



Transgender
Equality
Network
Ireland



Belong To LGBTQ+
Youth Ireland



LGBT
IRELAND

ADVANCING HUMAN RIGHTS

Coalition of LGBTQI+
organisations'
submission to the 4th
Universal Periodic
Review for Ireland

2026





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Context note

The Universal Periodic Review (UPR) is a process of the Human Rights Council of the United Nations (UN) where a UN Member State undergoes a peer-review of its human rights record. Each Member State undergoes UPR every 4.5 years. The Member State reports on how they have improved the human rights situation in the State, and other UN Member States provide recommendations for further improvement.

The process is informed by stakeholder engagement, including submissions by civil society organisations (CSOs). Submissions by CSOs may be made individually or by coalitions. There is a particular word-count and format that submissions must follow.

This document is the submission made by a coalition of LGBTQI+ organisations to the UPR process for Ireland.

Ireland has been reviewed three times before: in 2021, 2016 and 2011. This submission makes reference to previous recommendations from the 2021 Review. Ireland's fourth UPR will take place in November 2026.

Further information about the UPR is available at the following links:

- Basic facts about the UPR: <https://www.ohchr.org/en/hr-bodies/upr/basic-facts>
- Ireland's UPR documentation: <https://www.ohchr.org/en/hr-bodies/upr/ie-index>
- Timeline for engagement in the current cycle and information on previous reviews: <https://upr-info.org/en/review/ireland>



A joint submission by Transgender Equality Network Ireland (TENI), LGBT Ireland, and Belong To – LGBTQ+ Youth Ireland, for the 53rd session of the Universal Periodic Review Working Group, supported and endorsed by 20 other partner LGBTQI+ organisations.

Coalition members

Submitting organisation and co-leads

Transgender Equality Network Ireland (TENI) [*Submitting organisation*]

TENI is a national organisation committed to advancing equality and inclusion, and improving the lives of trans people and their families in Ireland. Since 2006, TENI has been working across Ireland to support trans people and their families, providing education and training, advocating for legal and policy change and building a fairer, safer and more inclusive Ireland for all. www.teni.ie

LGBT Ireland

LGBT Ireland is the national charitable organisation for LGBTQI+ people and their families. We are working to improve the visibility, rights and inclusion of LGBTQI+ people and to make Ireland the best place in Europe to be an LGBTQI+ person. www.lgbt.ie

Belong To – LGBTQ+ Youth Ireland

Belong To is a national organisation supporting lesbian, gay, bisexual, transgender, and queer (LGBTQ+) young people. 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. www.belongto.org

Endorsing organisations

AMACH! LGBT+ Galway, Dublin LGBTQ+ Pride, Equality for Children, Gay Health Network, Gay Project, GOSHH Ireland, Intersex Ireland, Irish Gay Dads, LGBT Restorative Justice Campaign, LINQ Ireland, Mammies for Trans Rights, Midlands LGBT+ Project, National LGBTQ+ Federation (NXF), Outcomers, Outhouse LGBTQ+ Centre, OutWest, Professional Association for Trans Health Ireland, ShoutOut, Trans Healthcare Action, Transgress the NGS.

Further details on the endorsing organisations are included at the end of this document.



A | Introduction

This submission spotlights key human rights issues faced by LGBTQI+ people in Ireland to inform the 4th UPR review. To do so, we follow up on recommendations from Ireland's previous cycles and raise new issues either arising since 2021 or not included in previous recommendations.

Transgender Equality Network Ireland (TENI), LGBT Ireland and Belong To prepared this submission with feedback and support of other LGBTQI+ organisations operating in Ireland. It is endorsed by 20 organisations. The submission provides first-hand information grounded in original research and analysis of the organisations involved.

In 2021, Ireland received 260 recommendations, supported 221, partially supported 6 and noted 33¹. Out of 6 LGBTQI+-specific recommendations, the State supported 4 and noted 2². Across all cycles, Ireland supported 8 LGBTQI+-specific recommendations and noted 3³.

Ireland's commitment to be a strong voice for LGBTQI+ rights internationally⁴ is positive and timely, as we observe attacks and regressions on LGBTQI+ rights globally. We positively note the numerous UPR LGBTQI+-specific recommendations issued by Ireland to other countries⁵, while also noting gaps persisting in equivalent areas domestically.


We stress that Ireland is far from being immune to human rights backsliding and progress stagnation. LGBTQI+ people in the country are still prevented from living life at their full potential, free from discrimination and violence. We note with particular concern that intersex, transgender and non-binary people are systemically failed in terms of legal protections, recognition and access to healthcare.

We urge the State to reflect its international commitment and leadership domestically, and take action to protect and strengthen human rights for LGBTQI+ people in Irish laws and policies.

B | Policy framework

State of implementation of 2021 recommendations

In the 3rd UPR Cycle (2021), Ireland accepted two recommendations (**157.82 and 157.67**) to continue to remove structural barriers and challenges for LGBTQI+ people⁶. The State provided updates in its mid-term report⁷, focusing mainly on the state of national strategies. While some progress was made to implement the recommendations from that end, significant gaps persist as outlined throughout this submission. LGBTQI+ people continue to face systemic



barriers and challenges, including in accessing healthcare, legal gender recognition, equal protections, and equal opportunities in their daily lives.

Programme for Government⁸

Out of the six LGBTQI-specific commitments included in the 2020 Programme for Government⁹ (PfG) only one was fully delivered (on adoptive leave and benefit for male same-sex couples)¹⁰ and one was partially delivered (on the implementation of national strategies)¹¹. While some progress was made, four commitments were not delivered (on the introduction of a legislative ban on conversion practices, actions to improve trans healthcare, the inclusion of gender identity under the gender ground in equality legislation, and the introduction of a disregard scheme for historical offences)¹². The 2025 PfG¹³ contains seven LGBTQI+-specific commitments (on the implementation of the National LGBTI+ Inclusion Strategy, investment in and access to health services, trans healthcare, legislation to ban conversion practices, legislation to disregard specific historical offences related to the criminalisation of homosexuality, actively advocate for the rights of LGBTQI+ domestically and internationally, and engage in discussions in international forums - including the UN - to uphold the universal nature of human rights and their application to LGBTQI+ individuals)¹⁴. Several undelivered commitments from the PfG 2020 are either missing or re-listed, sometimes in a watered-down form¹⁵.

National strategies

The *National LGBTIQ+ Inclusion Strategy II 2024-2028* (NLIS II) was published in 2025 - delayed, kicking off a year after its declared timeline - alongside its associated *Action Plan 2025-2026*¹⁶. It builds on two previous strategies: the *National LGBTI+ Inclusion Strategy 2019-2021* (NLIS I) and the *LGBTI+ National Youth Strategy 2018-2020* (LNYS I)¹⁷. The State's final report on the *LNYS I* noted just 27% of actions as complete and 25.5% as "completed and ongoing"¹⁸. The State-commissioned report on the review of the *NLIS I* found that of the 108 actions included in the Strategy, 58 (54%) had been fully achieved, 31 (29%) partially achieved, and 19 (17%) were not achieved¹⁹. A civil society shadow report on the implementation of the same strategy gave an overall score of C+, identifying entire areas with minimal to no implementation (gender-affirming healthcare, intersex data collection)²⁰. These findings point to a pattern of partial implementation and limited accountability, highlighting the need for effective enforcement and monitoring mechanisms.

"Policy rich, action poor" trap

Undelivered commitments speak to and fit within a longstanding Irish problem with "policy-rich, action-poor" frameworks that look good on paper but often do not result in change²¹.



Data collection

Several new questions will be included in Census 2027, including on gender and sexual orientation²². However, there are no known plans in place to include a question on variations of sex characteristics, leaving intersex people largely invisible in national data systems. The first iteration of the *National Equality Data Strategy* was recently published²³.

