



Information for the List of Issues Prior to Reporting with regard to the examination of Ireland's eighth periodic report under the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW)

Submission by the Irish Penal Reform Trust to the 88th Pre-Sessional Working Group of CEDAW (30 October – 3 November 2023)

8 September 2023

Submitting Stakeholder: Irish Penal Reform Trust

Established in 1994, the Irish Penal Reform Trust (IPRT) is Ireland's principal independent non-governmental organisation working for systemic penal reform and change. Our vision is a just, humane Ireland where prison is used as a last resort. We advocate for a progressive criminal justice system that prioritises alternatives, to prison, upholds human rights, and champions reintegration. We do this through conducting research, campaigning and changing attitudes.

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Introduction

1. The Irish Penal Reform Trust (IPRT) welcomes the opportunity to inform the Pre-Sessional Working Group's List of Issues Prior to Reporting (LOIPR) for Ireland's eighth periodic review under the UN Convention on the Elimination of All Forms of Discrimination against Women (CEDAW).
2. This submission provides updates on the relevant recommendations made by the Committee following Ireland's combined sixth and seventh periodic reviews under CEDAW in 2017, namely: **overcrowding in female prisons; monitoring and oversight; complaints procedures; and the overrepresentation of Traveller women in places of deprivation of liberty.**
3. IPRT regrets that the Irish State provided no updates relating to these in its follow-up information in June 2020.¹
4. The submission highlights several other issues that amount to discrimination of women, including:
 - The disproportionate number of female committals to prison on short sentences;
 - The disproportionate number of female committals to prison for non-payment of a court-ordered fine;
 - The disproportionate use of pre-trial detention for women,
 - Barriers to reintegration, including the absence of an open prison for women;
 - The treatment of transgender women in prison; and
 - The implementation of penal policy relating to women.
5. **As an overarching recommendation, IPRT urges the Committee to ask the State to explain what steps it is taking to ensure that Ireland is in full compliance with the UN Rules for the Treatment of Women Prisoners and Non-Custodial Measures for Women Offenders ('the Bangkok Rules') – the principal aims of which are to reduce women's imprisonment and address their specific needs – as well as the UN Standard Minimum Rules for the Treatment of Prisoners ('the Nelson Mandela Rules').**

¹ UN CEDAW, *Information received from Ireland on follow-up to the concluding observations on its combined sixth and seventh periodic reports** (UN OHCHR 2020)
<https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CEDAW%2FC%2FIRL%2FFCO%2F6-7&Lang=en>

Updates on recommendations arising from Ireland's combined sixth and seventh periodic reports under CEDAW (2017)

Overcrowding (53 (a))

6. There has been a significant increase in the daily average number of women in prison in Ireland. At the time of Ireland's 2017 review, there was an average of 144 women in custody on any given day.² In 2022, this rose to an average of 173,³ rising further to 217 by July 2023.⁴
7. While this growth of the female prison population reflects a global trend,⁵ the rate at which the average number of women in custody has risen compared to men is profound, with an 11.6% increase for men between 2017 and 2022, compared to 20% for women.⁶
8. During December 2022, there were 2,408 instances of prisoners sleeping on mattresses on prison floors. Of these, 320 (13%) were women,⁷ despite women representing only 4.6% of those in custody.⁸ This indicates that, despite the Committee's previous recommendations to reduce overcrowding, women continue to be disproportionately impacted.
9. A new prison facility providing additional closed prison spaces for women opened in Limerick in 2023.⁹ While the facility design is based on the principles of rehabilitation and normalisation, it is still a closed prison with features associated with medium-level security.¹⁰
10. While IPRT welcomes the modernisation of the female estate, this expansion is contrary to the long-standing policy consensus that community-based responses to less serious offending are more effective.¹¹ While this facility will go some way towards addressing overcrowding, without first or at least simultaneously addressing the significant numbers of women in prison on pre-trial detention, for non-payment of fines, and for very short sentences (see paras 24-32), the facility is destined to be overcrowded again.

² IPS, *Annual Report 2017* (IPS 2018) <www.irishprisons.ie/wp-content/uploads/documents_pdf/IPS-annualreport-2017.pdf>

³ Houses of the Oireachtas, 'Prison Service' (19 April 2023) <www.oireachtas.ie/en/debates/question/2023-04-19/89>

⁴ IPS, *Monthly Information Note – July 2023* (IPS 2023) <www.irishprisons.ie/wp-content/uploads/documents_pdf/JULY-2023.pdf>.

