

SHADOW REPORT FOR IRELAND'S EIGHTH PERIODIC REVIEW UNDER CEDAW (International Convention on the Elimination of All Forms of Discrimination Against Women)



Belong To LGBTQ+
Youth Ireland

INTRODUCTION

This submission is prepared by Belong To, Ireland's national LGBTQ+ youth organisation, to provide a parallel report for Ireland's eighth Periodic Review under the International Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW). It highlights some of the most pressing challenges faced by young lesbian, bisexual, transgender and queer (LBTQ+) women and girls in Ireland, as well as young intersex people who may fall outside of binary conceptions of male and female.

Research estimates that up to 10.8% of the population in Ireland is LGBTQ+. ¹ A significant number of women are affected by issues specific to their sexuality and/or gender identity.

Since 2003, Belong To has worked with LGBTQ+ youth to create a world where they are equal, safe and thriving in the diversity of their identities and experiences. The organisation advocates and campaigns with and on behalf of LGBTQ+ young people; offers specialised LGBTQ+ youth services in Dublin, including crisis counselling with Pieta; and supports a network of LGBTQ+ youth groups across Ireland. Belong To also supports educators and other professionals working with LGBTQ+ youth through training, capacity building, and policy development.

CEDAW Documents Referenced

- [Eighth periodic report submitted by Ireland under article 18 of the Convention](#) ("2024 country report")
- [List of issues and questions prior to the submission of the 8th periodic report of Ireland](#) ("2023 list of issues")
- [Concluding observations on the combined sixth and seventh periodic reports of Ireland](#) ("2017 concluding observations")

¹ [2019-06-28_l-rs-infographic-lgbt-community-in-ireland-a-statistical-profile_en.pdf](#)

INPUTS AND OBSERVATIONS

Trans healthcare

Ireland's health service does not meet the needs of trans women and other gender-diverse demographics. There are currently [over 2,000 people](#) on the waiting list for the National Gender Service (NGS), which is the only public gender healthcare service for adults. At present, waiting times for a first appointment are estimated at approximately 13 years for new referrals. There is currently no public service available at all for young people aged under 17.

The Health Service Executive (HSE) is [currently developing](#) an updated Model of Care for gender healthcare services in Ireland. However, we draw attention to a severe lack of meaningful engagement with transgender people and advocacy organisations. This process requires a genuine, two-way dialogue between the HSE and trans people/LGBTQ+ civil-society organisations, but a partnership approach is not being taken.

Our urgent recommendation is that the HSE engages meaningfully with trans women—and with trans communities more broadly—in developing its new model of trans healthcare for both young people and adults. This must involve a community co-production partnership approach, and address all relevant medical, therapeutic, and social care in compliance with national and international human rights, medical standards of care, and the principles of self-determination and informed consent.

Intersex healthcare guidelines

The 2017 CEDAW concluding observations recommended that Ireland “develop and implement an appropriate rights-based health-care protocol for intersex children, which ensures that children and their parents are properly informed of all options and that children are, to the greatest extent possible, involved in decision-making about medical interventions and that their choices are fully respected” (p6).

In September 2024, it [was announced](#) that Children's Health Ireland (CHI) would be developing a set of national guidelines for the medical care of intersex infants born in Ireland. However, as of May 2025, there has been no further update on this work.

The 2025 [ILGA-Europe Rainbow Map](#) awarded Ireland no points in relation to intersex bodily integrity.

Gender Recognition Act — Outstanding Actions

Ireland's Gender Recognition Act is noted as a positive aspect in the 2017 concluding observations (p2).

Ireland has been a global leader on trans rights since the enactment of this progressive gender recognition legislation in 2015. Since its commencement, 1,544 people have [received a Gender Recognition Certificate](#) and been able to legally recognise their gender identity.

Section 7 of the Act provided that the Minister would commence a review of the Act within two years of its operationalisation, and in 2017, a Review Group was formed, chaired by Belong To CEO, Moninne Griffith. Following a thorough examination of the Act and its operation, including consideration of 92 submissions to an open consultation process, the Review Group [published a report](#) containing a series of recommendations in July 2018.

