

April 2026

National Women's
Council of Ireland |
Stakeholder
Submission to the
Universal Periodic
Review
(Fourth Cycle)

Organisation Description

Founded in 1973, the National Women’s Council of Ireland (NWC) is the leading representative organisation working for women’s rights and women’s equality on the island of Ireland. We represent and derive our mandate from our membership, which includes nearly 200 groups and organisations from a diversity of backgrounds, sectors and locations across Ireland. As a membership organisation, we are uniquely placed to represent and communicate the concerns of women in Ireland.

NWC can play a significant role in the review of the State’s progress under UPR, ensuring women’s lived experiences and the inequalities and discrimination they face are recognised. This submission is grounded in consultation with our membership throughout March 2026 and builds on NWC’s recent research and policy work, including our submission on Ireland’s 2025 examination under CEDAW. While focused on recommendations for Government in the Republic of Ireland, NWC acknowledges shared challenges faced by women across the island of Ireland and calls for stronger North-South cooperation centred on peacebuilding and reconciliation. Although progress has been made since 2021, this report focuses on the systemic barriers faced by women – particularly from marginalised groups – in areas such as healthcare, economic equality, domestic, sexual, gender-based violence (DSGBV), housing, participation, and climate justice.

A. Implementation of 2021 UPR Recommendations

1. The 2021 UPR recommendations to Ireland emphasised the need for structural reform across gender equality, including strengthening responses to gender-based violence, addressing economic inequality and the gender pay gap, improving access to sexual and reproductive healthcare, and advancing the rights of marginalised groups such as Traveller, Roma and migrant women.
2. Since then, Ireland has taken some important steps, including the development of the Third National Strategy on Domestic, Sexual and Gender-Based Violence and the establishment of Cuan. In women’s health, successive Women’s Health Action Plans have delivered progress such as the introduction of free contraception for those aged 17-35 and increased policy focus on areas including menopause, screening and fertility.
3. However, progress remains uneven and insufficiently resourced, with persistent gaps between policy commitments and implementation.

B. Legal & Policy Framework

4. Ireland has made commitments to advancing gender equality through national strategies and legislative reform. However, implementation remains inconsistent and under-resourced. The recently published National Strategy for Women and Girls (2025-2030) presents an opportunity to strengthen accountability, coordination and resourcing across government.
5. Gender mainstreaming and gender budgeting are not yet systematically embedded in policy or public spending, and gaps persist in equality legislation, including a lack of explicit protection against intersectional and socio-economic discrimination. Limited disaggregated data, weak monitoring mechanisms and insufficient cross-departmental coordination continue to hinder progress. Women, including disabled, Traveller, Roma, migrant and LGBTQ+ women, face compounded barriers across policy areas. A stronger, whole-of-government approach is required to ensure Ireland meets its human rights and equality commitments.

Recommendations:

- Fully implement a resourced National Strategy for Women and Girls and accompanying Action Plan(s) with clear timelines, indicators and monitoring mechanisms.
- Embed gender mainstreaming and gender budgeting across all policy and public spending processes.
- Progress equality legislation reform to recognise intersectional and socio-economic discrimination.
- Implement the new National Data Equality Strategy. Ensure equality data collection – inclusive of ethnic data – and monitoring across all state departments and agencies.

C. Gender-Based Violence

6. [Implementation of the Third National Strategy](#): Ireland's Third National Strategy on Domestic, Sexual and Gender-Based Violence (DSGBV) and the establishment of Cuan in 2024 represent important progress. However, implementation remains uneven. Key priorities include sustained funding, improved data collection, justice system reform, and meaningful mechanisms for survivor engagement. An intersectional approach is required to meet the needs of marginalised women.¹ While progress has been made under the Istanbul Convention, the State's obligations are not yet fully realised. As highlighted by GREVIO in their baseline evaluation report on Ireland

¹ Irish Observatory on Violence Against Women. (2023).

