Community of Ireland;
JS3	Joint submission 3 submitted by: Abortion Rights Campaign, Dublin (Ireland), Abortion Support Network, Termination for Medical Reasons Ireland;
JS4	Joint submission 4 submitted by: Edmund Rice International, Geneva (Switzerland), Sisters of Our Lady of Apostles, Irish Province International Presentation Association Association of Leaders of Missionaries and Religious of Ireland Religious in Europe Networking Against Trafficking and Exploitation Akina Dada wa Africa-AkiDwa Community After Schools Project Edmund Rice Schools Trust European Province of the Christian Brothers Sisters of Mercy of the Americas - Mercy International Association - Global Action Institute of the Blessed Virgin Mary - Loreto Generalate Salesian Missions - Don Bosco Aid Ireland Congregation de Notre Dame (CND) Act To Prevent Trafficking (APT/AMRI) New Communities Partnership Congregation of Our Lady of Charity of the Good Shepherd Spirasi (Spiritan Asylum Services Initiative) Daughters of Charity The Jesuit Centre for Faith and Justice Cork Against Human Trafficking (CAHT) Sexual Violence Violence Centre Cork, MECPATHS (Mercy Efforts for Child Protection against Trafficking with the Hospitality and Services Sector Society of African Missions (Societas Missionum ad Afros) – Irish Province Cork Migrant Centre Irish Dominicans Province (OP) Friends of Africa The Congregation of the Most Holy Redeemer (Redemptorists), Irish Province;
JS5	Joint submission 5 submitted by: Irish Council for Civil Liberties, Dublin (Ireland), Age Action, BeLonG To Youth Services, Immigrant Council of Ireland, Irish Family Planning Association, Irish Network Against Racism, Irish Penal Reform Trust, NASC, National Women's Council;
JS6	Joint submission 6 submitted by: International Federation of Library Associations and Institutions, Den Haag (the Netherlands), Library Association of Ireland;

JS7	Joint submission 7 submitted by: Istituto Internazionale Maria Ausiliatrice, Veyrier (Switzerland), VIDES International – International Volunteerism Organization for Women, Education and Development;
JS8	Joint submission 8 submitted by: Institute on Statelessness and Inclusion, Eindhoven (the Netherlands), Immigrant Council of Ireland, European Network on Statelessness;
JS9	Joint submission 9 submitted by: Coalition of Traveller and Roma NGOs for UPR of Ireland, Dublin (Ireland), Pavee Point Traveller and Roma Centre, National Traveller Women's Forum, Donegal Travellers Project, Minceirs Whiden, Galway Traveller Movement;
JS10	Joint submission 10 submitted by: Traveller Visibility Group, Cork (Ireland), and Cork Traveller Women's Network.
<i>National human rights institution:</i>	
IHREC	Irish Human Rights and Equality Commission, Dublin (Ireland).
<i>Regional interGovernmental organization(s):</i>	
CoE	The Council of Europe, Strasbourg (France); Attachments: (CoE-CPT) Report to the Government of Ireland on the visit to Ireland carried out by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) from 23 September to 4 October 2019, CPT/Inf (2020) 37; (CoE-CPT-Response) Response of the Government of Ireland to the report of the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) on its visit to Ireland from 23 September to 4 October 2019, CPT/Inf (2020) 38; (CoE-ECRI) European Commission against Racism and Intolerance report on Ireland, adopted on 2 April 2019, CRI(2019)18; (CoE-CDADI) Steering Committee on Anti-Discrimination, Diversity and Inclusion, COVID-19: an analysis of the anti-discrimination, diversity and inclusion dimensions in Council of Europe member States; (CoE-ACFC) Advisory Committee on the Framework Convention for the Protection Of National Minorities, Strasbourg, Fourth Opinion on Ireland adopted on 10 October 2018, ACFC/OP/IV(2018)005; (CoE-CMResCMN) Resolution of the Committee of Ministers (2019)14 on the implementation of the Framework Convention for the Protection of National Minorities by Ireland, adopted on 16 October 2019; (CoE-GRETA) - Group of Experts on Action against Trafficking in Human Beings, Report concerning the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings by Ireland, Second Evaluation Round, Strasbourg, adopted on 7 July 2017, GRETA(2017)28; (CoE-GRECO) – Group of States Against Corruption, Second Interim Compliance Report of Ireland, Strasbourg, adopted 21-25 September 2020, GrecoRC4(2020)8; (CoE-ESCR) – European Committee of Social Rights; EU Agency for Fundamental Rights, Vienna (Austria); Office for Democratic Institutions and Human Rights of the Organization for Security and Co-operation in Europe, Warsaw (Poland).
EU-FRA OSCE/ODIHR	