In November 2019, the Minister for Employment Affairs and Social Protection [published a report](#) entitled “Gender Recognition Act 2015: Report to the Oireachtas under Section 7 of the Act” (Minister’s Report), setting out a series of proposals to address a number of these recommendations through legislation and other measures.

Many of the actions from both lists of priorities—the Review Group’s and the Minister’s—remain outstanding. These actions are as follows:

- Simplify the path to legal gender recognition for young people aged 16 and 17.* Since 2015, only 24 applications for a Gender Recognition Certificate have been made by 16- and 17-year-olds (21 granted). This suggests that the process is not fit for purpose and is delaying young people’s access to legal gender recognition.
- Publish existing research relating to gender recognition processes for under-16s.* The research was due for completion in 2024, but has yet to be released. The delay in publication of this research is delaying indefinitely any progress on this issue. Trans young people and their families tell us how important it is to have access to legal documents that reflect their gender identity, including passports, birth certificates, and other official records.
- Make legal gender recognition available to nonbinary people. The rights of nonbinary people have been excluded from proposed legislative amendments without clear rationale and should be addressed as a priority. We recognise that an impact assessment is required as part of a medium-term process. However, as this is progressed, in the short-term all feasible steps should be taken to improve the position and recognition of nonbinary people.
- Provide access for intersex people to all measures taken to improve access to gender recognition.
- Promote the use and acceptance of correct pronouns within the DSP and wider civil/public service.*
- Improve the design of forms and documentation within the DSP to permit the use of a third gender option, or no gender at all.*

- Introduce a certificate numbering system for the DSP, with the General Register Office, which looks identical to that used for birth certificates where the information is taken from the birth registers. This should apply to new certificates and the option of a replacement certificate should be made available to people who already have a certificate with no reference number (and the fee for issuing a replacement waived).
- Examine how administrative processes can be streamlined while maintaining a person's privacy once they have obtained a Gender Recognition Certificate. This should aim to improve interconnection between Departments and reduce the cost of replacing official documents (e.g. passports, birth certificates).
- Commit to reviewing, within five years, the Act and any impact assessment in relation to the introduction of legislation to provide legal gender recognition for non-binary people.
- Publish an easy-to-read booklet setting out the steps involved in obtaining a Gender Recognition Certificate and an entry in the register of gender recognition.
- Prepare a booklet for Government Departments, other State bodies, and private sector organisations, setting out how the Act applies to them.

*Included in Minister's Report (2019)

Conversion Practices

Ireland has repeatedly expressed its commitment to banning so-called “conversion therapy”, a set of harmful practices that aim to force LGBTQ+ people to alter their sexuality or gender identity. This [was reflected](#) in Ireland's national LGBTI+ Strategies. Action 8(b) in the LGBTI+ National Youth Strategy 2018–2020 provided for the prohibition of “the promotion or practice of conversion therapy by health professionals in Ireland” and the National LGBTI+ Inclusion Strategy 2019-2022 committed to ensuring that the practice of conversion therapy in Ireland was investigated and followed up with appropriate counter measures (Action 24.1).

However, the legislation [was delayed](#) due to cited complexities, and not enacted during the lifetime of the last Government, opening LGBTQ+ women to continued harm.

The 2025 Programme for Government includes an action to “Advance legislation to ban conversion practices,” and Belong To underscores the need to prioritise this during the term of the current government.

Equality Act Amendments

The 2024 country report notes: “Officials are currently finalising the legislative proposals arising from the review. This ongoing work includes further engagement with stakeholders and seeking legal advice on relevant matters. It is planned that these legislative proposals will be brought to Government for approval and publication in the coming months” (p7).

Belong To [made a submission](#) to the review of the Equality Acts in 2021. We draw attention to the following priority recommendations that were not included in the General Scheme of the Equality (Miscellaneous Provisions) Bill 2024 published in January 2025:

- That the definition of the gender ground contained in the Equal Status Acts and Employment Equality Acts is amended to explicitly prohibit discrimination on the basis of gender identity, gender expression and sex characteristics.
- That Section 7 of the Equal Status Acts be reviewed to ensure that the exemption applied to schools “of one gender only” regarding admission and access does not discriminate against trans, non-binary and gender nonconforming young people.

