



An Coimisiún um
Rialáil Cumarsáide
Commission for
Communications Regulation

Public Sector Equality and Human Rights Duty – Assessment

General Document

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Commission for Communications Regulation

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Irish Human Rights and Equality Commission Act, 2014

The Irish Human Rights and Equality Commission Act, 2014, places a positive duty on public sector bodies, in the performance of its functions, to have regard to the need to eliminate discrimination, promote equality of opportunity and treatment of its staff and the persons to whom it provides services, and to protect the human rights of its members, staff and the persons to whom it provides services. In addition, the “The Public Sector Duty” set out at Section 42(2) of the Act contains three core steps to be undertaken by public bodies:

1. In preparing strategic plans, public sector bodies must assess and identify the human rights and equality issues that are relevant to their functions. These issues must relate to all of its functions as an employer, policy maker and service provider.
2. Public bodies must then identify the policies and practices that they have in place or that they plan to put in place to address these issues.
3. In their annual reports, or equivalent documents, public bodies must report in a manner accessible to the public, on their developments and achievement in that regard.

The following is the Commission for Communications Regulation (ComReg) assessment and policy identification exercise pursuant items (1) and (2) of the Public Sector Duty as set out above. ComReg fulfils its obligations under item (3) above in its annual reports and Strategy Statements, and through a range of publications online.

ComReg Vision

ComReg's vision is to be an innovative, expert regulator which:

- (a) delivers a regulatory environment that facilitates the development of effective competition and innovation in the Irish communications market to the benefit of users;
- (b) promotes and protects the interests of users of electronic communications, premium rate services, radio spectrum, postal services, and designated digital services;
- (c) takes compliance action to ensure the proper functioning of markets and uphold consumer rights;
- (d) conducts proportionate regulatory supervision within its remit under the NIS2 Directive, upon transposition;
- (e) contributes to resolving the imbalance of power between providers and customers in the EU cloud market; and
- (f) manages Ireland's spectrum and numbering resources to ensure efficient usage, prevent misuse and restore trust

all of which will underpin access to ubiquitous, affordable, and high-quality digital and communications services which support users' social and economic needs.

ComReg's Mandate and Mission

ComReg's Mandate

Our mandate sets out the authority we have to carry out our functions. We deliver on our mission by applying the tools and powers provided to us by our mandate.

ComReg has a wide-ranging and evolving mandate which derives from extensive EU and Irish primary and secondary legislation. Our mandate has, to date, been centred on our statutory obligations which include, but are not limited to, premium rate services, electronic communication services and networks, postal services, and emergency call answering and public warning communications, and managing Ireland's radio spectrum resource. Our mandate will continue to expand into new areas over the lifetime of the 2025-2027 ComReg Strategy Statement and beyond.

Government has, as of 2024, assigned – or signalled its intention to assign – by means of legislation, specific roles to ComReg in the areas of accessibility, cybersecurity, physical resilience, AI, cloud and data. Given the complex, multifaceted nature of a number of these areas ComReg will likely share regulatory, supervisory, or oversight responsibilities with other state agencies or regulatory authorities in certain instances.

ComReg's Mission

ComReg's mission is to deliver effective regulation. We regulate the electronic communications and postal sectors and radio spectrum. We also have – or will have in the near future – responsibilities in the fields of physical resilience and cybersecurity under the NIS2 and CER Directives, as well as in the fields of data, cloud, competition law, and accessibility for end users. In a number of these fields, other agencies will also hold regulatory responsibilities.

To deliver effective regulation, we will

- (a) facilitate a competitive communications sector in Ireland that works well for users;

(b) empower and protect users, including end users with disabilities;

(c) manage Ireland's radio spectrum and numbering resources; and

(d) prepare to implement our new regulatory responsibilities.

We regularly work with other bodies and agencies. Where we share regulatory responsibilities with other bodies, we will cooperate to minimise any regulatory burden.

ComReg's Values

ComReg's values are the guiding principles that shape our mission and vision, and they reflect our commitment to high ethical standards. They govern our decision making and how we conduct ourselves.

Our values serve as the foundation of ComReg's identity and behaviour. We are guided by our values in our decision-making. They are:

Integrity: We act with honesty and respect, and adhere to the highest ethical and professional standards.

Impartiality: Our actions are evidence-based, objective, independent, non—discriminatory, and accessible.

Effectiveness: We successfully deliver our objectives in a dynamic environment.

Excellence: We are always striving to achieve the highest standards.