⁵ Penal Reform International, *Global Prison Trends 2022* (PRI 2022) <<https://cdn.penalreform.org/wp-content/uploads/2022/05/GPT2022.pdf>>.

⁶ IPS, *Annual Report 2017* (IPS 2018) <www.irishprisons.ie/wp-content/uploads/documents_pdf/IPS-annualreport-2017.pdf> and Kildare Street, 'Prison Service' (19 April 2023) <www.kildarestreet.com/wrans/?id=2023-04-19a.233>

⁷ Kildare Street, 'Prison Service' (21 March 2023) <www.kildarestreet.com/wrans/?id=2023-03-21a.2875>.

⁸ IPS, *Monthly Information Note – December 2022* (IPS 2023) <www.irishprisons.ie/wp-content/uploads/documents_pdf/December-2022-Website.pdf>

⁹ Key Foy, 'A gym, a salon and ensuite rooms – we take a look around the new Limerick Women's Prison' *Irish Independent* (26 July 2023) <www.independent.ie/irish-news/crime/a-gym-a-salon-and-ensuite-rooms-we-take-a-look-around-the-new-limerick-womens-prison/a532804390.html>

¹⁰ Kildare Street, 'Prison Service' (1 February 2022) <www.oireachtas.ie/en/debates/question/2022-02-01/609/>

¹¹ Department of Justice, *Strategic Review of Penal Policy: Final Report* (DoJ 2014) <www.gov.ie/pdf/?file=https://assets.gov.ie/137203/a2f65a3d-9402-490e-98d7-3d154661acae.pdf>

11. Furthermore, IPRT is concerned that the capacity of Limerick Prison (female) has increased by 28 beds – despite repeated reference to 22 cell spaces in the run-up to its opening¹² – bringing the total capacity to 56.¹³ Single-cell accommodation should be the default.
12. In December 2019, in response to overcrowding, the Irish Prison Service (IPS) increased the capacity of the Dóchas Centre from 105 to 146 by adding more beds to the existing space overnight.¹⁴ This is a regressive practice and should be reconsidered.

The Committee may wish to ask the State:

1. What measures it is taking to reduce the use of imprisonment as a response to offending by women and thereby improve its compliance with the UN Bangkok Rules, and to explain its expansion of the female prison estate, which is contrary to national and international policy.

Monitoring and oversight mechanisms (53 (a))

13. One of IPRT’s longstanding concerns about prison oversight in Ireland is that the Office of the Inspector of Prisons (OIP) does not have the authority to publish its reports directly. The Minister for Justice has the power to publish or withhold OIP reports.¹⁵
14. The Minister is currently withholding publication of **three** completed OIP reports into the Dóchas Centre (the largest of two female prisons) on the basis of ‘legal advice’.¹⁶ This includes a three-day monitoring report, a section 31(2) investigation report carried out by the OIP at the Minister’s request, and a supplementary report completed following the section 31(2) investigation. For context, the Minister can request a section 31(2) investigation into “*any matter arising out of the management or operation of a prison*”;¹⁷ the request itself is significant and conveys the serious nature of the concerns. These reports were submitted to the Minister in August 2020, February 2022, and July 2022.¹⁸
15. Refusal to publish these reports, in any form, and failure to communicate in any detail the reasons for non-publication, is having a disproportionate impact on women in prison.
16. There has been no public reassurance that the issues that prompted the investigations have been satisfactorily resolved. While details are not known, media reports suggest that issues include the “*manipulation of prisoners by some staff members and the use of prisoners by some staff to target other staff members*”.¹⁹ The year prior, the Dóchas Centre Chaplaincy

¹² Kildare Street, ‘Prison Service’ (29 June 2023) <www.kildarestreet.com/wrans/?id=2023-06-29a.990>

¹³ IPS, *Prisoner Population on Friday 4th August 2023* (IPS 2023) <www.irishprisons.ie/wp-content/uploads/documents_pdf/04-August-2023.pdf>

¹⁴ See 11 and 12 December 2019. IPS, ‘2019 Prison Populations’ (*IrishPrisons.ie*, 2023) <www.irishprisons.ie/information-centre/statistics-information/2015-daily-prisoner-population/2019-prison-populations/>

¹⁵ Prisons Act 2007, s 31(4).