Sustainable community services

LGBTQI+ organisations in Ireland provide frontline services - mental health, youth work, advocacy, peer support - that are not otherwise delivered by the State²⁴. While funding is provided across a range of Government Departments, Agencies, and programmes, including through the dedicated LGBTQI+ Community Services Fund, it remains largely short-term and project-based. In 2025, €1.7 million was allocated across 43 projects under the Fund²⁵.

While this dedicated funding is welcome, it does not provide the core, multiannual support needed for organisations to plan sustainably, retain staff, and meet growing demand. As a result, many organisations continue to operate in a fragile funding environment, despite increasing need and a challenging international context for LGBTQI+ rights²⁶. The *NLIS II Action Plan 2025-2026* includes commitments under Pillar 3 (Participation and Inclusion) but these have yet to translate into structural reform of funding models.

Recommendations

- Ensure full delivery of the Programme for Government LGBTQI+ commitments.
- Ensure full and effective implementation, adequate budgeting, ongoing monitoring and evaluation of the NLIS II in close collaboration with the community and community organisations.
- Ensure systemic, meaningful and effective consultation and engagement with LGBTQI+ communities and organisations to inform all strategies, policies, programmes, legislation and research with the potential to impact their lives.
- Ensure all LGBTQI+ people are included, and their identities recognised, in the forthcoming Census, in the collection of equality data and in key datasets used to inform policymaking and service delivery, embedding accuracy considerations for disaggregation and privacy safeguards.
- Ensure dedicated, predictable, sufficient, and sustainable multiannual core funding for LGBTQI+ organisations, including adequate, inflation-adjusted increases year-on-year. Commit to adequate investment in accessible, safe, and inclusive LGBTQI+ community spaces nationwide, ensuring equitable geographic distribution, and sustainable infrastructure development.



C | Legal gender recognition

The *Gender Recognition Act (GRA) 2015*²⁷ historically enshrined the right to legal self-determination for trans men and women in Irish law. Ten years on, non-binary people, trans and gender-diverse youth aged under 16, and Irish citizens in Northern Ireland (NI) are still not covered by this legislation, and therefore cannot access the gender recognition process. Intersex people are also affected by existing gaps. A pathway for 16- and 17-year-olds exists but it is overly complicated – since 2015, only 28 applications for a Gender Recognition Certificate have been made by 16- and 17-year-olds (24 granted)²⁸.

In 2018 the GRA was reviewed and several recommendations were made to improve the operation of the Act²⁹. In 2019 the Minister for Employment Affairs and Social Protection published a response to the report, setting out proposals for change³⁰. No substantial progress has been made to implement it. A recent landmark case from the Court of Justice of the European Union (*C-43/24 Shipova*) demands Member States to have a functioning process for legal gender recognition to guarantee freedom of movement³¹.

Recommendation


- Enact the recommendations from the 2018 Review of the GRA - including by means of amending legislation - to provide legal gender recognition to non-binary people, intersex people, trans and gender diverse youth and Irish citizens in Northern Ireland

D | Equality and non-discrimination

Equality legislation

In UPR 3rd cycle (2021), Ireland supported a recommendation (157.80) to expand protections against discrimination directed towards persons based on their gender identity, expression, sexual characteristics or sexual orientation³². Ireland also supported a recommendation (135.119) in this area in UPR 2nd cycle (2016)³³.

In its mid-term report, the State provided updates on the overall state of the review of anti-discrimination legislation, without providing specific details on how it planned to address protections for LGBTQI+ people³⁴. No changes in the law were made since UPR 3rd cycle (2021).



In the meantime, concerns on the absence of comprehensive anti-discrimination legislation were raised by human rights bodies³⁵. The State failed to deliver the 2020 PfG commitment to “*amend the gender ground in equality legislation, to ensure that someone discriminated against on the basis of their gender identity is able to avail of this legislation*”³⁶. The 2020 commitment was entirely omitted from the 2025 PfG. The General Scheme of the *Equality (Miscellaneous Provisions) Bill 2024*³⁷ was published in January 2025, following the State’s review of Ireland’s equality legislation (the *Equal Status Acts 2000-2018* and the *Employment Equality Acts 1998-2015*)³⁸.

The draft Bill does not address the existing lack of explicit protection against discrimination for trans, non-binary and intersex people, resulting in uncertainty and gaps in protections³⁹, despite the State’s own data showing that these groups continue to experience high levels of discrimination in Ireland⁴⁰.

Disregard scheme for historic convictions for same-sex activity

The Government recently approved plans to introduce a disregard scheme for men convicted of historic homosexual offences prior to the decriminalisation of homosexuality in Ireland in 1993⁴¹. Such laws are now widely recognised as a historical injustice. Plans to bring this forward were first announced almost a decade ago⁴² and included in the 2020 PfG, without delivering on the commitment. Following public consultation⁴³, in 2023 a multi-stakeholders Working Group (WG) issued 95 recommendations to shape the scheme⁴⁴. As draft legislation has yet to be published, it is unclear to which extent this aligns to the WG recommendations.

LGBTQI+ International Protection Applicants

LGBTQI+ people seeking international protection in Ireland face distinct risks within the protection system. A State-commissioned report identified significant challenges in International Protection Accommodation Services (IPAS), including harassment and violence, homophobia and transphobia, isolation, limited access to appropriate supports, and negative impacts on mental health and wellbeing⁴⁵.

Concerns have also been raised regarding the proposed International Protection Bill 2026⁴⁶. LGBTQI+ applicants may face particular risks, including barriers to safe disclosure of sexual orientation or gender identity, challenges in accessing timely legal and psychosocial supports, and difficulties in having vulnerability appropriately identified. The proposed use of accelerated and border procedures may exacerbate these risks, particularly where disclosure occurs later in the process. Additionally, the Bill’s provisions on “safe country” concepts fail to adequately account for risks of persecution for LGBTQI+ people in these countries.



Recommendations

- Take measures to ensure transgender, non-binary, and intersex people are fully protected under all equality legislation.
- Introduce and enact the Disregard Scheme with no further delays, building on the outcome of the public consultation and on the Working Group's final report.
- Ensure safe, appropriate and accessible accommodation for LGBTQI+ applicants within the international protection system.
- Ensure that the implementation of international protection reforms includes robust safeguards for LGBTQI+ applicants, including on vulnerability identification, safe disclosure, and access to an effective remedy.

E | Economic challenges in the


LGBTQI+ community⁴⁷

Hardship within the community

Recent civil society led research shows many LGBTQI+ people in Ireland experience poverty, struggle financially, and face housing, employment, education and healthcare inequalities⁴⁸. Nearly half (46.1%) of respondents experienced enforced deprivation (went without two or more essentials because they could not afford them), about three times the national rate (15.7%)⁴⁹. Hardship is higher among trans and non-binary people, disabled and neurodivergent people, migrants and people from ethnic minorities, young people and people with long-term health conditions⁵⁰. Despite these indicators of systemic economic exclusion, LGBTQI+ people remain insufficiently reflected in mainstream anti-poverty strategies. While acknowledged in some policy as a group facing disadvantage, this has not translated into targeted measures or resourcing, contributing to continued invisibility in practice⁵¹.

Wider socio-economic challenges

The specific challenges faced by the LGBTQI+ community compound and are exacerbated by a wider long-standing severe housing crisis⁵², as well as record high rates of homelessness⁵³ and high cost of living⁵⁴. On top of this, LGBTQI+ people face additional challenges accessing emergency homeless accommodation⁵⁵. This is often compounded by intersectional or multiple



marginalisation. A recent study found almost 40% of LGBTQI+ Travellers and Roma experienced homelessness as a consequence of being LGBTQI+⁵⁶.