² IHREC, paras. 1–4.

³ IHREC, p. 4.

⁴ IHREC, paras. 16–18.

⁵ IHREC, p. 10.

⁶ IHREC, paras. 10–11.

⁷ IHREC, p. 7.

⁸ IHREC, para. 12 and p. 8.

⁹ IHREC, para. 13.

¹⁰ IHREC, p. 8.

¹¹ IHREC, para. 21.

¹² IHREC, p. 12.

¹³ IHREC, paras. 30–31.

- ¹⁴ IHREC, p. 15.
- ¹⁵ IHREC, paras. 14–15.
- ¹⁶ IHREC, p. 9.
- ¹⁷ IHREC, para. 19.
- ¹⁸ IHREC, p. 12.
- ¹⁹ IHREC, para. 22.
- ²⁰ IHREC, p. 12.
- ²¹ IHREC, paras. 5–9.
- ²² IHREC, p. 5.
- ²³ IHREC, paras. 23–25.
- ²⁴ IHREC, p. 13.
- ²⁵ IHREC, paras. 27–29.
- ²⁶ IHREC, p. 14.
- ²⁷ The following abbreviations are used in UPR documents:
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| ICERD | International Convention on the Elimination of All Forms of Racial Discrimination; |
| ICESCR | International Covenant on Economic, Social and Cultural Rights; |
| OP-ICESCR | Optional Protocol to ICESCR; |
| ICCPR | International Covenant on Civil and Political Rights; |
| ICCPR-OP 1 | Optional Protocol to ICCPR; |
| ICCPR-OP 2 | Second Optional Protocol to ICCPR, aiming at the abolition of the death penalty; |
| CEDAW | Convention on the Elimination of All Forms of Discrimination against Women; |
| OP-CEDAW | Optional Protocol to CEDAW; |
| CAT | Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment; |
| OP-CAT | Optional Protocol to CAT; |
| CRC | Convention on the Rights of the Child; |
| OP-CRC-AC | Optional Protocol to CRC on the involvement of children in armed conflict; |
| OP-CRC-SC | Optional Protocol to CRC on the sale of children, child prostitution and child pornography; |
| OP-CRC-IC | Optional Protocol to CRC on a communications procedure; |
| ICRMW | International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families; |
| CRPD | Convention on the Rights of Persons with Disabilities; |
| OP-CRPD | Optional Protocol to CRPD; |
| ICPPED | International Convention for the Protection of All Persons from Enforced Disappearance. |
- ²⁸ For relevant recommendations see A/HRC/33/17, paras. 135.1–135.75, 135.82, 135.152, 136.1–136.10, 136.29, 136.48, 137.1–137.10.
- ²⁹ AI, p. 5, CoE-CPT, p. 10 para. 6, Doras, p. 2, IPRT, p. 3, JS5, p. 2, JS7, para. 9 and Nasc, p. 1.
- ³⁰ JS4, para. 11, Doras, p. 2, JS5, p. 2, JS7, para. 9, OCO, p.1 and Plan International, p. 9.
- ³¹ AI, p. 5, Doras, p. 2 and JS5, p. 2.
- ³² Doras, p. 2 and JS5, p. 2.
- ³³ AI, p. 5 and JS5, p. 8.
- ³⁴ For relevant recommendations see A/HRC/33/17, paras. 135.83, 135.103–135.104, 135.132, 135.136, 136.21, 136.11–136.20, 136.22–136.25, 136.30–136.32, 136.46–136.47, 136.71 and 136.90.
- ³⁵ For relevant recommendations see A/HRC/33/17, paras. 135.26, 135.105–135.110, 135.112–135.119, 135.127, 135.144, 136.55, 136.56, 136.43–136.45, 136.49.
- ³⁶ CoE-ECRI, p. 10, JS9, para. 9(a) and JS10, p. 8.
- ³⁷ JS9, paras. 9(b)–(c).
- ³⁸ OSCE-ODIHR, para. 7.
- ³⁹ JS9, para. 1.1.
- ⁴⁰ OSCE-ODIHR, pp. 2–3.
- ⁴¹ AMRI, paras. 5–12.
- ⁴² AMRI, paras. 14–16.
- ⁴³ Doras, paras. 27–30.
- ⁴⁴ CoE-ECRI, paras. 9–10 and JS9, para. 1.1.
- ⁴⁵ CoE-ACFC, p. 2, JS9, para. 1.1(a), and JS10, p. 10.