¹⁶ Kildare Street, ‘Prison Service’ (30 May 2023) <www.kildarestreet.com/wrans/?id=2023-05-30a.1448>

¹⁷ Prisons Act 2007, s 31(2).

¹⁸ Kildare Street, ‘Prison Service’ (30 May 2023) <www.kildarestreet.com/wrans/?id=2023-05-30a.1448>

¹⁹ Mick Clifford, ‘TD’s Call for More Capacity in Prisons Displays Ignorance of Penal Policy’ *Irish Examiner* (5 May 2022) <www.irishexaminer.com/opinion/commentanalysis/arid-40865414.html>

Service reported incidences of “*verbal abuse, xenophobic remarks, threatening language and pointed exclusion/favouritism of others*”.²⁰

17. In 2022, the UN Human Rights Committee called on Ireland to “*improve transparency related to the conditions of detention of women detainees, including by publishing the Dóchas reports*”.²¹ This recommendation has not yet been implemented.

The Committee may wish to ask the State:

2. For further information on why it is withholding relevant OIP reports into matters arising in the Dóchas Centre, its plans to publish these reports, and information on the steps taken to address any issues identified in the Inspectorate’s reports.

Complaints procedures (53 (a))

18. The introduction of a revised prison complaints system is long overdue, with rollout initially planned for 2019.²² Ireland’s current complaints system has faced repeated domestic²³ and international²⁴ criticism. The OIP’s most recent annual report noted that the “*failure to replace the current system is indicative of the priority it is receiving*”.²⁵
19. Recent Irish research reveals prisoners’ lack of faith in the system.²⁶ Some participants referred to a lack of response to submitted complaints, others felt that they were actively discouraged by staff from submitting complaints, while some felt that submitting a complaint could potentially worsen their situation.²⁷ Similar concerns were noted by the OIP, after receiving “*several letters from prisoners...expressing frustration with the complaints system*”, including a “*fear of adverse consequences*”.²⁸
20. The absence of a reliable and independent complaints system is particularly concerning for female prisoners, given the non-publication of OIP reports. Some women in prison have

²⁰ IPS, *Dóchas Chaplain’s Report 2019* (IPS 2020) <www.irishprisons.ie/wp-content/uploads/documents_pdf/CR_Dochas-Centre-2019.pdf>

²¹ UN Human Rights Committee, ‘135th session, Summary record of the 3886th meeting*’ (UN OHCHR, 14 July 2022) <<https://docstore.ohchr.org/SelfServices/FilesHandler.ashx?enc=6QkG1d%2FPPRiCAqhKb7yhsm0BTkouDPNIMXWAuPwondGwvt%2FG20yuKJteV9hb3OzaTpdfqhTFpkC6DTfQB%2FJbgaq8vY9%2BJCOPpaeYR7Z%2BFf16bO%2BhWNGU0ECv%2Fk%2By7rol>>

²² Houses of the Oireachtas, ‘Inspector of Prisons’ (30 January 2019) <www.oireachtas.ie/en/debates/question/2019-01-30/148/#pq_148>

²³ See *Annual Report 2021, Annual Report 2020, and Annual Report 2019*. Office of the Inspector of Prisons, ‘Annual Reports’ (Oip.ie, 2023) <www.oip.ie/publications/annual-reports/>

²⁴ UN Human Rights Committee, ‘Concluding observations on the fifth periodic report of Ireland*’ (UN OHCHR 2003) <<https://docstore.ohchr.org/SelfServices/FilesHandler.ashx?enc=6QkG1d%2FPPRiCAqhKb7yhsm0BTkouDPNIMXWAuPwondGwvt%2FG20yuKJteV9hb3OzaTpdfqhTFpkC6DTfQB%2FJbgaq8vY9%2BJCOPpaeYR7Z%2BFf16bO%2BhWNGU0ECv%2Fk%2By7rol>>

²⁵ Office of the Inspector of Prisons, *Annual Report 2021* (OIP 2022) <www.oip.ie/wp-content/uploads/2022/09/Office-of-the-Inspector-of-Prisons-Annual-Report-English.pdf>

²⁶ Sophie van der Valk and Mary Rogan, ‘Complaining in Prison: “I suppose it’s a good idea but is there any point in it?”’ (2023) 264 *Prison Service Journal* <www.crimeandjustice.org.uk/sites/crimeandjustice.org.uk/files/PSJ%20264%20January%202023_0.pdf>

²⁷ Ibid.