Recommendations

- Ensure LGBTQI+ people are included in national data systems, named in socioeconomic policy documents and invest in research on LGBTQI+ financial precarity and wellbeing.
- Address structural and institutional barriers that hinder LGBTQI+ people's access to and retention in employment, healthcare, housing and social protection, including through targeted and inclusive policy measures.

F | Health

Gender-affirming healthcare


Ireland has consistently performed extremely poorly on trans healthcare compared to other EU countries⁵⁷. For many trans people in Ireland, gender-affirming healthcare is inaccessible⁵⁸, with detrimental impacts on their mental health⁵⁹. Public services are extremely limited, with no services at all for under-17s⁶⁰. In December 2025, the National Gender Service (NGS), Ireland's only public gender clinic, attempted to close its waiting list to new patients⁶¹. With over 2,500 people waiting to access the service - and an 18-year estimated wait time⁶², which has doubled in just three years⁶³ - this speaks to a systemic failure to meet the needs of trans people and the realisation of their right to health.

The issues with the NGS go beyond a lack of resources, they are rooted in its model of care which is not aligned with international best practice (WHO and WPATH)⁶⁴. Patients report traumatic and overall negative experiences - including due to extremely invasive and inappropriate questions - and denial of care within the service, restrictions to alternative routes to care, and failure to meet the needs of the community, which has resulted in conflict, trauma and harm⁶⁵.

Recognising these failures, the Department of Health has established a new National Clinical Programme for Gender Healthcare to design a new model of care for trans people⁶⁶. Progress has so far been slow. While there is an existing commitment to the development of the new model of care, this commitment does not extend to resourcing or implementation.

Access to free HRT scheme

Ireland's free Hormone Replacement Therapy (HRT) Scheme⁶⁷, intended for menopausal women, inconsistently excludes transgender people⁶⁸, unlike equivalent schemes in other jurisdictions⁶⁹. Pharmacists have no clear guidance



and have described the implementation as unworkable, raising concerns on how they are supposed to determine eligibility under the scheme, refusing to question or examine people on whether they are trans⁷⁰. The current implementation creates a significant barrier which risks undermining the right to non-discrimination of trans people and the right to privacy of all those seeking access to the scheme.

Conversion practices


In UPR 3rd Cycle (2021), Ireland supported a recommendation **(157.79)** to enact legislation to prohibit “conversion therapies”⁷¹. The State committed to introduce a legislative ban on conversion practices in both the 2020 and 2025 PfG. To date the commitment remains undelivered and the UPR recommendation only remains partially implemented. In the meantime, human rights bodies have expressed concerns over these practices and advanced recommendations to Ireland⁷². The Parliamentary Assembly of the Council of Europe (PACE) recently adopted a resolution calling on member states to adopt legislation to prohibit conversion practices, which aim to change or suppress individuals' sexual orientation or gender identity⁷³.

In 2023, a report commissioned by the government to inform the development of legislation indicated that conversion practices continue to take place in Ireland⁷⁴. According to a 2023 survey, 26% of respondents were subject to a practice aimed at “changing” their sexual orientation and/or gender identity⁷⁵. The *Prohibition of Conversion Practices Bill* has been scheduled for drafting or priority drafting in Government Legislation Programmes since 2022⁷⁶, but to date no legislation has been published and such practices are still not prohibited.

It is key that upcoming legislation prohibiting conversion practices ensures protection for the entire LGBTQI+ community. This means prohibiting not only practices that try to change someone’s sexual orientation, but also their gender or sex characteristics. A ban on conversion practices that does not cover all members of the LGBTQI+ community will be ultimately ineffective and potentially harmful.

Intersex bodily integrity, autonomy and healthcare

In UPR 3rd cycle (2021), Ireland noted two recommendations **(157.167 and 157.161)** on intersex healthcare, bodily integrity and bodily autonomy⁷⁷. Consequently, no updates were provided in the State’s mid-term report. In 2025, Ireland scored 0% on intersex bodily integrity in the ILGA-Europe Rainbow Map⁷⁸. Human rights bodies have recognised medically unnecessary interventions on intersex children as violations of bodily integrity, autonomy, and the right to be free from ill-treatment⁷⁹. Specifically to Ireland, human rights bodies have expressed concerns over the performance of irreversible, invasive and medically unnecessary interventions on intersex children without their informed consent and issued recommendations on the matter⁸⁰, including prohibiting such practices by law⁸¹. Access to appropriate healthcare remains a



significant challenge for intersex people in Ireland⁸². Limited awareness and training among healthcare and mental health professionals can contribute to pathologising or inappropriate care for people with variations in sex characteristics.

A shadow report on the implementation of the *NLIS I* gave Ireland the lowest possible grade (F) for its only intersex-specific action, due to the State's failure to implement the corresponding commitment⁸³.


The *NLIS II* includes an action to address the healthcare needs of people with variations in sex characteristics, including developing of national clinical guidelines for paediatric care⁸⁴. However, the timeline has been delayed from Q2 2026 to Q2 2027⁸⁵. While welcome, clinical guidance cannot substitute for legislative protection of intersex bodily integrity.

Mental health

LGBTQI+ people in Ireland experience significantly poorer mental health outcomes than the general population⁸⁶. Mental health and wellbeing have declined amongst the LGBTQI+ population since 2016, with significant challenges experienced by younger age groups and transgender and gender non-conforming communities⁸⁷. Members of the LGBTQI+ community facing multiple marginalisation face particularly high rates of mental health issues, which are often compounded by the multiple and overlapping forms of discrimination they experience⁸⁸. Access to free, specialist, LGBTQI+-affirmative mental health support is critically inadequate: there is currently one part-time counsellor available through the public health system specifically for LGBTQI+ people⁸⁹. The *NLIS II Action Plan 2025-2026* commits to ensuring mental health services are responsive to LGBTQI+ needs in line with *Sharing the Vision* and *Connecting for Life*⁹⁰. Implementation is not yet evident.

Recommendations

- Develop, implement and resource 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.
- Review the Model of Care periodically every four years, in collaboration with the transgender community and LGBTQI+ groups.
- Explicitly include trans people in the scope of the free HRT scheme.
- Introduce and enact legislation to ban conversion practices, ensuring protection for the entire LGBTQI+ community.
- Enact comprehensive legislation recognising the right of intersex persons to bodily integrity and prohibiting medically unnecessary "sex-normalising" surgeries and other non-therapeutic interventions on children until they can provide free and informed consent.

- 
- Develop and implement evidence-based healthcare protocols for intersex people, aligned with international human rights standards, in consultation with the intersex community.
 - Fund and establish a national network of free, LGBTQI+-affirmative counselling services embedded in primary care and community settings by 2028.
 - Require all publicly-funded mental health training to include LGBTQI+-affirming, trauma-informed practice.
 - Ensure effective responses to the mental health issues impacting LGBTQI+ community members experiencing multiple and intersectional marginalisation, including Travellers and Roma, asylum seekers, refugees, and other ethnic minorities, and disabled people.

G | Family rights

Ireland's current legal framework leaves many children in LGBTQI+ families without a legally recognised relationship with both their parents. In July 2024, the *Health (Assisted Human Reproduction) Act 2024* (the 2024 Act) was signed into law⁹¹. This legislation provides a long-awaited framework to regulate Assisted Human Reproduction (AHR) and establishes a new regulatory body⁹². However, the Act has not yet been fully commenced⁹³ and significant legal gaps remain for many families.

This situation risks undermining children's rights under the UN Convention on the Rights of the Child, including the right to preserve their identity and legal recognition of family relationships, and to have their best interests treated as a primary consideration⁹⁴.

