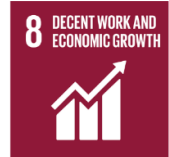




**Chambers  
Ireland**  
Advancing business together



# **Department of Children, Disability and Equality - Request for Submission on Updates to Ireland's Equality Legislation**

**Submission by Chambers Ireland**

**JUNE 2025**

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## Key Points

- Chambers Ireland welcomes the introduction of a socio-economic status equality ground and supports efforts to build a more inclusive and equitable society.
- Any new legislative provisions must be proportionate, clearly defined, and practical for employers and service providers to implement.
- New obligations must not impose undue burdens. Clear guidance and a phased implementation period are essential.
- Key terms such as 'poverty,' 'social status,' and 'accommodation status' must be clearly defined to avoid ambiguity and ensure consistent application.
- Anti-discrimination legislation should be accompanied by investments in education, skills development, affordable housing, and childcare to address root causes of inequality.
- The Department should consider supportive initiatives such as targeted training (e.g., intensive language programmes), employment supports, and inclusive procurement incentives.

## About Chambers Ireland

Chambers Ireland is an all-island business organisation with a unique geographical reach. Our members are the Chambers of Commerce in the cities and towns throughout the country – active in every constituency. Each of our member Chambers is central to their local business community and all seek to promote thriving local economies that can support sustainable cities and communities.

## General

Chambers Ireland welcomes the opportunity to provide input on the Department's proposal to introduce a new equality ground related to socio-economic status. We support efforts to foster a more inclusive and equitable society, while providing protection against socio-economic discrimination. We recognise the importance of ensuring that any new legislative provisions are proportionate, clearly defined, and workable for employers and service providers.

As the voice of the Irish business community, Chambers Ireland represents a diverse network of local chambers and their member businesses, many of which are SMEs. These businesses form the backbone of the Irish economy and often operate with limited administrative and legal resources. It is essential that any new obligations arising from this legislation are proportionate and do not impose undue burdens on SMEs.

When introducing new legislation, the Department must:

- Undertake a thorough Enhanced SME Test to assess the impact on small and medium enterprises.
- Provide clear, accessible guidelines tailored to the needs of SMEs.
- Ensure a phased implementation period that gives businesses sufficient time to adapt and comply.
- Design compliance mechanisms that are straightforward and cost-effective.

Applying the Enhanced SME Test is particularly important to ensure that proposed regulatory changes do not unintentionally hinder SME growth or sustainability. This test should be a standard part of the legislative process, helping to identify potential challenges early and to craft proportionate, SME-friendly solutions.

To ensure clarity and consistency in implementation, the Department must provide clear definitions of key terms such as 'poverty,' 'social status,' and 'accommodation status'. Without clear understandings, there is a risk of uncertainty or inconsistent application across different sectors. Explicit guidance is needed on how socio-economic discrimination will be assessed and adjudicated in practice. This should include practical examples of what would and would not

constitute discriminatory treatment under the new ground, helping employers comply with these new regulations efficiently.

Chambers Ireland has consistently advocated for policies that promote inclusive economic growth, regional development, and access to opportunity. In our 2025 Pre-budget submission<sup>1</sup>, we highlighted the importance of investing in education and skills development, supporting pathways to employment for disadvantaged groups and enhancing access to affordable housing and childcare. We believe that these structural supports are essential complements to anti-discrimination legislation and should be pursued in parallel.

We also note the Department's intention to define socio-economic disadvantage through a combination of factors, including accommodation status, poverty, and social status. While we understand the rationale for this approach, we urge the Department to ensure that these definitions are not overly broad or ambiguous. For example, the inclusion of 'employment status/source of income' must be carefully framed to avoid unintended consequences in recruitment and HR practices, where legitimate considerations such as qualifications and experience are essential.

Finally, we encourage the Department to consider the potential for positive action measures that support socio-economic inclusion, such as targeted training programmes, like intensive language training<sup>2</sup>, employment supports, and public procurement incentives for inclusive employers. These complementary strategies can help achieve the broader goals of equality and social cohesion without placing disproportionate compliance burdens on businesses.

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<sup>1</sup> [https://chambers.ie/wp-content/uploads/2024/07/Chambers-Ireland\\_2025-Pre-Budget-Submission\\_Final.pdf](https://chambers.ie/wp-content/uploads/2024/07/Chambers-Ireland_2025-Pre-Budget-Submission_Final.pdf)

<sup>2</sup> <https://chambers.ie/wp-content/uploads/2024/03/Closing-Skill-Gaps-Intensive-Language-Training.pdf>