Data Collection Measures

The 2017 concluding observations advise that Ireland should “collect data which should, inter alia, be disaggregated by sex, gender, ethnicity, disability and age, in order to inform policy and programmes on women and girls, as well as assist in tracking progress in the achievement of the Sustainable Development Goals” (p5).

In 2023, Belong To made [a submission](#) to the Central Statistics Office on the importance of including specific questions related to sexual orientation, gender identity and sex characteristics within the 2027 census. LGBTQ+ population data reveals not only a more accurate number of LGBTQ+ individuals living in Ireland but works to demonstrate how their experiences compare to those of their cisgender, heterosexual counterparts.

We are currently awaiting a report from the CSO on the results of the consultation, having made the following recommendations:

- Census 2027 includes new questions on gender identity, sexual orientation and sex characteristics.
- The final wording of these questions is based on broad consultation with members of the LGBTQ+ community in advance of the publication of the 2027 Census.
- A robust communication and education plan is required in order to ensure the successful inclusion of these new questions.
- All CSO staff with specific attention to census workers collecting data and researchers will require specific training related to new questions on gender identity, sexual orientation and sex characteristics.

- Extensive research and consultation is carried out prior to the 2027 Census in order to plan appropriately for the collection, analysis and dissemination of the new data that will be gleaned from the inclusion of these questions.

National LGBTI+ Strategy

The government's most recent *National LGBTI+ Inclusion Strategy* ran from 2019 to 2021, and was extended to 2023 following the impacts of the Covid-19 pandemic. We are awaiting the publication of the second strategy, which is due to launch in May 2025.

Belong To contributed to the consultation on the successor strategy in 2024, with the following priority recommendations included.

- LGBTQ+ inclusive education in primary and post-primary schools through the support, resourcing and training of school staff, for example through Belong To's LGBTQ+ Quality Mark and the development of a similar initiative for primary schools.
- Sustainable, LGBTQ+-inclusive youth services provided nationally, through the provision of multi-annual funding for youth services and development of Belong To's Rainbow Award programme for holistic LGBTQ+ inclusion across youth services.
- A programme of research relating to LGBTQ+ inclusion, informed by community needs, the Being LGBTQI+ in Ireland recommendations and the DCEDIY-commissioned NUIG landscape research study.
- Implementation of recommendations from the report of the Gender Recognition Review Group, primarily a simplified process of legal gender recognition for 16- and 17-year-olds, and non-binary legal gender recognition.
- Passage of hate crime and hate speech legislation, with a National Action Plan on Hate Crime.
- A legislative ban on conversion practices.
- Develop, fund and implement a new model of gender-affirming care for young people and adults that complies with national and international human rights and medical standards of care, and is based on the principles of self-determination and informed consent.
- Investment in the youth work sector for the sustainable provision of services and programmes locally and nationally to support and maintain positive mental health among LGBTQ+ youth in their communities.
- Funding the development of family support services for the parents and caregivers of LGBTQ+ young people, through a dedicated national LGBTQ+ family support service and a best practice in LGBTQ+ family support quality standards initiative for Family Resource Centres.

- Passage of hate crime and hate speech legislation, with a National Action Plan on Hate Crime.
- Progress on the National Counter Disinformation Strategy, including specific actions relating to the LGBTQ+ community and LGBTQ+ identities.
- Progress on online safety and regulation of online platforms via Coimisiún na Meán, including the introduction of the Online Safety Code, measures to tackle online hate and misinformation, and digital literacy measures.

Online Safety

In the 2024 country report, Ireland notes that its online safety regulator, Coimisiún na Meán, “adopted its first Online Safety Code under [Ireland’s online safety framework], which will hold designated online services to account for how they tackle the availability of defined categories of harmful online content, including serious forms of cyberbullying” (p22).

Belong To welcomes the introduction of the Online Safety Code (OSC) and the establishment and resourcing of Coimisiún na Meán. However, we would raise the need for proactive enforcement of the OSC. At present, our experience is that civil society is encouraged primarily to engage in reporting mechanisms to combat online harassment. However, this approach places the burden of action on a sector already greatly limited in its resources. The regulator must be further empowered to take proactive measures to ensure that large social-media companies are held to account.