It is hoped proposed amending legislation, the *Health (Assisted Human Reproduction) (Amendment) Bill*, will address continuing legal gaps for LGBTQI+ families, including to create a framework to recognise foreign parentage, and include parental rights where the child is conceived or born abroad through AHR.

To date, no general scheme or draft has been published, but a policy document⁹⁵ was made available for Pre-Legislative Scrutiny, which was conducted by the Joint Oireachtas Committee on Health in the absence of a draft Bill. The Committee's report contained 18 recommendations to make Ireland's AHR framework more inclusive of diverse family structures, including LGBTQI+ families⁹⁶.



Recommendations

- Amend and commence the Health (Assisted Human Reproduction) Act 2024, through the Health (Assisted Human Reproduction) (Amendment) Bill, to ensure legal recognition for all children of LGBTQI+ parents.
- Ensure the updated legal framework places the best interests of the child as the paramount consideration in all decisions, whether by the Assisted Human Reproduction Regulatory Authority or the Courts, provides for judicial discretion in court processes, recognises parentage for children born or conceived outside Ireland or conceived outside of a clinic, and removes criminal offences applicable to surrogates and intending parents.
- Engage meaningfully with LGBTQI+ families and affected stakeholders in developing and implementing legislative reforms.

H | Hate crime and hate speech

Legislative framework on hate crime

The Criminal Justice (Hate Offences) Act 2024, which came into force in December 2024, provides for standalone aggravated offences where hatred is proven as a motivating factor or where hatred is demonstrated, and enhanced sentences for existing offences⁹⁷. Sexual orientation, sex characteristics and gender (inclusive of gender identity and expression, and explicitly inclusive of transgender people and people with a gender other than male and female) are positively included as protected characteristics.

Legislative framework on criminal hate speech

During the legislative process, the State removed hate speech sections of the then *Criminal Justice (Incitement to Violence or Hatred and Hate Offences) Bill 2022*⁹⁸. The existing legal framework, the *Prohibition of Incitement to Hatred Act 1989*⁹⁹, does not include gender (inclusive of gender identity and gender expression) and sex characteristics as protected characteristics. The Act has been criticised - including by international, regional and national human rights bodies¹⁰⁰ - for its limited application, and ineffectiveness in responding to extreme hate speech requiring a criminal response, particularly online hate speech. The State has indicated that no further legislative interventions are planned¹⁰¹, which suggests it is renegeing on its 2025 PfG commitment to amend existing legislation¹⁰², and despite an ongoing infringement procedure at the EU level¹⁰³.



Wider measures

Action plans against hate crime and hate speech have been recognised as good practices by the European Union Fundamental Rights Agency¹⁰⁴ and the Council of Europe¹⁰⁵. Despite this and increased levels of hate targeting minoritised communities¹⁰⁶, to date there is no known plan to adopt a more comprehensive approach to tackle hate crime and hate speech that goes beyond criminal law.

Recommendations

- Ensure that the Criminal Justice (Hate Offences) Act 2024 is fully implemented and kept under review, and supported by targeted education and awareness, institutional accountability, transparent reporting, victim-centred supports, and an ongoing partnership between Government, statutory bodies, and civil society.
- Review and update the Prohibition of Incitement to Hatred Act 1989, including the protected characteristics to bring them at least in line with the Criminal Justice (Hate Offences) Act 2024, ensuring changes are in line with human rights law and standards, and that a criminal law response is used as a measure of last resort.
- Develop and implement a comprehensive Action Plan Against Hate, in partnership with affected communities. This should go beyond criminal law to address the root causes of hate, be grounded in human rights, be developed and delivered with a whole-of-Government, whole-of-society approach and include measures to address online hate.

I | Inclusive education

Existing challenges

LGBTQI+ young people in Ireland continue to experience significant identity-based harms in educational settings. Data from the 2022 Irish *School Climate Survey* show that 76% of LGBTQI+ students feel unsafe at school, 69% hear homophobic remarks from peers, and 58% hear such remarks from staff¹⁰⁷. Despite growing awareness of inclusion at policy level, there remains a persistent gap between high-level commitments and the practical tools teachers need to embed inclusion in everyday practice¹⁰⁸. A particular gap exists at primary level. While a guidance document, *Being LGBT in School* (2016), supports post-primary contexts to some extent, no equivalent guidance exists for primary schools - despite evidence that identity realisation often occurs in late primary years, with age 12 the most common realisation point, and mental health risks escalating shortly thereafter¹⁰⁹.



Policy framework and outstanding needs

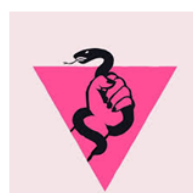
The updated *Bí Cineálta* anti-bullying procedures and the Department of Education's Wellbeing Framework represent positive steps, recognising belonging, identity and safety as core to learning. The *NLIS II Action Plan 2025-2026* includes commitments to fund the annual Stand-Up Awareness Campaign in post-primary schools and to review and update the *Being LGBT in School* resource. However, research shows that nine in ten primary teachers want LGBTQI+-inclusive classrooms but report uncertainty about age-appropriate language, classroom resources, and supporting LGBTQI+-parented families - indicating that goodwill exists but practical support is lacking¹¹⁰.

Recommendations

- Develop national primary-level guidance on LGBTQI+ inclusion that is age-appropriate, classroom-focused, and aligned with existing frameworks including *Bí Cineálta*, SPHE and the Wellbeing Framework.
- Ensure the forthcoming updated post-primary *Being LGBT in School* guidelines include specific, actionable protocols for supporting LGBTQI+ students, including guidance on name/pronoun usage and access to facilities, to be implemented across all schools regardless of patron ethos.
- Adequately resource the forthcoming updated post-primary *Being LGBT in School* guidelines with adequate training and implementation support.
- Establish a national professional learning pathway for both primary and post-primary staff, with funded time to ensure engagement.
- Embed LGBTQI+ inclusion within existing school systems - Social, Personal and Health Education (SPHE), wellbeing processes and School Self-Evaluation - rather than treating it as an additional burden.

Coalition members

This submission was coordinated and co-written by TENI, LGBT Ireland and Belong To. It is endorsed by 20 organisations. Details of all the 23 organisations are provided below.





Transgender Equality Network Ireland (TENI)

TENI is a national organisation committed to advancing equality and inclusion, and improving the lives of trans people and their families in Ireland. Since 2006, TENI has been working across Ireland to support trans people and their families, providing education and training, advocating for legal and policy change and building a fairer, safer and more inclusive Ireland for all. www.teni.ie

LGBT Ireland

LGBT Ireland is the national charitable organisation for LGBTQI+ people and their families. We are working to improve the visibility, rights and inclusion of LGBTQI+ people and to make Ireland the best place in Europe to be an LGBTQI+ person. www.lgbt.ie

Belong To – LGBTQ+ Youth Ireland

Belong To is a national organisation supporting lesbian, gay, bisexual, transgender, and queer (LGBTQ+) young people. 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. www.belongto.org

AMACH! LGBT+ Galway

AMACH! LGBT+ Galway is a community development project that seeks social change to achieve equality, social justice and human rights for the LGBTQI+ community, using the principles of participation, empowerment and collective decision making. <http://www.amachlgbt.com/>

Dublin LGBTQ+ Pride

Dublin LGBTQ+ Pride is a community-led organisation that celebrates, supports, and advocates for LGBTQ+ people across Ireland through year-round events, education, campaigning, and the annual Pride Festival and Parade.

<https://dublinpride.ie/>

Equality for Children

Equality for Children is a not-for-profit, volunteer-led organisation that campaigns for equality for children of LGBTQI+ families in Ireland. We work to influence positive inclusive change to the rights of children born to LGBTQ+ parents while also raising societal awareness of the issue.