(2023), the gap between progressive policies and the reality on the ground continues to undermine effective responses.²

7. [Funding for Frontline/Specialist Services](#): Frontline and specialist DSGBV services remain under-resourced, with short-term and insecure funding undermining delivery. This exacerbates existing inequalities in access to support. Despite longstanding recommendations to adequately fund NGOs supporting victims, funding instability continues to affect service capacity.
8. [Data Collection](#): Implementation of the DSGBV Strategy is hindered by limited, fragmented, and insufficiently disaggregated data, alongside weak monitoring mechanisms. The Central Statistic Office's [2022 Sexual Violence Survey](#) was the first national prevalence study since 2002. Sustained investment is needed to ensure reliable, inclusive data – particularly for Traveller, Roma, disabled and migrant women.
9. [Survivor-Centred Justice System](#): Survivors must often navigate criminal, family and childcare legal systems simultaneously, leading to retraumatisation and gaps in support. Research has shown that women and children feel the family law system fails to listen to them.³ Greater coordination across systems, expanded free legal aid to all victims and survivors, trauma-informed training, and improved court supports are needed. Reform of the in-camera rule is also required to provide for a transparent and a survivor-centred justice system. The continued use of survivors' counselling notes in court undermines privacy, deters reporting and accessing lifesaving mental health supports.
10. [Review of Part 4 \(Sexual Offences Act\)](#): Implementation of Part 4 of the Criminal Law (Sexual Offences) Act 2017 requires stronger public awareness, demand-reduction measures, and specialised adequately resourced exit supports for women in prostitution. Dedicated programmes remain insufficient. The CEDAW Committee's previous call for dedicated exit programmes remains unmet.
11. [Female Genital Mutilation](#): An estimated 5,790 women and girls in Ireland have undergone FGM.⁴ While recognised as gender-based violence in the DSGBV Strategy, FGM must be fully addressed across all pillars, including coordinated policies, training, awareness, and supports. A National Action Plan, proposed in 2015 by AkiDwA remains unadopted.
12. [Misogyny/ Online Abuse](#): A core pillar of the DSGBV Strategy is prevention – focused on dismantling the social and cultural norms that enable GBV. Technology-facilitated violence

² Council of Europe Group of Experts on Action against Violence against Women and Domestic Violence ([GREVIO](#)) [baseline evaluation report on Ireland](#). (2023).

³ [Exploring how Victim-Survivors of Domestic Violence and Abuse Experience Navigating the Irish Family Law System in Guardianship, Custody & Access Cases](#). Women's Aid. (2025)

⁴ [AkiDwA. Knowledge of Educators in Irelands on FGM \(2022\)](#).

against women is increasing. Legal protections, prevention measures, and education responses remain underdeveloped, particularly for marginalised groups. Stronger online safety measures (including robust legislation) and implementation of prevention commitments are required.

13. **Femicide:** Across the island of Ireland there is no dedicated system for the consistent recording, analysis and monitoring of femicide. The absence of comprehensive data limits the State's ability to identify risk factors, prevent killings, and learn from previous cases.⁵

Recommendations:

- Provide secure multi-annual funding for DSGBV services and Cuan to ensure sustainable frontline and advocacy capacity.
- Develop and implement a national DSGBV data and monitoring strategy – led by Cuan – with disaggregated data across departments and agencies.
- Implement survivor-centred justice reforms, including expanded free and adequate legal aid, coordination across legal systems and improved court supports.
- Legislate to robustly protect survivors' counselling notes from disclosure in court.
- Develop and implement a national framework to address technology-facilitated violence against women with robust platforms regulation to prevent harm.
- Adopt a fully resourced National Action Plan to Combat FGM.
- Expand and adequately fund specialised exit supports for women impacted by prostitution and sexual exploitation.

D. Women's Health

14. **Universal Healthcare:** Progress toward Sláintecare and universal healthcare remains slow, with no clear roadmap to ensure equitable access for all women and girls. Women – particularly Traveller, Roma, disabled, migrant, and other communities – continue to face barriers in a system shaped by privatisation and inequality. This is especially concerning given the disproportionate burden of chronic conditions affecting women, including endometriosis and autoimmune diseases.
15. **Women's Health Action Plan:** Ireland's Women's Health Action Plans have delivered significant improvements, including expanded contraception access and increased focus on menopause, fertility and gynaecological care. However, there is insufficient equality data collection across women's health, resulting in the gaps for disabled, Traveller and Roma women, migrant women,

⁵ [A Study on Femicide & Domestic and Family Violence Death Reviews](#). Department of Justice, Home Affairs, and Migration. (2023)

and others being difficult to assess and address. Women also consistently report not being taken seriously, highlighting gaps in the delivery of gender-sensitive healthcare.⁶