Transparency: We ensure trust and confidence by being clear and open in the work we do.

Assessment

Brief Description of Relevant Work

Corporate Services Division: Building Maintenance and Support; Finance; Human Resources; Information Technology; Public Affairs; Reception

Market Framework Division: Spectrum Management; Numbering; Market surveillance / SII; Network Operations; Network Security; Licensing; Compliance and enforcement

Retail and Consumer Division: Consumer care; Universal Service; Compliance and Enforcement; Consumer outreach; Charter; ADR

Wholesale Division: Market Analysis: Market monitoring and QKDR; Products; Pricing; Regulatory Governance

Commissioners Office: Executive Office; General Counsel's Office; Strategy & Economics (including Policy and Research); International; Data Governance; Digital

Public Sector Duty Issues Arising

Ensuring accessibility of building and building services for all users, both staff and external.

Ensuring accessible communications and reception for all, including those with a disability and those with non-English language requirements.

Ensuring equality of opportunity to all availing of the IT services provided, including users with a disability.

Ensuring all appropriate policies in place, observed, monitored, reviewed and kept up to date. Ensuring application of appropriate equality and non-discrimination policies in respect of all employment matters, including recruitment, retention, promotion, performance assessment, pay, L&D, termination, etc. Ensuring

appropriate application of non-discrimination, bullying and harassment policies and respect/dignity at work policy. Provision of appropriate, non-discriminatory grievance and disciplinary procedures.

Ensuring that all recruitment (both advertisements and recruitment processes) is carried out in a manner that is accessible to all, including provision of information relevant to those who may require special accommodations in the work place.

Ensuring information is accessible to all; non-discrimination in dissemination of information; monitoring compliance with public sector equality and human rights duty; promotion of equality and human rights; administering an accessible and non-discriminatory complaints mechanism for the public. Publication of information concerning compliance with equality and human rights duty.

Ensuring non-discrimination in the provision of all public facing services relating to spectrum management, numbering, market surveillance, network operations and security, licensing and enforcement.

Ensuring accessibility and non-discrimination in the provision of all public facing services relating to consumer care, consumer outreach, alternative dispute resolution and compliance and enforcement activity.

Ensuring accessibility and non-discrimination in the provision of all public facing services relating to market monitoring, information gathering, industry forums, and compliance & enforcement activity.

Ensuring accessibility and non-discrimination in the provision of all public facing services relating to the executive office, Commissioner interactions with the public, strategy formulation, development of policy, international engagement, the treatment of personal data and confidential information. Publication of appropriate information relating to equality and human rights duty in Strategy Statements.

Ensuring fair procedures applied in respect of all compliance and enforcement activity.

Protecting the human rights of all ComReg staff. Ensuring staff are protected from discrimination, harassment or bullying and are treated in all respects in an equal and non-discriminatory manner.

Ensuring the protection and appropriate treatment of private and confidential personal data and information.

Human Rights Engaged or Which Concern this Work

Equality and non-discrimination, including equal access and equal pay

Fair procedures in respect of disciplinary matters

Fair treatment in respect of enforcement matters

Right to respect for private life

Freedom of assembly and association

Freedom of expression

Freedom of religion

Measures in Place to Ensure Public Sector Duty Met

ComReg's Vision:

Our vision is an aspirational description of what we want to achieve or accomplish in the mid-term or long-term. Looking forward, it is the outcome we aim to help to bring about. Key aspects of ComReg's vision include:

- Delivery of a regulatory environment that facilitates the development of effective competition and innovation in the Irish communications market *to the benefit of users*;

- Promotion and protection of *the interest of users* of electronic communications, premium rate services, radio spectrum, postal services, and designated digital services;
- Taking compliance action to ensure the proper functioning of markets and *upholding consumer rights*.
- Contributing to *resolving the imbalance of power between providers and customers* in the EU cloud market.
- Managing Ireland's spectrum and numbering resources to ensure efficient usage, prevent misuse, and *to restore trust*.