<http://www.equalityforchildren.ie/>

Gay Health Network (GHN)

GHN comprises a network of organisations across the island of Ireland providing resources and expertise in relation to the support, prevention and awareness of HIV and STIs, information on sexual health, mental health and wellbeing for gay and bisexual men, men who have sex with men (gbMSM) and trans people (our communities). We do this by working closely with our state, community and network partners, creating content and resources, undertaking research, telling stories and promoting positive sexual health and wellbeing ethos.

www.gayhealthnetwork.ie



Gay Project

Gay Project's mission is to enable full participation of the LGBTI+ community in Cork and beyond in Ireland's social, economic, cultural, political, educational, artistic, and sporting life through its community centre and programmes.

<http://www.gayproject.ie/>

GOSHH Ireland

GOSHH – Gender, Orientation, Sexual Health and HIV is a dedicated sexual health and LGBTQI+ charity offering a range of sexual health and LGBT services. Our mission is to enable people in the Midwest to live authentic and healthy lives by providing a range of sexual health and LGBTI+ support services.

<http://www.goshh.ie/>

Intersex Ireland

Intersex Ireland is an organisation led by intersex people, working to advocate for the human rights, dignity, and equality of people with variations in sex characteristics, and to raise awareness through education, storytelling, and community support. <https://intersexireland.org/>

Irish Gay Dads

Irish Gay Dads is a community supporting gay men and other LGBTQ+ people who are fathers or dads-to-be in Ireland, offering a space to connect, share experiences, and navigate pathways to parenthood. The organisation also advocates for equality and recognition of diverse family structures.

<http://www.irishgaydads.ie>

LGBT Restorative Justice Campaign

The LGBT Restorative Justice Campaign is an LGBT+ community group that seeks redress for those directly affected by the laws which criminalised gay and bisexual men, and that campaigns for a restorative justice approach to understanding the lives and histories of LGBT+ people and communities directly and indirectly impacted by those laws. www.lgbtdisregard.ie

LINQ Ireland

LINQ Ireland is a national organisation working with LBQ women (Trans and non-binary inclusive). With close to 30 years experience, our aim is to improve the quality of life, health and well-being of our community and to do this with the principles of feminism, social justice and community development at the centre of our work. <http://www.linqireland.ie/>

Mammies for Trans Rights

Mammies for Trans Rights is a volunteer led, grassroots group of mammies (mothers) of trans kids advocating for their children and everyone in the LGBTQI+ community.

Midlands LGBT+ Project

Midlands LGBT+ Project is a support and advocacy service for LGBT+ adults in the Midlands and Kildare. They provide social and support groups along with



community events in Laois, Offaly, Kildare and Westmeath.

<http://www.midlandslgbtproject.com/>

National LGBTQ+ Federation (NXF)

The NXF seeks to bring about positive change for LGBTQ+ people through social, legislative, and educational awareness. We publish GCN - Ireland's monthly LGBTQ+ publication - and run the GALAS LGBTQ+ Awards. <https://nxf.ie/>

Outcomers

Outcomers are a regional LGBTI+ community support group, our community centre is situated in the town of Dundalk with a remit to support LGBTI+ people in the Northeast of Ireland. We provide peer support groups in Louth, Meath, Cavan, Monaghan, and Balbriggan we offer a range of supports including LGBT awareness training, one to one support, we host social event advocate for and on behalf of the LGBTI+ community. www.Outcomers.org

Outhouse LGBTQ+ Centre

Outhouse LGBTQ+ Centre is Dublin's LGBTQ+ community support and advocacy organisation, providing a safe, welcoming space where people can connect, access services, and build community. Through frontline support, cultural programmes, and policy engagement, we work to improve quality of life and advance equality, with a strong focus on those most at risk of exclusion, poverty, and harm. www.outhouse.ie

OutWest

Support group in Connacht providing services including a drop in centre for the LGBTQIA Community friends family and allies. <https://outwest.ie/>

Professional Association for Trans Health Ireland

The Professional Association for Trans Health Ireland (PATHI) is an all-island multidisciplinary organisation representing, supporting, and connecting those working to strengthen the health, rights, and wellbeing of all trans and gender diverse people across Ireland. <https://pathi.ie>

ShoutOut

ShoutOut is a registered charity working since 2012 to deliver inclusion for LGBTQI+ people in schools, workplaces, and communities. We do this through educational programmes, resources, guidance and advocacy designed to spark empathy and empower our community to build an Ireland where every LGBTQI+ person can fully and proudly be themselves. <https://www.shoutout.ie/>

Trans Healthcare Action

Trans Healthcare Action is a grassroots group of trans and gender diverse people working together to ensure that every person in Ireland can access the healthcare and resources they need to express their gender identity. <https://www.transhealthcare.ie/>

Transgress the NGS

Transgress the NGS is a volunteer led, grassroots direct action and advocacy group, fighting for self-determined transgender healthcare in Ireland.

Endnotes

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- ² UPR Info database, last accessed 23 March 2026. Available at: <https://upr-info-database.uwazi.io/en/>.
- ³ Ibid.
- ⁴ Including in the 2025 Programme for Government: *"This Government will: actively advocate for the rights of LGBTIQ+ individuals both in Ireland and internationally. [...] Engage in discussions at key international forums, including the EU and the UN, to uphold the universal nature of human rights, ensuring that these rights apply equally to all individuals, regardless of gender identity, sexual orientation, or any other characteristic"*. Department of the Taoiseach, *Programme for Government 2025: Securing Ireland's Future*, 23 January 2025. Available at: <https://www.gov.ie/en/department-of-the-taoiseach/publications/programme-for-government-2025-securing-irelands-future/>. Most recently restarted in the Department of Foreign Affairs and Trade, Speech by Minister McEntee *"Consistent and Committed. Ireland's membership of the Human Rights Council"*, 18 February 2026. Available at: <https://www.gov.ie/en/department-of-foreign-affairs/speeches/speech-by-minister-mcentee-consistent-and-committed-irelands-membership-of-the-human-rights-council-iveagh-house/>.
- ⁵ UPR Info database, last accessed 23 March 2026. Available at: <https://upr-info-database.uwazi.io/en/>.
- ⁶ UPR Cycle 3, Rec 157.82 (Malta): *"Continue to take steps to remove any remaining structural barriers and challenges that preclude LGBTI+ people from achieving their full potential"*; UPR Cycle 3, Rec 157.67 (Democratic People's Republic of Korea): *"Develop a new comprehensive strategy and action plan to eliminate all kinds of discrimination on the basis of race, religion and gender identity, and ensure non-discriminatory treatment of all minority communities within its territory."*
- ⁷ Ireland, *Universal Periodic Review, Mid-Term Report to the UN Human Rights Council 2024*, p.6-8. Available at: <https://www.ohchr.org/en/hr-bodies/upr/upr-implementation>.
- ⁸ A Programme for Government lays out the upcoming Government's vision for the next five years.
- ⁹ Government of Ireland, *Programme for Government: Our Shared Future, 2020*, p. 77. Available at: <https://www.gov.ie/en/department-of-the-taoiseach/publications/programme-for-government-our-shared-future/>. Hereinafter: PFG 2020.
- ¹⁰ PFG 2020, the Family Leave and Miscellaneous Provisions Act 2021 actioned the commitment *"we will legislate to provide for adoptive leave and benefit for male same-sex adoptive couples."*, p.77.
- ¹¹ PFG 2020, *"We will implement the National LGBTI+ and the LGBTI+ Youth Strategy, to create a safe, supportive, and more inclusive Ireland."*, p.77.
- ¹² PFG 2020, *"We will Legislate to ban conversion therapy; Create and implement a general health policy for Trans people, based on a best-practice model for care, in line with the World Professional Association of Transgender Healthcare (WPATH) and deliver a framework for the development of National Gender Clinics and Multidisciplinary Teams for children and adults.; Amend the gender ground in equality legislation, to ensure that someone discriminated against on the basis of their gender identity is able to avail of this legislation; Introduce a scheme for the expunging of criminal records for gay men convicted of historical offences."*, p.77.
- ¹³ Department of the Taoiseach, *Programme for Government 2025: Securing Ireland's Future*, 23 January 2025. Available at: <https://www.gov.ie/en/department-of-the-taoiseach/publications/programme-for-government-2025-securing-irelands-future/>. Hereinafter: PFG 2025.
- ¹⁴ PFG 2025, *"This Government will: Implement the National LGBTI+ Inclusion Strategy which focuses on safety, health and well-being, participation and inclusion, equality and non-discrimination – including online. Continue to improve investment in and access to a range of health services for LGBTIQ+ people and provide for a more inclusive health and social care environment. Ensure a gender healthcare service that is based on clinical evidence, respect, inclusiveness and compassion. Advance legislation to ban conversion practices. Implement legislation to disregard specific historical offences related to the criminalisation of homosexuality. Actively advocate for the rights of LGBTIQ+ individuals both in Ireland and internationally. Engage in discussions at key international forums, including the EU and the UN, to uphold the universal nature of human rights, ensuring that these rights apply equally to all individuals, regardless of gender identity, sexual orientation, or any other characteristic."*, p. 98-99.
- ¹⁵ For example, unlike in 2020, the 2025 PFG commitment on gender-affirming healthcare no longer includes reference to international best practice.
- ¹⁶ Department of Children, Disability and Equality, *National LGBTIQ+ Inclusion Strategy II 2024-2028 and National LGBTIQ+ Inclusion Action Plan 2025-2026*, 12 June 2025. Available at <https://www.gov.ie/en/department-of-children-disability-and-equality/campaigns/national-lgbtqi-inclusion-strategy-ii-2024-2028/>.