In relation to this, we support the recommendations of the [Children’s Rights Alliance Online Safety Monitor \(2025\)](#) as they pertain to safeguarding young people, including LGBTQ+ young people, online.

Rural and Disadvantaged Women

The 2024 country report refers to rural and disadvantaged groups of women (p35). LGBTQ+ women and girls live and work in communities across Ireland, including rural areas, villages, and towns. Yet they continue to face high levels of harassment and violence related to their sexual orientation and/or gender identity. Accordingly, any strategies aiming to strengthen and create inclusive communities across the country should explicitly recognise this population and the unique challenges they face.

Belong To recently made a submission to the Department of Rural and Community Development (DRCD) with a series of recommendations for including rural LGBTQ+ women (as part of the wider LGBTQ+ population) in its next Statement of Strategy. These recommendations are as follows:

- Name LGBTQ+ people as a specific population group within the next Statement of Strategy.
- Include objectives and actions, supported by the allocation of resources, focused on providing safe spaces, services and supports for LGBTQ+ people in rural areas. These should incorporate measures to combat social isolation and promote community connection among LGBTQ+ people in rural areas.
- These actions should harmonise with and complement the government's next National LGBTI+ Inclusion Strategy (forthcoming).
- Ensure that all DRCD-funded programs and initiatives are inclusive and accessible to LGBTQ+ people.

LBTQ+ Sexual Health

From Belong To's [School Climate Survey](#), we know that only 35% of LGBTQ+ students had LGBTQ+ inclusive Social, Personal and Health Education (SPHE) in 2022.

In 2022, Belong To [collected evidence](#) for the "Junior Cycle SPHE NCCA consultation" in which relationships, sexuality and LGBTQ+-inclusive sex education in schools were most frequently highlighted by the group, along with the need for Relationships and Sexuality Education (RSE) to be inclusive of people who are not heterosexual and/or cisgender. Young people who attended girls' single-sex schools noted that what little sex education they had received primarily focused on contraception for the purpose of preventing pregnancy, rather than safe sex and preventing the transmission of STIs.

This is evidence that there is a need to provide young LBTQ+ women with better and more inclusive sex education that covers more than just contraception and preventing pregnancy. Young people themselves are aware that they need a more in-depth awareness of sexual health and relationships, particularly LGBTQ+ young people.

Equality in Education

SPHE/RSE: For over 25 years, Irish curricula have included Social, Personal and Health Education (SPHE), with Relationships and Sexuality Education (RSE) falling under this.

While RSE is mandatory in schools at Senior Cycle, SPHE is currently not, and [research](#) by the National Council for Curriculum and Assessment (NCCA) shows that fewer than one in five schools timetable it for these older students on the cusp of adulthood. Upon the publication of the new syllabus in 2024, the Department of Education [announced](#) that the subject would be made mandatory, but that has been pushed back to 2027 "largely because there are so few teachers who are adequately trained to deliver a subject that includes topics that are highly sensitive and complex".

The 2024 country report references limited supports available to educators in SPHE and RSE. At present, there is only one post-graduate programme of continuing teacher professional development in SPHE in Ireland. According to [a 2022 report](#) from the NCCA:

Teachers consulted as part of the review of RSE affirmed the value of SPHE/RSE within the curriculum and agreed on the importance of teaching in an open, dialogical and non-judgmental manner. However, many teachers felt they lacked the necessary training to enable them to effectively and confidently teach SPHE, and this was more frequently noted by those teaching senior cycle students. They recognised the need for a curriculum that is relevant to young people's real-life questions and concerns but felt they needed further training and supports as well as clarity on what topics should be taught at different stages of learning.

This need remains pressing in 2025.

Anti-LGBTQ+ bullying: Since 2013, the “Department of Education Anti-Bullying Procedures for Primary and Post-Primary Schools – Circular 45/2013” has required all primary schools to explicitly name homophobic and transphobic bullying in their anti-bullying policy, along with education and prevention strategies to tackle these. However, over a decade on, a significant proportion of primary staff [are not aware](#) of whether their school fulfils this requirement.

The main resource for creating LGBTQ+-inclusive schools comes from a set of guidelines called “Being LGBTQ+ in School”. These are currently being updated for post-primary level, but there are no equivalent guides for primary schools.

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