All of these are intended to underpin access to ubiquitous, affordable, and high-quality digital and communications services *which support users' social and economic needs*. [Emphasis added]

ComReg's Mission:

- Our mission describes what we do and why we do it. It reflects our role and sets out the contribution we make towards achieving our vision.
 - ComReg' mission is to deliver effective regulation.
 - To deliver effective regulation, we will, amongst other things:
 - (a) Facilitate a competitive communications sector in Ireland *that works well for users*;
 - (b) *Empower and protect users including end users with disabilities*.
- [Emphasis added]

ComReg's Values

- *Integrity*
- *Impartiality*
- *Effectiveness*
- *Excellence*
- *Transparency*

ComReg Customer Charter

ComReg Policies and Programmes protecting the rights of staff:

- *Dignity in the Workplace Policy*
- *Equal Status Policy*
- *Disability Policy*
- *Blended Working Policy*
- *Wellness Programme*
- *Reasonable Accommodations Policy*
- *Adoptive Leave Policy*
- *Carer's Leave Policy*
- *Marriage/Civil Partnership Leave Policy*
- *Maternity Leave Policy*
- *Medical Care Leave Policy*
- *Parental Leave Policy*
- *Paternity Leave & Benefit Policy*

ComReg Respect Charter

ComReg Wellbeing Pledge

ComReg Menopause Pledge

Web accessibility statement

Irish language scheme

Equal Opportunity Employer: ComReg is an Equal Opportunity Employer and is committed to providing an environment where all staff in its diverse workforce are treated in a fair and non-discriminatory manner. ComReg applies the same values in its recruitment and staff retention and development policies.

Investors in Diversity Silver Award: ComReg was awarded the Investors in Diversity Silver Award in December 2024. As part of the process of bringing its

policies, procedures and practices up to a standard sufficient to receive the Investors in Diversity Silver award, diversity training was provided to all staff and a comprehensive D&I survey was conducted. The results of this survey will inform further work in this area. ComReg has now commenced the process of bringing its policies, procedures and practices up to a standard sufficient to receive the Investors in Diversity Gold award.

Mobile Coverage Map

Siteviewer for Mobile Masts

Consumer care and complaints handling policies and procedures

Equivalence of Access & Choice Forum

Dispute resolution procedures

Consumer engagement: ComReg consumer engagement, amongst other things:

- informs and empowers consumers on how to best engage with Electronic Communication Service (ECS) and Premium Rates Service (PRS) providers in line with their complaints handling Codes of Practice;
- educates consumers about their ECS and PRS rights and provides a dispute resolution service through our Consumer Care Team; and
- protects vulnerable users who find dealing with ECS and PRS providers challenging

Measures for disabled and vulnerable end-users

Reviews of service provider accessibility requirements

Sign Language Interpreting Service – ComReg supports and endorses this service

Irish Text Relay Services – ComReg supports and endorses this service

Ensuring compliance by operators with universal service obligations where applicable

Ensuring compliance by operators with consumer rights obligations in respect of electronic communications

Ensuring compliance with equal access and choice obligations in respect of electronic communications

Ensuring compliance with the European Accessibility Act obligations in respect of electronic communications when they apply from June 2025 onwards

Data Protection Policy

Protected Disclosures Policy

Customer Charter – [Customer-Charter-Revised-2024-edition.pdf](#)

Gaps Identified

ComReg has no EDI Committee, EDI Officer or EDI Sponsor/Champion at present.

ComReg has not availed of the opportunity to consult with IHREC on our compliance with the Public Sector Duty.

There has been limited specific EDI-focused training provided to all staff.

As part of the Investors in Diversity Silver award process, the Investors in Diversity Team recommended the following actions:

- Introduce a Diversity & Inclusion steering group with diverse membership to encourage a dialogue on the issues being experienced across the organisation.

- Continue to communicate the content of EDI related policies to all staff through a range of methods, ensuring that these are understood and followed by all.
- Provide managers and staff with training on what policies entail and how to put them into action.
- Review ComReg's approach to Talent Management and ensure those supporting the process of recruitment and progression have received appropriate training.
- Conduct discussions to understand perceptions around EDI further.
- Develop a focused 'Inclusive Leadership' programme for senior leaders and managers that includes the benefits of an inclusive culture, strategy and practical support in managing a diverse workforce.
- Set up a staff training program that educates on various aspects of EDI such as mental health and unconscious bias.
- Develop a communication plan which highlights a demonstrable commitment to EDI from senior leaders.
- Allocate key EDI topics (e.g., gender, disability etc.) to staff to champion and act as sponsors. Provide development opportunities for those taking these roles to ensure that they have the competence to provide the role modelling required.
- Review the policy and procedure framework for bullying and/or harassment including sign posting to methods of reporting. Introduce a process that encourages and supports staff to report inappropriate behaviour of all types; a 'safe space' approach.
- Provide staff and managers with specific training on bullying and harassment (including banter).
- Develop a strategy to address underrepresentation across the various levels of the organisation.