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- ¹⁷ Department of Children, Disability and Equality, *National LGBTI+ Inclusion Strategy 2019-2021*. Available at: <https://www.gov.ie/en/department-of-children-disability-and-equality/publications/lgbti-inclusion-strategy-2019-2021/>; Department of Children, Disability and Equality, *LGBTI+ National Youth Strategy 2018-2020*. Available at: <https://www.gov.ie/en/department-of-children-disability-and-equality/publications/lgbti-national-youth-strategy-2018-2020/>.
- ¹⁸ Department of Children, Equality, Disability, Integration and Youth, *Final Report on the Implementation of the LGBTI+ National Youth Strategy 2018-2021*, 2024. Available at: <https://assets.gov.ie/static/documents/lgbti-national-youth-strategy-implementation-report-2018-2021.pdf>.
- ¹⁹ Mazars. (2024) 'Report on the Review of the National LGBTI+ Inclusion Strategy'. Available at: <https://assets.gov.ie/static/documents/report-on-the-review-of-the-national-lgbti-inclusion-strategy-may-2024.pdf>
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- ²¹ An evaluation of three national equality strategies found that one of the reasons why equality policies fail to realise their ambitious visions in Ireland is a failure to adequately address intersectionality in the development of public policy. See Kavanagh and others, "Realising the promise of national equality policy" "An evaluation of the processes of implementation of three national equality strategies", 2023, p. 149. Available at: <https://www.gov.ie/pdf/?file=https://assets.gov.ie/263523/64481c7e-eeb8-46a0-b09f-8c27e3864978.pdf#page=null>.
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- ³⁰ Department of Employment Affairs and Social Protection, *Gender Recognition Act 2015: Report to the Oireachtas under Section 7 of the Act, 26 November 2019*. Available at : [gender-recognition-act-2015-report-to-the-oireachtas-under-section-7-of-the-act.pdf](https://assets.gov.ie/static/documents/c496c86b/20251007_Annual_Report_Gender_Recognition_Act_2024_E_V.pdf).
- ³¹ Court of Justice of the European Union, Judgment, 12/03/2026, Shipova, C-43/24, ECLI:EU:C:2026:183. Available at: https://infocuria.curia.europa.eu/tabs/jurisprudence?sort=DOC_DATE-DESC&searchTerm=%22C-43%2F24%22&publishedId=C-43%2F24. See also TGEU, "Joint statement: Landmark CJEU ruling demands Member States to ensure legal gender recognition to guarantee freedom of movement", 12 March 2026. Available at: <https://tgeu.org/joint-statement-landmark-cjeu-ruling-demands-legal-gender-recognition/>.
- ³² UPR Cycle 3, Rec 157.80 (United States of America): "Expand protections against discrimination directed towards persons based on their gender identity, expression, sexual characteristics or sexual orientation."
- ³³ UPR Cycle 2, Rec 135.119 (Denmark): "Take further steps to address discrimination of lesbian, gay, bisexual, transgender and intersex persons in access to goods, employment and services, including healthcare".
- ³⁴ Ireland, Universal Periodic Review, Mid-Term Report to the UN Human Rights Council 2024, p.26. Available at: <https://www.ohchr.org/en/hr-bodies/upr/upr-implementation>.

³⁵ E.g. see Committee on Economic, Social and Cultural Rights, Concluding observations on the fourth periodic report of Ireland, 2024, E/C.12/IRL/CO/4, para 22. Available at tbiinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=E%2FC.12%2FIRL%2FCO%2F4&Lang=en/.

³⁶ PFG 2020, p.77.

³⁷ [General Scheme of the Equality \(Miscellaneous Provisions\) Bill 2024](#).

³⁸ Department of Children, Disability and Equality, *The Review of the Equality Acts*, 6 February 2025. Available at: <https://www.gov.ie/en/department-of-children-disability-and-equality/publications/the-review-of-the-equality-acts/>.

³⁹ See e.g. the Irish Human Rights and Equality Commission (IHREC) - Ireland's NHRI - analysis in IHREC, Submission on the Review of the Equality Acts, July 2023, p 57 - 61. Available at: https://www.ihrec.ie/downloads/Submission-on-the-Review-of-the-Equality-Acts_2025-05-12-074328_kakv.pdf. In particular: "The failure to explicitly reference gender identity, gender expression, and sex characteristics in the Equality Acts creates uncertainty, which could be used to enable an exclusionary interpretation of rights arising on this basis, and does not sufficiently protect all people from discrimination. Inclusion of explicit reference to gender identity, gender expression, and sex characteristics would fill the current gaps in protection, and improve visibility of the protections in place for these groups." p.59.

⁴⁰ Central Statistics Office (CSO) [Equality and Discrimination Survey 2024 found: "Nearly half \(46%\) of people who identified as transgender/non-binary \(their current gender does not correspond with the sex recorded at birth\) had experienced discrimination of some form in the previous two years, double the prevalence amongst those who were cisgender \(their current gender corresponds with sex recorded at birth\) \(23%\)." Available at: https://www.cso.ie/en/releasesandpublications/ep/p-ed/equalityanddiscrimination2024/](#); European Union Agency for Fundamental Rights (FRA), [LGBTIQ equality at a crossroads: Progress and challenges](#), May 2024: in 2023, 70% of intersex people experienced discrimination, while trans women (69%), trans men (67%), and non-binary and gender diverse people (60%) also experienced high levels of discrimination. Across the EU-27, Ireland had the highest proportion of intersex respondents who experienced discrimination in employment (58%). Available at: <https://fra.europa.eu/en/publications-and-resources/data-and-maps/2024/eu-lgbtiq-survey-iii>.