16. **Abortion Access:** While the repeal of the Eighth Amendment was a major step forward, barriers to timely and equitable abortion access persist. Legislative and operational challenges include ongoing criminalisation, the mandatory three-day waiting period, and the 28-day clause for fatal foetal anomalies.⁷ These barriers result in at least 240 women and pregnant people travelling abroad to access abortion care from Ireland each year.⁸
17. **Contraception & HRT:** The Free Contraception Scheme (17-35-year-olds) has reduced costs, but this needs to be extended across the reproductive age range. Similarly, the HRT Arrangement which provides free dispensing of HRT products from pharmacies is positive, but the initial GP appointment costs are not included.
18. **Mental Health:** Women face long waiting times, lack of gender-sensitive services and persistent stigma, particularly in perinatal and maternal mental health. Women from minority ethnic groups and disabled women face additional barriers. Mental health funding remains below Sláintecare's 10% target, limiting implementation of *Sharing the Vision* and commitments to gender-sensitive care. Ireland still lacks a dedicated Mother and Baby Unit, resulting in separation of mothers and infants when specialist inpatient care is required.⁹
19. **Maternity Care:** The existing National Maternity Strategy (2016-2026) is coming to an end. A new Strategy which is fully resourced, women-centred, and addresses the needs of women in all their diversity is required. This should include targeted measures for women experiencing known health inequalities, like disabled and minority ethnic women.¹⁰ It should also address concerns regarding high and increasing rates of medical intervention, including high rates of inductions and c-sections, ensuring that maternity care is evidence-based and women centred.¹¹
20. **Gender-Affirming Healthcare:** Ireland has consistently performed extremely poorly on trans healthcare compared to other EU countries.¹² For many trans people in Ireland, gender-affirming healthcare is inaccessible, with detrimental impacts on their mental health. In December 2025, the National Gender Service (NGS), Ireland's only public gender clinic, attempted to close its

⁶ [Our Health, Our Voices: Women's Experience of Healthcare in Ireland Listening Forum Report 2](#). NWC. (2025)

⁷ [The Independent Review of the Operation of the Health \(Regulation of Termination of Pregnancy\) Act 2018. 2023 Report](#).

⁸ 'The most vulnerable are still being exported': Why and how women have to travel for abortions: <https://www.thejournal.ie/exporting-abortion-irish-law-6631886-Apr2025/>

⁹ [Perinatal Mental Health: Listening to Women and Shaping the Road Ahead](#). NWC. (2024)

¹⁰ [National Women's Council Submission to Joint Committee on Health \(National Maternity Strategy\). 2026](#).

¹¹ Panda S, Begley C, Daly D (2022) Clinicians' views of factors influencing decision-making for CS for first-time mothers—A qualitative descriptive study. *PLoS ONE* 17(12): e0279403. <https://doi.org/10.1371/journal.pone.0279403>

¹² Transgender Europe, *Trans Health Map 2024*. Available at: <https://transhealthmap.tgeu.org/>. Last consulted: 3 March 2026. The 2022 Map reported Ireland as having the worst healthcare system for trans people among all 27 EU States. See Transgender Europe, *Trans Health Map 2022*. Available at: <https://tgeu.org/trans-health-map-2022/>. Last consulted: 3 March 2026.

waiting list to new patients. There are over 2,500 people waiting to access the service, an 18-year estimated wait time.¹³

21. **Cancer & Screenings:** A life-course approach to gynaecological healthcare, including specialised supports for women during and after gynaecological cancer, is essential.

Recommendations:

- Implement the Independent Abortion Review and align with the clinical best practices recommended by WHO.¹⁴ This would include removing legislative and operational barriers to timely, local and equitable access to abortion care.
- Extend the free contraception scheme to all ages.
- Expand the HRT Arrangement to anyone who requires it and ensure GP visit costs are included.
- Fully implement Sláintecare through a gender-sensitive approach ensuring equitable access for women in all their diversity.
- Increase investment in gender-sensitive mental health services and establish a dedicated Mother and Baby Unit.
- Develop and resource a new National Maternity Strategy that is women-centred and addresses inequalities.
- Continue developing targeted women's health services and initiatives through the Women's Health Action Plans, ensuring ring-fenced multi-annual funding and an intersectional and life-course approach to women's health.
- Commit to the development, implementation and resourcing of gender-affirming healthcare services informed by international best practice and co-designed with the transgender community. These should be person-centred, based on informed consent, based on bodily autonomy, and delivered timely and locally.
- Improve national screening services, providing increased funding to ensure screening targets are achieved.