- 46 Doras, p. 12, JS9, para. 1.1(a), JS10, p. 10, MRCI, para. 2, and Nasc, p. 2.
- 47 CoE-ECRI, p. 10.
- 48 CoE-ECRI, paras. 9–10 and Nasc, paras. 10–12.
- 49 CoE-ECRI, p. 10, JS10, p. 10 and Nasc, p. 3.
- 50 JS5, p. 5.
- 51 CoE-ECRI, p. 10 and JS5, p. 5.
- 52 For relevant recommendations see A/HRC/33/17, paras. 136.96 and 136.97.
- 53 Oxfam, p. 2.
- 54 Oxfam, pp. 3–5.
- 55 Oxfam, p. 6.
- 56 C2030 para. 4.1.
- 57 C2030, paras. 5.1 and 5.3.
- 58 FoE, p. 4.
- 59 FoE, pp. 4–5.
- 60 FoE, pp. 6–7.
- 61 JS5, paras. 79–80.
- 62 JS5, p. 11.
- 63 For relevant recommendations see A/HRC/33/17, para. 135.122.
- 64 ADF, paras. 24–26 and HI, paras. 10–17.
- 65 ADF, para. 34(e)–(f). See also HI, para. 28.
- 66 CoE-CPT, p. 4.
- 67 JS5, pp. 7–8.
- 68 For relevant recommendations see A/HRC/33/17, paras. 135.8, 135.120–135.121, 135.123–135.125, 136.27–136.28, 136.50, 136.70, 137.11.
- 69 CoE-GRECO, para. 54.
- 70 FLAC, paras. 21–29 and ITM, p. 2.
- 71 FLAC, pp. 11–12.
- 72 OCO, para. 10.
- 73 OCO, para. 10.
- 74 EU-FRA, p. 8.
- 75 IPRT, p. 5 and JS5, p. 7.
- 76 IPRT, p. 3 and JS5, p. 7.
- 77 IPRT, p. 6.
- 78 For relevant recommendations see A/HRC/33/17, para. 135.126, 135.139, 136.53–136.54.
- 79 JS2, paras. 1.5, 3.1.2, 3.1.3, and 3.6.1 and HAI, paras. 1.2, 1.4 and 2.2.
- 80 HAI, paras. 1.1, 1.3, 1.5, and 1.6.
- 81 HAI, pp. 8–9.
- 82 JS2, paras. 2.1, 2.3 and 5.
- 83 FoE, p. 3.
- 84 FoE, p. 3.
- 85 AI, paras. 12–13 and 24–25 and HAI, p. 8.
- 86 AI, p. 6, HAI, p. 9 and JS5, p. 11.
- 87 JS5 para. 17.
- 88 JS5, p. 2–3.
- 89 For relevant recommendations see A/HRC/33/17, paras. 136.95, 136.150 and 136.151.
- 90 Doras, paras. 9–11 and JS4, para. 10.
- 91 JS4, paras. 12–13.
- 92 JS4, para. 14.
- 93 JS4, paras. 15–17.
- 94 Doras, paras. 9–11.
- 95 Doras para. 13.
- 96 Doras, p. 6 and CoE-GRETA, pp. 60–61.
- 97 CoE-GRETA, pp. 60–61.
- 98 JS4, paras. 21–22.
- 99 CoE-GRETA, pp. 60–61, JS4, para. 23 and JS5, p. 9.
- 100 JS4, paras. 7–8.
- 101 JS4, para. 9.
- 102 Global Unions, paras. 11–13.
- 103 Global Unions, paras. 14–18.
- 104 Global Unions, para. 24.
- 105 For relevant recommendations see A/HRC/33/17, para. 136.52
- 106 JS1, paras. 15–23.
- 107 JS1, para. 24(a)–(g).