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⁴² Department of Justice, *Report on the Public Consultation on the Disregard of Convictions for Certain Qualifying Offences related to Consensual Sexual Activity between Men*, 1 June 2023, p.3. Available at: [summary-report-on-the-public-consultation.pdf](#).

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⁴⁴ Department of Justice, *Working Group to Examine the Disregard of Convictions for Certain Qualifying Offences Related to Consensual Sexual Activity between Men: Final Report*. Available at: [final-report-and-recommendations-of-the-working-group.pdf](#).

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⁴⁷ To be read in conjunction with wider analysis of socio-economic policy provided by other stakeholders in the UPR review.

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⁴⁹ Ibid.

⁵⁰ Ibid.

⁵¹ Department of Social Protection, *Roadmap for Social Inclusion 2020-2025: Ambition, Goals, Commitments*, 2020. Available at: <https://www.gov.ie/en/department-of-social-protection/publications/roadmap-for-social-inclusion-2020-2025/>.

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⁷⁷ UPR Cycle 3, Recommendation 157.167 (Iceland): "Develop a rights-based health-care protocol for intersex children, ensure that children and their parents are well informed of all options and that children are involved in decision-making"; UPR Cycle 3, Recommendation 157.162 (Chile): "Develop a health-care protocol for intersex children, based on human rights, that ensures that children and parents are informed about all options and that children participate in decision-making, thus avoiding subjecting intersex children to irreversible interventions and medically unnecessary surgical procedures."

⁷⁸ ILGA-Europe, *Rainbow Map 2025 - Ireland*, last consulted 19 March 2026. Available at: <https://rainbowmap.ilga-europe.org/countries/ireland/>. The ILGA-Europe criteria for Intersex Bodily Autonomy are: prohibition of medical intervention without informed consent; universality of prohibition of medical interventions; existence of effective monitoring mechanism; access to justice for victims and reparations. See Intersex bodily integrity - Rainbow Map, last consulted 19 March 2026, available at: <https://rainbowmap.ilga-europe.org/categories/intersex-bodily-integrity/>.

⁷⁹ Council of Europe, *CM/Rec(2025)7 - Recommendation of the Committee of Ministers to member States on equal rights for intersex persons* (Adopted by the Committee of Ministers on 7 October 2025 at the 1539th meeting of the Ministers' Deputies). Available here: <https://www.coe.int/en/web/sogi/intersexrecommendation>; Office of the United Nations High Commissioner for Human Rights, "Discriminatory laws and policies, acts of violence and harmful practices against intersex persons", A/HRC/60/50, OHCHR, New York, 8 August 2025. Available here: <https://docs.un.org/en/A/HRC/60/50>.

⁸⁰ Committee on the Rights of the Child Concluding observations on the combined third and fourth periodic reports of Ireland, 2016, CRC/C/IRL/CO/3-4, para 39-40. Available at: <https://docs.un.org/en/CRC/C/IRL/CO/3-4>; Committee on the Elimination of Discrimination against Women Concluding observations on the combined sixth and seventh periodic reports of Ireland, [CEDAW/C/IRL/CO/6-7](#), 2017, para 24 (b). Available at: <https://docs.un.org/en/CEDAW/C/IRL/CO/6-7>; CCPR/C/IRL/CO/5 (2023), para 19; Committee on the Rights of the Child Concluding observations on the combined fifth and sixth periodic reports of Ireland, 2023, CRC/C/IRL/CO/5-6., para 30. Available at: <https://docs.un.org/en/CRC/C/IRL/CO/5-6>; Committee on the Elimination of Discrimination against Women Concluding observations on the eighth periodic report of Ireland, CEDAW/C/IRL/CO/8, 2025, para 39-40. Available at: tbiinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CEDAW%2FC%2FIRL%2FCO%2F8&Lang=en; ECRI sixth cycle report on Ireland, Adopted on 1 July 2025 Published on 28 October 2025, para 36-37. Available at: <https://rm.coe.int/sixth-report-on-ireland/48802911ef>.

⁸¹ ECRI sixth cycle report on Ireland, para 37: "ECRI recommends that the authorities: i) prepare and bring to parliament a comprehensive bill that expressly acknowledges the right of intersex persons to bodily integrity and prohibit the performance of medically unnecessary surgeries (often referred to as "sex-normalising" surgery) and other non-therapeutic treatments until such time as the intersex child is able to participate in the decision, based on the principle of free and informed consent; ii) ensure that appropriate protocols of care for intersex persons are developed; iii) provide intersex equality training for health professionals; iv) establish easily accessible counselling and support services for intersex people and their families."

⁸² See e.g. as outlined in Ní Mhuirthile, Tanya, Feeney, Maria, Duffy, Mel and Staines, Anthony (2022) *Mapping the lived experiences of intersex/ variations of sex characteristics in Ireland: contextualising lay and*

professional knowledge to enable development of appropriate law and policy. Project Report. Dublin City University. The report outlines that "Twenty-three of our participants reported that they were living in the Republic of Ireland. Sixteen of those (69.6%, 16/23) reported that they had experienced discrimination when availing of health/medical services based on their variation." (p.178). The report (p.186) also finds that "having access to meaningful, expert-led healthcare has the power to have a transformative effect on intersex people's health and wellbeing including their sense of self; see also Higgins A; Downes C; O'Sullivan K; Monahan M; Begley T; Molloy R; Keogh B; Doyle L; de Vries J; (2024). Healthcare experiences, wellbeing and mental health of people who have variations in sex characteristics in Ireland. Dublin: Trinity College Dublin. Available at: <https://www.belongto.org/support-our-work/advocacy/lgbtq-research/being-lgbtqi-in-ireland-2024-intersex-sub-report/>.

⁸³ LGBT Ireland, *Progress Made. Renewed Efforts Required. A Shadow Report of Ireland's First National LGBTI+ Inclusion Strategy*, 2024, p.76. Available at: <https://lgbt.ie/wp-content/uploads/2024/01/Full-Report-Progress-Made.-Renewed-Efforts-Required.-A-Shadow-Report-of-Irelands-First-National-LGBTI-Inclusion-Strategy.pdf>. The NLIS I commitment was "to "conduct a scoping exercise on intersex conditions in Ireland to determine and document prevalence, current practice, clinical governance and compare against international evidence and guidelines"." p. 24.

⁸⁴ National LGBTIQ+ Inclusion Strategy II Action Plan 2025-2026. Available at: https://assets.gov.ie/static/documents/National_LGBTIQ_Inclusion_Action_Plan_2025-2026.pdf.

⁸⁵ National LGBTIQ+ Inclusion Strategy II - Progress Report, July to December 2025. Available at: https://assets.gov.ie/static/documents/5e77acbb/NLIS_II_Progress_Report_July_to_December_2025.pdf.

⁸⁶ Higgins, A., et al (2024), *Being LGBTIQ+ in Ireland: The National Study on the Mental Health and Wellbeing of the LGBTIQ+ Communities in Ireland*. Trinity College Dublin and Belong To – LGBTIQ+ Youth Ireland. Available at: <https://www.belongto.org/support-our-work/advocacy/lgbtq-research/being-lgbtqi-in-ireland-2024/>.

⁸⁷ *Ibid.*

⁸⁸ Sartori, S. (2022). *Unveiling Inequality - Experiences of LGBTI+ Travellers & Roma A peer-research project to explore and make visible the experience of exclusion of LGBTI+ Travellers and Roma. National Action Group for LGBTI+ Traveller and Roma Rights*. Available at: <https://lgbt.ie/wp-content/uploads/2023/02/Unveiling-Inequality-experiences-of-LGBTITraveller-Roma-Full-Report.pdf>; Noone, C., Magugliani, N., & Sugrue, R. (2023). *LGBTI+ people living in International Protection Accommodation Services (IPAS) accommodation: Best practices & lived experiences*. Available at: <https://lgbt.ie/wp-content/uploads/2023/12/LGBTI-IPAS-accomodation-report.pdf>.