E. Care & Support

22. **Childcare:** Despite increased public investment, families continue to face high costs, limited availability and unequal access to childcare, particularly lone parents, Traveller and Roma families, migrants and those in rural areas. Low pay and poor conditions for Early Years

¹³ Jessica Black, "An eighteen-year wait for trans healthcare with more than 2,500 on waiting list", The Beacon, 17 February 2026. Available at: <https://the-beacon.ie/2026/02/17/an-eighteen-year-wait-for-trans-healthcare-with-more-than-2500-on-waiting-list/>.

¹⁴ [World Health Organisation. Guidelines on Abortion \(2nd Edition, 2025\).](#)

educators contribute to staffing shortages. A public model of early childhood education and care (ECEC) system, including school-age care, is essential to ensure affordability, accessibility and women's labour market participation.

23. [Family Leave](#): Family leave payments remain significantly below average earnings and there is a significant gap between the end of paid leave and the start of childcare provision.¹⁵ The current rate of the various Family Benefits is €299 per week – only 53% of the rate of National Minimum Wage for a 40-hour week. Ireland is the only country in the EU where state support for family leave is not directly linked to earnings. This contributes to women reducing working hours or leaving employment, with disproportionate impacts on lone parents.
24. [Care and Support Systems](#): Ireland faces a broader crisis in care and support services. Disabled people, older persons and carers experience long waiting lists, limited respite and uneven service provision. Continued reliance on private provision raises concerns about affordability, access and quality.
25. [Home Support and Personal Assistance](#): Delays in introducing a statutory home support scheme and ongoing workforce shortages mean many older people remain on waiting lists for essential supports. Ireland also lacks a fully resourced, rights-based Personal Assistance Service, limiting independent living for disabled people and increasing reliance on unpaid family care.
26. [Independent and Community Living](#): Progress toward community-based living for disabled people remains slow, with many still living in institutional settings. Older women, particularly those living alone, face housing and support challenges that are not adequately addressed in current policy.
27. [Recognition of Unpaid Care](#): Women continue to carry a disproportionate share of unpaid care work. Greater recognition of care through social protection and income supports, including consideration of models such as a participation income, is needed to address structural inequality.

Recommendations:

- Develop and deliver a public model of early childhood education and care with expanded public provision and improved pay for educators.
- Increase and benchmark family leave payments and address gaps between leave and childcare provision.
- Introduce a statutory home support scheme and a rights-based personal assistance service aligned with CRPD.
- Move toward a universal, rights-based social care system with a strong gender perspective.

¹⁵ [NWC Close the Gap Booklet \(2026\)](#)

F. Employment & Economic Inequality

28. Gender Pay and Employment Inequality: The labour market continues to undervalue care responsibilities, limiting women's participation and earnings. Lone parents, migrant, Traveller and Roma women, disabled women and young women face particular barriers, contributing to lower lifetime income, pensions and financial security.
29. Pensions: Ireland's gender pension gap remains high at approximately 35%.¹⁶ The current system relies heavily on tax reliefs that disproportionately benefit men. The new pension auto-enrolment scheme is unlikely to close the gap and may exacerbate inequalities without targeted measures.
30. Poverty and Cost of Living: Women – particularly lone parents, disabled women, and Traveller, Roma and migrant women – experience high levels of poverty and deprivation. Social protection increases have not kept pace with inflation, leaving many women disproportionately affected by the cost-of-living crisis.
31. Social Protection Reform: Increases to social protection rates in recent years have not kept pace with the rising cost of living. Women are disproportionately impacted by inadequate rates and continue to bear the brunt of the cost-of-living crisis, with inflation rising by more than 20% since 2023.¹⁷ Despite some progress on individual payments in recent budgets, the Government has prioritised tax cuts over benchmarking and indexing social protection and pension rates. Ireland's social protection system continues to treat many women as dependents through the Qualified Adult system and household means testing. This limits financial autonomy and access to employment supports. Reform toward an individualised system remains necessary.

Recommendations:

- Take concrete action to close the gender pay and pension gaps, including strengthening collective bargaining coverage.
- Establish the Minimum Essential Standard of Living as the benchmark for social protection payments, and index rates, thresholds, disregards and secondary benefits.
- Adopt a fully individualised social protection system to ensure women are treated as individuals, not dependents.
- Integrate a gender lens across all anti-poverty measures with targeted supports for lone parents and marginalised women.