- 108 For relevant recommendations see A/HRC/33/17, paras. 135.91, 135.128 and 135.143.
- 109 CoE-ECSR, p. 7.
- 110 EUROMIL, para. 8.
- 111 JS5, paras. 25–27.
- 112 JS5, p. 4.
- 113 For relevant recommendations see A/HRC/33/17, paras. 135.129, 136.57 and 137.13.
- 114 CoE-ECSR, pp. 5–6.
- 115 FLAC, p. 6.
- 116 MRCL, p. 6.
- 117 JS9, para. 1.2.
- 118 FLAC, pp. 6–7.
- 119 JS9, para. 1.2(a).
- 120 For relevant recommendations see A/HRC/33/17, paras. 135.130–135.131 and 135.133–135.135, 136.58–136.60, 137.12.
- 121 CoE-ECSR, p. 6.
- 122 OCO, para. 16.
- 123 OCO, para. 16.
- 124 AI, paras. 21–23.
- 125 AI, p. 6 and JS10, p. 7.
- 126 For relevant recommendations see A/HRC/33/17, paras. 136.62–136.69, 136.72–136.79.
- 127 JS3, paras. 6–10 and AI, paras. 14–18.
- 128 JS3, para. 11.
- 129 JS3, paras. 12–38.
- 130 JS3, para. 43.
- 131 JS3, para. 48, JS5, p. 4 and IFPA, p. 4.
- 132 JS3, para. 48.
- 133 IFPA, p. 4.
- 134 AI, p. 5.
- 135 JS5, para. 23.
- 136 JS5, p. 3 and JS3, para. 48.
- 137 ADF paras. 4–17 and 34 (b) – (d), and ECLJ paras. 4–26 and 27.
- 138 JS5, paras. 46–47.
- 139 JS5, p. 6.
- 140 JS7, paras. 38–40.
- 141 JS7, para. 41.
- 142 For relevant recommendations see A/HRC/33/17, paras. 135.138, 135.140–135.142, 135.146, 135.76–135.81, and 136.80.
- 143 OCO, para. 21 and JS7, paras. 10–13.
- 144 JS7, paras. 10–13.
- 145 OCO para. 21.
- 146 OCO, para. 21.
- 147 JS7, para. 14.
- 148 JS6, paras. 4–10.
- 149 JS6, paras. 22–26.
- 150 For relevant recommendations see A/HRC/33/17, paras. 135.88–135.89, 135.92–135.102, 135.137, 136.33–136.42 .
- 151 JS4, paras. 31–33.
- 152 JS4, paras. 36–38.
- 153 JS4, para. 40.
- 154 JS5, para. 69.
- 155 JS5, p. 9.
- 156 Plan International, pp. 5–7.
- 157 Plan International, p. 9.
- 158 Oxfam, p. 5.
- 159 Oxfam, p. 6.
- 160 SPMHS, paras. 9–10.
- 161 For relevant recommendations see A/HRC/33/17, paras. 135.84–135.86, 135.90 and 136.51.
- 162 AI, para. 28 and JS5, para. 66.
- 163 AI, paras. 29–36.
- 164 JS5, p. 8.
- 165 OCO, para. 23.
- 166 OCO, para. 23.
- 167 SPMHS, para. 5.