⁸⁹ LGBT Ireland, *Investing in LGBTIQ+ Equality: LGBT Ireland's Pre-Budget Submission 2026*, 2025. Available at: <https://lgbt.ie/wp-content/uploads/2025/09/LGBT-Ireland-Pre-Budget-Submission-Budget-2026.pdf>.

⁹⁰ Department of Children, Disability and Equality, *National LGBTIQ+ Inclusion Strategy II 2024-2028 and National LGBTIQ+ Inclusion Action Plan 2025-2026*, 12 June 2025. Available at <https://www.gov.ie/en/department-of-children-disability-and-equality/campaigns/national-lgbtqi-inclusion-strategy-ii-2024-2028/>.

⁹¹ [The Health \(Assisted Human Reproduction\) Act 2024](#)

⁹² Department of Health, *Minister for Health establishes Assisted Human Reproduction Regulatory Authority, 2025*. Available at: <https://www.gov.ie/en/department-of-health/press-releases/minister-for-health-establishes-assisted-human-reproduction-regulatory-authority/>.

⁹³ Essentially, the Minister for Health will need to sign a statutory instrument known as a commencement order with a stated date on which the Act will come into force.

⁹⁴ Convention on the Rights of the Child, adopted 20 November 1989, entered into force 2 September 1990, United Nations Treaty Series, vol. 1577, p. 3. Available at: <https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-child>.

⁹⁵ Department of Health, Policy Document – Health (Assisted Human Reproduction) (Amendment) Bill. Available at: https://data.oireachtas.ie/ie/oireachtas/committee/dail/34/joint_committee_on_health/submissions/2025/2025-10-06_policy-document-department-of-health_en.pdf.

⁹⁶ Joint Committee on Health, *Report on Pre-Legislative Scrutiny of the Health (Assisted Human Reproduction) (Amendment) Bill*, October 2025. Available at: https://data.oireachtas.ie/ie/oireachtas/committee/dail/34/joint_committee_on_health/reports/2025/2025-10-08_report-on-pre-legislative-scrutiny-of-the-health-assisted-human-reproduction-amendment-bill_en.pdf.

⁹⁷ [Criminal Justice \(Hate Offences\) Act 2024](#)

⁹⁸ Sarah Slater, "Plan to introduce hate speech laws has been dropped, Minister for Justice confirms", The Irish Times, 21 September 2024. Available at: <https://www.irishtimes.com/politics/2024/09/21/minister-for-justice-confirms-plan-to-introduce-hate-speech-laws-has-been-dropped/>.

⁹⁹ [Prohibition of Incitement to Hatred Act 1989](#)

¹⁰⁰At a UN level, Committee on the Elimination of Racial Discrimination Concluding observations on the combined fifth to ninth reports of Ireland, CERD/C/IRL/CO/5-9, 2020, para 19-20 (with a focus on racist hate speech). Available at: <https://documents.un.org/doc/undoc/gen/g20/018/47/pdf/g2001847.pdf>. At a Council of Europe level,

ECRI fifth-cycle report on Ireland, p.9. Available at: <https://rm.coe.int/fifth-report-on-ireland/168094c575>. At a national level, IHREC, Submission to the United Nations Committee on the Elimination of Racial Discrimination on Ireland's Combined 5th to 9th Report, 2019, p. 8. Available at: https://www.ihrec.ie/app/uploads/2022/08/IHREC_CERD_UN_Submission_Oct_19.pdf; IHREC, Ireland and the International Convention on the Elimination of All Forms of Discrimination Against Women, 2025, p 71-75. Available at: <https://www.ihrec.ie/downloads/250516-IHREC-Ireland-and-CEDAW-Full-Report-PDF.pdf>.

¹⁰¹ Department of Children, Disability and Equality, NLIS II Progress Report July to December 2025, p. 6, Action 39.3. Available at: https://assets.gov.ie/static/documents/5e77acbb/NLIS_II_Progress_Report_July_to_December_2025.pdf; Department: Justice, Home Affairs and Migration Written Answer, 24/02/2026. Question Number: 776, Question Reference: 14659/26. Asked by: Pádraig Rice T.D. Available at: <https://www.kildarestreet.com/wrans/?id=2026-02-24a.1790&s=hate+crime#g1792.r>.

¹⁰² PfG 2025, "Introduce amendments to modernise the Incitement to Hatred Act 1989 following engagement with the Joint Oireachtas Committee, in line with EU standards.", p. 122.

¹⁰³ European Commission calls on Ireland, Bulgaria and Estonia to correctly transpose EU law combating racism and xenophobia, 2024. Available at: https://ireland.representation.ec.europa.eu/news-and-events/news/european-commission-calls-ireland-bulgaria-and-estonia-correctly-transpose-eu-law-combating-racism-2024-10-03_en.

¹⁰⁴ European Union Agency for Fundamental Rights Opinion of the European Union Agency for Fundamental Rights on the Framework Decision on Racism and Xenophobia – with special attention to the rights of victims of crime (European Union Agency for Fundamental Rights 2013). Available at: <https://www.refworld.org/reference/countryrep/eufra/2013/95994>.

¹⁰⁵ Council of Europe, Recommendation CM/Rec(2022)16^[1] of the Committee of Ministers to member States on combating hate speech (Adopted by the Committee of Ministers on 20 May 2022 at the 132nd Session of the Committee of Ministers). Available at: [https://search.coe.int/cm/#{%22CoEIdentifier%22:\[%220900001680a67955%22\],%22sort%22:\[%22CoEValidationDate%20Descending%22](https://search.coe.int/cm/#{%22CoEIdentifier%22:[%220900001680a67955%22],%22sort%22:[%22CoEValidationDate%20Descending%22).

¹⁰⁶ An Garda Síochána, *Hate Crime Statistics - Garda*. Available at: <https://www.garda.ie/en/information-centre/statistics/hate-crime-statistics.html>. Last accessed 8 April 2026.

¹⁰⁷ Belong To – LGBTQ+ Youth Ireland, *School Climate Survey 2022*, conducted with Columbia University, 2022. Available at: <https://www.belongto.org/support-our-work/advocacy/lgbtq-research/belong-to-school-climate-survey-2022/>.

¹⁰⁸ Neary, A. and Power, J., *Belong To Primary: New Foundations for LGBTQ+ Inclusivity in Primary Schools*, University of Limerick and Belong To LGBTQ+ Youth Ireland, 2024. Available at: https://www.belongto.org/app/uploads/2024/06/Belong-To-Primary-2024_Full-Report_University-of-Limerick-and-Belong-To.pdf.

¹⁰⁹ Higgins, A., et al (2024), *Being LGBTQI+ in Ireland: The National Study on the Mental Health and Wellbeing of the LGBTQI+ Communities in Ireland*. Trinity College Dublin and Belong To – LGBTQ+ Youth Ireland. Available at: <https://www.belongto.org/support-our-work/advocacy/lgbtq-research/being-lgbtqi-in-ireland-2024/>.

¹¹⁰ Higgins, A., et al (2024), *Being LGBTQI+ in Ireland: The National Study on the Mental Health and Wellbeing of the LGBTQI+ Communities in Ireland*. Trinity College Dublin and Belong To – LGBTQ+ Youth Ireland. Available at: <https://www.belongto.org/support-our-work/advocacy/lgbtq-research/being-lgbtqi-in-ireland-2024/>.