²⁸ Office of the Inspector of Prisons, *Annual Report 2021* (OIP 2022) <www.oip.ie/wp-content/uploads/2022/09/Office-of-the-Inspector-of-Prisons-Annual-Report-English.pdf>

described being afraid to make an official complaint for fear of "further penalisation from the staff involved".²⁹

The Committee may wish to ask the State:

3. For a timeline for the introduction of the revised complaints process, and how it will reflect the particular needs of women.

4. For information on any steps taken to improve independence and trust in the complaints process in the interim period until the new complaints system is introduced.

Overrepresentation of Traveller women (52 (b))

21. Despite work by non-governmental organisations, including the Traveller Justice Initiative (TJI) and Pavee Point, to support the State in rolling out ethnic equality monitoring,³⁰ data are still not regularly published on the proportion of Travellers in prison.

22. A recent report published by IPRT outlined significant gaps in data, with almost a quarter of cases in the IPS dataset on all committals over a 12-month period having no ethnicity recorded.³¹

23. Existing data suggest that Traveller women are overrepresented in prison. Previous research identified that although Travellers represent 0.7% of the national population,³² they account for an estimated 22% of female prisoners and 15% of male prisoners.³³ More recently, during the OIP's 2019 visit to the Dóchas Centre, 24% of the population identified as being from the Traveller Community.³⁴

The Committee may wish to ask the State:

5. Whether it plans to develop a dedicated strategy for Travellers in the criminal justice system.

6. Whether it plans to collect and publish data on women in prison disaggregated by ethnicity, disability, and socioeconomic background.

²⁹ IPS, *Dóchas Chaplain's Report 2019* (IPS 2020) <www.irishprisons.ie/wp-content/uploads/documents_pdf/CR_Dochas-Centre-2019.pdf>

³⁰ Houses of the Oireachtas, 'Joint Committee on Key Issues affecting the Traveller Community debate' (21 October 2021) <www.oireachtas.ie/en/debates/debate/joint_committee_on_key_issues_affecting_the_traveller_community/2021-10-21/2/>

³¹ David Doyle et al., "Sometimes I'm missing the words": *The rights, needs and experiences of foreign national and minority ethnic groups in the Irish penal system* (IPRT 2022) <https://iprt.ie/site/assets/files/7076/iprt_the_rights-needs_and_experiences_of_foreign_national_and_minority_ethnic_groups.pdf>

³² Central Statistics Office, *Press statement census 2016 results profile 8 – Irish Travellers, ethnicity and religion* (CSO 2017) <www.cso.ie/en/csolatestnews/pressreleases/2017pressreleases/pressstatementcensus2016resultsprofile8-irishtravellersethnicityandreligion/>

³³ Rachel Doyle, 'Hearing their Voices' *Traveller Women in Prison* (SSGT 2017) <www.ssgt.ie/wp-content/uploads/2017/11/Hearing-their-Voices-Traveller-Women-in-Prison.pdf>

³⁴ OIP, *Annual Report 2019* (OIP 2021) <www.oip.ie/wp-content/uploads/2021/03/OIP-Annual-Report-2019.pdf>

Other issues

Committals to prison on short sentences

24. Women comprise a small yet increasing proportion of those in contact with the Irish criminal justice system. While women make up approximately 4% of the daily prison population, in 2022, they comprised 11.5% of committals.³⁵
25. Women are disproportionately handed down short sentences compared to men; with almost 85% of all women committed under sentence in 2022 for less than 12 months, compared with 65% of males.³⁶
26. No data are publicly available about the imposition of very short sentences (i.e., less than one month). However, a short case study from a 2021 report offers one example of the impact that these sentences have on vulnerable women:

“Recently the Court sent a woman to prison for five days. The woman lived in a hostel. [...] taking into account her remission entitlement [...], she was released on the Saturday, by which time the hostel had given away her room...”³⁷

27. IPRT welcomes the Department of Justice’s ongoing review of the Criminal Justice (Community Service) (Amendment) Act 2011, which is examining the causes for the continued use of short custodial sentences of 12 months or less, and the possible under-utilisation of community service orders.³⁸
28. It is vital that this review includes an examination of any gendered impacts of the legislation, including consideration of the impact of imprisonment on mothers and children.