- ¹⁶⁸ For relevant recommendations see A/HRC/33/17, paras. 136.81–136.82.
- ¹⁶⁹ OCO, para. 15.
- ¹⁷⁰ OCO, para. 15.
- ¹⁷¹ For relevant recommendations see A/HRC/33/17, paras. 135.83, 135.145, 135.147, 136.84–136.86.
- ¹⁷² CoE-ACFC, p. 1, ITM, p. 3, JS5, para. 34 and JS9, para. 2.
- ¹⁷³ CoE-ACFC, p. 2, JS5, p. 5, JS9, para. 2(a) – (b) and JS10, pp. 11–12.
- ¹⁷⁴ OCO, para. 14.
- ¹⁷⁵ JS10, p. 3.
- ¹⁷⁶ JS10, p. 3.
- ¹⁷⁷ ITM, paras. 8–14 and JS9, paras. 5–7 and 9.
- ¹⁷⁸ JS10, pp. 5–6.
- ¹⁷⁹ CoE-ECRI, paras. 9–10.
- ¹⁸⁰ JS9, para. 7(a).
- ¹⁸¹ JS10, p. 7.
- ¹⁸² CoE-ECRI, p. 10.
- ¹⁸³ ITM, para. 14(j).
- ¹⁸⁴ CoE-CDADI, p. 22.
- ¹⁸⁵ CoE-CDADI, p. 22.
- ¹⁸⁶ JS10, p. 13.
- ¹⁸⁷ OSCE-ODIHR, para. 10.
- ¹⁸⁸ For relevant recommendations see A/HRC/33/17, paras. 135.148–135.149, 136.87–136.89, 136.91–136.94.
- ¹⁸⁹ AI, paras. 19–20, CoE-ECRI, paras. 9–10, Doras, paras. 4–5 and JS4, paras. 45–46 and 48.
- ¹⁹⁰ AI, paras. 19–20 and Nasc, paras. 21–22.
- ¹⁹¹ AI p. 4, Doras, p. 2 and JS4, para. 49.
- ¹⁹² CoE-ECRI, p. 10.
- ¹⁹³ Nasc, p. 3.
- ¹⁹⁴ Doras, paras. 7–8, JS4, paras. 42–43, Nasc, paras. 24–25 and Oxfam p. 1.
- ¹⁹⁵ Doras, p. 4 and Oxfam, p. 1.
- ¹⁹⁶ JS4, para. 44 and Nasc, p. 6.
- ¹⁹⁷ Nasc, para. 16.
- ¹⁹⁸ Nasc, p. 3.
- ¹⁹⁹ JS4, para. 39.
- ²⁰⁰ Doras, paras. 15–18 and MRCI, p. 3.
- ²⁰¹ Nasc, para. 17.
- ²⁰² JS4, para. 40.
- ²⁰³ Doras, p. 7 and Nasc, p. 3.
- ²⁰⁴ Doras, para. 20.
- ²⁰⁵ Doras, pp. 8–9.
- ²⁰⁶ CoE-ECRI, p. 10.
- ²⁰⁷ MRCI, p. 6.
- ²⁰⁸ CoE-CPT, p. 4 and Nasc, p. 1.
- ²⁰⁹ CoE-CPT, p. 4.
- ²¹⁰ IPRT, p. 6, JS5, p. 8 and Nasc, p. 1.
- ²¹¹ The 1954 Convention Relating to the Status of Stateless Persons and the 1961 Convention on the Reduction of Statelessness
- ²¹² JS8, paras. 10–19.
- ²¹³ Doras, paras. 23–26.
- ²¹⁴ Doras, p. 11, JS8, para. 47(IV) and OCO, para. 13.
- ²¹⁵ JS8, para. 47(II), (III), and (VII).