¹⁶ Central Statistics Office. (2025, March 11). [https://www.cso.ie/en/releasesandpublications/ep/p-silced/surveyonincomeandlivingconditionssilcenforceddeprivation2024/Survey on Income](https://www.cso.ie/en/releasesandpublications/ep/p-silced/surveyonincomeandlivingconditionssilcenforceddeprivation2024/Survey%20on%20Income)

¹⁷ Central Statistics Office. (2020–2025). Consumer Price Index: January 2020 to April 2025

G. Housing, Accommodation & Homelessness

32. [Gendered Impacts of the Housing Crisis](#): Ireland’s housing crisis disproportionately affects women, with high levels of female homelessness and significant “hidden homelessness”, including women in refuges and Traveller and Roma families in insecure accommodation. Many women face barriers to secure housing and higher rates of overcrowding and homelessness. A severe national housing shortage continues to undermine women’s access to safe, affordable housing.
33. [Violence Against Women, Refuge and Long-Term Housing](#): Domestic violence remains a leading cause of homelessness for women and children. Refuge capacity remains insufficient to meet demand and unevenly distributed, with gaps in rural areas and several counties lacking provision. Current commitments fall short of the Council of Europe standards. The absence of sustainable, long-term accommodation options limits victims’ ability to leave abusive situations safely.
34. [Exploitation in the Rental Sector](#): Housing insecurity has increased women’s vulnerability to exploitation, including “sex-for-rent” exploitative arrangements. International students, women experiencing poverty, insecure immigration status, disability or domestic violence are particularly at risk. Stronger legal rental protections and enforcement are required, particularly for those in informal or licensee arrangements with limited legal protections

Recommendations:

- Recognise the mutually reinforcing relationship between Ireland’s housing and violence against women crises in legislation and policy responses, including long term pathways for victims-survivors.
- Create a specific named offence for the demanding or offering accommodation in exchange for sex.
- Ensure effective enforcement of social media and online platforms to account for content published on their services through content moderation, clear reporting mechanisms, and swift removal of exploitative advertisements.
- Adopt gender-responsive housing and homelessness policies with targeted supports for women and marginalised groups.
- Expand refuge capacity and ensure national coverage in line with international standards.
- Strengthen legal protections for all renters, including those living in informal arrangements such as “rent a room” accommodation, who are often excluded from existing tenancy safeguards.

H. Women's Participation

35. [Politics](#): Women remain underrepresented in political and public life. While national gender quotas have improved representation, local quotas and targeted supports are needed to ensure diverse participation, including for Traveller, Roma, migrant and disabled women. Barriers such as childcare, financial costs and harassment continue to limit engagement.
36. [Women's Organisations and Civic Participation](#): Play a critical role in addressing inequality and supporting participation but remain underfunded. Sustained investment in the women's and community sector is necessary to support inclusion, political engagement and gender equality.
37. [Cross-Border Collaboration](#): Women remain underrepresented in peacebuilding and decision-making processes. Strengthened all-island collaboration offers opportunities to advance women's rights and address shared challenges.

Recommendations:

- Introduce legislative gender quotas for local elections and targeted supports for under-represented women.
- Increase representation of women on corporate boards through legislative measures and enforcement.
- Increase funding for women's organisations and participation initiatives.

I. Feminist Climate Justice

38. [Gender and Climate Policy](#): Ireland's current climate policy framework does not adequately address the gendered or intersectional impacts of climate change. Without gender-sensitive measures across housing, energy and transport, women will continue to be disproportionately affected.
39. [Energy Poverty](#): This affects a significant proportion of households, with lone parents, older women, disabled people and Travellers most at risk. High retrofitting costs and long waiting times limit access to supports. Policy shifts away from targeted energy poverty measures risk weakening protections for those most affected. Continued reliance on imported oil and gas leaves households vulnerable to price shocks arising from international conflicts and geopolitical instability, including the ongoing war in Iran, which has contributed to volatility in global energy markets and heightened risks for already vulnerable households.
40. [Transport](#): Public transport policy lacks a gender-sensitive approach despite domestic research highlighting the shortcomings of the current approach. Women and marginalised groups – particularly disabled women – face barriers related to cost, accessibility, safety and rural availability, leading many to avoid public transport, particularly at night. Greater investment in

safe, affordable and accessible public transport is needed to support both climate goals and gender equality.

Recommendations:

- Gender-proof all climate policy and ensure the just transition addresses gender and poverty impacts.
- Build research capacity to analyse the gendered impacts of energy poverty and increase investment in retrofitting schemes, prioritising affected groups such as lone parents, older women, disabled women, and Travellers.
- Prioritise and increase investment in public and active travel infrastructure, especially in rural areas, ensuring transport is safe, accessible, and affordable for all women, including carers and disabled women.
- Increase investment in energy poverty supports and retrofitting for vulnerable households.