The Committee may wish to ask the State:

- 7. For information on its efforts to reduce the number of short prison sentences handed down to women, and an update on any new gender-specific alternatives.**
- 8. Whether it plans to develop a policy to encourage contact between parents in prison and their children, including plans to collect and publish relevant data in this area.**

Committals to prison for non-payment of court-ordered fines

29. In 2017 the Committee acknowledged the *Fines (Payment and Recovery) Act in 2014* as a progressive step. However, while the legislation has reduced the overall number of

³⁵ Houses of the Oireachtas, ‘Prison Service’ (19 April 2023) <www.oireachtas.ie/en/debates/question/2023-04-19/89>

³⁶ Aodhán Ó Ríordáin TD, ‘Prison numbers released to me from a PQ...’ (X, 18 August 2023) <<https://twitter.com/AodhanORiordain/status/1692422907811483664>>

³⁷ IPS, *Dóchas Centre Chaplains Annual Report 2021* (IPS 2023), 22 <www.irishprisons.ie/wp-content/uploads/documents_pdf/Dochas-Centre-Chaplaincy-Annual-Report-2021-2.pdf>

³⁸ Kildare Street, ‘Legislative Reviews’ (30 June 2022) <www.kildarestreet.com/wrans/?id=2022-06-30a.730>

committals for non-payment of court-ordered fines, women continue to be disproportionately committed for this and similar offences linked with poverty and disadvantage.

30. In 2022, 5.7% of all female prison committals were for non-payment of court-ordered fines; more than double the comparable figure for males (2.5%).³⁹

The Committee may wish to ask the State:

9. For information on the actions it is taking to address the disproportionate number of women imprisoned for the non-payment of a court-ordered fine.

Pre-trial detention of women (custodial remand)

31. An IPS interim report on women on remand found a 37% increase in the number of female remand committals between 2013 and 2019⁴⁰, although it decreased by 32% between 2019 and 2022 during the pandemic period.⁴¹

32. However, the proportion of female prisoners in custody on remand each day continues to be higher than for males, with 22% of women in prison custody in July 2023 being held on remand, compared to 17% of males.⁴²

The Committee may wish to ask the State:

10. For information on its efforts to minimise the reliance on the use of pre-trial detention in response to women accused of offending, including any plans to develop gender-specific bail support services.

Barriers to reintegration

33. Women are more likely to be held in custody further from their homes due to the small size of the female prison estate, which poses challenges to resettlement. Additionally, women are generally serving shorter sentences than men. While these sentences are lengthy enough to result in the loss of accommodation, employment, and caregiving responsibilities, they are often not long enough for women to access the services required to improve their circumstances on release.

³⁹ Houses of the Oireachtas, 'Prison Service' (19 April 2023) <www.oireachtas.ie/en/debates/question/2023-04-19/89>

⁴⁰ Caroline Finn, *Women on Remand - Interim Report for IPRT Analysis of PIMS, 13/08/20* (IPS 2020) [Unpublished]

⁴¹ From 462 in 2019 to 314 in 2022. IPS, *Annual Report 2019* (IPS 2020) <www.irishprisons.ie/wp-content/uploads/documents_pdf/IPS-Annual-Report-2019-Web.pdf> and Houses of the Oireachtas, 'Prison Service' (19 April 2023) <www.oireachtas.ie/en/debates/question/2023-04-19/90/>

⁴² IPS, *Monthly Information Note – July 2023* (IPS 2023) <www.irishprisons.ie/wp-content/uploads/documents_pdf/JULY-2023.pdf>

34. One positive development since Ireland's previous review under CEDAW is the opening of the Outlook Programme, a step-down facility for women, operational since May 2019.⁴³ The Programme supports women serving sentences or on probation, who pose a low risk to society, to reintegrate into the community.⁴⁴ However, it has a limited capacity, is Dublin-based, and is not equivalent to an open prison.
35. There are still no plans to develop an open prison for women, despite there being two open prisons available for men.⁴⁵ Open prisons offer residents an opportunity to demonstrate trustworthiness, build life skills, and gradually reintegrate back into communities and families. Women serving life and long sentences find themselves in a restrictive prison setting indefinitely.

The Committee may wish to ask the State:

- 11. About its focus on ensuring that women have equal opportunities when preparing for release from prison, including access to more open settings.**
- 12. For information on how it is ensuring that the specific needs of women are met on release from prison, including equitable access to services and accommodation that supports family reunification, where appropriate.**

Transgender women in prison

36. The IPS currently has no policy relating to the placement and treatment of transgender people in prison. The placement of transgender women in prison first came to popular media attention in 2019.⁴⁶ Since then, there has been continued media focus on this small group of marginalised women.
37. The OIP first recommended the development of a national policy on the safe custody of transgender prisoners in an inspection report published in 2021.⁴⁷ The IPS has confirmed that it hopes to finalise a transgender policy in Q3 2023.⁴⁸
38. IPRT is concerned that, while the policy is in development, the small number of transgender women in prison may be subject to inhuman treatment, with reports that these women have been (and may continue to be) subject to prolonged solitary confinement.⁴⁹

⁴³ Kildare Street 'Probation and Welfare Service' (1 March 2022) <www.kildarestreet.com/wrans/?id=2022-03-01a.1454>

⁴⁴ Ibid.

⁴⁵ Kildare Street, 'Prison Service' (8 November 2022) <www.kildarestreet.com/wrans/?id=2022-11-08a.2501>

⁴⁶ Gazette Desk, 'Male-bodied transgender inmate housed with women' *Law Society Gazette* (October 2019) <www.lawsociety.ie/gazette/top-stories/2019/10-october/male-bodied-transgender-inmate-housed-with-women-prisoners>

⁴⁷ OIP, *COVID-19 Thematic Inspection of Limerick Prison 6-7 April 2023* (OIP 2021) <www.oip.ie/wp-content/uploads/2021/08/Limerick-Prison-COVID-19-Thematic-Inspection-Report-2021.pdf>

⁴⁸ See status update 9 March 2023, LMCT18 Limerick Prison. Office of the Inspector of Prisons, 'Inspections Recommendation Monitoring' (*Oip.ie*, 2023) <www.oip.ie/inspections-recommendation-monitoring/>

⁴⁹ OIP, *COVID-19 Thematic Inspection of Limerick Prison 6-7 April 2023* (OIP 2021) <www.oip.ie/wp-content/uploads/2021/08/Limerick-Prison-COVID-19-Thematic-Inspection-Report-2021.pdf>; and Paul Healy, "'Dangerous"

The Committee may wish to ask the State:

13. For information on its treatment of transgender women in prison, and for an update on introducing a policy for transgender people in prison.

Penal policy relating to women

39. In 2017, the Committee noted that the 2014 *Strategic Review of Penal Policy* made several recommendations to improve standards of accommodation for women in detention. However, many of these recommendations have not been implemented.
40. In 2022, the Department of Justice published a wide-ranging new policy document on penal reform. It is encouraging that the *Review of Policy Options for Prison and Penal Reform 2022-2024* makes several proposals relating to women in the criminal justice system, and that they primarily relate to expanding the range of community-based sanctions and improving alternatives to custody.⁵⁰
41. However, while this is promising, it is not clear what measures are in place to ensure progress and timely delivery given that similar initiatives announced in 2014 remain unimplemented.

The Committee may wish to ask the State:

14. For an update on the implementation of the Priority and Complementary Penal Policy Action Plans arising from the *Review of Policy Options for Prisons and Penal Reform*,⁵¹ particularly the actions relating to female offenders.

Conclusion

42. For further information on women in the penal system in Ireland, see the most recent edition of IPRT's annual flagship report, *Progress in the Penal System: A framework for penal reform (2022)*.⁵²
43. IPRT thanks the Pre-Sessional Working Group for considering these issues.

transgender prisoner Barbie Kardashian will NEVER be allowed to mix with female inmates' *Irish Mirror* (22 March 2023) <www.irishmirror.ie/news/irish-news/dangerous-transgender-prisoner-barbie-kardashian-29526551>

⁵⁰ Department of Justice, *Review of Policy Options for Prison and Penal Reform 2022-2024* (DoJ 2022) <[www.gov.ie/pdf/?file=https://assets.gov.ie/233015/1dd9e5a8-796e-4eda-a2d7-4a1b4c160cea.pdf](https://assets.gov.ie/233015/1dd9e5a8-796e-4eda-a2d7-4a1b4c160cea.pdf)>

⁵¹ Ibid.

⁵² IPRT, *Progress in the Penal System: A framework for penal reform (2022)* (IPRT 2023) <www.iprt.ie/site/assets/files/7214/progress_in_the_penal_system_2022.pdf>